
Pollution Map Database

Guide to the Removal of Corporate Supervision Records



March 2013, 2nd Edition

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

Contents

1. Foreword	1
1.1 Removal Process for Corporate Environmental Supervision Records	1
1.2 Overview of Off-site Document Review Process	1
1.3 Overview of On-Site Audit Process	2
2. Off-site Document Review Criteria.....	3
3. Guidelines for On-site Audits	9
3.1 Basic Audit Information.....	9
3.1.1 Name of the Audit.....	9
3.1.2 Objective	9
3.1.3 Scope of the Audit.....	9
3.1.4 Phases of the Audit	10
3.1.5 Participating parties and relevant responsibilities	10
3.2 Relevant laws, regulations and standards.....	11
3.2.1 Relevant laws and regulations.....	11
3.2.2 Relevant technology standards	11
3.3 Audit requirements	12
3.3.1 Planning.....	12
3.3.2 Operation and implementation	13
3.3.3 Examination.....	14
Appendix: Example of Document Requisition List	17

Translation Accuracy Disclaimer This document has been translated by IPE for the purposes of reference only. Due to the difficulties of translation slight differences may exist. If any questions arise related to the accuracy of the information contained in this translation, please refer to the Chinese version of the document which is the official version of the document. Any discrepancies or differences created in the translation are not binding and have no legal effect for compliance or enforcement purposes.

1. Foreword

The Institute of Public and Environmental Affairs website (www.ipe.org.cn) acts as a publicly available database of environmental information. It allows stakeholders to more effectively participate in environmental governance by providing an open data platform.

This document provides a detailed explanation of how Corporate Environmental Supervision Records can be removed from the China Pollution Map Database.¹

1.1 Removal Process for Corporate Environmental Supervision Records

There are two sections in a company's supervision record in the Pollution Map Database where they can provide feedback and other relevant information on their record. There is a "Company Feedback" section where the company can provide information such as their own explanation of the record. There is also an "Environmental Protection Department Follow-Up Supervision" section where they can provide government follow-up monitoring reports.

If the enterprise wants to have their record removed from the database then they must show that they have conscientiously carried out corrective actions and can prove this by going through an independent third party audit, which can take the form of an on-site audit, or an off-site document review.

¹ For more information call IPE on: +86 10-67189470

Table 1.1 Overview of Record Removal Methodology

Action	Stakeholder				Probable results and other relevant information
	Enterprise	Government	NGO	Auditing Company	
Provide feedback to the public on their supervision record (Information Disclosure)	Submit an explanation for the supervision record (or incident), and details of any corrective actions taken.	Issue materials that show the company's environmental performance.	Place the explanation from the company in the "Company Feedback" section of their record on the IPE website.		Helps the public understand the problem that the company had and what actions they have taken.
	Submit government monitoring reports and/or follow-up supervision documents.	Issue government monitoring reports and/or follow-up supervision documents.	Place the government follow-up monitoring data in the "Environmental Protection Department Follow-Up Supervision" section of their record in the IPE website.		By publishing follow-up government monitoring information it gives the public a more up to date and complete understanding of the company's environmental performance.

Action			Stakeholder				Probable results and other relevant information
			Enterprise	Government	NGO	Auditing Company	
Record Removal	Off-site Document Review ²	Determine record status	Submit the relevant documents explaining the violation record.		Determine if the record can be removed through a document review; Provide list and contact details of third party auditors that can carry out document review; Confirm list of documents.	Confirm that the list of documents needed for review is complete (including the data disclosure form).	For the record removal to ultimately take place the company must be able to demonstrate that they have completed all corrective actions and submitted all relevant documentation proving that the problems that caused the violation have been corrected. They must also demonstrate that their emissions discharge is within the legal limits. If there are no objections from the participating NGO members of the GCA, after the 'Document Review Explanation Report' has been circulated for seven days then the environmental violation record will be removed from the IPE database.
		Document Review	Submit the necessary documents in accordance with the document list.		Check the document review report written by the third party auditing company.	Audit the relevant documents submitted by the company; Write the document review report.	
		Document Review Explanation Report published			Write the Document Review Explanation Report and circulate to the participating members of the GCA for a seven day review period.		

Note: The auditing company needs to provide both a word and pdf version of the audit report to IPE.

² If the violation record is older than three years, or one of the other special conditions for off-site document review are met. For an explanation of the special conditions for document review please see section 2 of this document.

