

SILENT GIANTS

AN INVESTIGATION INTO CORPORATE ENVIRONMENTAL
INFORMATION DISCLOSURE IN CHINA



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October 2009

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An investigation into corporate environmental information disclosure in China

Executive Summary

1. Background

Corporate environmental information disclosure (EID) can be an effective tool helping to drive corporations towards clean production practices. Public access to industry-held pollution data – in this case the types and amounts of substances that enterprises use and release into the environment during manufacturing processes – has been closely correlated to reductions in pollutant emissions. Increased knowledge of environmental impacts encourages stronger public scrutiny of environmental practices and can motivate companies towards innovative solutions to reduce and eventually eliminate hazardous emissions from source.

As a first step towards establishing corporate EID, China's Ministry of Environmental Protection (MEP) enacted the *Measures on Environmental Information Disclosure (for Trial Implementation)*¹ (hereinafter referred to as the *Measures*) in May 2008. The *Measures* stipulate that “seriously polluting enterprises” – defined as those that are “blacklisted” by local environmental authorities for exceeding discharge standards – are required to publicly release information regarding the major pollutants that they release into the environment.

This report analyses how well some of the largest multinational and Chinese corporations have complied with the *Measures* during its first year of operation (May 2008 to May 2009). The scope of our investigation encompasses enterprises belonging to either the 2008 *Fortune Global 500* or 2008 *Fortune China 100*² lists that were discovered to be exceeding discharge standards by environmental protection departments. According to the *Measures*, these corporations are then required to publish relevant environmental information in the public domain. Our investigation not only looked into whether these enterprises complied with the *Measures* but also looked at the quality of data that was supplied.

We hope that this report can play a role in fostering increased transparency of private sector environmental information. Ultimately, we hope that it can help kick-start a clean production revolution in China, whereby enterprises – under the supervision of government departments and civil society – start using preventive measures to reduce and eventually eliminate the large number of hazardous pollutants that they release into the environment and local communities.

2. Companies required to release environmental information

The 2008 *Fortune Global 500* and *Fortune China 100* companies listed below were reported by

¹ The official Chinese name of the *Measures* is as follows : 《环境信息公开办法 (试行) 》 .

² The official Chinese name of the list is 2008 中国上市公司 100 强排行榜

local environmental authorities between May 2008 and May 2009 for exceeding pollution discharge standards. In total they consist of 18 companies, with nine factories belonging to eight multinational companies and 16 factories belonging to 10 Chinese companies.

The eight multinational companies were (2008 *Fortune Global 500* list ranking in parenthesis):

- | Royal Dutch Shell (3)
- | Samsung Electronics (28)
- | Nestlé (57)
- | LG (67)
- | Kraft Foods (195)
- | Motorola (200)
- | Denso (212)
- | Bridgestone (276)

The 10 Chinese companies were (2008 *Fortune China 100* list ranking in parenthesis):

- | Sinopec Corp. (China Petroleum & Chemical Corporation) (1)
- | China Shenhua Energy Co., Ltd. (22)
- | Aluminum Corporation of China, Ltd. (25)
- | Dongfeng Motor Group Co., Ltd. (29)
- | China Resources Enterprise, Ltd. (30)
- | China International Marine Containers (Group) Co., Ltd. (38)
- | China Coal Energy Co., Ltd. (52)
- | Guangdong Midea Holding Co., Ltd. (58)
- | Weichai Power Co., Ltd. (67)
- | Hunan Nonferrous Metals Corp., Ltd. (90)

3. Results

Greenpeace discovered serious shortcomings in the way corporations abided by the *Measures*. None of the 25 factories belonging to the 18 companies that were required to disclose environmental information for exceeding discharge standards disclosed information within the stipulated time limit.

Furthermore, two of these companies failed to disclose environmental information even though local environmental authorities reported them as either using hazardous chemicals or discharging hazardous chemicals³ in excess of effluent standards.

The four factories belonging to three companies that did eventually disclose environmental information only disclosed extremely limited data.

4. Detailed results

1. All companies listed in this report violated Chinese regulations on environmental information disclosure.

- | None of the 25 factories belonging to the 18 companies disclosed environmental information within the 30-day time limit specified in the *Measures*;
- | Four factories belonging to three companies eventually disclosed their pollutant release information, but only after the 30-day time limit specified in the *Measures* had passed. These companies were: Samsung Electronics (two subsidiaries), China Coal Energy and Weichai Power;
- | In many of their operations in developed countries, the eight multinationals regularly disclose comprehensive data on factory emissions. In China, only Samsung Electronics out of the eight multinational companies disclosed data of their factories “blacklisted” by local environmental protection bureaus.

³ A hazardous chemical is one that has – at some point during its manufacture, use or disposal – the potential to harm people, other living organisms, or the environment, due to its intrinsic hazardous properties. For more information on hazardous chemicals, please refer to Annex 4 of this report.

2. Pollution data published by the three companies that did disclose environmental information was not comprehensive.

- | Two of the four factories that eventually supplied information gave details of only two pollutants. The third and fourth factories – both belonging to Samsung Electronics – gave information on six and four pollutants each. This pollution data is highly unlikely to be complete.⁴

3. Local government identified two of the companies that failed to disclose any pollutant data as either using hazardous chemicals during production or releasing hazardous chemicals in excess of effluent standards.

- | The two companies were (1) the Aluminum Corporation of China, whose subsidiary was found by local government authorities to be using or releasing hazardous materials such as fluoride salts, and (2) the Hunan Nonferrous Metal Corporation, whose subsidiary was found by government authorities to be discharging cadmium, lead and arsenic in excess of effluent standards.⁵

5. Key conclusions

The results above show that the *Measures* has fallen short of playing its intended role of informing citizens of industry-induced environmental and health risks. Greenpeace believes that there are three main reasons for such shortcomings:

1. Corporate non-compliance

The results above demonstrate corporate – both Chinese and multinational – disregard for Chinese environmental regulations.

2. Weak enforcement by local authorities

Corporate disobedience was, in part, encouraged by local governments' weak enforcement of the *Measures*.

3. Shortcomings of the *Measures* itself

There are ambiguities within the *Measures* that also contributed to weak corporate EID. These include the definition of what constitutes a “seriously polluting enterprise,” what pollutants enterprises are required to report and where this environmental information must be published.

6. Our demands

In order to strengthen corporate EID in China, Greenpeace demands that the following immediate actions be taken, both by companies that are releasing pollutants into the environment and by the government, which regulates industries and determines the direction of China's policy on environmental disclosure:

Industry:

1. All companies exceeding discharge standards shall disclose environmental information in accordance with the *Measures* in China.
2. All companies exceeding discharge standards should not only disclose the information of conventional pollutants such as Chemical Oxygen Demand (COD) and ammonia nitrogen, but also the release and transfer information of all pollutants, at least those listed in the relevant effluent standards that apply to their specific activities.

⁴ For examples of pollutant information the eight multinationals in this report released in developed countries, please refer to Table 3 in Section 7.

⁵ For more information, please refer to Annex 1 of this report.

Government:

1. Local environmental protection departments should strengthen their enforcement of the *Measures* and ensure that companies disclose environmental information in accordance with the law.
2. Relevant national and local environmental protection authorities should further define the scope of enterprises required to disclose environmental information as well as specify the types of pollutants that enterprises should disclose, thereby establishing a uniform corporate EID platform.
 1. Clearly define the scope of enterprises that are required to disclose environmental information;
 1. Require all enterprises that use or release hazardous chemicals during production to disclose comprehensive pollutant release information, and not just those “blacklisted” for exceeding effluent standards;
 1. Specify the types of pollutants that enterprises are required to disclose;
 1. Establish a uniform environmental information disclosure platform where the public can easily search for relevant information.
3. Relevant national and local environmental protection departments are advised to establish systems similar to the US Toxics Release Inventory (TRI) or the EU Pollutants Release and Transfer Register (PRTR) systems, which require a wide range of enterprises to disclose (according to a defined list of hazardous chemicals) a wide range of pollutant release data that is available on the Internet for public access.⁶

7. Our vision

Greenpeace believes that a comprehensive environmental information system that is free and easy to access for the public, includes a wide range of enterprises and pollutants – most importantly information on the use or release of hazardous chemicals – is essential to safeguard citizens and the environment from industry-induced risks and help to promote investment in clean production.

Ultimately, Greenpeace envisions China creating a database system where comprehensive information on the release of chemicals from companies – especially from their individual facilities – is systematically and regularly provided in a searchable format with direct public access, e.g. via the Internet. Providing data on pollutant releases should be mandatory for all companies that reach a certain threshold of chemical use.⁷

The US Toxics Release Inventory (TRI) system, where the public has direct access to an online database containing information of 666 chemicals released by a wide range of companies, and the European Union’s Pollutant Release and Transfer Register (PRTR) system, where the public can also search online information regarding pollutant discharges of 91 substances belonging to nine industrial sectors, are both innovative examples of effective corporate EID.

⁶ For more information on TRI and PRTR, please refer to Section 7, Box 1, entitled: Introduction to the US TRI, and Box 2, entitled: Introduction to the European PRTR.

⁷ For more information on what thresholds of chemical use the US and EU systems require for information disclosure, please refer to Section 7, Box 1, entitled: Introduction to the US TRI, and Box 2, entitled: Introduction to the European PRTR.

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1. Introduction

Background

Corporate environmental information disclosure (EID) can be an effective tool to drive corporations towards clean production practices.⁸ Public access to industry-held pollution data – in this case the types and amounts of substances that enterprises use and release into the environment during manufacturing processes – has been closely correlated to reductions in pollutant emissions.⁹ Increasing public access to knowledge of environmental risks encourages stronger public scrutiny of environmental practices and can motivate industry to develop innovative solutions to reduce and eventually eliminate hazardous emissions from source.

