

Green insurance (11)

The environmental liability insurance information disclosure performance of key polluting enterprises in the Yangtze River Delta hazardous waste management is poor



PECC

July, 2023

Introduction

As the process of industrialization continues, hazardous wastes emitted from industrial production processes are increasing. It is estimated that 330 million tons of hazardous waste are generated worldwide each year. Because of their environmental pollution and potentially serious impacts, hazardous wastes have come to be known as "political wastes" in industrially developed countries.

In recent years, China's industrial development has been rapid, and according to the *2017-2021 Annual Report on Ecological and Environmental Statistics* released by the Ministry of Ecology and Environment (MOE), the amount of industrial hazardous waste generated nationwide has fluctuated slightly, but the overall trend has been increasing year by year.

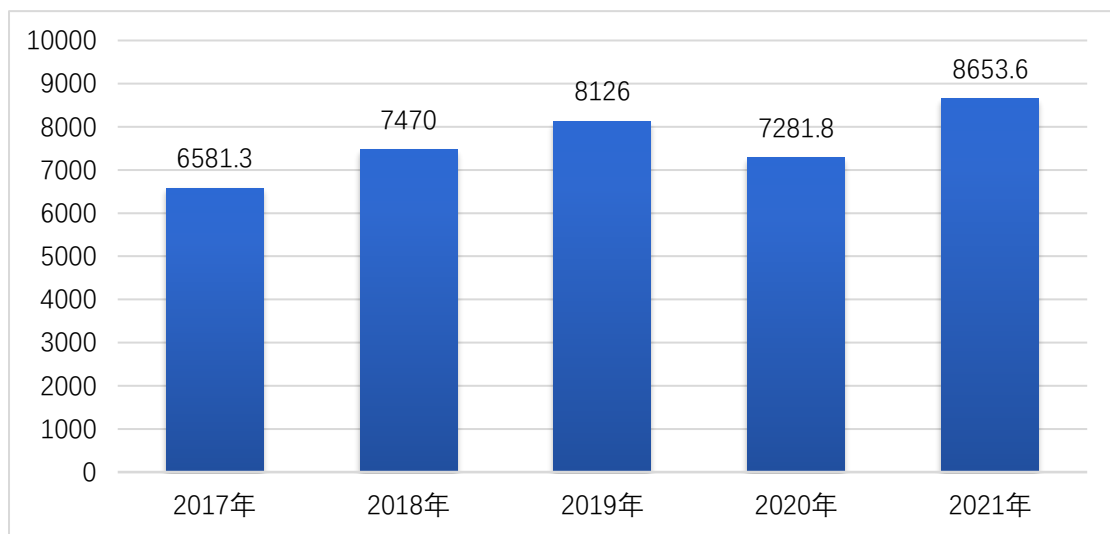


Figure 1 National Generation of Industrial Hazardous Waste, 2017-2021 (in tons)

In order to be able to effectively utilize and dispose of hazardous waste, the number of hazardous waste treatment enterprises is also climbing year by year, and according to the *2017-2021 Annual Report on Ecological and Environmental Statistics* released by the Ministry of Ecology and Environment, the number of centralized hazardous waste treatment plants in the country in

2021 is 1,528, compared with 2017, an increase of 27%.

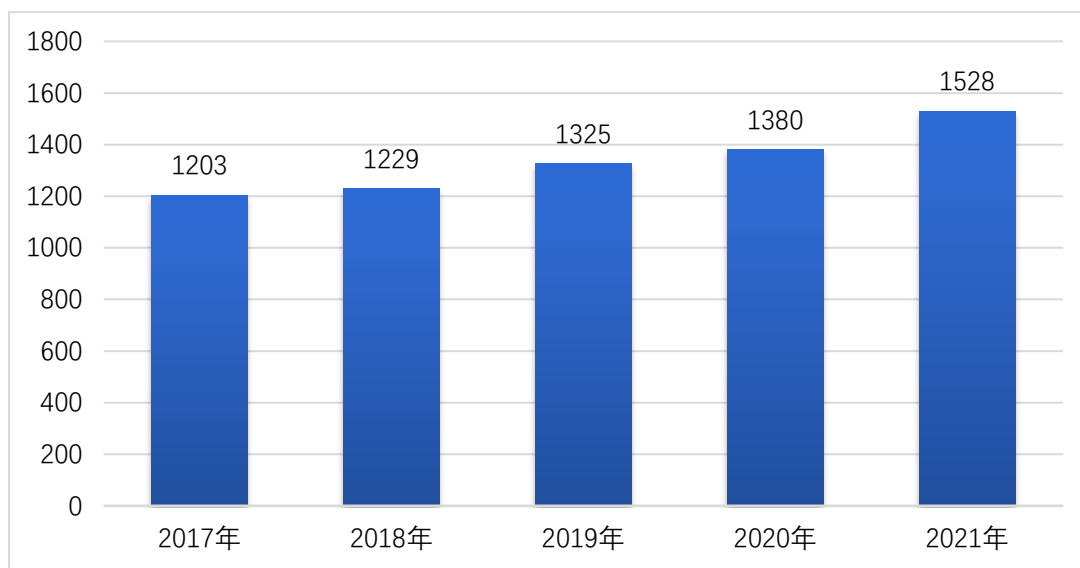


Figure 2 Number of centralized hazardous waste treatment plants in the country, 2017-2021 (in units)

In order to make hazardous waste management enterprises pay more attention to their own environmental responsibility and strengthen multi-party supervision, the state vigorously promotes hazardous waste management enterprises to take out environmental pollution liability insurance (hereinafter referred to as "environmental liability insurance"). Article 99 of the newly amended *Law of the People's Republic of China on the Prevention and Control of Environmental Pollution by Solid Wastes*, which came into effect on September 1, 2020, stipulates that "Units collecting, storing, transporting, utilizing, or disposing of hazardous wastes shall, in accordance with the relevant provisions of the state, take out environmental pollution liability insurance", which is the first time that environmental pollution liability insurance has been incorporated into the law. In Article 2 (Basic Requirements) of the *Measures for the Administration of Environmental Pollution Liability Insurance for Hazardous Wastes (Draft for Public Comments)* published by the Ministry of Ecology and Environment on November 19, 2021, it is also mentioned that "Units collecting, storing, transporting, utilizing and disposing of hazardous wastes (collectively referred

to as the insured and the insured) shall take out environmental pollution liability insurance with insurance companies.