Action			Stakeholder				Probable results and other relevant information
			Enterprise	Government	NGOs	Auditing Company	
Record removal	Third-party on-site audit ³	Confirm the audit	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.		To remove a record for discharging over the legally prescribed limit an enterprise must show that it has conscientiously implemented corrective actions and passed an independent on-site third party audit; The audit report conclusions report will be circulated to GCA NGOs for review for seven days. If there are no objections then the record will removed from the list of main violators and the audit report published under a list of enterprises that have gone through the audit process.
			Choose an auditing company. (Those auditing companies that are not currently accredited by IPE need to have an outside expert arranged by IPE to participate.)		Verify the credentials of the auditing company.	Confirm the scope of the audit; Send a list of required documents to the enterprise and also send those documents to IPE one week prior to the audit; Send audit plan to the enterprise.	
		Carry out on-site audit	Coordinate who will participate in the audit; Provide truthful information.		Take part in all auditing activities; Promptly inform the auditing company of anything that could affect the normal auditing procedures; Check on-site audit findings.	Chair the opening meeting; Lead the onsite document audit, on-site investigation and interviews; Sampling work (if required); Report on-site Audit Findings.	

³ If the supervision records mean that the conditions for an off-site review are not met then the enterprise must go through an on-site audit to have the record removed

		<p>Prepare Preliminary Audit Report</p>	<p>Provide supplementary documents that cannot be provided on-site; Obtain preliminary audit report.</p>		<p>Obtain and Check the preliminary audit report; Verify that the audit process was normal.</p>	<p>Write preliminary audit report; Send report to the NGOs to check and then send to the audited enterprise.</p>	
--	--	--	--	--	---	---	--

Options			Stakeholder				Probable results and other relevant information
			Enterprise	Government	NGO	Auditing Company	
Record Removal	On-site third Party Audit	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; Take part in any supplementary on-site audit; Bring to the attention of the third party auditor any circumstance that affect the normal conduct of the audit; Check the final audit report.	Clarify the nature of the enterprise's environmental violation record; Track progress of enterprise follow-up actions; If necessary, conduct a follow-up supplementary audit; Validate any corrective actions carried out; Send report to NGOs to check and then send to the audited enterprise.	To remove a record for discharging over the legally prescribed limit an enterprise must show that it has conscientiously implemented corrective actions and passed an independent on-site third party audit; The audit report conclusions report will be circulated to GCA NGOs for review for seven days. If there are no objections then the record will be removed from the list of main violators and the audit report published under a list of enterprises that have gone through the audit process.
		Publish audit conclusions			Based on the audit conclusions and the on-site circumstances an audit conclusions report will be prepared within 7 days. It will then be circulated to the other GCA NGOs for a further period of 7 days.		

Note: Auditing companies need to provide IPE with both pdf and word versions of the preliminary and final audit reports.

1.2 Overview of Off-site Document Review Process

The off-site document review refers to a process whereby an enterprise publishes relevant documents and environmental protection data to confirm the reason for its supervision record, what corrective actions it has carried out, and the current state of its environmental management practices. Off-site document reviews can be carried out by third party auditing companies recognized by IPE. Documents provided by the enterprise, environmental protection data, and the audit results will be publicly disclosed.

