

# Green insurance (16)

**The information disclosure of hazardous waste management enterprises needs to be improved**



PECC  
Aug, 2024

## **Abstract**

In recent years, with the rapid development of China's economy, the number of hazardous wastes generated in the process of industrial production has been increasing, and while the issue of hazardous waste management has become the focus of attention of all sectors of society, it has also triggered a series of accidents of safety and environmental pollution.

On March 21, 2019, Jiangsu Tianjiaoyi Chemical Co., Ltd. caused spontaneous combustion and then an explosion due to long-term illegal storage of hazardous waste, the accident affected 16 neighboring enterprises, resulting in a total of 78 deaths, 76 serious injuries, 640 hospitalizations, and direct economic losses of 1.986 billion yuan; At 20:54 on April 2, 2020, Zhaoqing Fire and Rescue Detachment received an alarm: a hazardous waste warehouse on fire in Baizhu Town, Gaoyao District, Zhaoqing City, a new Rongchang Environmental Protection Co. around 5:00 on March 13, 2021, Renfeng Town, Tengyue Environmental Protection Science and Technology Company's factory in a hazardous waste temporary storage warehouse on fire, the fire area of 450 square meters or so .....

In order to make the hazardous waste management enterprises to pay attention to their own environmental social responsibility, to strengthen multi-party supervision, September 1, 2020 came into force of the "People's Republic of China Solid Waste Pollution Prevention and Control Law" (hereinafter referred to as the "Solid Waste Law"), which Article 99 requires that "Collecting, storing, transporting, utilizing and disposing of hazardous wastes shall, in accordance with the relevant provisions of the State, take out environmental pollution liability insurance."

In order to standardize the disclosure of environmental information by enterprises in accordance with the law, promote enterprises to take the initiative to disclose environmental information, including environmental pollution liability insurance (hereinafter referred to as “environmental liability insurance”), and strengthen social supervision. *The Administrative Measures for the Legal Disclosure of Corporate Environmental Information* (hereinafter referred to as the *Administrative Measures*) and the *Format Guidelines for the Legal Disclosure of Corporate Environmental Information* (hereinafter referred to as the *Format Guidelines*), which came into effect on February 8, 2022, require that corporations should disclose corporate environmental information, including eco-responsibility insurance. And the *Administrative Measures* requires that the municipal ecological and environmental authorities shall, before the end of March each year, determine and publish the list of enterprises in the administrative region that disclose environmental information in accordance with the law (hereinafter referred to as the “disclosure list”).

Therefore, hazardous waste management enterprises included in the disclosure list should disclose information on their environmental liability insurance coverage in the annual environmental information disclosure system in accordance with the law.

This report will observe the disclosure of environmental liability insurance information in the annual environmental information reports of hazardous waste management enterprises across the country (except Xinjiang, Hong Kong, Macao, and Taiwan) in 2023, to analyze the current status of their insurance coverage and disclosure, and to make corresponding recommendations. And will be published through the legal disclosure system (hereinafter referred to

as the “Disclosure System”) of environmental information of enterprises in each province/municipality/autonomous region (hereinafter referred to as the “Region”).

## 1. Object of research

Lvse Jiangnan Public Environmental Concerned Centre (hereinafter referred to as “PECC”) relies on the Azure Map environmental database established by the Public Environmental Research Center (IPE), which is a public platform for environmental data that includes official and authoritative data. And through the list of enterprises that will disclose environmental information in 2023 according to the law announced by the local government, the National Emission Permit Management Information Platform (public side) and the information disclosure system established by each region, we screened out 1996 hazardous waste management enterprises as the research object of this report, and the distribution is shown in Figure 1 in detail.