In order to raise enterprises' awareness of environmental information disclosure, and also to improve the information disclosure mechanism of environmental liability insurance to facilitate supervision and management, the *Administrative Measures for the Legal Disclosure of Environmental Information of Enterprises* (hereinafter referred to as the "Administrative Measures"), which came into effect on February 8, 2022, requires that the annual legal disclosure report of the enterprise's annual environmental information disclosed by the key emission units shall include information on environmental pollution and liability insurance since the date of its inclusion in the list of key emission units. Liability insurance information should be included in the annual environmental information disclosure report of key emission units. It also requires that "enterprises shall disclose the environmental information from January 1 to December 31 of the previous year before March 15 of each year." *The Format Guidelines for Legal Disclosure of Environmental Information of Enterprises* issued by the General Office of the Ministry of Ecology and Environment on January 4, 2022 (hereinafter referred to as the Format Guidelines) also emphasizes that "enterprises shall disclose information on environmental pollution liability insurance in accordance with the law."

In other words, hazardous waste management enterprises that are key sewage disposal units should disclose the status of environmental pollution liability insurance coverage in their annual corporate environmental information disclosure reports in accordance with the law.

Based on this, Lvse Jiangnan Public Environmental Concerned Centre (hereinafter referred to as "Lvse Jiangnan") summarized the hazardous waste management enterprises in the Yangtze River Delta region that are key

emission units, and observed the disclosure of environmental liability insurance in 2022 through the legal disclosure system of the enterprise environmental information of the enterprise where the enterprise is located in order to understand and compare the current situation of environmental liability insurance and disclosure of hazardous waste management enterprises in the Yangtze River Delta region, hoping to promote the enterprises to actively take out environmental liability insurance and make timely, effective and comprehensive disclosure. The purpose of this study is to understand and compare the current situation of environmental liability insurance coverage and disclosure of hazardous waste management enterprises in the Yangtze River Delta region, hoping to promote hazardous waste management enterprises to actively take out environmental liability insurance and make disclosure in a timely, effective and comprehensive manner, so as to drive the enthusiasm of the whole industry to take out and disclose the insurance and create a true, accurate and complete environmental database for environmental liability insurance, and to help the healthy and orderly development of environmental liability insurance.

1. Research target

According to the *Annual Report on Ecological and Environmental Statistics* published by the Ministry of Ecology and Environment, Shanghai, Jiangsu, Zhejiang and Anhui Provinces all accounted for more than 16% of the total industrial hazardous waste generated nationwide during 2017-2021, and the number of centralized hazardous waste treatment plants exceeded one-third of the national total. Therefore, the research object of this report focuses on hazardous waste treatment enterprises in the Yangtze River Delta region that are key discharge units. The Yangtze River Delta region consists of 26 cities in three provinces and one city, namely Shanghai, Jiangsu Province (9 cities including Nanjing, Wuxi and Changzhou), Zhejiang Province (8 cities including Hangzhou, Ningbo and Jiaxing) and Anhui Province (8 cities including Hefei, Wuhu and Maanshan).

The lists of hazardous waste management enterprises in Shanghai, Jiangsu and Zhejiang provinces were obtained from the legal disclosure system of enterprise environmental information in each province and city, which were then summarized and matched with the 2022 list of key sewage disposal units issued by the environmental protection departments to determine the final list; and the lists of hazardous waste management enterprises in Anhui province were obtained directly from the legal disclosure system of enterprise environmental information (Anhui).

After excluding the inability to determine the industry category, shutdown, sewage license withdrawal, etc., the finalized list of hazardous waste management enterprises totaled 605, of which 32 were in Shanghai, 353 were in Jiangsu Province, 174 were in Zhejiang Province, and 46 were in Anhui Province. See Table 1 for details.

Table 1 Number of Hazardous Waste Management Enterprises in Each Province and City

province/city	city	Number of enterprises	province/city	city	Number of enterprises
Shanghai	/	32	Zhejiang Province	Jiaxing	21
Jiangsu Province	Suzhou	81		Huzhou	20
	Changzhou	65		Jinhua	17
	Wuxi	59		Shaoxing	16
	Nantong	43		Zhoushan	8
	Taizhou	34	Anhui Province	Hefei	19
	Nanjing	25		Wuhu	8
	Yangzhou	20		Chuzhou	6
	Zhenjiang	14		Tongling	5
	Yancheng	12		Chizhou	4
Zhejiang Province	Ningbo	43		Anqing	2
	Taizhou	27		Xuancheng	2
	Hangzhou	22		Maanshan	0

2. Disclosure of environmental liability insurance for hazardous waste management enterprises in various provinces and cities

According to the 2022 annual environmental information report disclosed by 605 hazardous waste management enterprises in the location of the enterprise environmental information disclosure system in accordance with the law, Green Jiangnan found that a total of 164 hazardous waste management enterprises did not disclose the insurance information of the environmental liability insurance, of which 20 are in Shanghai, 43 are in Jiangsu Province, 64 are in

Zhejiang Province, and 37 are in Anhui Province.

In terms of quantity, among the 26 cities, the largest number of hazardous waste management enterprises that did not disclose environmental liability insurance information in the legal disclosure system for corporate environmental information in their respective regions was Taizhou City, with 23, followed by Shanghai City, with 20, and the smallest was Yancheng City, with only one undisclosed enterprise.