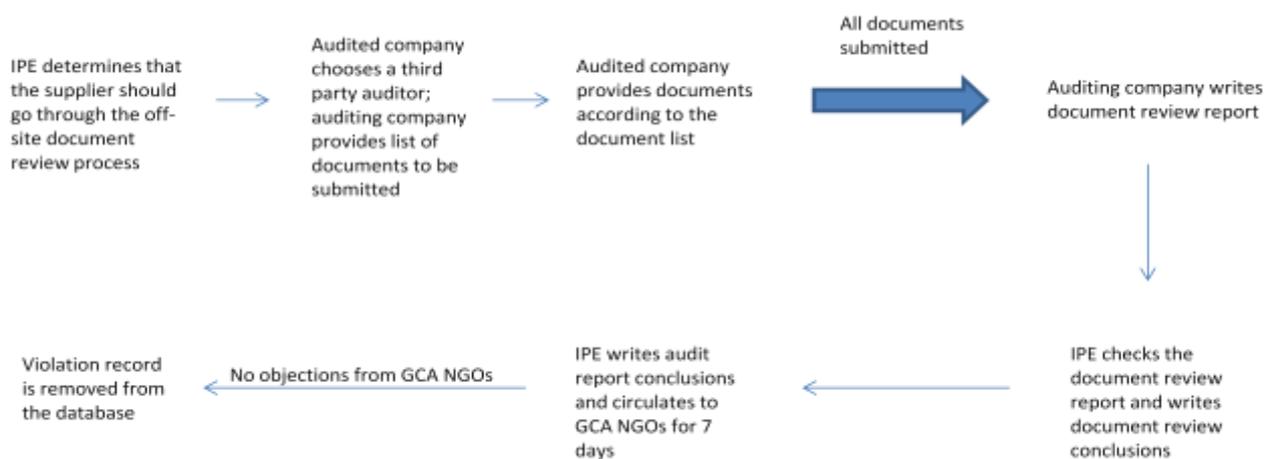


Figure 1.1 Flow Chart Showing Off-Site Document Review Process

Note:

1. Some enterprises may not be able to pass the document review process. If this situation occurs then after adopting corrective actions the enterprise can finish the document review, if necessary this may be through an on-site audit to determine if the record can be removed.

2. Please see section 2 – Document Review Requirements - of this document to determine if the document review process can be used to remove a record.

1.3 Overview of On-Site Audit Process

On-site audits are carried out by 3rd party auditing companies. The aim of the audit is to determine if the enterprise has implemented corrective actions to target the issues it was given a violation record for, and to determine whether or not it can consistently meet discharge standards, or treat discharge in order to be in compliance. The main focus of the audit is pollutant management and the scope of the audit includes corrective actions targeted at violation record issues, how well environmental management systems have been established and run, and capacity and operations of pollutant treatment facilities.

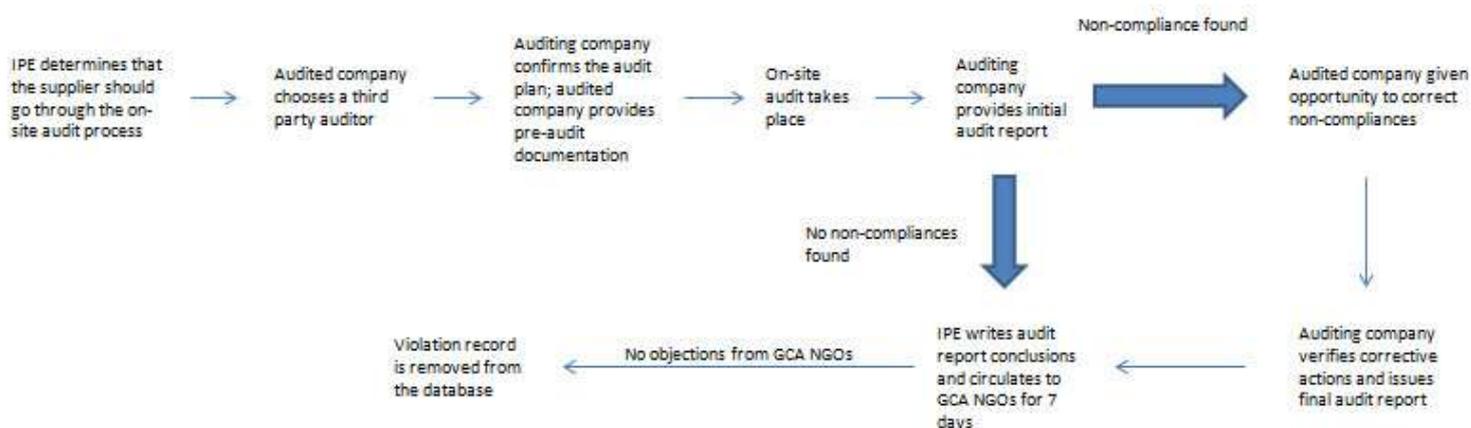


Figure 1.2 Flow Chart Showing On-site Audit Process

Note:

1. Before the audit takes place, the auditing company should confirm that: the manufacturing activities at the enterprise being audited 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.