The past three decades have seen a worldwide trend in increased openness of environmental data. The catalyst was the Bhopal Disaster of 1984, when a leak from a pesticide plant owned by a US company, Union Carbide, released toxic gases, killing 25,000 people in India.¹⁰ To avoid a repeat tragedy on this scale, the US established the Toxics Release Inventory (TRI) in 1986, which requires mandatory reporting of industrial emissions as well as public disclosure of all data via the Internet. In 2003, 36 European countries signed the *Protocol on Pollutant Release and Transfer Register* (PRTR), effective 8 October 2009, requiring industries to disclose information on a wide range of pollutants being released – including persistent, bio-accumulative and toxic hazardous chemicals – from which information can be accessed by anyone on a searchable Internet database.¹¹ Countries such as South Korea and Japan have also followed suit to make a wider range of industry pollutant data more easily accessible to their citizens.

As a first step towards establishing corporate EID, China's Ministry of Environmental Protection (MEP) enacted the *Measures on Environmental Information Disclosure (for Trial Implementation)* (hereinafter referred to as the *Measures*) in May 2008. The *Measures* stipulates that “seriously polluting enterprises” – defined as those that are “blacklisted” by local environmental authorities for exceeding discharge standards – are required to publicly release information regarding the major pollutants that they release into the environment.

Key clauses in the *Measures* related to corporate EID

- 1 **Paragraph 13, Article 11:** “The environmental protection department shall publish a list of the **seriously polluting enterprises** that release pollutants **in excess of national or local discharge standards** (or those that pollute in excess of the total emission control targets allocated by the local government).”
- 1 **Article 19:** “The state encourages enterprises to disclose environmental information voluntarily.”
- 1 **Article 20:** “Seriously polluting enterprises” belonging to **Paragraph 13, Article 11** must disclose information on the “major pollutants” that they release, including names of the pollutants, concentration amounts and other relevant information. Companies shall not use “business secret” as an excuse to refuse to disclose the information listed above.”
- 1 **Article 21:** “Any blacklisted company shall, **within 30 days of the list being published**, disclose pollutant release information and other environmental information via **major local media** and submit the disclosed information to the local environmental protection department for record.”

⁸ For more information on how corporate EID can drive pollution reduction, please refer to Section 7 of this report, entitled “Our vision: Towards comprehensive corporate information disclosure”.

⁹ For more information on TRI and PRTR, please refer to Section 7 of this report, entitled “Our vision: Towards comprehensive corporate information disclosure”.

¹⁰ The Bhopal Medical Appeal website: <http://bhopal.org/index.php?id=22>.

¹¹ For more information, please refer to the United Nations Economic Commission for Europe's (UNECE) press release: “New treaty on pollutants enters into force on 8 October”.
http://www.unece.org/press/pr2009/09env_p23e.htm.

2. Methodology

Investigation Methodology

Stage One:

- | **We identified those factories¹² belonging to companies listed in the 2008 Fortune Global 500 (both exclusively foreign-owned and jointly-owned) and 2008 Fortune China 100 rankings that were reported by local environment protection bureaus as having exceeded discharge standards between 1 May 2008 and 1 May 2009.**
- | We used the Institute of Public & Environmental Affairs' (IPE) "*China Water Pollution Map*"¹³ and official websites of local environmental protection departments to identify those companies that had exceeded discharge standards.

Stage Two:

- | **To determine whether the factories identified in Stage One published pollutant release information¹⁴ in accordance with the *Measures*, we thoroughly checked the corporations' Chinese websites and corporate annual reports, local environmental protection bureau websites and all major local media channels. We also sent a questionnaire to the companies' headquarters in China requesting more information.¹⁵ We also applied to local environmental protection bureaus for access to any pollutant information disclosed by the enterprises.¹⁶**

Stage Three:

- | **To find examples of the kind of environmental information released by companies in developed countries, we collected environmental information published overseas (focusing on the US and South Korea's TRI websites and the EU's PRTR website) by those multinational companies identified in Stage One.**

Disclaimer

- | This report is based on the information that was available to Greenpeace within the time period of the investigation. If companies wish to dispute the findings contained within this report, we invite them to communicate with us directly.
- | The articles of laws and regulations invoked in this report represent Greenpeace's own interpretation of current laws and regulations.
- | This report is solely intended for the purpose of assessing corporate performance on EID. It does not assess the corporations' overall pollution record or their performance in other fields not related to EID.
- | Despite efforts to be as thorough as possible, this investigation may have missed some exclusively-owned or jointly-owned subsidiaries of *Fortune Global 500* companies and *Fortune China 100* companies in China that might have also been "blacklisted" by local environmental bureaus.
- | Information provided about corporate EID in other countries was found on the US and South Korea's TRI websites and the EU's PRTR website and is intended for the purposes of illustration only. The examples given are not meant to be industrial replicas of factories' operations in China.
- | After the conclusion of this investigation in 20 July 2009, no new or additional online information was included in the investigation analysis or results.
- | For the purposes of this report, the term China refers solely to Mainland China.
- | Some of the government web pages that were previously available may no longer be accessed online. Therefore, many of our footnotes contain the dates in which we accessed particular web pages.

¹² For multinationals, factories include both exclusively foreign-owned and jointly-owned ones.

¹³ Please refer to the Institute of Public & Environmental Affairs' China Water Pollution Map at www.ipe.org.cn.

¹⁴ Any pollutant release information disclosed through follow-up monitoring by the environmental protection department rather than voluntarily by the company shall not be deemed to be active disclosure by the company in this survey.

¹⁵ Please refer to Appendix 5 to refer to the questionnaire Greenpeace sent out to the 18 companies mentioned in this report.

3. Companies required to release environmental information

The 2008 *Fortune Global 500* and *Fortune China 100* companies listed below were reported by local environmental authorities between 1 May 2008 and 1 May 2009 for exceeding pollution discharge standards. In total they consist of 18 companies, with nine factories belonging to eight multinational companies and 16 factories belonging to 10 Chinese companies.

Table 1. Multinational companies that are required to release environmental information for exceeding discharge standards¹⁷:

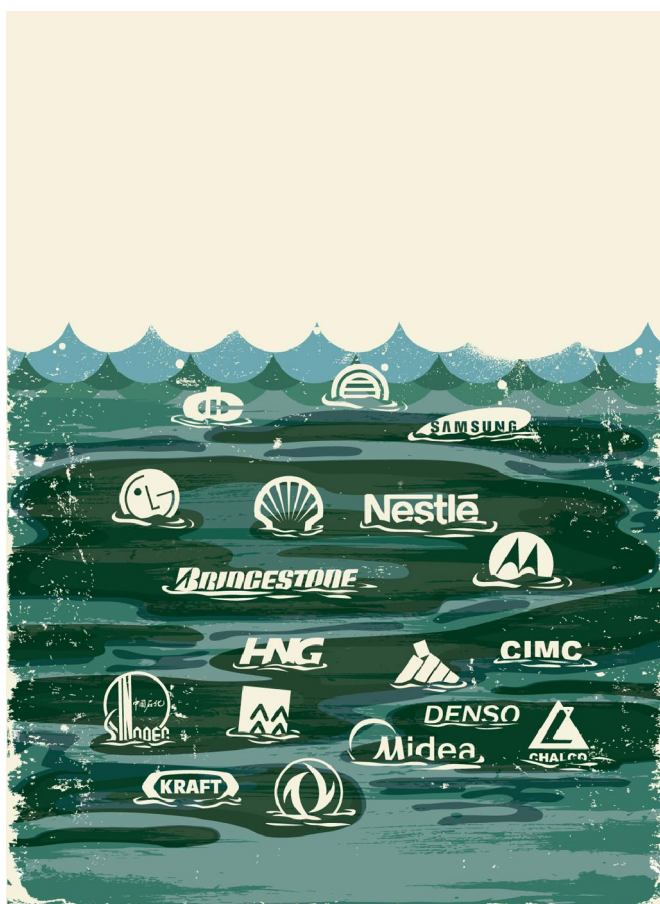
Company ranking in the Fortune 500 list	Chinese Name	English Name	Primary Business	Name of the subsidiary company found to be exceeding discharge standards by the local environmental protection department
3	壳牌	ROYAL DUTCH SHELL	Refining	Shell Road Engineering (Shanghai) Co. Ltd.
28	三星电子	SAMSUNG ELECTRONICS	Electronic and electrical equipment	Tianjin Samsung Electronics Monitor Co. Ltd.
				Suzhou Samsung Electronics Co. Ltd.
57	雀巢	NESTLÉ	Food	Nestlé Purina PetCare Tianjin Co. Ltd.
67	乐金	LG	Various, e.g. Electronics, Chemicals, etc.	Ningbo LG Yongxing Chemical Co. Ltd.
195	卡夫	KRAFT FOODS	Food and consumables	Kraft Tianmei Foods (Tianjin) Co. Ltd.
200	摩托罗拉	MOTOROLA	Network communications equipment	Motorola (China) Electronics Co. Ltd.
212	电装	DENSO	Automotive parts	Tianjin Fengxing Electronics Co. Ltd. (Yat-Sen Park)
276	普利司通	BRIDGESTONE	Tires	Bridgestone (Shenyang) Steel Cord Co. Ltd.

Table 2. Chinese companies that are required to release environmental information for exceeding discharge standards:

Company ranking in the China Fortune 100 list	Chinese Name	English Name	Primary Business	Name of the subsidiary company found to be exceeding discharge standards by the local environmental protection department
1	中国石油化工股份有限公司	Sinopec Corp. (China Petroleum & Chemical Corporation)	Petroleum, natural gas and chemicals	Sinopec Zhongyuan Oil Field Southwest Drilling Company
				Sinopec Shanghai Gaoqiao Logistics Branch
22	中国神华能源股份有限公司	China Shenhua Energy Co. Ltd.	Coal	Daliuta Colliery, CSEC Shendong Branch
25	中国铝业股份有限公司	Aluminum Corporation of China Ltd.	Metals	CHALCO Lanzhou Branch
29	东风汽车集团股份有限公司	Dongfeng Motor Group Co., Ltd.	Automobiles	DFL Commercial Vehicle Frame Factory
				DFL Commercial Vehicle General Assembly Factory

¹⁷ For more information, please see Appendix 1: Government records of companies exceeding discharge standards.

