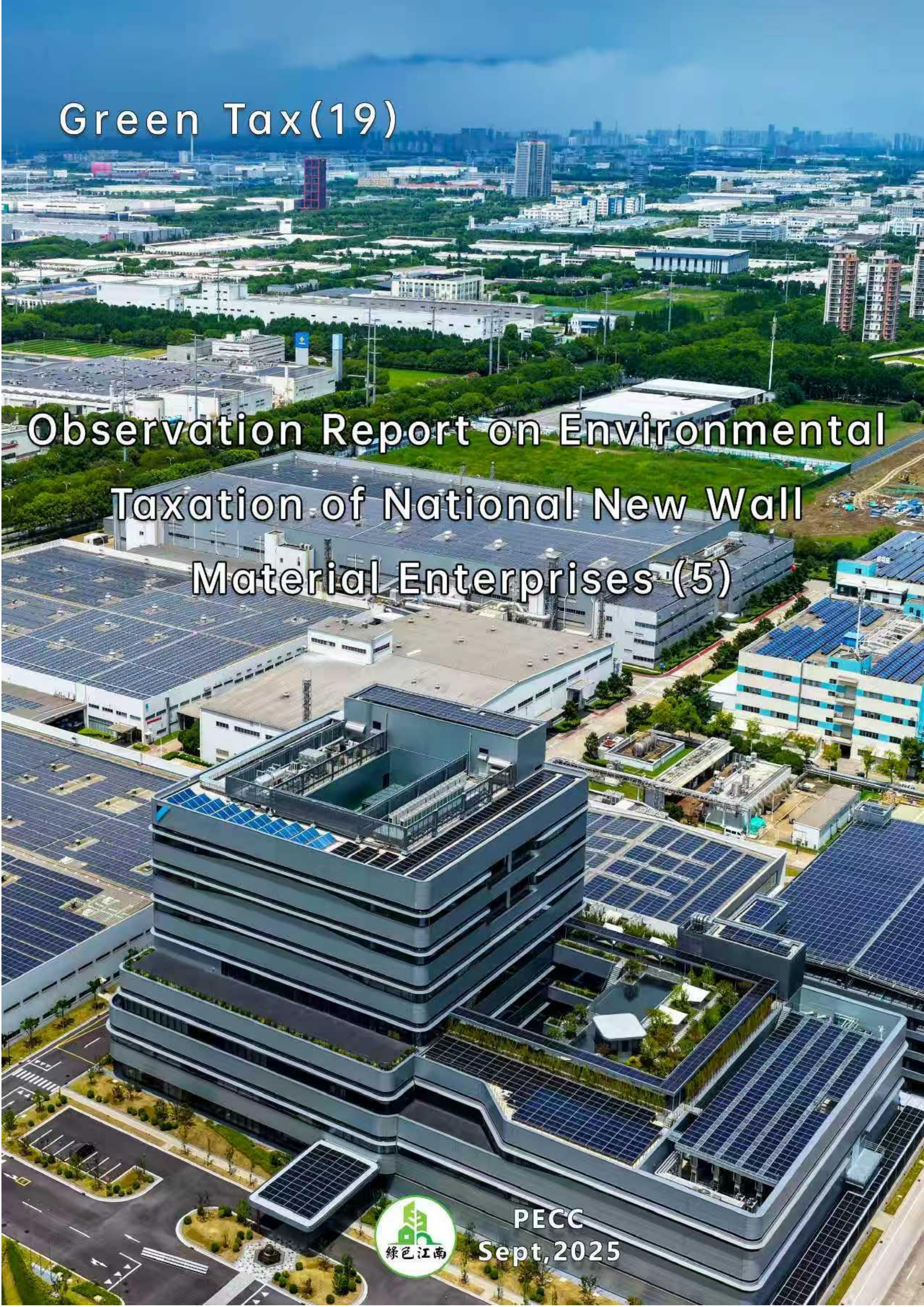
Green Tax(19)

# Observation Report on Environmental Taxation of National New Wall Material Enterprises (5)



PECC

Sept,2025

# Background and Introduction

The environmental performance of new wall material enterprises and their enjoyment of tax incentives have always been the focus of attention of Lvse Jiangnan Public Environmental Concerned Centre (hereinafter referred to as "PECC"). Since 2021, PECC has released four research reports[1], aiming to promote new wall material enterprises to enjoy tax incentives in a reasonable and compliant manner, and achieve the coordinated development of environmental and economic benefits.