Table 2 Number of non-disclosures by location

province/city	city	Number of enterprises	province/city	city	Number of enterprises
Shanghai	/	20	Zhejiang Province	Jiaying	3
Jiangsu Province	Suzhou	15		Huzhou	8
	Changzhou	5		Jinhua	4
	Wuxi	7		Shaoxing	8
	Nantong	5		Zhoushan	2
	Taizhou	2	Anhui Province	Hefei	14
	Nanjing	3		Wuhu	6
	Yangzhou	3		Chuzhou	4
	Zhenjiang	2		Tongling	5
	Yancheng	1		Chizhou	4
Zhejiang Province	Ningbo	9		Anqing	2
	Taizhou	23		Xuancheng	2
	Hangzhou	7		Maanshan	/

From the perspective of undisclosed rate, among the three provinces and one city, the undisclosed rate of hazardous waste management enterprises in Anhui Province is the highest, with as high as 80.43% of enterprises failing to disclose the information of environmental liability insurance in the annual environmental report, and the lowest in Jiangsu Province, with only 12.18%. See Figure 1 for details.

Among the 25 cities (excluding Maanshan City, which has no hazardous waste management enterprises belonging to key sewage disposal units), the hazardous waste management enterprises in Xuancheng City, Anqing City, Chizhou City and Tongling City have not disclosed information on environmental liability insurance in the legal disclosure system of enterprise environmental information in their respective areas, and the non-disclosure rate of the four cities is as high as 100 percent. This is followed by Taizhou City, with a non-disclosure of 85.19%, and Taizhou City with fewer non-disclosed enterprises and a non-disclosure rate of only 5.88%. See Figure 2 for details.