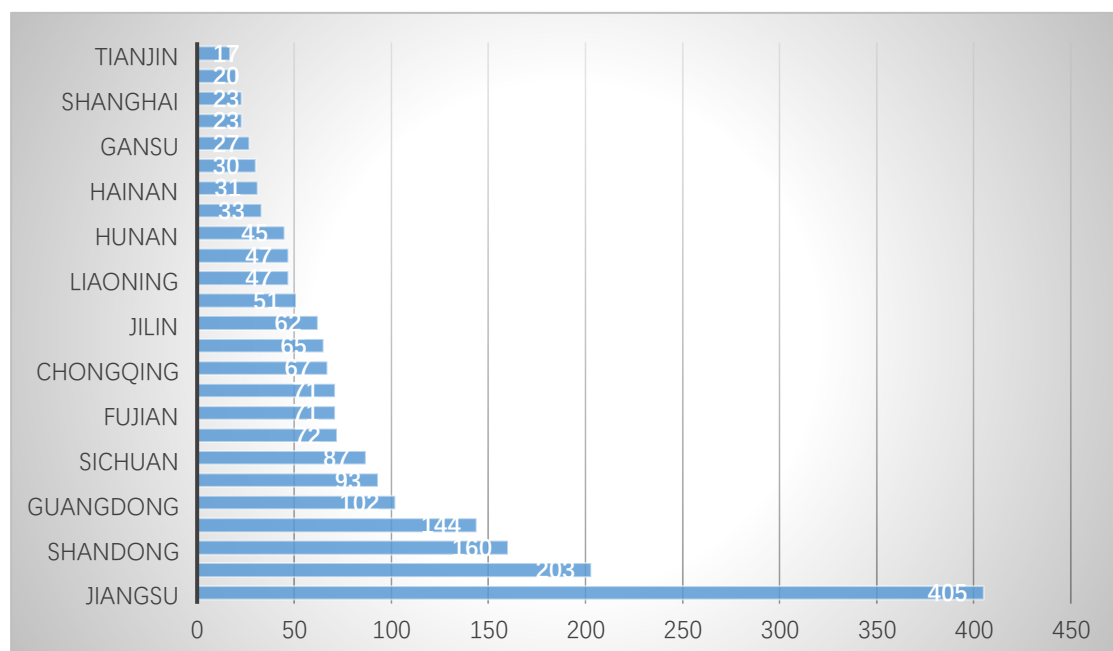


Figure 1 Number of hazardous waste management enterprises in 25 regions

Note: Four provinces and cities, namely Beijing, Hebei, Qinghai and Shanxi, are

not accessible due to the upgrading of the trust system, and the Tibet Autonomous Region is not included in the study of this report due to the small number of enterprises involved in hazardous waste management.

## 2. Disclosures

By searching the letter disclosure system of each region, PECC found that among 1996 hazardous waste management enterprises, there are 967 enterprises that have not disclosed the information of environmental liability insurance, accounting for nearly 50%. Another five companies did not retrieve relevant information in the letter system, although they were on the 2023 environmental letter list published by government departments (in the case of Fujian Hongyuan Environmental Protection Industry Co.)

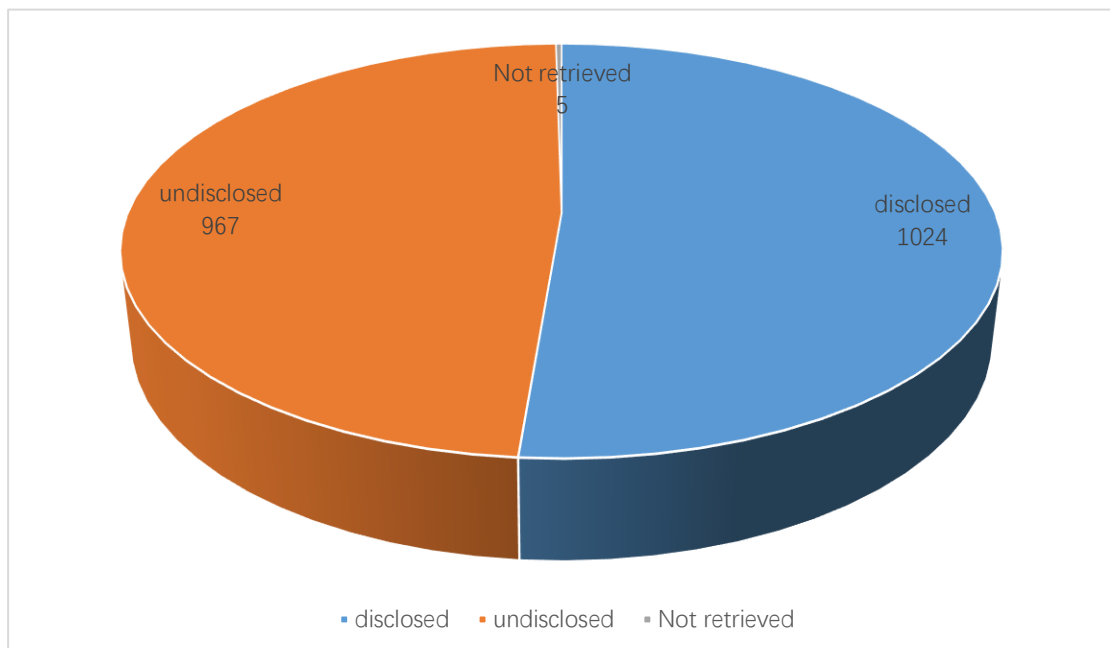


Figure 2 Disclosure of environmental liability insurance for hazardous waste management enterprises

Table1 List of companies not retrieved

No.	company identification
1	Fujian Dutt New Energy Technology Co.

2	Fujian Hongyuan Environmental Protection Industry Co.
3	Luhe Zhongyi Environmental Technology Co.
4	Ningcheng Shishuo Metal Co.
5	Ningxia Led Environmental Energy Co.