In recent years, there have been numerous cases where enterprises have been required to recover tax incentives due to environmental penalties. During communications with tax authorities, we learned that during the self-inspection phase, a number of enterprises have been required to recover the refunded taxes because they failed to meet the eligibility criteria, and will no longer enjoy the immediate tax refund policy thereafter. For example: Zhejiang Zhugong Technology Co., Ltd. was fined 172,000 yuan by the environmental protection department on August 19, 2024 for exceeding the water pollutant discharge standards. In accordance with relevant regulations, the tax incentives that the company had enjoyed since the month following the environmental penalty shall be recovered. Accordingly, the local tax authority legally recovered a total of 810,084.67 yuan in taxes from the company on March 6, 2025; Lanxi Yongyou New Building Materials Co., Ltd. continued to discharge pollutants after the expiration of its pollutant discharge permit in March 2024 without applying for renewal, and was fined 200,000 yuan by the environmental protection department. Affected by this penalty, starting from April 2024, the

[1] https://www.pecc.cc/section/32

enterprise no longer met the eligibility criteria for enjoying the immediate tax refund policy, and the tax authority legally recovered the refunded taxes it had obtained, totaling 23,372.66 yuan, on November 21, 2024. Since PECC launched the green taxation work in 2020, it has assisted tax authorities across the country in recovering nearly 60 million yuan in taxes.

In this report, PECC continues to collate the "Information on Taxpayers Enjoying the Immediate VAT Refund Policy for New Wall Materials in 2024" published on the official websites of tax bureaus in 36 provinces, autonomous regions, municipalities directly under the Central Government and planned cities nationwide. A total of 1,330 enterprises enjoyed tax incentives. Among them, Zhejiang, Jiangsu, Anhui, Sichuan and Guangdong have the largest number of new wall material enterprises enjoying tax incentives, with a total of more than 550; Shanghai, Tianjin, Ningxia, Dalian, Qingdao, Shenzhen, Qinghai and Tibet have no more than 5 enterprises each enjoying tax incentives; and Xiamen has no enterprises enjoying tax incentives.

Table 1: National Situation of Enjoying Immediate VAT Refund for New Wall Materials in 2024

| 表1 2024年全国享受新型墙体材料增值税即征即退情况 | | |
|---|---|---|
| 序号 | 地区 | 纳税人数量 |
| 1 | 江苏 | 146 |
| 2 | 山东 | 78 |
| 3 | 安徽 | 92 |
| 4 | 河南 | 23 |
| 5 | 湖北 | 30 |
| 6 | 四川 | 84 |
| 7 | 浙江 | 230 |
| 8 | 湖南 | 30 |
| 9 | 河北 | 52 |
| 10 | 广东 | 83 |
| 11 | 福建 | 39 |
| 12 | 广西 | 72 |
| 13 | 辽宁 | 9 |
| 14 | 贵州 | 14 |
| 15 | 内蒙古 | 14 |
| 16 | 重庆 | 42 |
| 17 | 陕西 | 17 |
| 18 | 新疆 | 24 |
| 19 | 宁波 | 29 |
| 20 | 甘肃 | 18 |
| 21 | 云南 | 59 |
| 22 | 上海 | 2 |
| 23 | 天津 | 5 |
| 24 | 宁夏 | 2 |
| 25 | 大连 | 4 |
| 26 | 北京 | 14 |
| 27 | 青岛 | 3 |
| 28 | 深圳 | 3 |
| 29 | 海南 | 19 |
| 30 | 青海 | 3 |
| 31 | 吉林 | 20 |
| 32 | 西藏 | 4 |
| 33 | 厦门 | 0 |
| 34 | 山西 | 16 |
| 35 | 黑龙江 | 11 |
| 36 | 江西 | 39 |
| 合计 | | 1330 |

Based on the environmental database of the Blue Map (www.ipe.org.cn), PECC systematically sorted out the environmental supervision status of enterprises enjoying tax incentives. The study found that from 2022 to 2024, 59 enterprises in 19 regions had environmental supervision records with a single fine exceeding 10,000 yuan. For enterprises that received environmental penalties during the tax incentive period, PECC effectively promoted tax authorities to conduct verification on the relevant situations by sending letters to tax authorities in 19 provinces and cities across the country, helping the healthy and stable operation of the green taxation policy and effectively guiding enterprises to fulfill their main responsibility of reducing carbon and pollution.

