

Chinese Commercial Law

15PLAC106-A17/18

Dr. Zhu Sanzhu

The Lack of Public Participation in the  
Chinese Environmental Impact Assessment  
Process: Consequences of a Changing Law

## INTRODUCTION

The Environmental Impact Assessment (EIA) is a procedure whose aim is to evaluate the conservational repercussions that a proposed development project, plan or activity puts forward.<sup>1</sup> Representing a “key management regime” among China’s environmental controlling system, EIA can be traced back to China’s 1979 first Environmental Protection Law.<sup>2</sup> The EIA was introduced in China as a top-down administrative tool by technocrats and experts in order to react against severe environmental problems.<sup>3</sup> Consequently public participation did not become a formal element of the law until the “Regulation on Environmental Management of Construction Projects” in 1998, when developers had to inform work units and residents whilst preparing the EIA.<sup>4</sup> Therefore avoiding episodes that could jeopardize the preservation of the environment.<sup>5</sup> However, the act of informing the people about the project’s consequences without involving them in the decision-making process was not enough, therefore proactive public involvement has become part of the Chinese law in 2003 when the National People’s Congress endorsed the Environmental Impact Assessment Law (EIA Law) of the PRC.<sup>6</sup> Public participation theoretically plays a pivotal role in order to achieve successful EIA outcomes through a fostered democratic participation in policy-making. In Articles 5 and 11 public participation is a mandatory requirement encouraged by the State because it contributes to the identification of environmental rights and interests of

---

<sup>1</sup> Brombal, D., Moriggi, A. and Marcomini, A. (2016). ‘Evaluating public participation in Chinese EIA. An integrated Public Participation Index and its application to the case of the New Beijing Airport’. *Environmental Impact Assessment Review* (62) p.49.

<sup>2</sup> McElwee, C. (2011). *Environmental law in China*. New York: Oxford University Press.p.126.

<sup>3</sup> Wang, Y., Morgan, R. and Cashmore, M. (2003). Environmental impact assessment of projects in the People's Republic of China: new law, old problems. . *Environmental Impact Assessment Review* (23) p. 563.

<sup>4</sup> Li, T., Thomas Ng, S. and Skitmore, M. (2012). Public participation in infrastructure and construction projects in China: From an EIA-based to a whole-cycle process. *Habitat International* (36),1 p.48.

<sup>5</sup> Glucker, A., Driessen, P., Kolhoff, A. and Runhaar, H. (2013). ‘Public participation in environmental impact assessment: why, who and how?’. *Environmental Impact Assessment Review* (43) p.104.

<sup>6</sup> Moorman, J. L.; Ge, Z. (2007). Promoting and strengthening public participation in china's environmental impact assessment process: Comparing china's EIA Law and U.S. Nepa. *Vermont Journal of Environmental Law* 8(2) p.282.

the public who is able to express opinions before the EIA submission.<sup>7</sup> In February 2006 the State Environmental Protection Administration of China (SEPA) – today’s MEP (Ministry of Environmental Protection) – published the SEPA Guidelines, a draft of measures that introduced the endorsement of the public in the decisional sphere of EIA.<sup>8</sup> In response to open and democratic articles, the third one states that “public participation should implement the principles of openness, equality and broadness”<sup>9</sup>. Articles such as the sixth of the second chapter do not contribute to a real improvement of the public’s involvement, considering that the guidelines represented an amendment among the law regarding public participation. In fact information disclosure regarding the EIA results should be published for the public’s scrutiny within 15 days following the compilation of the EIA.<sup>10</sup> The fact that the public is not involved in the scoping but is just asked to review something drafted by experts is problematic. Lastly, in 2015, the Environmental Protection Law (EPL) has been amended to include a new chapter dedicated to Public Participation.<sup>11</sup> Articles 53-54 contribute to more efficient and extensive information disclosure, however again at a stage where the Environmental Impact Report is in progress.<sup>12</sup> The three stages of the EIA are screening, reviewing the evidence and monitoring among three different construction projects categories.<sup>13</sup> The first group of projects, which requires a complete Environmental Impact Report (EIR), comprises the ones with potentially significant repercussions for the environment; secondly an Environmental Impact Report Form (EIF) is required for less dangerous projects and is not as detailed as the previous one. Finally an Environment Impact Registration

---

<sup>7</sup> Npc.gov.cn. (2012). *laws*. [online] Available at: [http://www.npc.gov.cn/englishnpc/Law/2007-12/06/content\\_1382122.htm](http://www.npc.gov.cn/englishnpc/Law/2007-12/06/content_1382122.htm) [Accessed 31 Mar. 2018]. Chapter 1, Art 5-7.

<sup>8</sup> Moorman and Ge op. cit. p.282.

<sup>9</sup> SEPA-Guidelines, Chapter 1, Art 3 in Moorman and Ge op. cit. p.327.