				DFL First Commercial Vehicle Casting Factory
				DFL Second Commercial Vehicle Casting Factory
				DFL Cutting & Measuring Tools Factory
30	华润创业有限公司	China Resources Enterprise Ltd.	Various, e.g. food, brewery, medicine, etc.	China Resources Breweries (Liaoning) Co., Ltd.
38	中国国际海运集装箱(集团)股份有限公司	China International Marine Containers (Group) Co. Ltd.	Equipment manufacturing	Shanghai CIMC Baowell Industries Co., Ltd.
52	中国中煤能源股份有限公司	China Coal Energy Company Ltd.	Coal	China Coal Mudangjiang Coking Co., Ltd.
58	广东美的电器股份有限公司	Guangdong Midea Holding Co. Ltd.	Electrical appliances	Hefei Royalstar Refrigerator Co., Ltd.
67	潍柴动力股份有限公司	Weichai Power Co. Ltd.	Automobiles	Mudanjiang Foton Automobile Air Conditioner Co., Ltd.
90	湖南有色金属股份有限公司	Hunan Nonferrous Metals Corp. Ltd.	Metals	Zhuzhou Smelting Group Co., Ltd.
				Zhuzhou Cemented Carbide Group Corp. Ltd.



All 18 companies in the picture above violated Chinese EID regulations¹⁸

¹⁸ The purpose of the logos in this image is to reflect the results of this particular investigation. It does not represent Greenpeace's opinion on the performance of the corporations in areas not related to this investigation.

4. Detailed results¹⁹

Greenpeace discovered serious shortcomings in the way corporations abided by the *Measures*. None of the 25 factories belonging to the 18 companies that were required to disclose environmental information for exceeding discharge standards did so within the stipulated time limit.

Furthermore, two of these companies failed to disclose environmental information even though local environmental authorities reported them as either using hazardous chemicals or discharging hazardous chemicals in excess of effluent standards.

The four factories belonging to three companies that did eventually disclose environmental information only disclosed extremely limited data.

1. All companies listed in this report violated Chinese regulations on environmental information disclosure

- 1 **None of the 25 factories belonging to the 18 companies disclosed environmental information within the 30-day time limit specified in the *Measures*;**
According to Article 21 of the *Measures*, all “blacklisted” companies – defined as those “releasing pollutants in excess of the national or local discharge standards or in excess of the total emission control targets allocated by the local government” – must disclose pollutant release and other environmental information within 30 days of being blacklisted. However, not one of the 25 factories in this report disclosed pollutant release information within the specified time limit.
- 1 **Four factories belonging to three companies eventually disclosed their pollutant release information, but only after the 30-day time limit specified in the *Measures* had passed.**
 - 1. Samsung Electronics (two subsidiaries):**
 - Two subsidiaries belonging to Samsung Electronics – Tianjin Samsung Electronics Monitor Co., Ltd. and Suzhou Samsung Electronics Co., Ltd. – disclosed pollutant release information, **12 months after the deadline had passed.**
 - These two factories published this information on the Tianjin Economic-Technological Development Area (TEDA) government website²⁰ and the Institute of Public & Environmental Affairs’ (IPE) China Water Pollution Map²¹ on 15 June 2009 and 13 July 2009, respectively.
 - 2. China Coal Energy:**
 - Its subsidiary, China Coal Mudanjiang Coking Co., Ltd., disclosed pollutant release information **almost two months after the deadline had passed.**
 - It published the information on the Mudanjiang Environmental Protection Administration website on 6 July 2009.²²
 - 3. Weichai Power:**
 - Its subsidiary, Mudanjiang Foton Automobile Air Conditioner Co., Ltd., published its pollutant release information **seven months after the deadline had passed.**
 - It published the information on the Mudanjiang Environmental Protection Administration website on 16 June 2009.²³

¹⁹ For more information, see Appendix 2: Detailed Investigation Results.

²⁰ TEDA 2008-2009 corporate environmental information disclosure:

<http://www.teda.gov.cn/cms/html/10/129/200906/446802.html> (visited on 15 July 2009).

²¹ Release information in 2008 disclosed by Suzhou Samsung Co., Ltd. on China Water Pollution Map:

<http://www.ipe.org.cn/myqypwxx/gvqypwinfo.jsp?ID=757> (visited on 15 July 2009).

²² China Coal Mudanjiang Coking Co., Ltd. (of China Coal Energy Co., Ltd.): *Provincial Environmental Protection Department for Environmental Inspection and Supervision 2008 Bulletin*.

<http://www.mdjepb.gov.cn/news18.htm> (visited on 15 July 2009).

²³ Clean production audit bulletin of Mudanjiang Foton Automobile Air Conditioner Co., Ltd. (of Weichai Power Co., Ltd.): <http://www.mdjepb.gov.cn/news21.htm> (visited on 15 July 2009).

- 1. **In many of their operations in developed countries, the eight multinationals regularly disclose comprehensive data on factory emissions. In China, only Samsung Electronics out of the eight multinationals companies disclosed data for its “blacklisted” factories.**

There is sizeable evidence that the eight multinational companies investigated in this report regularly disclose substantially more comprehensive pollutant discharge information on their manufacturing facilities in developed countries than in China. In many developed countries, multinationals must publish environmental information on the PRTR²⁴ or the TRI²⁵ system. For example, in 2007, Shell’s Texas-based Deer Park Refinery disclosed discharge data listing 49 pollutants on the US TRI system.²⁶

2. Pollution data published by the three companies that did disclose environmental information was not comprehensive.

- 1. Two of the four factories that eventually supplied information gave details of only two pollutants. The third and fourth factories – both belonging to Samsung Electronics – gave information on six and four pollutants each. This pollution data is highly unlikely to be complete.²⁷

1. Samsung Electronics. Its subsidiary, Tianjin Samsung Electronics Monitor Co., Ltd., disclosed information on the discharge of six pollutants; namely chemical oxygen demand (COD), animal and vegetable oils, ammonia nitrogen, industrial particulate matter, lead particles and non-methane hydrocarbons. Its other subsidiary, Suzhou Samsung Electronics Co., Ltd., disclosed information on the discharge of four pollutants – COD, suspended solids (SS), total phosphorus and petroleum emissions.²⁸

2. Weichai Power. Its subsidiary, Mudanjiang Foton Automobile Air Conditioner Co., Ltd., disclosed information on the discharge and concentrations of just two pollutants: COD and SS.²⁹

3. China Coal Energy. Its subsidiary, China Coal Mudanjiang Coking Co. Ltd., also only disclosed information on the release of just two pollutants: COD and ammonia nitrogen.³⁰

3. Local government identified two of the companies that failed to disclose any pollutant data as either using hazardous chemicals during production or releasing hazardous chemicals in excess of effluent standards.³¹

1. The Aluminum Corporation of China. The local environmental authority identified the Lanzhou branch of the Aluminum Corporation of China, Ltd as using or releasing hazardous chemicals, namely fluoride salts and coal tar pitch, as well as releasing excessive amounts of COD.³²

²⁴ For more information on PRTR, please refer to Box 2 in Section 7, entitled: Introduction to the European PRTR.

²⁵ For more information on TRI, please refer to Box 1 in Section 7, entitled: Introduction to the US TRI.

²⁶ For more details, please refer to Table 3 located in Section 7 of this report, entitled: Examples of pollutant information the eight multinationals released in developed countries via the TRI and PRTR systems.

²⁷ For examples of pollutant information the eight multinationals in this report released in developed countries, please refer to Table 3: “Table 3 located in Section 7 of this report, entitled: Examples of pollutant information the eight multinationals released in developed countries via the TRI and PRTR systems”

²⁸ For detailed investigation results, please refer to Annex 2.

²⁹ *Ibid.*

³⁰ *Ibid.*

³¹ To find out why it is important for companies to release environmental information on the use and release of hazardous chemicals, please refer to Appendix 4.

³² Information found on the *Gansu Province List of Enterprises and Institutions’ Compulsory Clean Production Audit in 2008*. <http://www.gsli.gov.cn/new.asp?id=2899&classcode=15> (visited on 15 August 2009)

2. The Hunan Nonferrous Metal Corporation. The Zhuzhou Smelting Group, a subsidiary of Hunan Nonferrous Metal Corp. violated discharge standards for COD and ammonia nitrogen during the first half of 2008. It also violated discharge standards for the hazardous chemicals cadmium, lead and arsenic.³³

5. Key Conclusions

The results above show that despite being a big positive step towards corporate EID in China, the *Measures* has fallen short of playing its intended role of informing citizens of industry-induced environmental and health risks in its first year of enactment.

Greenpeace believes that there are three main reasons for such shortcomings that must be addressed:

1. Corporate noncompliance

Our results demonstrate corporate – both Chinese and multinational – disregard for Chinese environmental regulations. This is especially disheartening given that all 18 companies mentioned above are leaders in their respective fields. Furthermore, all the multinationals mentioned in this report practice corporate EID in developed countries such as the US, countries of the European Union, South Korea and Japan, yet they do not obey the most basic EID regulations in China.

2. Weak enforcement by local government authorities

Corporate disobedience was, however, encouraged by local authorities' weak enforcement. Article 28 of the *Measures* states that when companies fail to disclose pollutant release information as required, environmental protection departments at the local level or above shall impose a maximum fine of RMB 100,000 and disclose the information on behalf of the company.³⁴ However, based on our investigation, there is little evidence showing that local governments have done this.

3. Shortcomings of the *Measures* itself

Our investigation also revealed that certain weaknesses and ambiguities in the *Measures* itself also contributed to weak corporate EID.

:

- | **It is not clear which enterprises are legally required to disclose environmental information.** The *Measures* stipulates that “seriously polluting enterprises” that are “blacklisted” by local environmental protection departments should disclose environmental information but we discovered during the course of our investigation that some enterprises believe that they do not belong in this category despite discharging in excess of official standards. The regulation does not clearly define the term “seriously polluting enterprise.” Furthermore, local environmental protection departments have numerous “blacklists”. It is unclear which “blacklist” triggers an EID obligation.
- | **It does not define what types of pollutants enterprises are required to disclose.** Article 20 of the *Measures* stipulates that “seriously polluting enterprises” must disclose information on the “major pollutants” that have been emitted in excess of effluent standards. However, the term “major pollutants” is not defined in the current form of the regulation.
- | **There is no uniform EID platform where the public can search for corporate**

³³ Information found on the *Circular Ordering Zhuzhou Smelting Group Co., Ltd. to Make Immediate Corrections in Environmental Protection*. http://www.zhuzhou.gov.cn/sitepublish/site1/gov/zfxgk/gjbmxx/content_3125.html (visited on 15 August 2009)

³⁴ According to Article 28 of the *Trial Measures for Environmental Information Disclosure*, where any seriously polluting company – releasing pollutants in excess of the national or local release standards or in excess of the total pollutant release control index ratified by the local government – fails to disclose pollutant release information, the environmental protection department of the local government level or above shall impose a maximum fine of RMB 100,000 and disclose the information on behalf of the company.

environmental information. Article 21 of the *Measures* stipulates that “seriously polluting enterprises” must publish pollutant release information on “major local media” channels. But the regulation does not clearly define what constitutes “major local media.” Some of the media used by enterprises to publish environmental information is not freely and easily accessible to the public.