Table 2: Regions and Number of Enterprises to Which Letters Were Sent

**表2 致函地区及企业数**

| 序号 | 致函地区 | 涉及企业数 |
|---|---|---|
| 1 | 江苏 | 2 |
| 2 | 山东 | 2 |
| 3 | 安徽 | 6 |
| 4 | 河南 | 1 |
| 5 | 湖北 | 1 |
| 6 | 四川 | 5 |
| 7 | 浙江 | 16 |
| 8 | 湖南 | 3 |
| 9 | 河北 | 1 |
| 10 | 广东 | 3 |
| 11 | 福建 | 7 |
| 12 | 广西 | 2 |
| 13 | 贵州 | 1 |
| 14 | 陕西 | 1 |
| 15 | 宁波 | 1 |
| 16 | 甘肃 | 2 |
| 17 | 云南 | 1 |
| 18 | 山西 | 3 |
| 19 | 江西 | 1 |

By the release of this report, PECC has received specific verification replies from tax authorities at the provincial, municipal and county levels in 20 places. The verification results are as follows: 8 enterprises had their taxes recovered due to the prompt from Green Jiangnan's letters; 3 enterprises had their tax incentive eligibility revoked due to environmental penalties; 4 enterprises were not affected in continuing to enjoy tax incentives despite the revocation of environmental penalties; 5 enterprises were not affected in continuing to enjoy tax incentives due to special circumstances.

## Tax Incentive Policies

According to the *Notice of the Ministry of Finance and the State Taxation Administration on Issuing the <VAT Policy for New Wall Materials> (Caishui [2015] No. 73)* [2], taxpayers selling self-produced products listed in the *Catalogue of New Wall Materials Enjoying the Immediate VAT Refund Policy* attached to the policy can enjoy a 50% immediate VAT refund policy. At the same time, the document clearly stipulates that: If a taxpayer enjoying this policy is penalized for violating tax or environmental protection laws and regulations (except for warnings or a single fine of less than 10,000 yuan), it shall not enjoy this policy again within 36 months from the month following the issuance of the penalty decision. Tax authorities in various places shall publish the list of taxpayers enjoying the policy before the end of February each year, including the taxpayer's name, identification number and product name.

In addition, the *Environmental Protection Tax Law of the People's Republic of China* stipulates that entities discharging pollutants in excess of standards shall pay environmental protection tax in accordance with the law.

## Feedback and Analysis from Tax Authorities

By the release of this report, PECC has received specific replies from tax authorities at the provincial, municipal and county levels in 20 places. By sorting out the replies from tax authorities, we have obtained the following key findings:

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[2] https://www.mof.gov.cn/gkml/caizhengwengao/wg2015/wg201508/201601/t20160107_1645703.htm

## 1. Situation of Tax Recovery and Revocation of Tax Incentive Eligibility

### 11 enterprises had the taxes they enjoyed in the early stage recovered due to environmental penalties

On June 24, 2025, the Yichun Municipal Tax Bureau called PECC and confirmed that Yichun Xingfu Building Materials Co., Ltd. was fined 112,000 yuan for discharging water pollutants in excess of standards. The enterprise still illegally enjoyed tax incentives in the month following the environmental penalty, which did not comply with the relevant policy provisions. After the prompt from PECC's letter, the tax authority completed the tax recovery and put the taxes into the state treasury on June 12.

On July 2, 2025, the Youjiang District Tax Bureau of Baise City, Guangxi Zhuang Autonomous Region sent a letter stating that Baise Xinxin Building Materials Manufacturing Co., Ltd. was penalized for environmental violations in 2022 and did not meet the eligibility criteria for enjoying the 2024 immediate VAT refund policy for new wall materials. Due to the prompt from PECC's letter, the company had 134,000 yuan in taxes recovered on June 16, 2025, and the corresponding amount has been paid into the state treasury。

On July 7, 2025, PECC received a reply letter from the Baojing County Tax Bureau, which stated: Regarding the environmental penalty received by Xiangxi Jinshi Building Materials Co., Ltd. on September 1, 2023, our bureau has recovered all the tax refund amounts applied for by the company since October 2023. At the same time, the company shall not continue to enjoy the relevant tax incentives from October 2023 to October 2026, that is, it shall not enjoy tax incentives for 36 months from the month following the environmental penalty.