<sup>10</sup> Idem. Chapter 2, Art. 6, p.327.

<sup>11</sup> Alberton, M. (2017). ‘Public Participation in Environmental Impact Assessment in China’, *Routledge Handbook of Environmental Policy in China* p. 239.

<sup>12</sup> Npc.gov.cn. (2012). *laws*. [online] Available at: [http://www.npc.gov.cn/englishnpc/Law/2007-12/06/content\\_1382122.htm](http://www.npc.gov.cn/englishnpc/Law/2007-12/06/content_1382122.htm) [Accessed 31 Mar. 2018]. Art 54-55.

<sup>13</sup> Jin, Z. (2015). ‘Environmental Impact Assessment Law in China’s courts: A study of 107 judicial decisions’. *Environmental Impact Assessment Review* (55) p.35.

Form (EIRF) is required for projects that are supposed to impact the environment in a minimal way.<sup>14</sup>

After having mentioned the development of the amendments and changes in the various laws concerning public participation in the EIA process throughout the last 35 years, it can be argued that increasing decisional power has been theoretically devolved to the public that is directly affected by new construction projects. This paper's aim, however, is to critically analyse the changes that occurred over time and the growing involvement of people's opinion in the EIA, acknowledging that in China public participation is still severely lacking at the scoping stage where pivotal decisions are made. Public opinion has been increasingly cited in the laws, yet the effective contribution to decision making is still harshly disregarded. As a result, a chaotic combination of indefinite actors and timeframes concerning public participation is contributing to the marginalisation and ineffective involvement of public opinion in the EIA process. Furthermore, the formal changes in the law cannot be conceived as a progressive development in order to foster public opinion but are rather understandable as prescribed forms of theoretical changes, hence mere formalities. China is still lacking in effective involvement of the public in controversial decisions such as environmental projects, leaving core decisions to technocrats and specialists and therefore not giving space to the inhabitants of the People's Republic of China. The first part of the essay will focus on the most significant issue concerning public participation in the EIA process: the timeframe problem. The second part of the essay will analyse the theoretical participants of EIA and the beneficial results that genuine participation would propose, however starting from a point where bad timing represents the barrier for considerable improvement. The third and last chapter will analyse episodes of litigation and protests regarding polluting construction projects that occurred throughout the

---

<sup>14</sup> Jin op. cit. p.36

years of the EIA law enactment and its amendments from the point of view of Chinese citizens who decided either to protest or sue environmental project bureaus (EPBs).

## I. TIMING

“Quality of EIA depends on the stage at which public participation is undertaken.”<sup>15</sup>

Public participation in Chinese EIAs is required only after the finalization of the draft EIA document, hence excluding the public from being involved in preparing the EIA report. The inclusion of the public opinion in an advanced stage where the report has already being shaped and the contents have been carefully determined risks becoming just a formal and ineffective procedure.<sup>16</sup> The fundamental stage during which the EIA is shaped occurs at the beginning of the report structuring phase, thus depicting Chinese institutions and decision makers as highly mistrusting the people’s judgements. While Article 5 of the Environmental Impact Assessment Law states that the public should be involved in the assessment process; the venue and the way in which this process can succeed is not specified.<sup>17</sup> Moreover articles 11 and 21 enforce the requirement of public opinion in the process of decision making through hearings or other techniques, omitting however when the process might take place.<sup>18</sup> As a result, this crucial decision is in the hands of local governments and therefore depends on arbitrary decisions concerning an important factor such as the scheduled time for the public to speak up.<sup>19</sup>

---

<sup>15</sup> Moorman and Ge op. cit. p 308.

<sup>16</sup> Alberton op. cit. p.241.

<sup>17</sup> EIA Law op. cit. Chapter 1, Art 5.

<sup>18</sup> Idem. Chapter 1 Art. 11,21.

<sup>19</sup> Martens, S. (2006) ‘Public participation with Chinese characteristics: Citizen consumers in China’s environmental management’. *Environmental Politics*, 15:(2), p. 220.

As identified by Alberton, the timeframes for public participation in EIA procedure become shorter depending on the remoteness of the place.<sup>20</sup> It is the case of both Shandong and Yunnan. In the latter example, public participation is not only delayed at a stage where the project is almost implemented, but is mostly inaccessible for the great portion of population living in remote areas of the region. Shandong region, on the other hand, has adopted an own regulation in 2012 regarding public participation in the EIA process.<sup>21</sup> It can be argued that the “Notification of strengthening the project EIA public participation supervision” is a procedure that includes more clarity and openness in the process, however in this case, as indicated by Alberton, “EIA procedures were initiated after the project started, thus public participation was included as a symbolic exercise”.<sup>22</sup> In addition it has been recognized that local government regarded the involvement of the public as something superficial with negative connotations.<sup>23</sup>