2. For more details on audit requirements please see section 3 of this document– On-site Audit Requirements.

2. Off-site Document Review Criteria

If a company's violation record satisfies the following criteria then it can go through an off-site document review⁴:

- A.** If a company with a violation record has closed down and relocated then the off-site document review process, which includes the disclosure of discharge data and the publication of certain documents, can be used to determine if the record can be removed from the database. To do this the company has to provide the following environmental data and documentation:
- ◆ An explanation of past violation records, any corrective measures taken and also information on existing wastewater/air emissions management practices;
 - ◆ Proof that the factory has closed or relocated;
 - ◆ Soil and groundwater monitoring reports for the original factory location to prove that during the time they were producing at that location they did not pollute the soil or groundwater. (If they cannot provide soil and ground water monitoring reports for the original locations then they must implement this management practice at their new factory location);
 - ◆ An explanation of when the move took place and when the new site started being used;
 - ◆ A statement detailing environmental management practices at the new site, including: date of relocation, date that production at the new factory started, whether or not EIA procedures were carried out, whether or not the three simultaneous system was adhered to, and the status of wastewater, air emissions and hazardous waste management at the new site.
 - ◆ Environmental monitoring reports for the time the factory has been at the new location. (If the factory has been operating at the new location for more than two years then they only need to provide monitoring records for the most recent two years.) If the enterprise cannot provide monitoring reports from the EPB or a qualified third party organization then it is acceptable for them to provide online monitoring data. However, the company must provide the declaration of "Stable Discharge within the Authorized Standards" issued by the EPB, which must include all times monitoring took place over the past 12 months, supervision details, sampling details, monitoring results and state of discharge compliance.
 - ◆ Corporate environmental information - the most recent two years of corporate discharge data.
 - ◇ A Public commitment to continue to disclose annual discharge data (optional);
 - ◇ Other relevant documents.
- B.** If a violation record is three or more years old then the off-site document review process, which includes the disclosure of discharge data and the publication of certain documents,

⁴ Please contact IPE for confirmation of delisting process: 010-67189470

can be used to determine if the record can be removed from the database. To do this the company has to provide the following environmental data and documentation:

- ◆ The company must provide an explanation of past violation records, any corrective measures taken and also information on existing wastewater/air emissions management practices;
- ◆ Environmental monitoring records for the previous two years. If the enterprise cannot provide monitoring reports from the EPB or a qualified third party organization then it is acceptable for them to provide online monitoring data. However, the company must provide the declaration of “Stable Discharge within the Authorized Standards” issued by the EPB, which must include all times monitoring took place over the past 12 months, supervision details, sampling details, monitoring results, and status of discharge compliance.
- ◆ Corporate environmental information - the most recent two years of corporate discharge data.
- ◇ A Public commitment to continue to disclose annual discharge data (optional);
- ◇ Confirmation from the local Environmental Protection Bureau on corrective actions taken (optional);
- ◇ Other relevant documents.

C. If a company has a violation record because it was named by the EPB for having added discharge fees levied on it for breaching discharge standards, but the pollutant type that was discharged in breach of regulations was not specified, then the off-site document review process, which includes the disclosure of discharge data and the publication of certain documents, can be used to determine if the record can be removed from the database. To do this the company has to provide the following environmental data and documentation:

- ◆ The company must provide an explanation as to why an added discharge fee was levied on it for discharge in breach of the standards, as well as an explanation of any corrective measures taken, and also information on existing wastewater/air emissions management practices;
- ◆ The company must provide environmental monitoring records for the time when the additional discharge fees were levied up until the present time (if the record occurred more than two years ago the company just has to provide environmental monitoring records for the last 24 months). If the enterprise cannot provide monitoring reports from the EPB or a qualified third party organization then it is acceptable for them to provide online monitoring data. However, the company must provide the declaration of “Stable Discharge within the Authorized Standards” issued by the EPB, which must include all times monitoring took place over the past 12 months, supervision details, sampling details, monitoring results, and status of discharge compliance.
- ◆ Corporate environmental information - the most recent two years of corporate discharge data.
- ◇ A Public commitment to continue to disclose annual discharge data (optional);
- ◇ Confirmation from the local EPB on the status of any corrective actions the company has