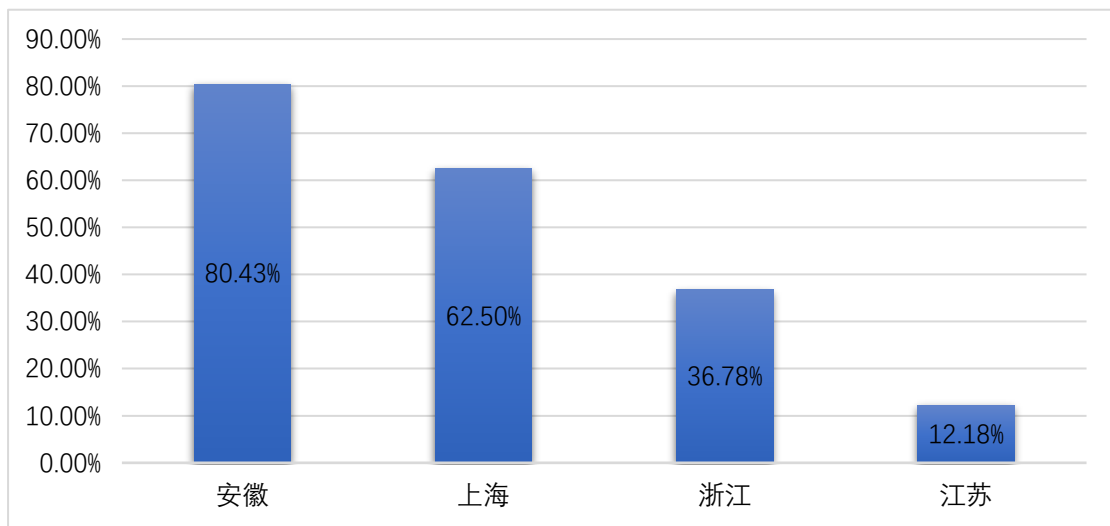


Figure 3 Undisclosed rates in three provinces and one city

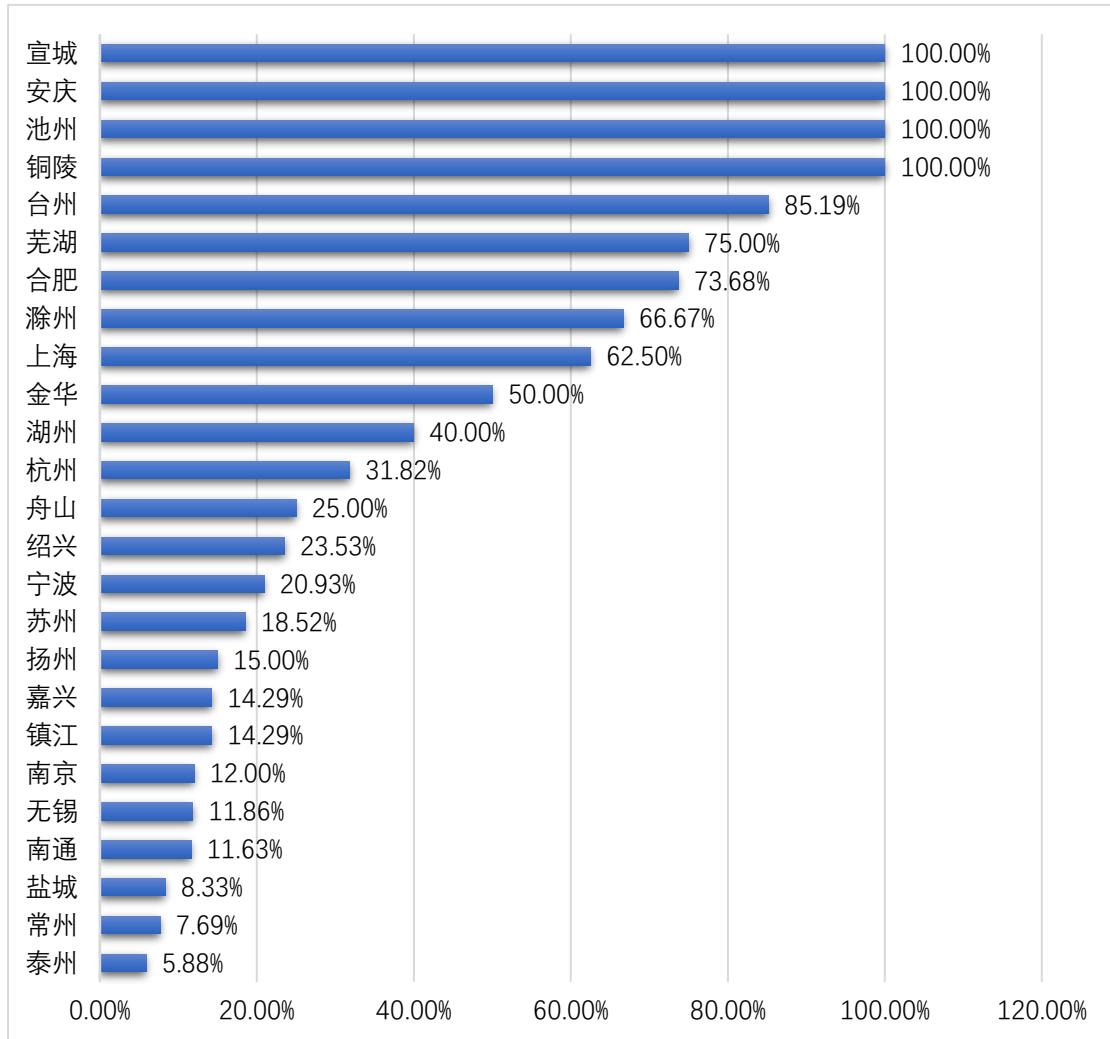


Figure 4 Undisclosed rates in 25 cities (except MaanShan)

3. Issues and findings

3.1 Five companies failed to disclose annual environmental information in a timely manner as required

According to the search, Lvse Jiangnan found that there are five hazardous waste management enterprises in the enterprise environmental information disclosure system in accordance with the law shows "no data for the time being", that is to say, these five enterprises are not in accordance with the requirements of the "Management Measures" in March 15, before the disclosure of the 2022 annual enterprise environmental information.

Table 3 List of enterprises that have not disclosed their annual environmental information reports

location	Number of enterprises	location	Number of enterprises
Hangzhou, Zhejiang	Hangzhou Baode Silver Co.	Changzhou, Jiangsu	Changzhou Environmental Sanitation Management Center
Ningbo, Zhejiang	Ningbo Donghai Hengyi Storage Battery Co.	Suzhou, Jiangsu	Suzhou Huale Air Pollution Control Technology Development Co.
Huzhou, Zhejiang	Deqing Eternal Environmental Protection Technology Co.		



图 表 5 Hangzhou Baode Silver Co. "Enterprise environmental information disclosure system according to law (Zhejiang)" search situation

Article 28 of the *Administrative Measures* stipulates that "If an enterprise fails to disclose environmental information, the competent ecological and environmental department at or above the municipal level of the district shall order rectification, notify and criticize the enterprise and may impose a fine of not less than 10,000 yuan and not more than 100,000 yuan. information beyond the prescribed time limit or fail to upload the environmental information to the enterprise environmental information disclosure system according to law, the competent department of ecological environment at or above the municipal

level of the district shall order rectification, notify and criticize, and may impose a fine of not more than 50,000 yuan." Based on this, Lvse Jiangnan suggests that the above hazardous waste management enterprises should disclose annual environmental information in a timely manner in accordance with the relevant requirements, so as to avoid being penalized by the ecological environment department.

3.2 159 companies failed to disclose information on environmental liability insurance

In addition to the hazardous waste management enterprises that did not disclose their annual environmental information reports, 159 enterprises disclosed their annual environmental information reports but did not disclose information on their environmental liability insurance coverage in their annual reports.

Hazardous waste management enterprises in Jiangsu Province and Shanghai Municipality that have not disclosed information on environmental liability insurance have a sub-column of "Environmental Pollution Liability Insurance" in their annual environmental information reports, but they are either left blank or written as "None". As shown in Figure 6 and Figure 7

企业环境信息依法披露系统（江苏）			
南京绿环废物处置有限公司			
依法披露			
年度报告封面及扉页			
专业名词及术语解释			
关键环境信息摘要			
企业基本信息			
企业基本信息			
生产工艺和产品信息			
企业环境管理信息			
环境污染责任保险			
承保公司	--	保险期	,
主要承保范围、司法判决等情况	--	保险赔偿限额(万元)	--
环保信用评价情况			
评价单位	环保险诺	评价年度	2022
评价等级	一般守信【10分】	等级变化	无

Figure 6 Relevant disclosures of Nanjing Green Circle Waste Disposal Co.

企业环境信息依法披露系统 (上海)
System on Corporate Environmental Information Disclosed in accordance with the Law

首页 | 企业年报 | 披露名单 | 使用帮助 | 2023-03-28 星期二

上海环源实业发展有限公司
统一社会信用代码: 9131010713298673X9
法定代表人: 顾剑峰
企业性质: 国有企业
行业: 危险废物治理
注册地址: 上海市普陀区金通路799、899、999号17幢1105室

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年度报告 | 临时披露 (0) | 年份: 2022

年度报告封面及扉页 | 专业名词及术语解释 | 关键环境信息摘要 | 企业基本信息 | **企业环境管理信息** | 企业污染物产生、治理与排放信息 | 碳排

行政许可情况

许可类别	行政许可	许可名称	固体废物跨省转移的许可
获得时间	2022-11-18	许可编号	沪环保许防〔2022〕1573号
审批文件	固体废物跨省转移的许可意见	核发机关	上海市生态环境局
有效期限	2022年12月31日	申请状态	延续
许可事项	点击下载		

环境保护税
无

环境污染责任保险
无

环保信用评价情况
无

Figure 7 Disclosure relating to Shanghai Huan Yuan Industrial Development Co.

Zhejiang Province did not disclose the environmental liability insurance of hazardous waste management enterprises, in addition to write "no" or "not involved" in addition to some enterprises in the annual environmental information reporting system does not see the "environmental pollution liability insurance" sub-column, some in the "environmental pollution liability insurance" column in the reasons for not involved in the "not included in the mandatory environmental pollution liability insurance scope".