1. **Enterprises that are subject to Clean Production Audits for using or releasing hazardous chemicals are not subject to EID under the *Measures*.** Since the release of hazardous chemicals by enterprises poses the greatest threat to human health and the environment, Article 28 of the *Clean Production Promotion Law*³⁵ and Article 8 of the *Interim Measures for Clean Production Audits*³⁶ stipulate that enterprises that use or release hazardous chemicals during production must periodically conduct clean production audits and report the results to environmental authorities. This demonstrates the government’s efforts to curb hazardous chemical pollution. However, these enterprises are not required to publish their environmental information. This is a loophole that must be addressed.³⁷

6. Our Demands

In order to make corporate EID in China more comprehensive, Greenpeace demands that the following immediate actions be taken, both by companies that are releasing pollutants into the environment and by the government, which regulates industries and determines the direction of China’s policy on EID:

Corporations:

1. **All companies exceeding discharge standards shall disclose environmental information in accordance with the *Measures on Environmental Information Disclosure in China*.**
 - All companies exceeding discharge standards should publicly release environmental information via major local media channels and submit pollutant information to local environmental authorities within 30 days of being “blacklisted”;
 - All companies exceeding discharge standards should disclose the following environmental information: (a) corporate name, address and information of their legal representative; (b) the names, concentrations, total quantity, pathways of release and all other information concerning major pollutants being released in excess of discharge standards; (c) information regarding the construction and operation of the involved facilities; and (d) emergency plans to address environmental pollution
2. **All companies exceeding discharge standards should not only disclose the information of conventional pollutants such as Chemical Oxygen Demand (COD) and ammonia nitrogen, but also the release and transfer information of all pollutants, at minimum those listed in the relevant effluent standards that apply to their specific activities.**

Government:

1. **Local environmental protection departments should strengthen their enforcement of the *Measures* and ensure that companies disclose environmental information in accordance with the law.**
Local environmental protection departments shall not be exempt from liability for failure to urge enterprises to disclose environmental information. In order to fully ensure the fulfillment

³⁵ The official Chinese name of the *Clean Production Promotion Law* is 《清洁生产促进法》.

³⁶ http://www.mep.gov.cn/law/gz/bmgz/qtgz/200408/t20040816_70832.htm (visited on 25 August 2009).

³⁷ The Environmental Protection Bureau of Shandong province has required some companies using or releasing hazardous chemicals to disclose environmental information, please refer to http://www.sepa.gov.cn/info/gxdt/200905/t20090512_151386.htm (visited on 22 July 2009).

of corporate EID under the *Measures*, local environmental protection departments shall intensify their enforcement of the *Measures*, reminding and fining³⁸ the enterprises when needed.

2. **Relevant environmental protection authorities should further define the scope of enterprises required to disclose environmental information as well as specify the types of pollutants that enterprises should disclose, thereby establishing a uniform corporate EID platform.**
 - a) **Clearly define the scope of enterprises that are required to disclose environmental information.** The *Measures* needs to clearly define which companies are required to disclose environmental information. Currently, the *Measures* stipulates that “seriously polluting enterprises” that have exceeded discharge standards are required to disclose environmental information. The term, “seriously polluting enterprises” has been subject to various interpretations by both local environmental authorities and the corporations themselves. This needs to be rectified.
 - b) **Require all enterprises that use or release hazardous chemicals during production to disclose comprehensive pollutant release information, and not just those “blacklisted” for exceeding effluent standards.** Both Article 28 of the *Clean Production Promotion Law* and Article 8 of the *Interim Measures for Clean Production Audits*³⁹ stipulate that enterprises that use or release hazardous chemicals during production must periodically conduct clean production audits and report the results to responsible environmental authorities. These same companies – as they pose the largest risk to society and the environment – should also be subject to pollutant information disclosure obligations under the *Measures*, especially hazardous chemicals data.⁴⁰
 - c) **Specify the types of pollutants that enterprises are required to disclose.** Article 20 of the *Measures* stipulates that polluting enterprises must disclose information on the “major pollutants” that they are emitting in excess of effluent standards. However, “major pollutants” is not defined under the current form of the regulation, meaning that there is no standardised disclosure of pollutants. This problem can be addressed by requiring enterprises to disclose information on all the pollutants regulated under the relevant effluent standards⁴¹ and those pollutants that are subject to clean production audits as defined by the *Clean Production Promotion Law*.
 - d) **Establish a uniform environmental information disclosure platform where the public can freely search for environmental information.** Article 21 of the *Measures* stipulates that “seriously polluting enterprises” must disclose pollutant release information via “major local media” channels within 30 days of being identified by an environmental protection department as exceeding discharge standards. However, the term “major local media” is not defined. In fact, some of the media platforms used to report pollutant data is not easily accessible to the public. To enable the public to access corporate environmental performance without restrictions, a uniform corporate environmental information disclosure platform (e.g. via the Internet) should be established.
3. **Relevant national and local environmental protection departments are advised to establish systems similar to the US Toxics Release Inventory (TRI) or the EU Pollutants Release and Transfer Register (PRTR) systems, which require a wide range of enterprises to disclose a wide range of pollutant release data (according to a defined list of hazardous chemicals) that is available on the Internet for public access.**

³⁸ According to Article 28 of the *Measures*, any company disobeying the regulation shall be fined less than RMB 100,000.

³⁹ http://www.mep.gov.cn/law/gz/bmgz/qtgz/200408/t20040816_70832.htm (visited on 25 August 2009)

⁴⁰ The Environmental Protection Bureau of Shandong province has required some companies using or releasing hazardous chemicals to disclose environmental information, see http://www.sepa.gov.cn/info/gxdt/200905/t20090512_151386.htm (visited on 22 July 2009)

⁴¹ Please refer to Appendix 3 to take a look at the pollutants that are monitored under China’s Integrated Wastewater Discharge Standard (GB8978-1996)

The TRI system, where the public has direct access to an online database containing information of 666 chemicals released by a wide range of companies, and the PRTR system, where the public can also search online information regarding pollutant discharges of 91 substances belonging to nine industrial sectors, are both innovative examples of effective corporate environmental disclosure. Pilot efforts to establish a PRTR system have already begun in China, beginning from December 2008 with the cities of Shanghai and Tianjin. This is an encouraging step that must be replicated nationwide.⁴²

7. Our vision: Towards comprehensive corporate information disclosure

Greenpeace believes that a comprehensive corporate environmental information system that is easily accessible to the public and includes a wide range of enterprises and pollutants is essential to safeguard citizens and the environment from industry-induced risks. Ultimately, Greenpeace envisions China creating a database system where a wide array of information on the release of chemicals by companies – especially those of individual facilities – is systematically and regularly provided in a searchable format with direct public access, e.g. via the Internet. Providing data on pollutant releases should be mandatory for all companies that reach a certain threshold of chemical use.

There is strong evidence that comprehensive corporate EID systems expedite the reduction of corporate pollutant emissions. For example, between 1988 and 2007, the total quantity of pollutants released and transferred by manufacturing facilities continuously recorded in the US TRI system dropped by 61%.⁴³ The effect on emissions reduction was greater than what could be solely achieved by direct regulations. Japan's PRTR also achieved remarkable results with pollutant emissions reduction. According to analysis by the National Institute of Technology and Evaluation (NITE) in Japan, the total quantity of pollutants released into the environment recorded on the PRTR (including release into air, water and soil) decreased by 17% from 2001 to 2005.⁴⁴ Spokesmen for European countries and environmental protection organisations have commented that although PRTR did not set an objective of emissions reduction, its impact had been greater than many laws and regulations. The mere disclosure of pollutant emissions and transfer information can urge enterprises to put pollution prevention and treatment into practice.⁴⁵

Box 1. Introduction to the US Toxics Release Inventory (TRI)

<http://www.epa.gov/tri/>

In response to the toxic gas leak disaster in Bhopal, India, the US enacted the *Emergency Planning and Community Right-to-Know Act* (EPCRA) in 1986 with the aim of safeguarding the public's right to access information about toxic and hazardous substances in their communities. This act established a Toxics Release Inventory (TRI) for the public, stipulating that enterprises shall disclose information every year on toxic and hazardous pollutants emitted by their factories and facilities. The system demands disclosure of up to 666 pollutants, including 16 special PBT (persistent, bio-accumulative and toxic) hazardous chemicals.

⁴² <http://www.sepb.gov.cn/news.jsp?intKeyValue=16779> (visited 15 Sept 2009)

⁴³ <http://www.epa.gov/tri/tridata/tri07/brochure/brochure.htm>.

⁴⁴ National Institute of Technology and Evaluation (NITE), "Reported PRTR Data 2005: Comparison with Previous Years," August 2007. <http://www.prtr.nite.go.jp/english/pdf/comp2005/comp2005.pdf>.

⁴⁵ OECD. *Government Guidebook on Pollutant Release and Transfer Register*. 1996.

Any enterprise meeting the following conditions must report pollutant release information:

1. The enterprise belongs to one of the 30 industries (such as textiles, printing and semiconductors) prescribed by law.
2. The enterprise has 10 or more full-time employees.
3. The enterprise exceeds the annual manufacturing (including importing) or processing threshold of a chemical (25,000lbs) or the threshold for using a chemical (10,000lbs). The reporting threshold for PBT chemicals is far lower (i.e. generally either 10 or 100lbs).⁴⁶

These enterprises must, on an annual basis, report to the US Environmental Protection Agency (EPA) the types and amounts of toxic chemicals that are released into the air, soil, and water. The EPA publishes a categorized TRI summary every year.