- taken (optional);
- ✧ Other relevant documentation.
- D.** If a company has a violation record because they were found to be breaching discharge standards during the completion of construction project verification period, then the off-site document review process, which includes the disclosure of discharge data and the publication of certain documents, can be used to determine if the record can be removed from the database. To do this the company has to provide the following environmental data and documentation:
- ◆ Analysis of why discharge standards were breached during the verification process, an explanation of any corrective actions implemented, and an explanation of existing wastewater/air emissions management practices;
 - ◆ The project verification conclusions report;
 - ◆ All environmental monitoring records from the time of the construction project completion. (If the violation occurred more than two years ago then the enterprise just has to provide environmental monitoring records for the most recent 24 months.) If the enterprise cannot provide monitoring reports from the EPB or a qualified third party organization then it is acceptable for them to provide online monitoring data. However, the company must provide the declaration of “Stable Discharge within the Authorized Standards” issued by the EPB, which must include all times monitoring took place over the past 12 months, supervision details, sampling details, monitoring results, and status of discharge compliance.
 - ✧ Corporate environmental information - the most recent two years of corporate discharge data.
 - ✧ A Public commitment to continue to disclose annual discharge data (optional);
 - ✧ Other relevant documentation.
- E.** If a company has a violation record for building a factory without first getting approval, or starting production without passing the verification process (if, and only if the company has sufficient pollution treatment facilities, has not stopped using pollution control facilities without permission, and has not had any complaints from the public), then the off-site document review process, which includes the disclosure of discharge data and the publication of certain documents, can be used to determine if the record can be removed from the database. To do this the company has to provide the following environmental data and documentation:
- ◆ A detailed explanation of past violation records, any corrective measures taken and also information on existing wastewater/air emissions management practices;
 - ◆ Construction Project EIA Acceptance Document;
 - ◆ Construction Project Inspection Conclusions;
 - ◆ Environmental monitoring reports from the time that production was started at the facility. (If the violation occurred more than two years ago then the enterprise just has to provide environmental monitoring records for the most recent 24 months.) If the enterprise cannot provide monitoring reports from the EPB or a qualified third party organization then it is

acceptable for them to provide online monitoring data. However, the company must provide the declaration of “Stable Discharge within the Authorized Standards” issued by the EPB, which must include all times monitoring took place over the past 12 months, supervision details, sampling details, monitoring results, and status of discharge compliance.

- ◆ Corporate environmental information - the most recent two years of corporate discharge data;
- ◇ A Public commitment to continue to disclose annual discharge data (optional);
- ◇ Other relevant documentation.

F. If the company has a record because it was rated yellow for environmental management practices that did not satisfy the necessary requirements, or a solid waste utilization rate that was less than 80%, or some other reason, other than a breach of discharge standards, then the off-site document review process, which includes the disclosure of discharge data and the publication of certain documents, can be used to determine if the record can be removed from the database. To do this the company has to provide the following environmental data and documentation:

- ◆ A detailed explanation as to why they have been rated as yellow; details of corrective measures taken by the company; and an explanation of existing wastewater/air emissions management practices.
- ◆ The Industrial Enterprise Environmental Conduct Evaluation List. If the company cannot provide this document then they should provide an official document from the environmental authorities stating the specific reasons why they were rated as yellow.
- ◆ Environmental monitoring records for the period since the enterprise was rated as yellow. (If the violation occurred more than two years ago then the enterprise just has to provide environmental monitoring records for the most recent 24 months.) If the enterprise cannot provide monitoring reports from the EPB or a qualified third party organization then it is acceptable for them to provide online monitoring data. However, the company must provide the declaration of “Stable Discharge within the Authorized Standards” issued by the EPB, which must include all times monitoring took place over the past 12 months, supervision details, sampling details, monitoring results, and status of discharge compliance.
- ◆ Corporate environmental information - the most recent two years of corporate discharge data;
- ◇ A Public commitment to continue to disclose annual discharge data (optional);
- ◇ Confirmation from the local EPB on the status of any corrective actions the company has taken (optional);
- ◇ Other relevant documentation.

G. If corrective punishment documents clearly show that remediation work the enterprise was ordered to carry out has been finished, then the off-site document review process, which includes the disclosure of discharge data and the publication of certain documents, can be used to determine if the record can be removed from the database. To do this the company has to provide the following environmental data and documentation:

- ◆ An explanation of past violation records, any corrective measures taken and also information on existing wastewater/air emissions management practices;
 - ◆ Environmental monitoring records for the most recent 24 months. If the enterprise cannot provide monitoring reports from the EPB or a qualified third party organization then it is acceptable for them to provide online monitoring data. However, the company must provide the declaration of “Stable Discharge within the Authorized Standards” issued by the EPB, which must include all times monitoring took place over the past 12 months, supervision details, sampling details, monitoring results, and status of discharge compliance.
 - ◆ Corporate environmental information - the most recent two years of corporate discharge data;
 - ◇ A Public commitment to continue to disclose annual discharge data (optional);
 - ◇ Confirmation from the local EPB on the status of any corrective actions the company has taken (optional);
 - ◇ Other relevant documentation.
- H. If a company has a violation record because it has been listed by the EPB as having problems with hazardous waste management, then the off-site document review process, which includes the disclosure of discharge data and the publication of certain documents, can be used to determine if the record can be removed from the database. To do this the company has to provide the following environmental data and documentation:
- ◆ An explanation of past violation records, any corrective measures taken and also information on existing wastewater/air emissions management practices;
 - ◆ An explanation of the present state of hazardous waste management at the company, including evidence of a hazardous waste management system, hazardous waste generation approval form, hazardous waste transport manifests, details of companies receiving and transporting their hazardous waste, evidence of hazardous waste being labeled and stored correctly;
 - ◆ Corporate environmental information - the most recent two years of corporate discharge data;
 - ◇ A Public commitment to continue to disclose annual discharge data (optional);
 - ◇ Confirmation from the local EPB on the status of any corrective actions the company has carried out (optional);
 - ◇ Other relevant documentation.
- I. If the company has a been given an environmental violation record because they have been required to reduce emissions within a designated time frame, but do not have any specific total volume of pollutants discharged in breach of the standards, then the off-site document review process, which includes the disclosure of discharge data and the publication of certain documents, can be used to determine if the record can be removed from the database. To do this the company has to provide the following environmental data and documentation:

- ◆ An explanation of why they were required to reduce their emissions before a certain deadline, any corrective measures taken and also information on existing wastewater/air emissions management practices;
- ◆ If the company has already completed its emissions reduction work then they should provide the results of this work. If the company has not completed this work they must provide evidence showing current results as well as details of expected results once work is complete;
- ◆ Confirmation from the environmental authorities that work to reduce emissions has already been started;
- ◆ Environmental monitoring records for the most recent 24 months. If the enterprise cannot provide monitoring reports from the EPB or a qualified third party organization then it is acceptable for them to provide online monitoring data. However, the company must provide the declaration of “Stable Discharge within the Authorized Standards” issued by the EPB, which must include all times monitoring took place over the past 12 months, supervision details, sampling details, monitoring results, and status of discharge compliance;
- ◆ Corporate environmental information - the most recent two years of corporate discharge data;
- ◇ A Public commitment to continue to disclose annual discharge data (optional);
- ◇ Other relevant documentation.

Note:

If the processes that were causing pollution and were responsible for the violation record have been outsourced, or production that was causing the pollution has been stopped, but the company is still using those components (so still sourcing them from another factory or contractor), then the company needs to provide the following documents to have the record removed:

- Evidence that the processes that were causing the pollution have been outsourced;
- The name of the supplier, contractor, or company that the process has been outsourced to, to allow IPE to determine if this company has a violation record. If the company has a violation record then they need to be pushed to provide an explanation of what the violation was and what corrective actions have been carried out;
- A commitment to continue to regularly use the IPE database to screen external contractors that conduct outsourced processes or supply materials. If a violation record is discovered then the company should be pushed to provide an explanation of what the violation was and what corrective actions have been carried out.

3. Guidelines for On-site Audits

3.1 Basic Audit Information

3.1.1 Name of the Audit

Pollutant Management and Control Audit

Note: “Pollutant” refers to all industrial wastewater, domestic wastewater, industrial waste gases, kitchen emissions, and hazardous waste generated during normal, abnormal and emergency conditions.

3.1.2 Objective

The Pollutant Management and Control Audit is a third party audit carried out to evaluate the integrity, effectiveness, and compliance status of an organization’s pollutant management and control systems. The third-party audit should be conducted by an accredited auditing organization, supervised by interested non-governmental organizations (NGOs), and the audit results should be made publicly available.

3.1.3 Scope of the Audit

The scope of the third-party audit involves evaluating an organization’s practices related to any production, operations and services that produce, collect, store, treat and discharge pollutants under normal, abnormal, and emergency conditions, to determine whether or not they can satisfy all relevant laws and regulations, as well as the requirements of any technological standards.

The scope of the Pollutant Management and Control Audit is based on the type of environmental violation record (wastewater, air emissions, hazardous waste) that was given to the company. Checks on hazardous waste management will be included in all audits.

If the organization wishes to conduct assessment activities beyond the scope listed above, it can negotiate with the auditing entity to adjust the scope of the audit based on the auditing entity’s

qualifications and area of expertise. It should be noted that the scope listed above is the minimum requirement to conduct a credible GC Audit.