漳州市生态环境局 hbj.zhangzhou.gov.cn			
65	龙海区	北海市众立新型建材有限公司	重点排污单位
66	龙海区	福建省佳宝轻工工艺品	重点排污单位
67	龙海区	漳州水恒能源管理有限公司	重点排污单位
68	龙海区	漳州程祥气体有限公司	重点排污单位
69	龙海区	福建鸿源环保产业有限公司	重点排污单位
70	龙海区	福建省腾龙工业公司	重点排污单位

Figure 3 2023 Environmental Letter List issued by the Zhangzhou City Bureau of Ecology and Environmental Protection

企业环境信息依法披露系统(福建Beta版)

企业填报查询

福建鸿源环保产业有限公司 查询

时间: 年份 2023

地区: 省份 请选择省份 城市 请选择城市

行业类别: 行业类型 请选择行业

序号	省份	城市	年份	企业名称	统一社会信用代码	行业类别	法人代表	操作
暂无数据								

Figure 4 Fujian Information Disclosure System did not retrieve Fujian Hongyuan Environmental Protection Industry Co.

### 3. Issues and findings

#### 3.1 Failure to disclose environmental liability insurance exists in all 25 regions

According to the observation, enterprises in 25 regions covered in this report have failed to disclose information on environmental liability insurance, among which, hazardous waste management enterprises in Hainan, Shaanxi, Inner Mongolia and Ningxia have failed to disclose environmental liability insurance, and only 1 and 2 hazardous waste management enterprises in Yunnan and

Heilongjiang have disclosed environmental liability insurance respectively. The proportion of enterprises that did not disclose environmental liability insurance in another eight regions exceeded 50 percent.

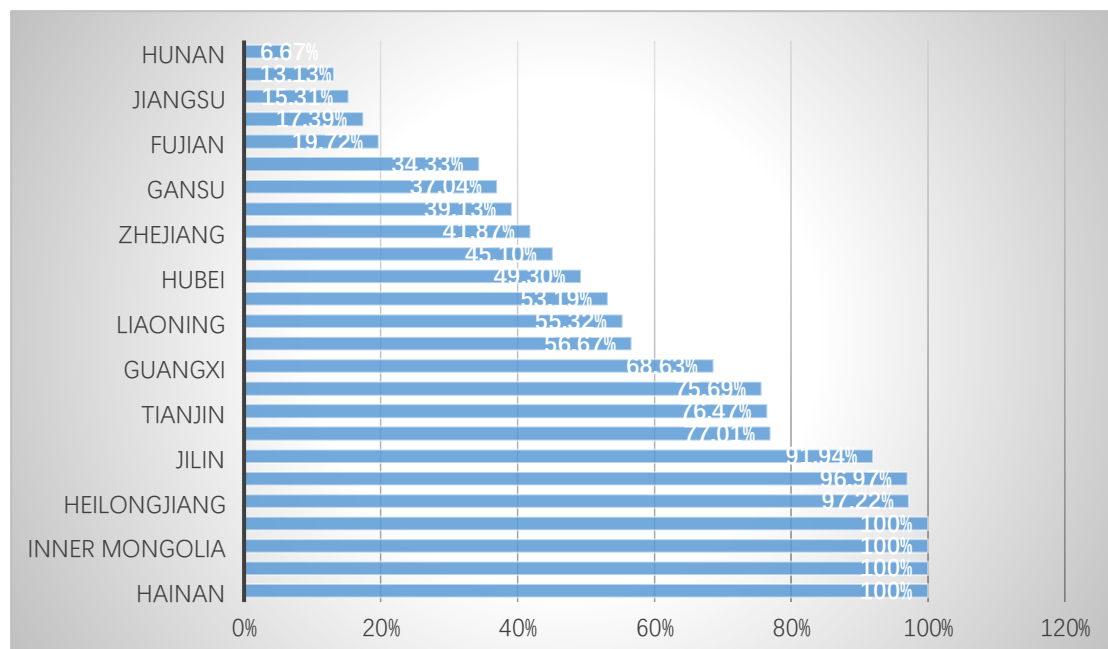


Figure 5 Distribution and percentage of undisclosed companies

### 3.2 Lack of disclosure of information on ecological and environmental violations

In accordance with the provisions of Article 12 of the Management Measures, enterprises included in the letter and disclosure list should disclose information on ecological and environmental violations in their annual environmental information reports. And among the 1996 hazardous waste management enterprises involved in this report, 84 enterprises had ecological and environmental violation information in FY2023, but 32 of them failed to disclose the relevant violation information in accordance with the regulations. (Taking Changchun FAW Integrated Rimantis Environmental Protection Technology Co.)