The US public can easily access detailed corporate pollutant release and transfer data, maps and other data via online databases (including TRI.NET⁴⁷ and TOXNET⁴⁸ maintained by the US National Library of Medicine). Moreover, US environmental watchdog organisations periodically analyse and summarise TRI data to make information most relevant to their local region even more accessible to citizens. The most well-known of these is the “Scorecard” (<http://www.scorecard.org>) system launched by Environmental Defense, a nonprofit environmental group.⁴⁹

Box 2. Introduction to the European Pollutants Release and Transfer Register (E-PRTR)

http://www.bipro.de/_prtr/index.htm

Launched in 2009, the E-PRTR is an EU-wide platform for pollutant release data disclosure based on its predecessor, the European Pollutant Emission Register (EPER). The establishment of the platform demonstrates the EU’s efforts to improve the transparency of information on pollutant release and transfer, encouraging enterprises to safeguard the environment and respond to the latest emissions developments. It is a concrete move by the EU to fulfill its obligation under the *Protocol on Pollutant Release and Transfer Registers*, which entered into force on the October 8th, 2009.

Compared to its predecessor, EPER, which was established in 2000 and in operation since 2003, the E-PRTR involves more pollutants (the number has increased from 50 to 91) with the reporting frequency increasing from once every three years to once a year, and specifies more reporting details (for example, it involves not only release into air and water, but also release into soil and off-site transfers). Information must be released on any of the 45 types of industrial activities in nine industrial sectors (including energy, chemicals, papermaking, etc.).

The environmental protection departments of all EU members are responsible for collecting pollutant release and transfer data declared by their enterprises, producing statistics about the pollutant release information from diffuse sources such as vehicles and human waste, summarising the information and reporting it to the European Commission (EC). The EC is in charge of publishing the database on the Internet before the time limit as prescribed by law. The public can access the pollutant release data of

⁴⁶ A separate declaration threshold is set for each PBT chemical substance; for details, see the TRI official website:

<http://www.epa.gov/tri/lawsandregs/pbt/pbtrule-sum.pdf>.

⁴⁷ <http://www.epa.gov/tri/tridotnet/index.htm>.

⁴⁸ <http://toxnet.nlm.nih.gov/cgi-bin/sis/htmlgen?TRI>.

⁴⁹ <http://www.scorecard.org/>.

approximately 12,000 industrial enterprises in 25 EU countries via the E-PRTR, which is maintained by the European Environment Agency (EEA).

Table 3. Examples of pollutant information the eight multinationals released in developed countries via the TRI and PRTR systems

<i>Fortune Global 500 (2008) ranking</i>	Company	Factory	Country	Pollutant Information Disclosure Platform	Type and Quantity of Pollutants
3	Royal Dutch Shell	Shell Oil Co. Deer Park Refining LP	USA	TRI website of the US Environmental Protection Agency	49 types, ⁵⁰ including ammonia, benzene and nickel compounds and methanol
38	Samsung Electronics	Samsung Electronics (shares) Hwa-Seong City business	Korea	TRI website of the Korean government	13 types, including 2-propanol, peroxide and hydroxylamine.
57	Nestlé	Nestlé Nederland B.V.	Netherlands	PRTR website of the Netherlands ⁵¹	4 types, including total phosphorus, total nitrogen, total organic carbon and COD
67	LG	LG Daesan Factory Chemicals	Korea	TRI website of the Korean government	32 types, including benzene, toluene, hydrogen chloride and vinyl chloride
195	Kraft Foods	Kraft Foods Global Inc. – Madison	USA	TRI website of the US Environmental Protection Agency	Four types, ⁵² including ammonia, nitric acid and sodium nitrate
200	Motorola	Motorola	USA	TRI website of the US Environmental Protection Agency	One type, ⁵³ lead
212	Denso	Denso Manufacturing Tennessee Inc.	USA	TRI website of the US Environmental Protection Agency	Nine types, ⁵⁴ including lead, copper, manganese and nickel
276	Bridgestone	Bridgestone Aiken County Factory	USA	TRI website of the US Environmental Protection Agency	Six types, ⁵⁵ including lead compounds, zinc compounds and phenols

⁵⁰ http://oaspub.epa.gov/enviro/tris_web.dcn_details?tris_id=77536DRPRK5900H (Visited on 20 July 2009).

⁵¹ <http://www.prttr.nl> (Visited on 20 July 2009).

⁵² http://oaspub.epa.gov/enviro/tris_web.dcn_details?tris_id=53704SCRM910MA (visited on 20 July 2009)

⁵³ http://oaspub.epa.gov/enviro/tris_web.dcn_details?tris_id=60196MTRLN1301E (visited on 20 July 2009)

⁵⁴ http://oaspub.epa.gov/enviro/tris_web.dcn_details?tris_id=37801NPPND1720R (visited on 20 July 2009)

⁵⁵ http://oaspub.epa.gov/enviro/tris_web.dcn_details?tris_id=29829BRDGS1BRID (visited on 20 July 2009)

Appendix

Appendix 1: Government records of companies exceeding discharge standards

Multinational companies:

<i>Fortune Global 500 ranking</i> ⁵⁶	Company name	Name of the subsidiary company listed by local environmental protection depts. as “exceeding discharge standards”	Pollution facts	Recorded by
3	Royal Dutch Shell	Shell Road Engineering (Shanghai) Co., Ltd.	Cause: excessive release of polluted wastewater Type of violation: Violation of the regulations on administration of water pollution control	<i>List of Second Group of Illegal Companies Punished by Shanghai Environmental Protection System in 2008</i> ⁵⁷ Published by Shanghai Environmental Protection Bureau on December 31, 2008
38	Samsung Electronics	Tianjin Samsung Electronics Monitor Co., Ltd.	Excessive release of COD Applicable standard: 150mg/L (Grade II)	List of Companies Involved in Excessive Release of Pollutants from January to April 2008 Published by Environmental Protection Bureau, Tianjin Economic-Technological Development Area on May 15, 2008
		Suzhou Samsung Electronics Co., Ltd.	Categorized as “black” (i.e. the company’s emissions violations are serious or frequent, resulting in serious environmental impact; it has been involved in major environmental	<i>Grading Results of Environmental Information Disclosure by Companies in Suzhou in 2007</i> ⁵⁹ Published by Suzhou Environmental Protection Bureau on June 10, 2008

⁵⁶ 2008 Fortune Global 500 companies: http://money.cnn.com/magazines/fortune/fortune500/2008/full_list/.

⁵⁷ <http://www.sepb.gov.cn/zhifa/subsearch.jsp?type=082> (visited on 5 June 2009).

			violations, or serious or extraordinarily serious environmental events) ⁵⁸	
57	Nestlé	Nestlé Purina PetCare Tianjin Ltd.	Excessive release of pollutant: COD Applicable standard: Grade III Release concentration (mg/L): 516	<i>List of Companies Involved in Excessive Release of Pollutants in Tianjin Economic-Technological Development Area (Q3, 2008)</i> ⁶⁰ Published by Environmental Protection Bureau, Tianjin Economic-Technological Development Area in November 2008 ⁶¹
67	LG	Ningbo LG Yongxing Chemical Co., Ltd.	Violation: Excessive release of production wastewater into the Houhaitang waters Punishment: RMB 50,000 fine	<i>Yong Huan Zi [2008] No. 30</i> ⁶² Published by Ningbo Environmental Protection Bureau Punished on May 28, 2008
195	Kraft Foods	Kraft Tianmei Foods (Tianjin) Co., Ltd.	Excessive release of pollutant: COD Applicable standard: Grade III Release concentration (mg/L): 812; Excessive pollutant: BOD Applicable standard: Grade III Release concentration (mg/L): 390	<i>List of Companies Involved in Excessive Release of Pollutants in Tianjin Economic-Technological Development Area (Q3, 2008)</i> ⁶³ Published by Environmental Protection Bureau, Tianjin Economic-Technological Development Area in November 2008
200	Motorola	Motorola (China) Electronics Co., Ltd.	Excessive release of pollutant: COD Applicable standard: 500mg/L (Grade III)	List of Companies Involved in Excessive Release of Pollutants from January to April 2008 Published by Environmental Protection Bureau, Tianjin Economic-Technological Development Area on May 15, 2008
212	Denso	Tianjin Fengxing Electronics Co., Ltd. (Yat-Sen Park)	Excessive release of pollutant: COD Applicable standard: Grade II Release concentration (mg/L): 1,130	<i>List of Companies Involved in Excessive Release of Pollutants in Tianjin Economic-Technological Development Area (Q3, 2008)</i> ⁶⁴ Published by Environmental Protection Bureau, Tianjin

⁵⁹ <http://www.szhbj.gov.cn/hbj/showinfo/showinfo.aspx?infoid=69c1e28b-75f9-46ec-a2bd-1a06958dc7ad&siteid=1&categoryNum=017001> (visited 10 June 2009)

⁵⁸ Opinion on Accelerating Corporate Environmental Behavior Evaluation Work: http://www.mep.gov.cn/info/gw/huanfa/200511/t20051121_71961.htm (visited on 4 May 2009)

⁶⁰ <http://www.teda.gov.cn/cms//cms/upload/info/200811/441416/> (2008 年三季度) 天津开发区污染物排放超标公司名单.doc (visited on 8 June 2009)

⁶¹ The date of publication was quoted from the China Water Pollution Map: <http://www.ipe.org.cn/bdbqy/gvqyinfo.jsp?ID=25302> (visited on 8 June 2009)

⁶² http://hbj.ningbo.gov.cn/Punish_Show.aspx?ClassID=22&InfoID=620 (visited on 8 June 2009)

⁶³ <http://www.teda.gov.cn/cms//cms/upload/info/200811/441416/> (2008 年三季度) 天津开发区污染物排放超标公司名单.doc (visited on 8 June 2009)