企业环境信息依法披露系统（浙江）

System on Corporate Environmental Information Disclosed in accordance with the Law

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企业填报
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使用帮助
2023-03-27 星期一 16:29:50



台州弘源资源综合利用有限公司

统一社会信用代码: 91331021MA2AK6KB23
 法定代表人: 黄豪洪
 企业性质: 民营企业
 行业: 危险废物治理
 注册地址: 浙江省玉环市楚门镇中山村



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年度报告
临时披露 (0)
自 2022年

年度报告封面及扉页
专业名词及技术解释
企业环境守法关键信息
企业环境管理信息
企业污染物产生、治理与排放信息
强制性清洁生产审核信

| 行政许可情况

许可类别: 废水、废气 许可编号: 91331021MA2AK6KB23001V	许可名称: 排污许可证 审批文件: <div style="border: 1px solid #ccc; padding: 2px; text-align: center; font-size: xx-small;"> 排污许可证正本信息公开.pdf 预览 下载 </div>
核发机关: 台州市生态环境局 有效期限: 2026-06-09	获得时间: 2021-06-10 许可事项: 排污口位置和数量、排放方式、排放去向; 排放污染物种类、许可排放浓度、许可排放量
管理要求: 自行监测方案、台账记录、执行报告等要求; 排污许可证执行情况报告等的信息公开要求; 企业应承担的其他法律责任。	

| 环境保护税信息

应税因子: 化学需氧量 排放总量 (t/a): 实际缴纳数额(元): 134.86 减免税额(元): 0	应税因子编码: W01018 核定缴税额(元): 42 享受减征或免征情况: 无 应税污染物类型: 水污染物
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| 环境信用评价情况

等级变化: 没有 评价等级: A 参评文件名称: 无 评价结果文件发布日期: 2022-03-26	评价年度: 2022 评价单位: 浙江省生态环境厅 备注: 无
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Figure 8 Disclosure relating to Taizhou Hongyuan Resources Comprehensive Utilization Co.

企业环境信息依法披露系统 (浙江)
System on Corporate Environmental Information Disclosed in accordance with the Law

2023-03-27 星期一 16:50:16

杭州献驰贸易有限公司
统一社会信用代码: 913301820536987723
法定代表人: 一宋献红
企业性质: 民营企业
行业: 危险废物治理
注册地址: 经济开发区

以下信息由该企业提供, 企业对其报送信息的真实性、合法性负责

年度报告 临时披露 (0) 2022年

年度报告封面及扉页 专业名词及技术解释 企业环境守法关键信息 企业环境管理信息 企业污染物产生、治理与排放信息 强制性清洁生产审核

行政许可情况

不涉及理由: 不涉及

环境保护税信息

不涉及理由: 不涉及

环境污染责任保险

不涉及理由: 未纳入强制性环境污染责任保险范围。

环境信用评价情况

等级变化: 等级无变化
评价等级: A
参评文件名称: 《浙江省企业环境信用评价管理办法(试行)》
评价结果文件发布日期: 2023-03-02

评价年度: 2022
评价单位: 浙江省生态环境厅
备注: 无

Figure 9 Relevant disclosures of Hangzhou Xianchi Trading Co.

Anhui Province did not disclose the environmental liability insurance of hazardous waste management enterprises, in its public annual environmental information report are not seen in the "environmental pollution liability insurance" sub-column, part of the enterprise's index column does not even cover the environmental liability insurance and other information of the "enterprise environmental management information" this item.

企业环境管理信息	
企业生态环境行政许可情况 (企业有多个生态环境行政许可应当逐一填报)	
行政许可类别 *	排污许可
行政许可名称 *	排污许可证
行政许可编号 *	9134080066949978XL001V
审批文件 *	9134080066949978XL001V
核发机关 *	安庆市生态环境局
获得时间 *	2021-12-30
有效期限 *	2026年12月29日
许可事项 *	9fe4d50e717ad73f77fe6e3ec468c4.jpg 预览 下载
申请状态 *	延续
环境保护税 (企业涉及多种多种应税污染物类型、应税因子的应当逐一填报)	
应税污染物类型 *	大气污染物
应税因子 *	氨氧化物, 氟化氢, 二氧化硫
分档目数金额 (元) *	15688.9
实际缴纳总额 (元) *	8653.28
减征或免征情况 *	7035.62
环境信用评价情况	
环保信用评价单位 *	安庆发投环保科技有限公司
环保信用评价年度 *	2021
环保信用评价等级 *	诚信企业
等级变化 *	无

Figure 10 Disclosure relating to Anqing Fatou Environmental Protection Technology Co.

企业环境信息依法披露系统 (安徽)													
System on Corporate Environmental Information Disclosed in accordance with the Law													
<p>安徽天衢环保科技有限公司新厂</p> <p>统一社会信用代码: 91341700MA276Y2T2Y</p> <p>法定代表人: 施文涛</p> <p>企业性质: 民营企业</p> <p>行业: 危险废物治理</p> <p>注册地址: 安徽省池州市贵池区区域江北高新产业集中区乐山山路以西, 污水处理厂以南地块</p>													
<p>年度报告 临时披露 2022</p> <p>年度报告披露及查阅</p> <table border="1"> <tr> <td>企业名称 *</td> <td>安徽天衢环保科技有限公司新厂</td> </tr> <tr> <td>统一社会信用代码 *</td> <td>91341700MA276Y2T2Y</td> </tr> <tr> <td>报告年度 *</td> <td>2022</td> </tr> <tr> <td>编制日期 *</td> <td>2023-02-28</td> </tr> <tr> <td>企业负责人承诺 *</td> <td>承诺书.jpg 预览 下载</td> </tr> <tr> <td>企业环保机构负责人承诺 *</td> <td>承诺书.jpg 预览 下载</td> </tr> </table>		企业名称 *	安徽天衢环保科技有限公司新厂	统一社会信用代码 *	91341700MA276Y2T2Y	报告年度 *	2022	编制日期 *	2023-02-28	企业负责人承诺 *	承诺书.jpg 预览 下载	企业环保机构负责人承诺 *	承诺书.jpg 预览 下载
企业名称 *	安徽天衢环保科技有限公司新厂												
统一社会信用代码 *	91341700MA276Y2T2Y												
报告年度 *	2022												
编制日期 *	2023-02-28												
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企业环保机构负责人承诺 *	承诺书.jpg 预览 下载												

Figure 11 Disclosure related to the new plant of Anhui Tianqu Environmental Protection Technology Co.