2023年1月份行政处罚公示											
时间：2023-02-10 20:20 来源：长春市生态环境局						【字体：大 中 小】 打印					
2023年1月份行政处罚公示											
序号	所属县(市)区	处罚单位规范名称(个人)	社会信用代码(身份证号)	法定代表人	责令改正违法行为决定书文号	责改作出时间	行政处罚决定书文号	处罚作出时间	违法事实简述	处罚依据法律法规名称及条款号	处罚金额(万元)
1	九台区	吉林省大唐自动焊制科技有限公司	91220181786838891D	王玉林	长环责改字【2022】JT31号	2022-12-12	长环罚字【2023】JT1号	2023-01-09	喷漆作业产生挥发性有机物，未在密闭空间或设备中进行	《中华人民共和国大气污染防治法》第一百零八条第一项	2
2	长春新区	长春优思创科技有限公司	91220102333946443U	宋朋	长环责改字【2022】XQ21号	2022-12-05	长环罚字【2023】XQ3号	2023-01-16	将污水在线数采仪上的PH计量程由0-14篡改改为0-13，属篡改、伪造监测数据逃避监管的方式排放水污染物	《中华人民共和国水污染防治法》第八十三条第二项	28.3
3	市本级	长春一汽综合瑞曼迪斯环保科技有限公司	9122010169779628XF	Michael Jung	长环责改字【2023】1号	2023-01-11	长环罚字【2023】1号	2023-01-28	未按照国家有关规定如实记录危废管理台账	《中华人民共和国固体废物污染环境防治法》第一百一十二条第一款第十三项、第二款	10

Figure 6 Penalty Information Publicized by Changchun Ecological Environment Bureau

The screenshot displays the 'Enterprise Environmental Information Legal Disclosure System (Jilin)'. The main content area shows the profile of '长春一汽综合瑞曼迪斯环保科技有限公司' (Changchun First Automobile Group Comprehensive Ruiman Di Si Environmental Protection Technology Co., Ltd.). Key information includes:
 

- 统一社会信用代码: 9122010169779628XF
- 法定代表人: Michael Jung
- 企业类型: 合资企业
- 行业: 危险废物治理
- 注册地址: 长春市绿园区西新工业集中区建九路以东

 A map on the right shows the company's location. The bottom navigation bar includes links for '年度报告封面及首页', '基础信息', '企业环境管理信息', '污染物产生、治理与排放信息', '碳排放信息', '强制性清洁生产审核信息', '生态环境应急信息', and '生态环境违法行政处罚及司法判决情况'.

Figure 7 Disclosure of enterprises in the Jilin Province Credit and Disclosure System

### 3.3 Local Policies Boost Development of Environmental Liability Insurance

In May 2024, PECC released Green Insurance (XV) “Local Environmental Liability Insurance Policies Have Their Own Differences”. During the research process of the fifteen-phase report, PECC found that Hunan, Shandong and Guizhou have been continuously updating their environmental liability insurance policies, and the number of policies related to environmental liability insurance released is also the largest.

As a result, under the continuous promotion of local policies, Hunan, Shandong



and Guizhou have relatively low non-disclosure rates among the 25 regions, of which Hunan Province has the lowest non-disclosure rate among the 25 regions, with only 3 out of 45 hazardous waste management enterprises failing to disclose environmental liability insurance. It can be seen that the guidance and support of local policies have played a key role in promoting the real landing of environmental liability insurance.

### **3.4 Excellent Case**

#### **3.4.1 Suspension of production, not suspension of responsibility, and timely disclosure by three companies**

In this issue of the report, we found that 62 of the 1996 hazardous waste management enterprises did not disclose information related to environmental liability insurance due to the suspension of production in 2023, a production cycle of less than three months, and poor production and business conditions. However, there are also 3 enterprises that have taken out and disclosed information on environmental liability insurance despite the fact that their production will cease in 2023 or their production cycle is shorter.

Table 2 2023 List of companies that have ceased production or have a short production cycle but disclose environmental liability insurance

No.	company identification	Production in 2023
1	Hunan Yuantong Environmental Protection Technology Co.	discontinue
2	Zhejiang Shuntong Resources Development Co.	discontinue
3	Chongqing Ruihan Environmental Protection Engineering Co.	It's closed until September 12th.



Figure 8 Disclosure of Hunan Yuantong Environmental Protection Technology Co.

### 3.4.2 4 companies continuously disclose information on environmental liability insurance

In the process of inquiring about the disclosure of environmental liability insurance of hazardous waste management enterprises, we found that 3 of the disclosed 1,024 enterprises have disclosed the environmental liability insurance information for many years in the letter disclosure system. For example, Xiamen Zisheng Environmental Protection Technology Co., Ltd. disclosed the environmental liability insurance information of three insurance cycles in the Fujian letter disclosure system, as shown in Figure 9.

Table 3 3 companies disclosing multi-year environmental liability insurance information

No.	company identification
1	Fujian Yili Environmental Technology Co.
2	Xiamen Yubaobao Environmental Protection Technology Co.
3	Xiamen Ares Environmental Technology Co.



Figure 9 Disclosure of Xiamen Ares Environmental Technology Co.

