

VII. INFORMATION DISCLOSURE AND PUBLIC CONSULTATION

A. PRC and ADB Requirements for Disclosure and Public Consultation

1. PRC Requirements

169. Relevant provisions in the PRC *Environmental Impact Assessment Law* (revised in 2016) and the *Regulations on the Administration of Construction Project Environmental Protection* (No. 253 Order of the State Council, 1998, revised in 2017) require that an EIA study for a construction project shall solicit opinions from affected residents, as well as other organizations and concerned stakeholders. However, the requirements of public consultation are different for various forms of EIA reports, including a comprehensive EIA report, simplified tabular EIA report and EIA registration form. For projects requiring an comprehensive EIA report, the implementer shall hold a debate, a hearing, or other forms to solicit opinions from relevant parties, experts and the public before the submission of the EIA report to be approved by relevant administration of environment protection. There is no explicit requirement for public participation in projects preparing a simplified tabular EIA report or EIA registration form.
170. According to the *Catalogue for the Classified Administration of Environmental Impact Assessments for Construction Projects (revised in 2018)*, the subproject shall prepare a simplified tabular EIA report. The subborrower responded that the relevant public stakeholders were not participated in environmental impact assessment, except for a 15-day information disclosure including environmental protection, fire prevention, safety and other relevant issues.

2. ADB Requirements

171. ADB's SPS 2009 has specific requirements for information disclosure and public consultation. Information disclosure involves delivering information about a proposed project to the general public and to affected communities and other stakeholders, beginning early in the project cycle and continuing throughout the life of the project. Information disclosure is intended to facilitate constructive engagement with affected communities and stakeholders over the life of the project.
172. In order to make key documents widely available to the general public, the SPS requires submission to ADB for posting on the ADB website as follows: (i) for Category A projects, the final EIA report; (ii) for Category B projects, the final IEE report. The SPS requires that subborrowers take a proactive disclosure approach and provide relevant information from environmental assessment documentation directly to affected peoples and stakeholders.
173. The SPS also requires that the subborrowers carry out consultation with affected people and other concerned stakeholders, including civil society, and facilitate their informed participation.

B. Project Information Disclosure

174. The domestic environmental assessment of this project is required to prepare a simplified tabular EIA report. The Environmental Protection Bureau of Shangjie District of Zhengzhou City approved the simplified tabular EIA report on January 9, 2018, and the approval was published on the website of Shangjie District Environmental Protection Bureau.
175. Corresponding part in the EIA report of partial changes made to the project construction plan

has also been updated and recored at the relevant authorities.. In accordance with the relevant requirements, the environmental impact report form needs to be updated and the relevant approval is required. The simplified tabular EIA report has been approved by the Shangjie District Environmental Protection Bureau on April 30, 2019. For details, see Figure 22.

176. Before the construction of the project, the subborrower had set up bulletin boards outside the construction site boundary for 15 days to disclose information regarding the project, the construction sites and the rules related to environmental protection, fire prevention, safety and other relevant issues (Figure 25). The main contents are as follows:

- 1) project name, project scale, the construction developer, the designer, the construction contractor, the supervision unit, and the start and completion dates;
- 2) a list of managers such as project managers, and contact information;
- 3) measures taken to mitigate dusts, waste gases, wastewater, solid waste at the construction site, as well as noise and vibration.

177. The IEE will also be posted on the websites of the subborrower and ADB.





Figure 25: Bulletin Boards

C. Public Consultation

178. According to the requirements of ADB Safeguards Policy Statement and the Fund's Environmental and Social Management System (ESMS), the subproject is subject to public participation and surveys to collect opinions on the subproject.
179. CECEP Fund Management Co., Ltd., staffs of the subborrower and audit team members facilitated public participation by holding meetings and sending questionnaires. The scope of public participation includes residents in environmentally sensitive areas and residents benefiting from the heating service provided by the subproject. Details as listed in the table below.

Table 23: Environmentally sensitive targets around the project

Name of the Road	Sensitive Locations	Type	Direction	Relative Distance
Zhongxin Road	Residential building	Residential area	S	15m
	District of Yihemeil	Residential area	S	30m
	100 High school	School	NE	150m
	Training collage of China Great Wall	School	SE	110m
	Aluminum Co., Ltd.			
Mengjin Road	No.12 District	Residential area	E	20m
	District of Shangchengya	Residential	W	20m

		area		
	NO.22 District	Residential	E	20m
		area		
	NO.32 District	Residential	E	18m
		area		
	Linxi District	Residential	W	20m
		area		
	No.42 District	Residential	E	10m
		area		
	Zhengzhou 15 th Hospital	Hospital	E	5m
	Hongyuan West District	Residential	E	5m
		area		
Danjiang Road	Hongyuan West District	Residential	N	5m
		area		
	District of Yihu	Residential	S	20m
		area		
	Xinghai Garden	Residential	S	20m
		area		
Runan Road	Hongyuan District	Residential	E	25m
		area		
Xinan Road	Yaxing District	Residential	S	20m
		area		
	No.14 District	Residential	S	15m
		area		
	Shangcheng District	Residential	N	8m
		area		
	No. 4 District	Residential	N	10m
		area		
	Shanjie Primary School	school	N	10m
Dengfeng Road	No. 4 District	Residential	W	20m
		area		
	No.6 District	Residential	E	15m
		area		
	Longxinjia District	Residential	NE	35m
		area		