⁶⁴ *Ibid.*

				Economic-Technological Development Area in November 2008 ⁶⁵
276	Bridgestone	Bridgestone (Shenyang) Steel Cord Co., Ltd.	Violation: Excessive release of sewage Date of filing: April 30, 2008 Punishment: The company was ordered to immediately restore sewage treatment facilities and pay a fine of RMB 100,000 Disciplinary action: The company paid a fine of RMB 100,000 on June 18, 2008	<i>List of Companies Subject to Administrative Punishments in Shenyang in 2008</i> ⁶⁶ Published by Shenyang Environmental Protection Bureau on August 15, 2008

Chinese Companies:

<i>Fortune China 100 ranking</i> ⁶⁷	Company name	Name of the subsidiary company listed by local environmental protection depts. as “exceeding discharge standards”	Pollution facts	Recorded by
1	Sinopec Corp. (China Petroleum & Chemical Corporation)	Sinopec Zhongyuan Oil Field Southwest Drilling Company	Pollutants released into wastewater, such as COD, petroleum and volatile phenol, seriously exceeding standards. COD, petroleum and volatile phenol pollutants 12.3, 6.2 and 25.1 times above standards, respectively	<i>Notification for Hearing of Administrative Punishment on Environmental Protection Violations [2008] No.2, Notification for Hearing of Administration Punishment on Environmental Protection Violations</i> ⁶⁸ Published by Xuanhan Environmental Protection Bureau on July 25, 2008 <i>Notification for Hearing of Administrative Punishment on Environmental Protection Violations [2008] No. 4</i> ⁶⁹ Published by Xuanhan Environmental Protection Bureau on

⁶⁵ The date of publication was quoted from the China Water Pollution Map: <http://www.ipe.org.cn/bdbqy/gvqyinfo.jsp?ID=25302> (visited on 8 June 2009)

⁶⁶ http://www.syepb.gov.cn/data/2008_08_19/20088199430.html (visited on 8 June 2009)

⁶⁷ Rankings of 2008 *Fortune China 100* companies: http://www.fortunechina.com/rankings/content/2008-07/11/content_9331.htm

⁶⁸ <http://www.xhbj.cn/web/cftg/110833662.html> (visited on 8 June 2009)

⁶⁹ <http://www.xhbj.cn/web/cftg/105230453.html> (visited on 8 June 2009)

				September 10, 2008
		Sinopec Shanghai Gaoqiao Logistics Branch	Pollutants in wastewater exceeding standards	<i>List of Second Group of Illegal Companies Punished by Shanghai Environmental Protection System in 2008</i> ⁷⁰ Published by Shanghai Environmental Protection Bureau on December 31, 2008
22	China Shenhua Energy Company Limited	Daliuta Colliery, CSEC Shendong Branch	Wastewater directly released into the Wulanmulun River with a total COD of 258mg/L, seriously exceeding standards	<i>Rapid Response and Decision by Yulin Environmental Protection Bureau, Shaanxi to Suspend Sewage Treatment Plant at Daliuta Colliery Involved in Excessive Release of Pollutants</i> ⁷¹ Published by the Ministry of Environmental Protection on May 7, 2008
25	Aluminum Corporation of China Limited	CHALCO Lanzhou Branch	Triggered compulsory clean production audit Excessive release of COD Toxins: fluoride salts, coal tar	<i>Circular on Publishing the List of Gansu Province Enterprises and Institutions for Compulsory Clean Production Audit in 2008 (Gan Huan Ke Fa [2008] No. 14)</i> ⁷² Published by Gansu Environmental Protection Bureau on October 7, 2008
29	Dongfeng Motor Group Co., Ltd.	DFL Commercial Vehicle Frame Factory	Release of pollutants in excess of discharge standards and total emission control targets	<i>Circular of Provincial Environmental Protection Bureau and Provincial Development and Reform Commission on Publishing the List of First Key Companies for Compulsory Clean Production Audit (E Huan Fa [2008] No. 63)</i> ⁷³ Published by Hubei Environmental Protection Bureau on December 31, 2008
		DFL Commercial Vehicle General Assembly Factory	Release of pollutants in excess of discharge standards and total emission control targets	
		DFL First Commercial Vehicle Casting Factory	Release of pollutants in excess of discharge standards and total emission control targets	
		DFL Second Commercial Vehicle Casting Factory	Release of pollutants in excess of discharge standards and total emission control targets	
		DFL Cutting & Measuring	Release of pollutants in excess of	

⁷⁰ <http://www.sepb.gov.cn/zhifa/subsearch.jsp?styp=082> (visited on 8 June 2009)

⁷¹ http://www.zhb.gov.cn/info/gxdt/200805/t20080507_122203.htm (visited on 8 June 2009)

⁷² http://www.gsep.gansu.gov.cn/showpage/news_detail.aspx?arc_id=1513 (visited on 8 June 2009)

⁷³ <http://www.hbepb.gov.cn/show.aspx?id=17033> (visited on 8 June 2009)

		Tools Factory	discharge standards and total emission control targets	
30	China Resources Enterprise, Limited	China Resources Breweries (Liaoning) Co., Ltd.	Violation: Excessive release of sewage. Punishment: The company was ordered to immediately restore sewage treatment facilities and pay a fine of RMB 100,000.	<i>List of Companies Subject to Administrative Punishments in Shenyang in 2008</i> ⁷⁴ Published by Shenyang Environmental Protection Bureau on August 19, 2008
38	China International Marine Containers (Group) Co., Ltd.	Shanghai CIMC Baowell Industries Co., Ltd.	The company released polluted wastewater exceeding the city's standards, seriously polluting the water environment	<i>Summary of Administrative Punishment Cases in April 2008</i> ⁷⁵ Published by Baoshan Environmental Protection Bureau, Shanghai on May 12, 2008
52	China Coal Energy Company Limited	China Coal Mudanjiang Coking Co., Ltd.	Excessive release of pollutants	<i>Bulletin of Provincial Department of Environmental Protection on Fulfilling the Supervisory Opinion on Implementation of Environmental Monitoring Notice in 2008</i> ⁷⁶ Published by Heilongjiang Department of Environmental Protection on April 14, 2009
58	Guangdong Midea Holding Co. Ltd.	Hefei Royalstar Refrigerator Co., Ltd.	Excessive release of pollutants resulting in a wastewater pH of 12.2. Disciplinary action: The company was punished due to the abnormal operation of sewage treatment facilities	<i>List of Companies Exceeding National or Local Release Standards in Hefei Since 2008 (index number: AA028003401200810003)</i> ⁷⁷ Published by Hefei Environmental Protection Bureau on October 28, 2008
			Excessive release of pollutants, resulting in a wastewater pH of 3.16. Disciplinary action: The company was punished and forced to pay a fine	<i>List of Companies Exceeding National or Local Release Standards in Hefei Since 2008 (index number: AA028003401200810003)</i> Published by Hefei Environmental Protection Bureau on

⁷⁴ http://www.sypb.gov.cn/data/document/Table20088199447_公示名单.xls (visited on 8 June 2009)

⁷⁵ http://bshbj.baoshan.sh.cn/home/protect/protect_view.asp?BulletinID=504&size=big (visited on 8 June 2009)

⁷⁶ <http://www.hljdep.gov.cn/viewArtical.do?id=2947> (visited on 8 June 2009)

⁷⁷ <http://zwgk.hefei.gov.cn/catalog/public/gkfb/zwsearch.xp?doAction=show&indexno=AA028003401200810003> (visited on 8 June 2009)

			for its release of pollutants due to the abnormal operation of sewage treatment facilities	October 28, 2008
67	Weichai Power Co., Ltd.	Mudanjiang Foton Automobile Air Conditioner Co., Ltd.	Cited as a Category I key company (i.e. a seriously polluting company that has released pollutants in excess of the prescribed limits)	<i>Circular on Publishing the List of Key Companies for Clean Production Audit in 2008</i> ⁷⁸ Published by Heilongjiang Department of Environmental Protection on October 27, 2008
90	Hunan Nonferrous Metals Corp. Ltd.	Zhuzhou Smelting Group Co., Ltd.	The COD, ammonia and total cadmium content of wastewater often exceed prescribed limits; total lead and total arsenic release are also over the limit	<i>Zhu Huan Fa [2008] No. 24 (Circular on Ordering Zhuzhou Smelting Group Co., Ltd. to Make Immediate Corrections in Environmental Protection)</i> ⁷⁹ Published by Zhuzhou Environmental Protection Bureau on June 10, 2008
		Zhuzhou Cemented Carbide Group Corp., Ltd.	Excessive release of pollutants	<i>Zhu Huan Fa [2008] No. 30 (Circular on Ordering Tantalum & Niobium Product Department of Zhuzhou Cemented Carbide Group Corp., Ltd. to Suspend and Correct Wet Process Line)</i> ⁸⁰ Published by Zhuzhou Environmental Protection Bureau on June 30, 2008

⁷⁸ <http://www.hljdep.gov.cn/viewArtical.do?id=2361> (visited on 8 June 2009).

⁷⁹ http://zhuzhou.gov.cn/sitepublish/site1/gov/zfxxgk/gjbmxx/content_3125.html (visited on 8 June 2009).

⁸⁰ http://www.zhuzhou.gov.cn/sitepublish/site1/gov/zfxxgk/gjbmxx/content_3133.html (visited on 8 June 2009).

Appendix 2: Detailed Investigation Results

Multinational Companies:

<i>Fortune Global 500 ranking</i>	<i>Company name</i>	<i>Name of the subsidiary company listed by local environmental protection depts. as “exceeding discharge standards”</i>	<i>Did the factory disclose pollutant release information within 30 days, in accordance with the Measures?</i>	<i>Did the factory disclose pollutant release information before the completion of this investigation?</i>	<i>Number of pollutants in disclosed information</i>	<i>Types of released pollutants in disclosed information</i>
38	Samsung Electronics	Tianjin Samsung Electronics Monitor Co., Ltd.	No	Yes ⁸¹	6	Domestic sewage: - COD: 32,927kg/y - Animal and vegetable oils: 964.1kg/y - Ammonia nitrogen: 1,141g/y Air emissions: -Industrial particulate matter: 195.8kg/y -Lead particles: 2.4kg/y -Non-methane hydrocarbons: 135.5kg/y
		Suzhou Samsung Electronics Co., Ltd.	No	Yes ⁸²	4	COD: 3.14t/y Suspended solids: 2,990.0kg/y Total phosphorus: 57.68kg/y Petroleum: 730.0kg/y
3	Royal Dutch Shell	Shell Road Engineering (Shanghai) Co., Ltd.	No	No	-	

⁸¹ TEDA 2008-2009 corporate environmental information disclosure: <http://www.teda.gov.cn/cms/html/10/129/200906/446802.html> (visited on 15 July 2009).