Nantong Huimin Solid Waste Disposal Technology Co., Ltd. although the disclosure of the environmental liability insurance information in Jiangsu Province in the letter disclosure system is only one, but its environmental liability insurance for the insurance period of August 6, 2022 to July 25, 2027, fully insured for five years of environmental liability insurance.



Figure 10 Disclosure of environmental liability insurance of Nantong Huimin Solid Waste Disposal Technology Co.

#### 4. Letters and Feedback

In view of the fact that there are 972 hazardous waste management enterprises involved in this report that have not disclosed the environmental liability insurance (including 5 enterprises that have not obtained the information), which are geographically dispersed and involve a total of 230 municipalities or prefectural-level cities, PECC has formulated the following two screening conditions for the hazardous waste management enterprises involved in this report before sending a letter to the Ecological Environment Bureau involved:

- 1) Five or more hazardous waste management enterprises in the same municipality or prefectural city fail to disclose environmental liability insurance;
- 2) Shaanxi Province letter system can be directly through the platform for feedback on issues, without the need to write to the letter.

Based on the above screening conditions, PECC screened out 51 prefectural-level cities that need to write letters, involving 490 hazardous waste management enterprises.2024 In early July, PECC wrote letters to the ecological environment bureaus of 51 prefectural-level cities regarding the lack of disclosure of information on the environmental liability insurance of hazardous waste management enterprises under their jurisdiction, and as of press release, PECC communicated amicably with a total of 34 ecological environment departments and, except for the Taizhou City Ecological Environment Bureau, the remaining 33 ecological environment departments have given specific replies (see attached table for specific replies). As of press time, PECC has communicated with a total of 34 ecological environment departments, and except for Taizhou Ecological Environment Bureau, which has indicated that it needs to delay its reply, the remaining 33 ecological environment departments have given specific replies (see the attached table for specific replies).

In addition, PECC has provided feedback to a total of 47 companies that have

failed to disclose information on environmental liability insurance through the Shaanxi Provincial Credit and Disclosure System, but as of now, no response has been received.

Table 4 Ecological departments that did not respond to letters sent to them

No	Subordinate prefecture-level city	No	Subordinate prefecture-level city
1	Huaibei	10	Changchun
2	Qingyuan	11	Huludao
3	Haikou	12	Jinzhou
4	Nanyang	13	Ordos
5	Daqing	14	Hulunbuir
6	Haerbing	15	Shizuishan
7	Heihe	16	Linyi
8	Wuhan	17	Qujing
9	Songyuan	/	/

Feedback from the ecosystem sector:

**(1) Insured with additional disclosures**

The **Maanshan Municipal Bureau of Ecology and Environment**, the **Jinhua Municipal Bureau of Ecology and Environment** and the **Ningbo Municipal Bureau of Ecology and Environment** responded to the letter by stating that the hazardous waste management enterprises involved in the letter had taken out environmental liability insurance, and requested the enterprises to make additional disclosure in the form of “temporary disclosure” in 2024, and the enterprises also uploaded the environmental liability insurance policy. (Anhui Hangfu Solid Waste Environmental Protection Co., Ltd. as an example)

2023	
企业生态环境行政许可情况 (企业有多个生态环境领域行政许可应当逐一填报)	
行政许可类别 *	延长危险废物贮存期限审批
行政许可名称 *	危险废物延期贮存
行政许可编号 *	皖环函(2023)287号
审批文件 *	安徽省生态环境厅关于同意安徽杭富固废环保科技有限公司延长现有危险废物贮存期限的函
核发机关 *	安徽省生态环境厅
获得时间 *	2023-03-15
有效期限 *	/
许可事项 *	延期贮存.pdf
申请状态 *	新获得
预览 下载	
企业生态环境行政许可情况 (企业有多个生态环境领域行政许可应当逐一填报)	
行政许可类别 *	危险废物跨省跨区域转移审批
行政许可名称 *	危险废物跨省转移
行政许可编号 *	皖固转函(2023)257号
审批文件 *	关于安徽杭富固废环保科技有限公司危险废物跨省转移的许可意见
核发机关 *	安徽省生态环境厅
获得时间 *	2023-09-14
有效期限 *	2023年12月31日
许可事项 *	转移许可意见.pdf
申请状态 *	新获得
预览 下载	

Figure 11 Anhui Hangfu Solid Waste Environmental Protection Co., Ltd. supplementary information prior to the letter

已披露环境信息变更情况	
已披露环境信息变更情况1	
变更事项:	变更内容:
环境污染责任险	增加环境污染责任险
变更依据:	
杭富2024投保单.pdf	
<a href="#">预览</a> <a href="#">下载</a>	



Figure 12 Anhui Hangfu Solid Waste Environmental Protection Co., Ltd. additional disclosure after letter