3.1.4 Phases of the Audit

The audit shall include;

- a) Preliminary off-site documentation check (compulsory)
- b) An on-site documentation/personnel/facility check (compulsory)
- c) Off-site wastewater sample testing and analysis (optional)
- d) Report write-up and release of results (compulsory)
- e) Follow-up audits (optional)

Note: “Optional” phases can be skipped, if, at the discretion of the auditing entity, it is determined that even without these stages, the auditing entity can make objective and reliable conclusions, and that the conclusions will not vary due to omission of these optional phases.

3.1.5 Participating parties and relevant responsibilities

Participants in the audits include: the audited organization, the auditing entity, and a relevant environmental NGO. Responsibilities of each participating party are explained below:

- a) The **audited organization** should: arrange relevant personnel to cooperate with the auditing entity throughout all audit processes, provide accurate and reliable information, commit to disclose the audit results, and provide all necessary financial support for the audit activities;
- b) The **auditing entity** should carry out the audit objectively and impartially; provide results of the audit in a timely fashion; resolve any doubts expressed by the environmental NGO in a timely manner; and maintain confidentiality regarding the financial and technological information provided by the audited organization; the auditing company needs to provide an auditing team that have experience of doing GC audits to ensure that they are familiar with the contents and methodology of the audit. If personnel in the auditing team changes they need to inform IPE in plenty of time to get final approval.
- c) The **environmental NGO** should participate in the audit process, oversee audit processes, and evaluate the audit’s impartiality. The environmental NGO retains the right to disclose audit results, however, the NGO must maintain confidentiality regarding the financial and technological information provided by the audited organization. Furthermore, the NGOs cannot accept any cash or gifts from the audited enterprise in any form whatsoever.

Note: Environmental NGO representatives cannot charge consulting fees. However they can claim

transportation and accommodation expenses, which should be included in the total cost of the audit covered by the audited organization.

3.2 Relevant laws, regulations and standards

3.2.1 Relevant laws and regulations

Including but not limited to:

- a) Law of People's Republic of China on Environmental Protection;
- b) Law of People's Republic of China on the Prevention and Control of Water Pollution;
- c) Law of the People's Republic of China on the Prevention and Control of Atmospheric Pollution;
- d) Law of The People's Republic of China on Prevention of Environmental Pollution Caused by Solid Waste;
- e) Measures for the Environmental Management Registration of Hazardous Chemicals (for Trial Implementation);
- f) Law of People's Republic of China on Environmental Impact Assessment;
- g) Law of People's Republic of China on Cleaner Production Promotion.

3.2.2 Relevant technology standards

Including but not limited to:

Wastewater

- a) Integrated Wastewater Discharge Standard (GB8978-1996);
- b) Discharge Standard for Municipal Wastewater (CJ343-2010);
- c) Technical Requirements for Monitoring of Total Amount of Pollutants in Waste Water (HJ/T 92-2002);
- d) Technical Specifications Requirements for Monitoring of Surface Water and Waste Water (HJ/T 91-2002); AND
- e) Specification and Manual for Environmental Management System (GB/T24001-1996).

Air Emissions

- a) Integrated Emission Standard of Air Pollutants (GB16297-1996);
- b) Emission Standards For Odor Pollutants (GB 14554-1993);
- c) Technical Requirements for Monitoring of Fixed Source of Emissions (HJ/T 397-2007);
- d) Technical Guidelines for Fugitive Emission Monitoring of Air Pollutants (HJ/T 55-2000) ;
- e) Technical Requirements and Test Methods for Catering Fume Purification Equipment (Trial) (HJ/T 62-2001); And
- f) Specification and Manual for Environmental Management System (GB/T24001).

Hazardous Waste

- a) Rules for Storage of Dangerous Chemicals (GB 15603-1995)
- b) Standard for Pollution Control on Hazardous Waste Storage (GB 18597-2001)

Note: The most up to date versions of the laws, regulations and technical standards issued by the government or industry bodies are

3.3 Audit requirements

3.3.1 Planning

3.3.1.1 Identification of the relevant factors and setup of control plans

- a) Evidence must be provided to demonstrate that during the factory design, construction and operation phases, the audited organization 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 simultaneous” system.
- b) Before major alterations occur in production technology, scale, workshops, equipment etc, the organization should further identify risk factors related to pollutant management and control, and draft relevant control plans and measures.
- c) The organization should demonstrate that it has already carried out necessary pollutant control measures to manage the risks identified in relevant assessment reports.