In addition, tax authorities such as the Pingxiang Municipal Tax Bureau of Chongzuo City, Guangxi, the Lin'an District Tax Bureau of Hangzhou City, the Yongshun County Tax Bureau of Hunan Province, and the Jiangcheng District Tax Bureau of Yangjiang City have also replied to PECC, confirming that they have legally recovered taxes from the relevant enterprises and carried out targeted policy publicity and guidance. PECC took this opportunity to recommend the "Blue Map" platform to the tax authorities, suggesting that this tool can be used to conveniently search for environmental penalty information of enterprises within their jurisdictions, thereby improving work efficiency. Tax authorities in many places stated that they appreciate PECC's attention and support for tax work, and actively assist tax authorities in promoting the verification of enterprise tax information and the disclosure of preferential policies, helping the effective implementation of environmentally friendly tax policies and promoting the healthy development of the green tax system.\

Table 3: Enterprise Supervision Records and Tax Authority Verification Status

| 序号 | 企业名称 | 监管内容 | 监管链接 | 核实情况 |
|---|---|---|---|---|
| 1 | 百色市新鑫建筑材料制造有限公司 | 百环罚〔2022〕8号<br>罚款：7.4354万 | http://b.u6v.cn/6ib2Li | 因环保处罚，前期已享受的税收优惠需要被追缴 |
| 2 | 麻城高辉建材有限公司 | 麻环罚字〔2023〕29号<br>罚款：20万 | http://b.u6v.cn/5zOlNu | |
| 3 | 湘西金石建材有限责任公司 | 州环罚字[2023]104号<br>罚款：2万 | http://b.u6v.cn/5zOmsC | |
| 4 | 永顺县泰丰建材有限责任公司 | 州环罚字〔2023〕26<br>罚款：22万 | http://b.u6v.cn/5zOmss | |
| 5 | 宜春市星福建材有限公司 | (宜)袁环罚〔2023〕10号<br>罚款：11.2万 | http://b.u6v.cn/6aFfLH | |
| 6 | 浙江筑工科技有限公司 | 金环东罚〔2024〕74号<br>罚款：17.2万 | http://b.u6v.cn/6xdqpQ | |
| 7 | 兰溪市永有新型建材有限公司 | 金环（兰）罚〔2024〕5号<br>罚款：20万 | http://b.u6v.cn/6ibqCk | |
| 8 | 兰溪市鑫伟业新型建材有限公司 | 金环（兰）罚〔2024〕38号<br>罚款：20万 | http://b.u6v.cn/5zOmp4 | |
| 9 | 凭祥市威菱红砖厂 | 崇环罚字〔2023〕0020号<br>罚款：23.9528万 | http://b.u6v.cn/5O6FkG | |
| 10 | 杭州临安同鑫建材有限公司 | 杭临青山湖罚决字〔2024〕第000233号<br>罚款：13.609万<br>临综执罚决字〔2024〕第000830号<br>罚款：10.5万 | http://b.u6v.cn/6390tU | |
| 11 | 广东恒佳建材股份有限公司 | 江水行罚字〔2022〕第01号<br>罚款：2.1万 | http://b.u6v.cn/6pHfMh | |

## 2. Differences in Types of Tax Incentives

### 3 enterprises actually enjoyed the immediate VAT refund for comprehensive utilization of resources

On July 21, 2025, PECC received a reply letter from the Henan Provincial Tax Bureau. The reply pointed out that Luoyang Tianzhi Building Materials Co., Ltd. was fined 28,743 yuan by the local environmental protection department on October 19, 2023 for failing to take centralized collection and treatment measures to control gaseous pollutant emissions in accordance with the requirements for building materials enterprises. The enterprise legally enjoyed the immediate VAT refund policy for comprehensive utilization of resources, rather than the immediate VAT refund policy for new wall materials. Due to the mistake of grass-roots staff in confirming the public list, the enterprise was included in both the "List of Comprehensive Utilization of Resources" and the "List of New Wall Materials". In fact, there was no problem of illegally enjoying the preferential policy for new wall materials. The reply also mentioned that the tax authority continues to strengthen information sharing and exchange with environmental protection and other departments, has carried out internal and external policy training and guidance for many times, and requires taxpayers to promptly report changes in circumstances affecting the enjoyment of policies, such as being subject to environmental penalties.

In addition, the Hefei Municipal Tax Bureau and the Bozhou Municipal Tax Bureau also called to explain that Hefei Liufang New Building Materials Co., Ltd. and Bozhou Hongsen Wall Material Co., Ltd. also enjoy the immediate VAT refund for comprehensive utilization of resources, rather than the immediate VAT refund for new wall materials. Therefore, they should not be included in the list of new wall material enterprises.