**Lianyungang City Bureau of Ecology and Environment, Suqian City**

**Bureau of Ecology and Environment and Chengdu Municipal Bureau of Ecology and Environment** all indicated in their reply letters that except for one enterprise (Lianyungang Yongxin Scrap Material Recycling Co. The remaining enterprises have taken out environmental liability insurance and will disclose additional information in the environmental information report for the year 2023 or make “temporary disclosure” in the year 2024. In addition, Suqian Honglong Recycling Resources Co., Ltd. has taken out environmental liability insurance after resuming operation in 2024. (Suqian Dacheng Environmental Recycling Resources Co., Ltd. as an example)

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

**宿迁大成环保再生资源有限公司**  
统一社会信用代码: 91321302MA1MPWEB1J  
法定代表人: 王标  
企业性质: 民营企业  
行业: 水利、环境和公共设施管理业 / 生态保护和环境治理业 / 环境治理业 / 危险废物治理  
注册地址: 宿迁市宿城区蔡集镇宿全民创业园18号

以下信息由企业提供, 企业对其报送内容的真实性、合法性负责

年度报告 | 临时披露 | 2023

告封面及扉页 | 专业名词及技术解释 | 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 | 碳排放情况 | 强制性清洁生产审核信息 | 生态环境

**环境保护税**

应税污染物类型	应税因子	分税目应纳税额 (元)	实际缴纳总额 (元)	减征或免征情况
大气污染物	硫酸雾,挥发性有机物	0	0	纳税人排放应税大气污染物或者水污染物的浓度值低于国家和地方规定的污染物排放标准百分之五十的减征环境保护税

**环境污染责任保险**

不涉及	
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**环保信用评价情况**

年度报告 | 临时披露 | 2023

年度报告封面及扉页 | 专业名词及技术解释 | 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 | 碳排放情况 | 强制性清洁生产审核信息 | 生态环境应急信息

**环境污染责任保险**

承保公司	保险期
中国人民财产保险股份有限公司	2023-06-30~2024-06-29

**主要承保范围**

主要承保范围	保险赔偿责任限额 (元)
宿迁大成环保再生资源有限公司, 按照《公众责任保险条款(1999版)》保障项目: 公众责任(1999版), 保险金额: ¥10,000.00元, 累计责任限额: ¥10,000.00元, 每次事故绝对免赔率: 10.00%, 每次事故每人人身伤亡责任限额: ¥10,000.00元, 每次事故每人医疗费用责任限额: ¥10,000.00元, 每次事故每人财产责任限额: ¥10,000.00元, 每次事故免赔额: ¥100.00元, 每次事故每人伤亡责任限额: ¥10,000.00元, 每次事故责任限额: ¥10,000.00元, 每次事故免赔率: 10.00%;	10000

**环保信用评价情况**

评价单位: 江苏省企业环保信用评价 | 评价年度: 2023

Figure 13 Comparison of disclosure before and after letter from Suqian Dacheng Environmental Recycling Resources Co.

Both **Baotou Eco-Environmental Bureau** and **Ulanqab Eco-Environmental Bureau** said that after verification by their staff, they found

that most of the enterprises mentioned in the letter have taken out environmental liability insurance and disclosed relevant information. After PECC communicated with the two local ecological and environmental departments, it was found that the reason for the error in the information was that the Inner Mongolia Information Disclosure System failed to display the relevant environmental information disclosed by the enterprises in the “public side”. Accordingly, PECC to the Inner Mongolia Ecological Environment and Environmental Protection Department in accordance with the application, the staff replied that it was due to system reasons, will investigate the causes and repair, the current business fill in the relevant information has been made public. (Baotou Green Source Hazardous Waste Disposal Limited Liability Company as an example)



Figure 14 Baotou Green Source Hazardous Waste Disposal Limited Liability Company Letter to and Comparison of Before and After Disclosure Pursuant to the Application

**Wuzhong City Bureau of Ecology and Environment** indicated that Ningxia Shangfeng Mengsheng Environmental Protection Science and Technology Co., Ltd. mentioned in the letter, has taken out environmental liability insurance in accordance with the provisions of the Guiding Opinions on Carrying Out the Pilot Work of Compulsory Liability Insurance for Environmental Pollution (Huanfa [2013] No. 10) issued jointly by the former Ministry of Environmental Protection and the China Insurance Regulatory Commission as its business is



related to heavy metals while the remaining four have not taken out any insurance, but they will be considered. Because of the recent upgrading of Ningxia's letter disclosure system temporarily suspended, it failed to confirm the additional disclosure of Ningxia Shangfeng Mengsheng Environmental Protection Technology Co. PECC asked four enterprises did not insure the reason, Wuzhong City Bureau of Ecology and Environment said that the Solid Waste Law, although there is a reference to hazardous waste management enterprises should be insured in accordance with the relevant provisions of the State Environmental Liability Insurance, but the "relevant provisions of the State" can not be found in the relevant provisions of the insurance, and there is no basis for penalties.