⁸² Release information in 2008 disclosed by Suzhou Samsung Co., Ltd. on the China Water Pollution Map: <http://www.ipe.org.cn/myqypwxx/gyqypwinfo.jsp?ID=757> (visited on 15 July 2009).

57	Nestlé	Nestlé Purina PetCare Tianjin Ltd.	No	No ⁸³	-	
67	LG	Ningbo LG Yongxing Chemical Co., Ltd.	No	No ⁸⁴	-	
195	Kraft Foods	Kraft Tianmei Foods (Tianjin) Co., Ltd.	No	No ⁸⁵	-	
200	Motorola	Motorola (China) Electronics Co., Ltd.	No	No ⁸⁶	-	
212	Denso	Tianjin Fengxing Electronics Co., Ltd.	No	No	-	
276	Bridgestone	Bridgestone (Shenyang) Steel Cord Co., Ltd.	No	No	-	

Chinese Companies:

<i>Fortune China 100 ranking</i>	Company name	Name of the subsidiary company listed by local environmental protection depts. as “exceeding discharge standards”	Did the factory disclose pollutant release information within 30 days, in accordance with the <i>Measures</i> ?	Did the factory disclose pollutant release information before the completion of this investigation?	Number of pollutants in disclosed information	Types of released pollutants in disclosed information
52	China Coal Energy	China Coal Mudanjiang	No	Yes ⁸⁷	2	Major pollutants:

⁸³ According to the Environmental Protection Bureau of Tianjin Economic-Technological Development Area in November 2008, the COD release concentration of Nestlé Purina PetCare Co., Ltd. was 54mg/L. The abovementioned information was published in 1 December 2008 on the government website of Tianjin Economic-Technological Development Area (<http://www.teda.gov.cn/cms/html/10/46/200812/441843.html>, visited on 22 July 2009), but Greenpeace did not deem it to be disclosure by the company.

⁸⁴ The Ningbo Environmental Protection Bureau published *The formalities for the environmental check and acceptance of ABS resin Phase IV project of Ningbo LG Yongxing Chemical Co., Ltd. on its website* (http://www.nbepb.gov.cn/JSXM_Show.aspx?ClassID=100&Kind=2&InfoID=381, visited on 22 July 2009), but Greenpeace did not deem it to be disclosure by the company.

⁸⁵ According to the Environmental Protection Bureau of Tianjin Economic-Technological Development Area in January 2009, the COD and BOD release concentration of Kraft Tianmei Foods (Tianjin) Co., Ltd. was 291mg and 250mg/L respectively. The abovementioned information was published on 9 February 2009 on the government website of Tianjin Economic-Technological Development Area (<http://www.teda.gov.cn/cms/html/10/129/200902/443547.html>, visited on 22 July 2009), but Greenpeace did not deem it to be disclosure by the company.

⁸⁶ Motorola (China) Electronics Co., Ltd. disclosed environmental information on 15 June 2009, but the environmental information did not include any pollutant release information. <http://www.teda.gov.cn/cms/html/10/129/200906/446802.html> (visited on 22 July 2009)

	Company Limited	Coking Co., Ltd.				residual ammonia water, phenol-cyanogen wastewater. COD: lower than 30-50mg/L on average; ammonia nitrogen; lower than 25.8mg/L
67	Weichai Power Co., Ltd.	Mudanjiang Foton Automobile Air Conditioner Co., Ltd.	No	Yes ⁸⁸	2	Pollutant concentration: COD: 110mg/L Suspended solids: 85mg/L Total quantity of pollutants COD: 3.96t/y Suspended solids: 1.02t/y
1	Sinopec Corp. (China Petroleum & Chemical Corporation)	Sinopec Zhongyuan Oil Field Southwest Drilling Company	No	No	-	
		Sinopec Shanghai Gaoqiao Logistics Branch	No	No	-	
22	China Shenhua Energy Company Limited	Daliuta Colliery, CSEC Shendong Branch	No	No	-	
25	Aluminum Corporation of China Limited	CHALCO Lanzhou Branch	No	No	-	
29	Dongfeng Motor Group Co., Ltd.	DFL Commercial Vehicle Frame Factory	No	No	-	
		DFL Commercial Vehicle General Assembly Factory	No	No	-	
		DFL First Commercial Vehicle Casting Factory	No	No	-	
		DFL Second Commercial Vehicle Casting Factory	No	No	-	

⁸⁷ China Coal Mudanjiang Coking Co., Ltd. (of China Coal Energy Co., Ltd.): *Provincial Environmental Protection Department for Environmental Inspection and Supervision 2008 Bulletin*. <http://www.mdjepb.gov.cn/news18.htm> (visited on 15 July 2009)

⁸⁸ Clean production audit bulletin of Mudanjiang Foton Automobile Air Conditioner Co., Ltd. (of Weichai Power Co., Ltd.): <http://www.mdjepb.gov.cn/news21.htm> (visited on 15 July 2009)

		DFL Cutting & Measuring Tools Factory	No	No	-	
30	China Resources Enterprise, Limited	China Resources Breweries (Liaoning) Co., Ltd.	No	No	-	
38	China International Marine Containers (Group) Co., Ltd.	Shanghai CIMC Baowell Industries Co., Ltd.	No	No	-	
58	Guangdong Midea Holding Co. Ltd.	Hefei Royalstar Refrigerator Co., Ltd.	No	No	-	
90	Hunan Nonferrous Metals Corp.	Zhuzhou Smelting Group Co., Ltd.	No	No	-	
		Zhuzhou Cemented Carbide Group Corp. Ltd.	No	No	-	

Appendix 3: All pollutants and pollution indicators listed in China's Integrated Wastewater Discharge Standard (GB8978-1996)

Pollutants listed in the first category	
1	Total Mercury
2	Alkyl mercury
3	Total cadmium
4	Total chromium
5	Hexavalent chromium
6	Total arsenic
7	Total lead
8	Total nickel
9	Benzo [a] pyrene
10	Total beryllium
11	Total silver
12	Total radioactivity
13	Total radioactive
Pollutants listed in the second category	
1	pH
2	Chroma
3	Suspended Solids
4	BOD ₅
5	COD
6	Oil and Grease
7	Animal and Plant Oil
8	Volatile phenol
9	Total cyanide
10	Sulfide
11	NH ₃ -N
12	Fluoride
13	Phosphate
14	Formaldehyde

15	Aniline
16	Nitrobenzene
17	LAS
18	Total Copper
19	Total zinc
20	Total manganese
21	Color reagent
22	Reagent and oxides
23	Total Phosphorus
24	Organophosphorus pesticide
25	Rogor
26	Parathion
27	Methyl parathion
28	Malathion
29	Pentachlorophenol
30	AOX
31	Trichloromethane
32	Carbon tetrachloride
33	Trichlorethylene
34	Tetrachloroethylene
35	Benzene
36	Toluene
37	Ethylbenzene
38	O - Xylene
39	Of - p-xylene
40	Inter - xylene
41	Chlorobenzene
42	O - Dichlorobenzene
43	Of - p-Dichlorobenzene
44	On - Nitrochlorobenzene
45	2,4 - Dinitrochlorobenzene
46	Phenol
47	Inter - Cresol
48	2,4 - Dichlorophenol

49	2,4,6 – Trichlorophenol
50	Dibutyl phthalate
51	Diethyl phthalate
52	Acrylonitrile
53	Total selenium
54	Fecal coliforms
55	Total Chlorine
56	TOC

Appendix 4 : Why is it important for companies to disclose pollutant information on hazardous chemicals

The society we live in is pervaded by tens of thousands of different man-made chemicals. We already know that some of them are hazardous to our health or to the environment; but a far greater number have never even been tested properly, especially under conditions of long-term use and exposure. Even so, we find hazardous man-made chemicals in many everyday products, including clothes, food, detergents, paints, furniture, toys, cosmetics, pharmaceuticals and electronic goods. Some of these are becoming increasingly present in water, air, soil and living organisms as a result of being released during manufacturing, use, and/or disposal.

What are hazardous chemicals?

A hazardous chemical is one that has – at some point during its manufacture, use or disposal – the potential to harm people, other living organisms, or the environment, due to its intrinsic hazardous properties. A hazardous chemical can either be man-made or it may occur naturally in the environment. Hazardous properties include:

Persistence (chemicals that do not readily break down in the environment as the result of biodegradation or other processes)

Bio-accumulation (chemicals that can accumulate in organisms, and whose concentration can even increase further along the food chain)

Carcinogenic properties (chemicals that can cause cancer)

Mutagenicity (chemicals that have the capacity to induce mutation and genetic defects)

Toxicity towards the reproductive system (chemicals that can harm the reproductive system, including its development) **or the nervous system**

The capability to disrupt endocrine (hormone) systems

Why are hazardous chemicals such a problem?

Unfortunately, it is very difficult, if not impossible to remove hazardous chemicals or control the risks they create after they have been released into the environment. The more environmentally persistent chemicals cannot be effectively contained or destroyed using traditional “end-of-pipe” measures, including the processes

commonly used in wastewater treatment plants. Such persistent chemicals can cause harm over a long period of time. They may even cause harmful impact far away from the place where they were initially released into the environment and long after any controls have been introduced, because they can travel long distances in air or water, and then become re-concentrated to harmful levels through food chains.

The most effective way to address the problems associated with hazardous substances is to ensure that their discharge is rapidly reduced to zero, and ultimately to remove them from commerce through clean production by replacing them with less hazardous – preferably non-hazardous – alternatives (the “principle of substitution”).