It can be seen that although these 159 enterprises have the awareness of public disclosure of environmental information, they do not pay enough attention to the disclosure of information on environmental liability insurance. Article 10 of the *Format Guidelines* clearly requires that "key emissions unit enterprises shall disclose information on environmental pollution liability insurance in

accordance with the law." For the disclosure of environmental information does not meet the requirements of the *Format Guidelines*, the *Administrative Measures* stipulates that "the competent ecological and environmental department at or above the municipal level of the district shall order correction, notify and criticize, and may impose a fine of not more than 50,000 yuan." Therefore, as a hazardous waste management enterprise required by the *Solid Waste Law* to take out environmental liability insurance, it is reasonable to disclose the information of environmental liability insurance in the enterprise environmental information disclosure system according to the law, or else the competent ecological and environmental authorities have the right to penalize it.

3.3 Significant differences in disclosures

According to statistics, the observation of the 605 hazardous waste management enterprises, more than 70% of the enterprises disclosed the environmental liability insurance information, Shanghai, Jiangsu and Anhui Province, enterprises fill in the environmental liability insurance information, including the underwriting company, the insurance period, the main scope of coverage and the insurance liability limits, Zhejiang Province, on the basis of the increase of four items, including the policyholder, the issuing organization, the date of issuance of the document and the name of the document.

It is observed that there are differences in the disclosure contents among different enterprises. In addition to Zhejiang Province, the differences in disclosure between hazardous waste management enterprises in other two provinces and one city are mainly reflected in the "main coverage" item. According to rough statistics, the disclosure of this item can be roughly divided into three categories, one type of fill in the business scope or address of the

enterprise, one type of insurance company to fill in the specific scope of coverage, such as third-party personal injury or death or direct property damage, cleanup costs, additional insured, etc., and one type of direct to the "Environmental Pollution Liability (insurance)" a few words instead of. The words "Environmental Pollution Liability (Insurance)" are used instead of "Environmental Pollution Liability".

环境污染责任保险	
承保公司 *	中国人寿财产保险股份有限公司
保险期 *	2022-06-29至2023-06-28, 共365天
主要承保范围 *	被保险生产经营场所外1公里内范围
保险赔偿责任限额 (元) *	14000

Figure 12 Relevant disclosure of Hefei Sangon Chemical Co.

环境污染责任保险	
承保公司 *	中国平安财产保险股份有限公司
保险期 *	2021-11-26至2022-11-25, 共365天
主要承保范围 *	平安环境污染责任保险、附加场所外清理费用保险、附加场所内清理费用保险
保险赔偿责任限额 (元) *	480000

Figure 13 Disclosure in relation to Wuhu Lansheng Centralized Medical Waste Disposal Limited Liability Company

企业环境信息依法披露系统 (江苏)				
无锡恒久再生资源有限公司				
依法披露	环境污染责任保险			
	承保公司	中国人民财产保险股份有限公司	保险期	2021-12-31,2022-12-30
企业环境管理信息	主要承保范围、司法判决等情况	环境污染责任	保险赔偿责任限额 (万元)	50万
企业生态环境行政许可				
环境保护税				
环境污染责任保险				

Figure 14 Disclosure relating to Wuxi Hengjiu Renewable Resources Co.

Among the enterprises that filled in the report on "the specific scope of coverage by the insurance company", some enterprises disclosed in great detail not only the type of environmental liability insurance insured, but also the scope and limit of each liability insured.

企业环境信息依法披露系统（江苏）			
江苏电科环保有限公司			
依法披露			
企业基本信息	环境污染责任保险		
企业基本信息	承保公司	中国人民保险	保险期
生产工艺和产品信息	主要承保范围、司法判决等情况	保障项目: 环境污染责任(B款), 保险金额: ¥ 500,000.00元, 累计责任限额: ¥ 500,000.00元, 每次事故法律费用责任限额: ¥ 25,000.00元, 每次事故有责赔偿限额: ¥ 500,000.00元, 每人人身伤亡责任限额: ¥ 300,000.00元, 任次本故生态环境损害赔偿责任限额 ¥ 100,000.00元 每次事故应急处置与精万费用责任限额: ¥ 250,000.00元.	2022-11-15,2023-11-15
企业环境管理信息			保险赔偿责任限额 (万元)
企业生态环境行政许可			50
环境保护税			

Figure 15 Relevant disclosures of Jiangsu Dianke Environmental Protection Co.

The disclosure of environmental liability insurance in the disclosure system of Zhejiang Province is twice as much as that of other provinces and municipalities, and there are even more differences in disclosure among enterprises, which are reflected in the coverage, issuing organization and name of the document, respectively. The content of coverage is similar to that of other provinces and cities, also focusing on three aspects, such as business address and specific content of coverage. The reporting contents of the issuing organization and the name of the document can be roughly divided into three categories, one of which is not filled in, one of which is the name of the insurance company underwriting the environmental liability insurance and the environmental liability insurance policy, and one of which is the name of the governmental department and the relevant document.

环境污染责任保险	
保险公司: 中国人民财产保险股份有限公司杭州市分公司	保险期: 365
投保人: 康纳新型材料(杭州)有限公司	承保范围: 环境污染事故第三责任、清污费用、紧急应对费用、法律费用
保险赔偿金额: 500000	文件发布日期: 2022-03-23
发文机构: 中国人民财产保险股份有限公司杭州市分公司	文件名称: 环境污染责任保险(2015版) 保险单

Figure 16 Disclosure relating to Connor New Materials (Hangzhou) Co.