180. On January 15, 2019, staffs of the subproject invited 10 surrounding residents for a meeting. A total of 10 questionnaires were distributed and all of them were returned (Figure 26). Following the meeting, the staffs visited the residents provided with the heating service, issued 43 questionnaires and returned 43 copies. A total of 53 valid questionnaires were collected in public participation.

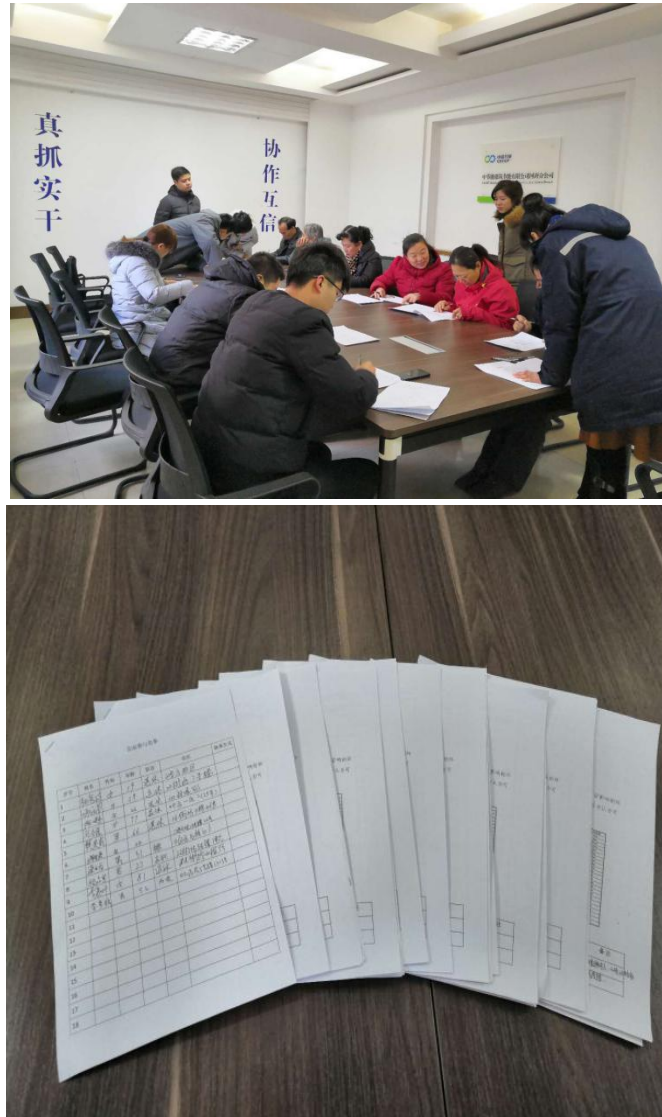


Figure 26: Invited residents at the meeting and filled questionnaires.

181. A total of 53 residents participated in the meeting and survey, and 19 were women, accounting for 38.5% of the total number of participants. For the opinions collected, see Table 24.

Table 24: Public Consultation Survey Results

Question	Item	No.	%
1. In your opinion, what are the major environment pollution issues in your areas?	Ambient air	39	73.58%
	Noise	24	
	Surface water	12	
	Ground water	8	
	Soil	5	
	Solid waste	11	

Question	Item	No.	%
	Odor	4	
	Risks associated with chemicals and hazardous chemicals	3	
	Other concern	4	
2. Do you know this project before this public consultation?	Yes	43	81.13%
	No	10	
3. Do you understand environmental impacts of this project before this public consultation?	Yes	14	
	Not clear	30	56.60%
	No	9	
4. In your opinion, what are the major impacts on surroundings areas?	Ambient air	26	49.06%
	Noise	17	
	Surface water	12	
	Ground water	10	
	Soil	14	
	Solid waste	6	
	Odor	1	
	Risks associated with chemicals and hazardous chemicals	3	
	Other concern	9	
5. Do you understand the potential environmental impacts of the proposed project?	Clearly understand	18	
	Somewhat understand	26	49.06%
	Barely understand	7	
	Do not understand	2	
6. Are you satisfied with environment protection measures of the subproject?	Very satisfied	12	
	Satisfied	13	
	Somewhat satisfied	26	49.06%
	Very disappointed	2	
	Do not understand	0	
7. Do you understand the potential adverse impacts	Clearly understand	9	