3.3.1.2 Compliance requirements

- a) The organization must demonstrate its understanding of each requirement related to pollutant management laws, regulations and technology standards, such as: Requirements

for pre-treatment, pollutants concentration limits for effluent, limits on the total quantity of discharged pollutants, monitoring requirements, etc. The organization should be able to demonstrate its understanding of how the regulations and standards are applied to standard business operations.

- b) The organization should prepare relevant procedures to demonstrate 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.

3.3.2 Operation and implementation

3.3.2.1 Risk management resources, roles, responsibilities and authority

- a) The organization should demonstrate adequate resources for management and control plans related to risk factors as identified in 3.1. The organization's resources should include: management oversight of pollutant management processes, technological training and expertise related to pollutant management, as well as financial resources dedicated to upgrading and monitoring 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 organization should appoint qualified personnel and define their responsibilities and levels of authority.

3.3.2.2 Skills and training

- a) The organization should ensure that the personnel responsible for the control of pollutant risk factors have the necessary technical capacity which will be assessed according to personnel's education, training, and experience. The organization should also provide materials to verify that personnel are adequately qualified.
- b) The organization 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 organization. All trainings should be documented for time, place, content, and attendees.

3.3.2.3 Operations management

- a) The organization 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 organization 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.

3.3.2.4 Emergency and accident management

- a) The organization must verify that it has conducted a pre-assessment of risk factors related to pollutant discharge accidents. The organization must demonstrate that it has set up relevant safeguard management procedures including personnel planning, and facilities and equipment emergency monitoring to manage potential risks. The organization must verify that it conducts regular emergency response training, and regular checks on the status of relevant equipment in order to ensure early response to emergencies and minimize harmful effects of accidents.
- b) The organization must provide evidence that it has set up internal (organization headquarters) and external (administrative department and other interested parties) accident notification procedures.
- c) The organization 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 analyze the accident *ex-post*, and determine a rectification plan to avoid similar accidents in the future.
- d) All accidents and accidents investigations should be clearly documented.

3.3.3 Examination

3.3.3.1 Monitoring and recording

- a) The organization should regularly assess the working conditions of relevant personnel and be able to provide maintenance records for all wastewater-related 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 organization 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.

3.3.3.2 *Rectification and prevention measures*

- a) The organization should set up rectification procedures for timely improvement of non-compliance identified in any assessments. Records of such procedures and improvement efforts should be documented.
- b) The organization should establish risk-prevention procedures for potential risks as identified in the assessment process.
- c) The organization 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:

1. During the document review and on-site audit process all documents submitted by the audited company must be genuine and valid. If the audited company covers up any facts, or forges or modifies documents then this will affect the outcome of the audit. If this situation is discovered then the NGOs would reinstate the environmental supervision record that had been removed. If the audited company then wanted to once again remove the record they would have to:

- a) Provide a formal, written explanation and apology, and allow this to be published;
- b) Provide genuine documents to the auditing company and the NGOs. Accept an on-site audit if the auditing company deems this necessary. For the audit procedure please refer to section 3 of this document.

2. If, during the document review or on-site audit, the audited company is found to have a supplier (including pollutant transportation and treatment vendors and outsourced manufacturing that generates pollutants, for example: wastewater treatment vendors, hazardous waste transportation and treatment vendors) with a violation record then the audited company should push that supplier to provide an explanation of their violation record or go through the record removal process.

Appendix: Example of Document Requisition List

Including but not limited to:

- a) General information of the audited organization
 - Organization name, address and history
 - Information related to main facilities and the surrounding geographic area
 - Product information and production scale
 - Number of employees, business-operating time and work shifts

- b) Documentation on production processes, air pollution generation and discharge
 - Production flow chart
 - List of main materials
 - For documentation related to pollutant generation, organization should provide information on pollutant output per product unit and variety, quantity and concentration of main pollutants.
 - Relative fugitive emission information
 - Relative non-production emission information.

- c) Information of air pollution treatment facilities
 - Pollutant collection mode
 - Pollutant pre-treatment process and related design documentation
 - Pollutant discharge mode

- d) If the organization has received any violations or penalties from the environmental administrative department due to air pollution management infractions, the organization should provide detailed information about the violation, including the following:
 - Time and place of the violation
 - Officially announced information
 - Internal survey results and environmental remediation information
 - Following-up official inspection records

- e) Corporate environmental data disclosure form for the previous two years

- f) Other supplementary documentation