环境污染责任保险	
保险公司: 中国太平洋财产保险股份有限公司杭州中心支公司	保险期: 365
投保人: 杭州大地海洋环保股份有限公司	承保范围: 环境污染
保险赔偿金额: 5000000	文件发布日期: 2022-08-23
发文机构: 省美丽浙江建设领导小组办公室	文件名称: 省美丽浙江建设领导小组办公室关于印发《浙江省全域“无废城市”建设实施方案(2022-2025年)的通知》

Figure 17 Disclosure relating to Hangzhou Dadi Ocean Environmental Protection Co.

环境污染责任保险	
保险公司: 中国人保	保险期: 365
投保人: 杭州诚洁环保有限公司	承保范围: 环境污染责任
保险赔偿金额: 500000	文件发布日期: 2022-06-20
发文机构: 无	文件名称: 无

Figure 18 Relevant disclosure of Hangzhou Chengjie Environmental Protection Co.

It can be seen that when enterprises fill in the relevant contents of the environmental liability insurance, there is a lack of uniform knowledge and bias in the understanding of some of the fill-in items, resulting in a large difference in the content of the disclosure.

4. Communication and Feedback

Among the 605 hazardous waste management enterprises observed in this issue of the report, 5 enterprises (3 in Zhejiang Province and 2 in Jiangsu Province) have not disclosed the annual environmental information report of the enterprises, and 159 enterprises (20 in Shanghai Municipality, 41 in Jiangsu Province, 61 in Zhejiang Province and 37 in Anhui Province) have disclosed the annual environmental information report but have not disclosed the information on environmental liability insurance. Accordingly, on May 26th, Green River sent letters to 157 enterprises in addition to the 7 enterprises that did not retrieve the information required for the letter, hoping to communicate with the

enterprises on the lack of disclosure of environmental liability insurance information in a friendly manner. Subsequently, Lvse Jiangnan South received 15 letters of return due to reasons such as no one was found, refusal to accept, and so on.

Up to now, a total of 52 enterprises have communicated with Lvse Jiangnan, and the reasons why enterprises have not disclosed their environmental liability insurance are roughly as follows:

(i) Lack of mandatory environmental liability insurance by the Government

Although hazardous waste management enterprises to take out environmental liability insurance has been clearly written into the Solid Waste Law, but such as Nanjing Bashi Environmental Protection Science and Technology Co. The enterprises did not take out environmental liability insurance on their own, and indicated that they would continue to judge whether they needed to take out environmental liability insurance according to the list of mandatory environmental liability insurance issued by local environmental departments. As a result, they do not fill in the information related to environmental liability insurance when they fill in the annual environmental information.

(ii) Lack of familiarity with legislation

Anhui Jiarui Environmental Protection Science and Technology Co., Ltd. said in communication that they do not understand the "Solid Waste Law" in the management of hazardous waste enterprises should be insured against environmental liability insurance related provisions, and the government has not issued a relevant document requiring enterprises to take out insurance, followed by the relevant information and local ecological and environmental

protection bureau to communicate.

(iii) Not on the pilot list

Although Changzhou Environmental Sanitation Management Center is a key sewage disposal unit, it did not disclose its annual environmental information report because the enterprise was not on the pilot filing list published by the local ecological and environmental departments, and the relevant government departments did not open the filing authority.

Subsequently, the enterprise will Lvse Jiangnan letter reflecting the situation feedback to the local ecological environment bureau, after further verification of the ecological environment department, the enterprise is not in the pilot fill in the list because of omissions in the list, and now the ecological environment department has re-opened for the enterprise to fill in the permissions, and the enterprise has successfully filled in the annual environmental information in 2022.



Figure 19 Comparison of disclosures by Changzhou Environmental Health Management Center

(iv) Systemic issues

Kunshan City, Ningchuang Environmental Technology Development Co., Ltd. said in communication, as early as March 8, filled in the environmental liability insurance information, and screenshots sent to the Department of Ecology and Environment to confirm, but recently opened the reporting system did not see the environmental liability insurance information, has now re-filled.



Figure 20 Disclosure Comparison of Kunshan Ningchuang Environmental Technology Development Co.

(v) Insured but not reporting

A number of hazardous waste management enterprises, including Hangzhou Xianchi Trade Co., Ltd, Zhejiang Jingcheng Renewable Resources Co., Ltd, Changzhou Dawei Environmental Science and Technology Co., Ltd, have indicated that their enterprises have been insured against environmental liability insurance for several years in a row, but have neglected to fill in information on environmental liability insurance when filling in the annual environmental information, and have indicated that they will supplement the information on environmental liability insurance in the system.



Figure 21 Disclosure Comparison of Changzhou Da Wei Environmental Technology Co.

However, the annual environmental information of 2022 in the enterprise environmental information disclosure system of Zhejiang Province can not be updated, and can only be disclosed in the form of interim report, but there is no option of "environmental pollution liability insurance" in the interim report, and can only disclose the information of environmental liability insurance in other options.



Figure 22 Supplemental disclosure of Taizhou Dechang Environmental Protection Co.

Hazardous waste management enterprises take out environmental liability insurance and make good information disclosure, which not only meets the requirements of national laws and regulations, but also helps to improve the enterprises' environmental protection awareness and sense of responsibility. However, through this communication, Green Jiangnan believes that some of the hazardous waste management enterprises still need to strengthen their autonomy in taking out environmental liability insurance and their enthusiasm in disclosing information on environmental liability insurance.