There are differences in the content of tax incentive policies applicable to "comprehensive utilization of resources" and "new wall material" enterprises. Although both are associated with environmental penalties, the amount of fines triggering the impact and the duration of the impact are different. For example, enterprises enjoying the VAT preferential policy for comprehensive utilization of resources will have their tax incentive eligibility affected only when the amount of a single environmental penalty exceeds 100,000 yuan; while enterprises enjoying the immediate VAT refund policy for new wall materials may no longer be able to enjoy the relevant tax incentives once the amount of environmental penalty exceeds 10,000 yuan.


Figure 1 Screenshot from the Henan Provincial Tax Bureau

附件2

**2024年度享受新型墙体材料增值税即征即退政策的纳税人清册**

| 序号 | 纳税人名称 | 纳税人识别号 | 新型墙体材料名称 | 销售数量 | 数量单位 |
|---|---|---|---|---|---|
| 1 | 洛阳市偃师区华泰综合利用建材有限公司 | 91410381775104403Q | 蒸压加气混凝土砌块（GB/T-11968—2020） | 918535.92 | 方 |
| | | | 蒸压加气混凝土板(符合GB/T15762—2020) | 99625.6 | 方 |
| 2 | 偃师市首阳山四方建材厂 | 91410381783428678L | 蒸压加气混凝土砌块（GB/T-11968—2020） | 155731.6 | 方 |
| 3 | 河南龙全建材有限公司 | 91410381MA40R31N48 | 蒸压加气混凝土砌块（GB/T-11968—2020） | 155024.62 | 方 |
| 4 | 洛阳久天建材有限公司 | 91410381345023523J | 蒸压加气混凝土砌块（GB/T-11968—2020） | 156475.9 | 方 |
| 5 | 偃师市友鑫建材厂 | 91410381590846179F | 蒸压加气混凝土砌块（GB/T-11968—2020） | 201027.24 | 方 |
| 6 | 洛阳市天力建材有限公司 | 91410381O559788070 | 蒸压加气混凝土砌块（GB/T-11968—2020） | 223914 | 方 |
| 7 | 洛阳市天智建材有限公司 | 91410381MA44MUW46X | 蒸压加气混凝土砌块（GB/T-11968—2020） | 175761.66 | 方 |
| 8 | 河南瑞瑾建材有限公司 | 91410307MA9KPLH975 | 蒸压加气混凝土砌块（GB/T-11968—2020） | 139440.93 | 方 |
| 9 | 洛阳西艾尔墙体科技有限公司 | 914103000906237027 | CL网架板 | 22146.96 | 平方米 |
| 10 | 固始佳兴新型建材有限公司 | 9141152558974911XK | 蒸压加气混凝土砌块 | 66492.92 | 方 |
| 11 | 绿丰节能科技股份有限公司 | 91410700668873020B | 建筑用金属面绝热夹芯板 | 881321.61 | 平米 |
| 12 | 帆颖装配式建筑科技（新乡）有限公司 | 91410703MA9L5N8Q6Y | 建筑用轻质隔墙条板 | 138.38 | 平米 |
| 13 | 河南超诚建材科技有限公司 | 91410725337119226W | 建筑用金属面绝热夹芯板 | 1897774.41 | 平方米 |
| 14 | 河南新蒲远大住宅工业有限公司原阳分公司 | 91410725MA3XCTU91W | 预制复合墙板（体） | 6833.5 | 吨 |
| | | | 预制复合墙板（体） | 18439.97 | 立方米 |
| 15 | 万城科技(河南)股份有限公司 | 91410804317679904B | 建筑用轻质隔墙条板 | 1628 | 张 |
| 16 | 河南新美家节能材料科技有限公司 | 91410821MA9FQ8940M | 蒸压加气混凝土板 | 172580.85 | 方 |
| | | | 蒸压加气混凝土砌块 | 14088.5 | 方 |
| 17 | 河南奥利德科技有限公司 | 91411327MA3XUUYA6E | 建筑用金属面绝热夹芯板 | 380146.893 | 立方米 |
| 18 | 唐河县龙新建材有限公司 | 91411328317658839W | 蒸压加气混凝土切块 | 37727 | 立方米 |
| 19 | 新野县豆豆新型环保墙体保温材料有限公司 | 91411329MA47NW4L0D | 钢丝网架模塑聚苯乙烯板 | 3951.65 | 立方米 |
| | | | 钢丝网架模塑聚苯乙烯板 | 9931.5 | 米 |
| 20 | 宝润达新型材料股份有限公司 | 91411082569806252B | 建筑用轻质隔墙条板、建筑用金属面绝热夹芯板 | 1845175 | 平方米 |
| 21 | 许昌山岩新型建材有限公司 | 91411000395615834T | 蒸压加气混凝土砌块 | 29400 | 立方米 |
| 22 | 许昌施普雷特节能科技有限公司 | 914110007942704237 | 建筑用金属面绝热夹芯板 | 249228.11 | 平方米 |
| 23 | 周口开源新型建材有限公司 | 91411626MA47JY9H3K | 蒸压加气混凝土砌砖、粉煤灰蒸压砖 | 91632.38 | 方 |