Appendix 5 : Distribution, response and content of questionnaire on corporate EID sent out to the 18 companies

- Questionnaire Distribution:

The questionnaire submitted to the companies included questions regarding their pollutant information disclosure in the Chinese mainland and in developed countries, their understanding of the *Measures on Environmental Information Disclosure (for Trial Implementation)* and their plans for improving their implementation of the *Measures*. More than four weeks were allotted for the companies to reply to the questionnaire.

- Questionnaire Response:

Of the 18 companies, seven responded to Greenpeace's questionnaire; 4 companies filled out the questionnaire and 3 others provided corporate policies or reports as replies. For details, see the table below:

Companies who replied to the questionnaire (4)	Companies who provided corporate policies or reports as replies (3)	Companies that did not respond to the questionnaire (11)
Samsung Electronics LG Bridgestone China Shenhua Energy Company Limited	Royal Dutch Shell Nestlé Motorola	Kraft Foods Denso Sinopec Corp. Aluminum Corporation of China Limited Dongfeng Motor Group Co., Ltd. China Resources Enterprise, Limited China International Marine Containers (Group) Co., Ltd. China Coal Energy Company Limited Guangdong Midea Holding Co. Ltd. Weichai Power Co., Ltd. Hunan Nonferrous Metals Corp. Ltd.

Questionnaire for Chinese Enterprises:

Part I Company's understanding of the Measures on Environmental Information Disclosure (for Trial)	
1. Is your company aware of the <i>Measures on Environmental Information Disclosure (for Trial)</i> , which came into force on May 1 st , 2008?	Please choose: “ Yes” “No”
2. Is your company aware of article 19 of the <i>Measures on Environmental Information Disclosure (for Trial)</i> , in which companies are encouraged to voluntarily disclose their environmental information, including pollutant discharge information?	Please choose: “ Yes” “No”
3. Is your company aware of article 20 of the <i>Measures on Environmental Information Disclosure (for Trial)</i> , which requires that companies that disobey pollutant discharge standards or discharge volume standards are <i>required</i> to disclose their environmental information, including pollutant discharge information, and cannot use trade secret as a justification to refuse disclosure?	Please choose: “ Yes” “No”
4. Is your company aware that according to article 21 of the <i>Measures on Environmental Information Disclosure (for Trial)</i> , companies required to disclose environmental information must disclose it in a well-known local media source, and at the same time submit a record of the information disclosed to the local environmental protection bureau?	Please choose: “ Yes” “No”
5. Does your company and all related subsidiaries located in mainland China support the MEP's <i>Measures on Environmental Information Disclosure (for Trial)</i> ?	Please choose: “ Yes” “No”

Part II Corporate environmental information disclosure	
1. Are you aware that XXXX, belonging to your company, was included in the xxx environmental protection bureau's list of companies that disobeyed pollutants discharge standards or discharge volume standards in xxx city in XX date? (Please provide related links)	Please choose: "Yes" "No"
2. Did XXXX disclose its environmental information, including pollutant discharge information, in accordance with article 21 of the <i>Measures on Environmental Information Disclosure (for Trial)</i> ?	Please choose: "Yes" "No"
3. If you responded "yes" to Question 2, please describe the platform in which you disclosed corresponding environmental information (e.g. xx newspaper at xx time, corporate website, etc.), or provide related website links:	
4. If you responded "yes" to Question 2, please provide the quantity of pollutants that XXX company disclosed to the public.	Please write down the numbers:
5. Please list the names of pollutants mentioned in Question 4.	Please write down the names of pollutants or provide related documents that will have this information (e.g. website links, related corporate documents, etc.)
6. Has XXX company submitted a record of the disclosed environmental information to the local environmental protection bureau, in accordance with article 21 of <i>Measures on Environmental Information Disclosure (for Trial)</i> ?	Please choose: "Yes" "No"
7. If you answered "yes" to Question 6, please write down the name of the environmental protection bureau to which your company submitted a record.	Please write down the name of the environmental protection department.

Part Improvement plans concerning environmental information disclosure policies	
1. Does your company have any plans to implement the provisions of the <i>Measures on Environmental Information Disclosure (for Trial)</i> that concern corporate environmental information disclosure?	Please choose: “ Yes” “No”
2. If you answered “yes” to Question 1, please write down the time for implementing the plan.	
3. Do you require that all your related subsidiaries in Mainland China make plans to carry out the <i>Measures on Environmental Information Disclosure (for Trial)</i> ?	Please choose: “ Yes” “No”
4. If you answered “yes” to Question 3, please describe the required time for implementing the plan.	

Questionnaire for multinational corporations:

Part I Company’s understanding of the <i>Measures on Environmental Information Disclosure (for Trial)</i>	
1. Is your company aware of the <i>Measures on Environmental Information Disclosure (for Trial)</i> , which came into force on May 1 st , 2008?	Please choose: “ Yes” “No”
2. Is your company aware of article 19 of the <i>Measures on Environmental Information Disclosure (for Trial)</i> , in which companies are encouraged to voluntarily disclose their environmental information, including pollutant discharge information?	Please choose: “ Yes” “No”

<p>3. Is your company aware of article 20 of the <i>Measures on Environmental Information Disclosure (for Trial)</i>, which requires that companies that disobey pollutant discharge standards or discharge volume standards are <i>required</i> to disclose their environmental information, including pollutant discharge information, and cannot use trade secret as a justification to refuse disclosure?</p>	<p>Please choose: “ Yes” “No”</p>
<p>4. Is your company aware that according to article 21 of the <i>Measures on Environmental Information Disclosure (for Trial)</i> , companies required to disclose environmental information must disclose it in a well-known local media source, and at the same time submit a record of the information disclosed to the local environmental protection bureau?</p>	<p>Please choose: “ Yes” “No”</p>
<p>5. Does your company and all related subsidiaries located in mainland China support the MEP’s <i>Measures on Environmental Information Disclosure (for Trial)</i>?</p>	<p>Please choose: “ Yes” “No”</p>
<p>1. Are you aware that XXXX, belonging to your company, was included in the xxx environmental protection bureau’s list of companies that disobeyed pollutants discharge standards or discharge volume standards in xxx city in XX date? (Please provide related links)</p>	<p>Please choose: “ Yes” “No”</p>
<p>2. Did XXXX disclose its environmental information, including pollutant discharge information, in accordance with article 21 of the <i>Measures on Environmental Information Disclosure (for Trial)</i>?</p>	<p>Please choose: “ Yes” “No”</p>
<p>3. If you responded “yes” to Question 2, please describe the platform in which you disclosed corresponding environmental information (e.g. xx newspaper at xx time, corporate website, etc.), or provide related website links:</p>	

4. If you responded “yes” to Question 2, please provide the quantity of pollutants that XXX company disclosed to the public.	Please write down the numbers:
5. Please list the names of pollutants mentioned in Question 4.	Please write down the names of pollutants or provide related documents that will have this information (e.g. website links, related corporate documents, etc.)
6. Has XXX company submitted a record of the disclosed environmental information to the local environmental protection bureau, in accordance with article 21 of <i>Measures on Environmental Information Disclosure (for Trial)</i> ?	Please choose: “ Yes” “No”
7. If you answered “yes” to Question 6, please write down the name of the environmental protection bureau to which your company submitted a record.	Please write down the name of the environmental protection department.
1. Does your company have any plans to implement the provisions of the <i>Measures on Environmental Information Disclosure (for Trial)</i> that concern corporate environmental information disclosure?	Please choose: “ Yes” “No”
2. If you answered “yes” to Question 1, please write down the time for implementing the plan.	
3. Do you require that all your related subsidiaries in Mainland China make plans to carry out the <i>Measures on Environmental Information Disclosure (for Trial)</i> ?	Please choose: “ Yes” “No”
4. If you answered “yes” to Question 3, please describe the required time for implementing the plan.	

<p>1. Does your company and/or subsidiaries located in regions around the world, excluding Mainland China, have a precedent of voluntarily disclosing information on pollutant discharge? (e.g. voluntary disclosure in the official corporate websites of other countries)</p>	<p>Please choose: “Yes” “No”</p>
<p>2. If you answered “yes” to Question 1, please give at least one example in which your company and/or related subsidiaries disclosed pollutant discharge information and provide related website links:</p>	
<p>3. Please list the quantity of pollutants mentioned in Question</p>	<p>Please write down the numbers:</p>
<p>4. Please list the names of pollutants mentioned in Question 2.</p>	<p>Please write down the names of pollutants or provide related documents with this information in them. (e.g. website links, related corporate documents, etc.)</p>
<p>5. Does your company and/or related subsidiaries located in other regions around the world excluding Mainland China disclose information regarding pollutant discharge in accordance with local laws?</p>	<p>Please choose: “Yes” “No”</p>
<p>6. If you answered “yes” to Question 3, please give at least one example in which your company and/or related subsidiaries disclosed pollutant discharge information and provide related website links:</p>	
<p>7. Please list the quantity of pollutants mentioned in Question</p>	<p>Please write down the numbers:</p>
<p>8. Please list the names of pollutants mentioned in Question 6.</p>	<p>Please write down the names of pollutants or provide related documents with this information in them. (e.g. website links, related corporate documents, etc.)</p>

In China, large quantities of hazardous chemicals are poisoning the water systems and threatening people's health. Greenpeace's water pollution campaign is working tirelessly to stop the most dangerous hazardous chemicals from being discharged into China's water systems. Greenpeace is calling on the government to enact strict legislation to support zero toxic discharge. At the same time, we are demanding that companies monitor and publicly release information on what chemicals they are using and to ultimately stop using hazardous chemicals.

In order to achieve this, Greenpeace monitors the environmental performance of companies and their factories, visits local victims of water pollution, and samples water in the Yangtze, Yellow and Pearl River Delta regions. We use extensive field visits and in-depth research to expose the culprits of industrial water pollution, and work with experts to showcase best industry and legislative practices. The public is behind us throughout this process, working with us to push for positive change.

Greenpeace stands for positive change through action to defend the natural world and promote peace.

Greenpeace is a non-profit organization with a presence in 40 countries across Europe, the Americas, Asia and the Pacific. To maintain its independence, Greenpeace does not accept donations from governments or corporations but relies on contributions from individual supporters and foundation grants.

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* The company logos in the cover solely reflect the results of this report. They do not represent Greenpeace opinion on any of the company's performance in areas not addressed by this investigation.