The Bureau of Ecology and Environment of Neijiang City said that one of the five enterprises involved in the letter (Neijiang Ruifeng Environmental Protection Technology Co., Ltd.) did not take out environmental liability insurance in 2023, but was insured and disclosed in 2024. Neijiang Tianjie Energy Science and Technology Co., Ltd. on the other hand, has ceased production, and the remaining three are uninsured. PECC asked the reason for not insured, Neijiang City Bureau of Ecology and Environment said that the current jurisdiction of hazardous waste enterprises have been encouraged to insure the main, not mandatory. In addition, the content of the enterprise's information disclosure whether the first review and then published, Neijiang City Bureau of Ecology and Environment said that due to limited manpower, will only be filled out for the enterprise's basic information for review, the rest of the information, including the environmental liability insurance, including the attention of the relatively small.



Figure 15 Neijiang Ruifeng Environmental Protection Technology Company Limited Supplemental Disclosure of 2024 Enrollment Information After Letter to

Zhoushan City Bureau of Ecology and Environment said that enterprises believe that environmental liability insurance is not mandatory, so five of the six have taken out environmental liability insurance, but did not disclose. The other, Zhoushan Zhicheng Environmental Protection Technology Co., Ltd. is a small and micro-enterprise, so it is not insured. PECC asked whether enterprises can make additional disclosure, and Zhoushan Bureau of Ecology and Environment

indicated that enterprises can only make “temporary disclosure” because the disclosure authority for 2023 has been closed. Up to now, all five enterprises that have taken out environmental liability insurance will make additional disclosure of environmental liability insurance related information in the form of “temporary disclosure” in 2024. (Zhoushan Dinghai Baida Petrochemical Engineering Co., Ltd. as an example)



Figure 16 Zhoushan Dinghai Baida Petrochemical Engineering Co., Ltd. disclosure prior to letter writing



Figure 17 Zhoushan Dinghai Baida Petrochemical Engineering Co., Ltd. additional disclosure after letter to

## (2) Insured in 2024

The Hefei Ecological Environment Bureau stated that none of the 12 enterprises were insured in 2023, but three of them had taken out environmental liability insurance in 2024.

The Huai'an Municipal Bureau of Ecology and Environment indicated that after receiving our letter, it has urged the enterprises to make additional disclosures and sorted out the insurance status of the city's hazardous waste operating units, and will urge the enterprises to take out insurance in 2024 for those enterprises that have not taken out insurance in 2023. PECC verified the enterprises' supplementary disclosure through Jiangsu Province's information disclosure system, and found that the enterprises only filled in the insurance period, and all other information was "none". In response to this situation,

PECC asked Huai'an Bureau of Ecology and Environment again, and they said that none of the six enterprises had taken out environmental liability insurance in 2023, so there was no other information, but in 2024, except for Xuyi Liyuan Energy Co.

Yangzhou Ecology and Environment Bureau said that after verification, it was found that only Jiangsu Chunye Environmental Protection Engineering Co., Ltd. had taken out environmental liability insurance to cover the insurance period until 2023, while the remaining four either did not take out insurance or the insurance period ended before 2023. However, all five enterprises have taken out environmental liability insurance in 2024. As for the enterprises' disclosure of information in 2023, Yangzhou Ecological Environment Bureau said it will investigate and deal with them in accordance with the law.

### **(3) Uninsured**

#### a) Enterprise shutdown

Six ecological and environmental departments, including Baicheng City and Lianyungang City, responded to the letter by stating that some of the enterprises involved in the letter had stopped their furnaces or had ceased production or had closed down, and therefore had not taken out environmental liability insurance in 2023.

#### b) Inadequate policies and low motivation of enterprises to take out insurance

Thirteen out of 33 ecological and environmental departments indicated that no enterprises under their jurisdiction had taken out environmental liability insurance in 2023, mainly due to the fact that the *Solid Waste Law* does not regard "failure to take out environmental liability insurance" as a violation of the law and there are no corresponding penalty clauses. Other relevant policies,

such as *the Administrative Measures for Compulsory Liability Insurance for Environmental Pollution* (Draft for *Public Comments*) formulated by the Ministry of Ecology and Environment in 2017, and *the Administrative Measures for Liability Insurance for Environmental Pollution of Hazardous Wastes* (Draft for *Public Comments*) formulated in 2021, have not yet been formally introduced, which has led to the fact that hazardous waste management enterprises in the jurisdiction do not have high incentives to take out insurance.

c) Enterprises with low environmental risk rating, not insured

Suzhou City Bureau of Ecology and Environment said that eight of the 10 enterprises are waste engine oil, waste lead-acid battery recycling storage and transfer enterprises, one is a waste activated carbon disposal enterprise, and one is a medical waste disposal enterprise. After investigation and understanding, the 10 enterprises are small, low environmental risk level, not insured environmental liability insurance.