5. Recommendation

As a special insurance product, environmental liability insurance is of great significance in strengthening enterprise environmental management and promoting enterprise environmental compliance. Doing a good job in disclosing information of environmental liability insurance is not only the need of enterprises themselves, but also the need of the public, government and environmental protection field, which is of great practical significance and long-term value. Therefore, we suggest:

5.1 Improve the reward and punishment mechanism, strengthen the publicity of the law, and enhance enterprises' awareness of insurance coverage and disclosure

Environmental liability insurance can transform the preventive, management and compensatory functions of insurance into green and low-carbon genes injected into enterprises at high risk of environmental pollution, which has a positive effect on improving the quality of the ecological environment. In the Solid Waste Law, it is clearly stipulated that "units collecting, storing,

transporting, utilizing and disposing of hazardous wastes shall, in accordance with relevant state regulations, take out environmental pollution liability insurance", but there is no mention of corresponding penalties for uninsured hazardous waste enterprises in Chapter VIII Legal Liability. However, in "Chapter 8 Legal Liability", there is no mention of the corresponding punitive measures for uninsured hazardous waste enterprises, which, to a certain extent, will reduce the enthusiasm of enterprises to take out insurance. Therefore, Lvse Jiangnan believes that the laws and regulations related to environmental liability insurance still need to be improved, and a clear system of rewards and penalties needs to be established to enhance the awareness of enterprises to take out insurance.

In addition, there is a certain lag in the reception of new laws and regulations by enterprises, therefore, the government can organize a unified legal training for local enterprises at the beginning of the introduction of laws and regulations related to environmental liability insurance, so as to clarify the responsibilities and obligations of enterprises, as well as the government's rewards and penalties, and to strengthen the awareness of the enterprises of taking out insurance and disclosure.

5.2 The Government plays a regulatory role and is strict in its requirements

Among the 605 hazardous waste management enterprises observed in this report, 164 of them have not disclosed the information of environmental liability insurance, and the non-disclosure rate is more than 27%. Through subsequent communication with enterprises, Lvse Jiangnan learned that many enterprises have not taken out environmental liability insurance because they are not on the list of mandatory insurance issued by the ecological environment department. However, it is a requirement of the Solid Waste Law for hazardous

waste management enterprises to take out environmental liability insurance. When compiling the list of mandatory insured enterprises, the government should include all the enterprises that meet the requirements into the list of insured enterprises in accordance with the requirements of the law and regulations, so as to ensure that they should be insured to the fullest extent.

There are also some enterprises that have actually taken out environmental liability insurance, but neglected to report the annual environmental information. After the enterprises fill in the information, they need to be audited by the ecological and environmental departments before the relevant information will be publicized, and there are corresponding penalties in the "Management Measures". Therefore, Lvse Jiangnan suggests that the ecological environment department should give full play to the supervisory function of the government department when reviewing the information reported by the enterprises, strictly review the information in accordance with the "Administrative Measures" and the "Format Guidelines", correct it in time, and start the penalty procedure to ensure the truthfulness, accuracy and completeness of the information of the enterprises, and urge the enterprises to do the disclosure of disclosure as much as they can.

5.3 Improve interpretation and standardize disclosure

The Administrative Measures and Format Guidelines have standardized the content of environmental information disclosure of key emission units, and the reporting systems of provinces and cities have set up reporting items according to the requirements. However, according to Lvse Jiangnan's observation, the enterprises' understanding of certain reporting items varies during the reporting process, resulting in different reporting contents.

Anhui Province's filing system includes a "Manual for Enterprises Disclosing

Environmental Information in accordance with the Law - Annual Report", which includes notes and examples, but lacks detailed explanations of some of the filing items. Although the reporting system in Jiangsu Province has the "explanation of technical terms and terminology", it shows "no data available". The reporting systems in Shanghai and Zhejiang Province did not have publicly available manuals or explanations of terms and terminology.

Therefore, Lvse Jiangnan suggests that provinces and municipalities, while establishing the reporting system, should provide unified training to reporting enterprises and improve the "explanation of terms and terminology" in the system to standardize the disclosure content of enterprises and form an accurate and comparable database to facilitate the subsequent supervision and assessment.

5.4 Improvement of the information disclosure platform to facilitate public participation

In the process of combing through the legal disclosure systems of corporate environmental information of various provinces and cities in the early stage of this report, Lvse Jiangnan found that the filing systems of some provinces and cities lacked friendliness to the public, i.e., the relevant links could not be directly accessed by way of webpage searching, and they needed to be obtained by way of governmental public disclosure upon application.

Secondly, the original purpose of the Government in setting up the system for the legal disclosure of environmental information by enterprises was to be used for enterprises to centrally publicize the content of their legal disclosure of environmental information, so as to facilitate unified supervision by the Government and monitoring by the public. However, the filing systems in individual provinces and municipalities set limits on public access, so that once

the number of accesses exceeds the limit, the public will not be able to access the relevant data, which is contrary to the Government's original intent in setting up the system.

Therefore, Lvse Jiangnan suggests that all provinces and municipalities should set up enterprise environmental information reporting system, at the same time, it should be publicized in the government website, and there is no restriction on public access, so as to facilitate the participation of the public and stakeholders in the process of information disclosure, and to enhance the public transparency of information disclosure.

At present, although there are only laws and regulations relating to the disclosure of information on corporate environmental liability insurance, such as the *Administrative Measures* and the *Format Guidelines*, environmental protection and emission reduction have become important tasks faced by countries around the world in the context of the dual-carbon goal, and environmental liability insurance is an important means for enterprises to minimize environmental risks and protect the environment. Enhancing the disclosure of information on environmental liability insurance will help to improve the transparency and credibility of information on enterprises' environmental liability insurance, and will also help to promote the active fulfillment of environmental responsibility and protection of the environment by enterprises, thus facilitating the realization of the dual-carbon goal.

In this context, the state will continue to improve the laws and regulations on disclosure of environmental liability insurance information, and improve the relevant incentives and penalties. On this basis, the government will also gradually increase the supervision and enforcement of the disclosure of environmental liability insurance information, so that enterprises will realize the importance of environmental liability insurance information disclosure.

Therefore, enterprises need to take the initiative to disclose information related to environmental liability insurance while enhancing their awareness of environmental protection, increasing the transparency of their environmental information, promoting their environmental protection behavior, and realizing their sustainable development.