Question	Item	No.	%
during the construction of the proposed subproject components?	Somewhat understand	21	39.62%
	Barely understand	19	
	Do not understand	4	
8. What would be the major environmental impacts during project construction?	Noise	31	62.26%
	Dust	33	
	Solid waste	17	
	Traffic congestion	15	
	Others	0	
	No major impacts	16	
9. Do you think the environmental impacts during the project construction process is acceptable?	Acceptable	28	52.83%
	Somewhat acceptable	23	
	Not acceptable	0	
	Do not understand	2	
10. Do you understand the adverse environmental impacts that may exist during the operation of the project?	Clearly understand	6	47.17%
	Somewhat understand	25	
	Barely understand	19	
	Do not understand	3	
11. Do you understand all the adverse health and safety effects of the project?	Clearly understand	5	43.40%
	Somewhat understand	23	
	Barely understand	22	
	Do not understand	3	
12. Do you understand the environmental protection measures in the operation of the project?	Clearly understand	8	52.83%
	Somewhat understand	28	
	Barely understand	16	
	Do not understand	1	
13. Can you accept the impact of this project on the air?	Accept	26	49.06%
	Somewhat accept	23	
	Do not accept	2	
	Have no idea	2	
14. Can you accept the impact of the project on the	Accept	26	49.06%

Question	Item	No.	%
surface water environment?	Somewhat accept	20	
	Do not accept	3	
	Have no idea	4	
15. Do you accept the impacts to ground water quality by this project?	Accept	23	43.40%
	Somewhat accept	23	43.40%
	Do not accept	2	
	Have no idea	5	
16. Do you accept the impacts to acoustic environment quality by this project?	Accept	24	45.28%
	Somewhat accept	23	
	Do not accept	3	
	Have no idea	3	
17. Do you accept the solid waste pollution by this project?	Accept	15	
	Somewhat accept	29	54.72%
	Do not accept	7	
	Have no idea	2	
18. Do you accept the impacts to ecological environment by this project?	Accept	25	47.17%
	Somewhat accept	22	
	Do not accept	1	
	Have no idea	5	
19. Do you accept environment, health, and safety risks caused by this project?	Accept	24	45.28%
	Somewhat accept	22	
	Do not accept	4	
	Have no idea	3	
20. What are the major concerns of this project Ambient?	Ambient air	28	
	Noise	33	62.26%
	Surface water	11	
	Ground water	12	
	Soil	7	
	Solid waste	4	

Question	Item	No.	%
	Odor	1	
	Risks associated with chemicals and hazardous chemicals	1	
	Other concern	1	
21. In your opinion, what areas should the project focus on?	Exhaust air efficiency treatment	13	
	Fugitive emissions	4	
	Wastewater treatment	26	49.06%
	Groundwater protection	19	
	Soil protection	18	
	Chemicals handling	7	
	Odor control	4	
	Make use of recyclable resources to reduce solid waste	6	
	Noise disturbing to residents	8	
	Protection for community health and safety	9	
	Protection to workers health and safety	9	
	Others	5	
22. Do you think of the necessity of the project?	Necessary	50	94.34%
	Barely necessary	0	
	Do not necessary	0	
	Do not matter	3	
23. Do you consider the impacts of the subproject plant on surrounding environment and your life are acceptable?	Yes	40	75.47%
	No	6	
	I do not know	7	
24. Do you support the project?	Yes	49	92.45%
	No	0	
	I do not know	4	
25. As far as you know, is there any relocation involved in the project construction (temporary or No	Yes	0	
	No	41	77.36%

Question	Item	No.	%
permanent relocation)?	I do not know	12	
26. As far as you know, are there any ethnic minority areas within the scope of the project?	Yes	2	
	No	35	66.04%
	I do not know	16	
27. As far as you know, the construction or operation of the project will cause anybody to lose their jobs, or affect the livelihood of some people?	Yes	0	
	No	34	64.15%
	I do not know	19	
28. As far as you know, are there any problems such as disturbing the people or causing complaints in the process of project construction?	Yes	3	
	No	32	60.38%
	I do not know	18	

182. The results of public participation showed that 81.13% of the respondents had learnt about the construction of the project, accepted or basically accepted the impact of the construction and operation of the project on the surrounding environment; 94.34% thought that the construction of the project was necessary, 75.47% believed that the environmental impact was acceptable; and, 92.45% of the respondents supported the construction and operation of the project.