Wenzhou Municipal Bureau of Ecology and Environment said that the letter mentioned in the 11 hazardous waste management enterprises in 7 only involved in the collection of hazardous waste, belonging to the environment of low-risk enterprises, so did not insure the environmental liability insurance.

## **5. Our Recommendation**

Disclosure of information on environmental liability insurance is an important means to promote the fulfillment of environmental responsibility by hazardous waste management enterprises and to improve the effectiveness of hazardous waste management. Under the current severe situation of hazardous waste management in China, it is of great practical significance to speed up the establishment and improvement of the environmental liability insurance

information disclosure system to protect the ecological environment, satisfy the public's right to know and promote public participation. Therefore, we recommend:

### **5.1 Open channels for information disclosure**

Under the impetus of regulations and policies such as *Management Measures* and *Format Guidelines*, each province/municipality/autonomous region has established a unified information disclosure platform to disclose annual environmental information of enterprises. However, through observation, Green Jiangnan found that the information disclosure systems in Guizhou, Guangxi and other regions often fail to open, and the information disclosure system in Inner Mongolia can be accessed normally before disclosure on application, but the disclosure content of enterprises is blank except for the “annual report cover and title page”.

All these problems highlight the fact that some local sewage enterprises still have imperfect environmental information disclosure, which needs to be emphasized and solved by the government departments, to facilitate the public and other stakeholders to understand and supervise the annual environmental information of the sewage enterprises, including the environmental liability insurance, in a timely manner.

### **5.2 Improvement of local environmental liability insurance policies**

Combined with the observations in the PECC Green Insurance (XV) report and the current report, we find that the development of environmental liability insurance cannot be separated from the support of local policies.

Local governments can formulate corresponding local policies and regulations

on environmental liability insurance according to the actual situation of the region, clarifying the scope of application of environmental liability insurance, insurance liability, and claims procedures. It can also set up a risk co-insurance fund to share the risk of insurance companies in underwriting environmental liability insurance, to reduce the operating pressure of insurance companies. In addition, the local government can give certain policy support to enterprises participating in the environmental liability insurance, reduce the cost of participation in the insurance, to improve the enthusiasm of enterprises to take out environmental liability insurance.

Through the establishment and improvement of the local environmental liability insurance policy system, give full play to its guiding and incentivizing role, and provide a high-quality policy environment for the sound development of environmental liability insurance.

### **5.3 Establishment of a sound regulatory mechanism for environmental information disclosure**

Facing the impact of extreme weather on human beings, environmental protection has become a global consensus. As an important participant in environmental protection, the authenticity, accuracy and completeness of enterprises' environmental information disclosure is particularly important. In the process of communicating with government departments, PECC learned that after enterprises fill in the annual environmental information, some local government departments either do not audit or only conduct a cursory audit, resulting in enterprises filling in the content or missing or incorrect.

Although the information disclosure system has stated that “enterprises are responsible for the authenticity and legitimacy of the information they submit”,



PECC believes that in order to ensure the authenticity, accuracy, completeness and legitimacy of the enterprises' external environmental information disclosure, it is still necessary for governmental departments to supervise, inspect and guide the enterprises' environmental information disclosure work.

In addition, a corresponding disciplinary system for environmental information disclosure violations can be developed. Enterprises that fail to disclose environmental information in accordance with the regulations or disclose information that is untrue or inaccurate should be reminded and penalized to further standardize the mechanism for disclosure of environmental information by enterprises.

#### **5.4 Raising awareness of corporate disclosure**

In this issue of the report, we found that some enterprises have incomplete annual environmental information disclosure and consider environmental liability insurance not a required item. For hazardous waste management enterprises, improving the transparency of environmental information disclosure is a key factor in building trust and demonstrating corporate social responsibility. Through transparent and open disclosure of environmental information, the public can not only understand the annual environmental situation of enterprises, but also encourage enterprises to pay more attention to their own environmental responsibility.

Therefore, the government can raise enterprises' awareness of environmental information disclosure through the establishment of a reward and punishment mechanism for environmental information disclosure, publicity, training and other means. In addition, modern information technology means can be used to realize the automation, intelligence and convenience of enterprise environmental information disclosure and to improve the efficiency and

accuracy of enterprise information disclosure.

## **5.5 Establishment of diversified supervisory bodies**

Strengthening the diversified supervision of corporate environmental information disclosure is not only a key initiative to promote the sustainable development of enterprises, but also a necessary means to maintain the ecological environment and realize green development.

Therefore, in addition to the supervision of government departments, a diversified supervision system should be established with the upstream and downstream industrial chain, social organizations and the public as the main body, so as to give full play to the advantages of all parties, and jointly promote the enterprises to strengthen and improve the work of environmental information disclosure, to enhance the level of environmental protection in China, and to contribute to the construction of a beautiful China.