注：纳税人2024年度因违反税收、环境保护的法律法规受到处罚（警告或单次1万元以下罚款除外），按规定不得继续享受有关优惠的，只公示处罚前数据。

Figure 2 Screenshot from the Henan Provincial Tax Bureau


Figure 3 Screenshot from the Anhui Provincial Tax Bureau


Figure 4 Screenshot from the Anhui Provincial Tax Bureau

Table 4: Enterprise Supervision Records and Tax Authority Verification Status

| 序号 | 企业名称 | 监管内容 | 监管链接 | 核实情况 |
|---|---|---|---|---|
| 1 | 合肥六方新型建材有限公司 | 合环蜀山罚字﹝2022﹞13号<br>罚款：10万 | http://b.u6v.cn/5VCPnt | 未享受新型墙体材料增值税即征即退政策 |
| 2 | 亳州市红森墙体材料有限责任公司 | 皖亳环﹝谯﹞罚﹝2024﹞16号<br>罚款：10万 | http://b.u6v.cn/5z3JvT | |
| 3 | 洛阳市天智建材有限公司 | 洛环罚决字﹝2023﹞1014号<br>罚款：2.8743万 | http://b.u6v.cn/5VCPo7 | |

## 3. Special Circumstances Not Affecting the Eligibility for Enjoying Tax Incentives

### 1 enterprise had excessive water consumption but no environmental pollution caused

On May 29, 2025, the Shaanxi Provincial Tax Bureau called: Hanyin County Xihan New Environmental Protection Building Materials Co., Ltd. was fined 20,000 yuan for excessive water consumption, which did not involve environmental pollution, so it did not affect the enjoyment of tax incentives.

## 1 enterprise received a penalty that was not an environmental protection penalty

On June 20, 2025, the Guizhou Provincial Tax Bureau sent a letter explaining that the penalty previously received by Xiuwen Xingda Co., Ltd. was not an environmental protection penalty, so it did not affect its continued enjoyment of the relevant tax incentive policies. It is understood that in July 2023, the company was fined 19,305 yuan by the natural resources department for causing damage to forest land (the forest category is local public welfare forest) during the soil extraction process. The natural resources bureau is not a law enforcement entity specified in the "Environmental Protection Law of the People's Republic of China", so it does not affect the enterprise's continued enjoyment of tax incentives

## 1 enterprise's environmental penalty was caused by a third-party testing institution

On July 7, 2025, PECC received a reply from the Yueyang County Tax Bureau: After requesting instructions from the Yueyang Municipal Tax Bureau, from the perspective of facts, Yueyang County Feixiang New Wall Material Co., Ltd. was subject to an environmental administrative penalty due to improper operation by a third-party testing institution. Since the third-party testing institution was commissioned by the company itself, the subject of the environmental administrative penalty was Yueyang County Feixiang New Wall Material Co., Ltd. After this incident, Yueyang County Feixiang New Wall Material Co., Ltd. actively rectified the problem, re-employed a more professional testing company for re-testing, and no non-compliant behavior occurred after the re-test. The Yueyang County Branch of the Yueyang Municipal Bureau of Ecology and Environment deleted the environmental administrative penalty record of Yueyang County Feixiang New Wall Material Co., Ltd. on the data platform website in April 2023, because the enterprise met the eligibility criteria for enjoying the VAT immediate refund in accordance with the "Notice of the Ministry of Finance and the State Taxation Administration on the VAT Policy for New Wall Materials" (Caishui [2015] No. 73).

### 1 enterprise's environmental penalty was revoked

On July 29, 2025, the Yunnan Provincial Tax Bureau called to inform that the environmental penalty of Kunming Hongxingyuan Building Materials Manufacturing Co., Ltd. had been revoked, which did not affect its continued enjoyment of tax incentives.

Table 5: Enterprise Supervision Records and Tax Authority Verification Status

| 序号 | 企业名称 | 监管内容 | 监管链接 | 核实情况 |
|---|---|---|---|---|
| 1 | 汉阴县西汉新型环保建材有限公司 | 汉水罚决字〔2024〕第8号<br>罚款：2万 | http://b.u6v.cn/5VCPAx | 因超标用水被罚款，不涉及环境污染 |
| 2 | 贵州修文兴达有限责任公司 | 修自然资林罚决字〔2024〕第027号<br>罚款:2.2605万 | http://b.u6v.cn/6392EK | 受到的处罚不属于环保处罚 |
| 3 | 岳阳县飞翔新型墙体材料有限公司 | 岳环罚决字〔2022〕173号<br>罚款：2.2万 | http://b.u6v.cn/6ibqrw | 因第三方检测机构导致被处罚，实际不存在环保违规行为，且已在数据平台网清除 |
| 4 | 昆明宏兴源建材制造有限公司 | 昆生环阳罚〔2022〕10号<br>罚款：1.8万 | http://b.u6v.cn/6pHfTx | 环保处罚已撤销 |

## Comprehensive Feedback and Analysis: The Linkage Mechanism Between Environmental Penalties and Tax Incentives Has Initially Emerged

Comprehensive feedback from tax authorities across the country shows that PECC's letters have effectively promoted tax authorities to conduct verification and correction work on the environmental penalties of relevant enterprises and their eligibility for enjoying tax incentives. On the one hand, a number of enterprises have had the taxes they enjoyed recovered or their subsequent tax incentive eligibility revoked due to environmental violations, which reflects that the linkage between environmental law enforcement and tax policies has produced a rigid constraint effect and strengthened the seriousness of policy implementation. On the other hand, during the verification, it was also found that some enterprises actually enjoyed different types of preferential policies, or their tax incentives were not affected due to special reasons such as penalties not involving environmental protection and clarification of fact-finding. This reflects that there are still problems such as ambiguous boundaries and poor information sharing in policy implementation, and it is necessary to further clarify the scope of policy application and improve the cross-departmental information synchronization mechanism.

Overall, the feedback in this report shows that tax authorities can handle problems in accordance with laws and regulations when responding to social supervision, which has improved the efficiency of coordinated supervision between environmental protection and taxation. In the future, we should continue to promote cross-departmental information disclosure, comprehensive transparency of penalty results and refinement of policy application standards, so as to further enhance the accuracy and credibility of linking tax incentives with environmental compliance.

Finally, as an environmental protection public welfare organization, PECC hopes to further promote the verification of enterprise tax information and the disclosure of preferential policies in the process of its future work, and help the effective implementation of environmentally friendly tax policies. At the same time, we also call on tax authorities that have not yet actively responded to the concerns of social organizations to further open up communication channels, reduce communication barriers, and work together to build a more open and cooperative government-social interaction mechanism.

## Recommendations from PECC

### Integration of Photovoltaics and Buildings to Facilitate the Application of New Wall Materials

Embracing the integration of photovoltaics and buildings is the most powerful proof for enterprises to fulfill the "dual carbon" goals, and it is also easier to obtain policy support and market favor. Through offline field research, PECC found that the development of industrial and commercial centralized photovoltaics and rural photovoltaics is remarkable. The laying of large-area photovoltaic panels on enterprise roofs can not only meet the enterprises' own electricity demand, significantly reduce the purchase of electricity from the power grid, but also effectively reduce the scope 2 carbon emissions of enterprises (indirect emissions from purchased electricity). In rural areas, the promotion of distributed photovoltaics also shows multi-level benefits. The "photovoltaic +" models such as farmer house roofs, agricultural greenhouses, and complementary fishery and photovoltaics not only provide stable electricity guarantee and additional electricity sales income for village collectives and farmers, but also gradually become an important part of the "green industry" in the rural revitalization strategy. For example: In September 2024, the Jiangsu Provincial Department of Finance and the Jiangsu Provincial Department of Housing and Urban-Rural Development jointly issued the *Notice on Issuing the Budget Indicators of the 2024 Jiangsu Provincial Urban and Rural Construction*

*Development Special Fund (First Batch)*. Two projects in Kunshan were included in the list, namely the "High-Quality Green Building Project of 'Carbon 12 Workshop' in the Pilot Zone of the Yangtze River Delta (Kunshan) International Low-Carbon Industry Innovation Park" and the "Green Transformation Project of the Industrial Heritage Park in Kunshan High-Tech Zone" constructed by the Kunshan High-Tech Group on behalf of others, which were approved for a provincial special fund of 4 million yuan.[3] It can be seen that driven by policy support, mature technology and cost reduction, the application scope and depth of "photovoltaic + building" will continue to expand. In the future, it will not only be an important path to achieve building energy conservation and carbon reduction, but also gradually become a standard configuration for new buildings and a mainstream choice for green transformation of existing buildings, which will profoundly change the way buildings use energy and provide key support for the green and low-carbon transformation of cities.

Figure 5 Daikin Mechanical & Electrical Equipment (Suzhou) Co., Ltd. (Photographed by PECC)

[3] https://data.ks.gov.cn/kss/bmdt/202409/3affec1e99f74f0e9ec76ca89a9619fe.shtml

Figure 6 Futong Group Yangtze River Delta Information Technology Industrial Park (Photographed by PECC)

Figure 7　Complementary Fishery and Photovoltaics in Baiyudang, Yaozhuang Town, Jiashan County, Zhejiang (Photographed by PECC)

Figure 8 Qingnan Village in Lianyungang - Zero-Carbon Village (Photographed by PECC)

### Guiding Enterprises to Develop Low-Carbon and Environmentally Friendly Materials to Improve the Ability to Undertake Green Tax Policies

Whether the current green tax policies can be effectively implemented largely depends on the enterprises' own green R&D and production capabilities. It is recommended that ecological and environmental departments and tax authorities work together to guide enterprises to invest the tax dividends into the process improvement of low-carbon materials and clean production through policy incentives. At the same time, enterprises should be encouraged to accelerate the R&D and replacement of green technologies and equipment in key fields such as traditional building materials and comprehensive utilization of resources, so as to promote the technological and product upgrading of enterprises. Especially in the fields of new wall materials and comprehensive utilization of resources, taking the tax policy stipulated in the Notice of Caishui [2015] No. 73 [4]as an opportunity, we should accelerate the update of the green

[4] https://jiangsu.chinatax.gov.cn/art/2015/6/12/art_23636_2483.html

product catalog, promote enterprises to align with the "dual carbon" technical standards, and provide financial or policy incentives for enterprises with outstanding green R&D achievements, so as to promote the coordinated development of tax incentives and green industries. For enterprises that have performed well in green technology R&D and green performance, policy pilots or financial incentives can be considered to create a virtuous cycle of integration of tax incentives and green industries. Through promoting R&D with taxation and promoting green development with R&D, we are expected to gradually build a new policy coordination framework characterized by "low-carbon materials + tax support".

## Accurately Connecting with Green Tax Policies to Improve Enterprises' Compliance Declaration Capabilities

Green tax policies are highly professional and updated rapidly. Some enterprises may "unintentionally" cross the violation boundary due to insufficient information or misinterpretation. Therefore, it is recommended that tax authorities take the initiative to sort out and interpret the content of green tax policies, and help enterprises clarify the application eligibility and declaration process through various forms such as online publicity, policy interpretation, and guidance and Q&A. In addition, enterprises should be guided to conduct self-inspection of environmental compliance risks or third-party consultation before declaration to prevent the suspension of preferential eligibility due to procedural defects. At the same time, for enterprises that have taxes recovered due to environmental penalties, a classified handling and flexible law enforcement mechanism should be established, and differentiated treatment should be given according to factors such as the nature of the violation, the degree of subjective intent and the effect of rectification. For enterprises that have no subjective intent, violate the regulations for the first time and actively rectify, a certain transition period or delayed recovery can be considered to guide them to give priority to rectifying environmental problems; for enterprises that have violated the regulations many times or with serious circumstances, tax recovery shall be strictly implemented in accordance with the law and they shall be included in the key supervision list.

## Deepening the Application Scenarios of the "Blue Map" Database to Improve Risk Identification Capabilities

As a leading public environmental data platform in China, the Blue Map has extensively collected environmental protection, safety, pollutant discharge permit and supervision information nationwide. Its data is updated in a timely manner and comes from authoritative sources, which can provide strong support for environmental risk identification in tax collection and management. It is recommended that tax and ecological and environmental departments at all levels access the Blue Map database in a systematic manner, and use it as a pre-query tool for enterprises to apply for green tax incentives, so as to timely identify enterprises with major environmental penalties or multiple illegal acts, and further improve the accuracy and fairness of the implementation of green tax policies.


Figure 9 Blue Map Enterprise Environmental Information Retrieval Platform

**Special Thanks: Thanks to the Blue Map for its support in the enterprise environmental data information in this report!**