When comparing the U.S. NEPA process, the first form of EIA that initiated this worldwide technique of public involvement, with the Chinese EIA, it becomes clear how in America public opinion is required also at the screening stage of an EIA. Moreover, the scrutiny of the public is required not only for severe polluting projects but also for less harmful ones. This is the case of the FONSI – the Chinese versions of EIRF.<sup>24</sup> The involvement of the public at various stages enables the population to have major decisional power also for less significant projects. This demonstrates that public involvement in Chinese EIA should not only be at the outset of the scoping stage, but also represent a continuous procedure throughout the entirety of the process.<sup>25</sup> An example of mediocre and ill-timed participation of

---

<sup>20</sup> Alberton op. cit. p.242.

<sup>21</sup> Ibidem.

<sup>22</sup> Ibidem.

<sup>23</sup> Alberton op. cit. p.243.

<sup>24</sup> Moorman and Ge op. cit. p. 308.

<sup>25</sup> Yang, S. (2008) ‘Public participation in the Chinese Environmental Impact Assessment (EIA) System’ *Journal of Environmental Assessment Policy and Management*, 10(1). p.107.

the public in a recent EIA project has been analysed by Brombal et al. in the 2014 approved “New Beijing Airport Project” developed by Capital Airports Holding (CAH), a state-owned establishment that has been previously responsible for the erection of the third terminal of Beijing International Airport for the 2008 Olympic games. The new airport’s site is 46km south from the capital’s city centre.<sup>26</sup> According to the simplified EIA report published only 19 days after public comments had been set forth and excluding any form of public comment in the earlier scoping phase, public opinion did not count as a relevant procedure. Nonetheless the public had been extensively questioned, interviews took place after the publication of the simplified EIA report.<sup>27</sup> To reward the public with information disclosure the simplified EIA for public discussion was extensively distributed online and local points. Nevertheless the language used in the report was very technical and overwhelmed by acronyms without the provision of a glossary, causing the report to be incomprehensible.<sup>28</sup> The combination of late involvement detached from the crucial stages of the assessment and the voluntary and persistent use of a complex language shows that the institutions have no interest in the involvement of the public in the decisional apparatus. Despite the fact that public participation in the decision making process contributes to the improvement of the aforementioned, China’s approach is defined by Li et al. as “ex-post facto”<sup>29</sup>. The release of the project’s information is delayed to the extent that many important decisions are already made public consultation. The channel from which voices can be heard is released at such a late stage that Enserink and Koppenjan define the Chinese policy making as a “decide-announce-defend” style.<sup>30</sup> This means that decisions at a late stage cannot be challenged by the public differently than in the form of protests or profound disappointment. The

---

<sup>26</sup> Brombal et. al. op. cit. p. 56.

<sup>27</sup> Ibidem.

<sup>28</sup> Ibidem.

<sup>29</sup> Li, Thomas and Skitmore op. cit. p.51.

<sup>30</sup> Enserink, B., Koppenjan, J. (2007) ‘Public participation in China: sustainable urbanization and governance’, *Management of Environmental Quality: An International Journal*, 18:(4), p.463.

Chinese system should abandon the *ex-post* approach and move on to a more inclusive and constructive decision making process following the model of the *ex-ante* approach adopted in the EU.<sup>31</sup>

## II. ACTORS AND OBJECTIVES OF REAL PUBLIC PARTICIPATION IN CHINA

“Effective public participation is a matter of will.”<sup>32</sup>

Public participation in the EIA process is defined by O’Faircheallaigh as “any form of interaction between government and corporate actors and the public that occurs as part of EIA processes.”<sup>33</sup> However, as aforementioned, China’s problem resides in the vague amount of importance that the public opinion receives since it is requested at a stage of the EIA where key decisions have already been made. The result is that the interaction between different actors such as governmental bodies, developers and the public is unbalanced. Moreover, according to Glucker et. al., there is no consensus at the base of China’s EIA on the actors of the public that need to be involved.<sup>34</sup> Apart from influencing the decision making process, the aims of public participation in EIA are various. The enhancement of democratic capability through the development of citizenship abilities stands as the educative purpose of genuine public involvement.<sup>35</sup> Nevertheless, discrepancies in the distribution of the participants need to be revised. In the previously mentioned case of the “New Beijing Airport”, a large gender gap has occurred among the survey’s participants. Women accounted for just the 21% of the participants and in addition no member

---

<sup>31</sup> Enserink and Koppenjan op. cit. p. 463.

<sup>32</sup> Yang op. cit. p. 96.

<sup>33</sup> O’Faircheallaigh, C. (2010). ‘Public participation and environmental impact assessment: Purposes, implications, and lessons for public policy making’ Environmental Impact Assessment Review 30. p.20.

<sup>34</sup> Glucker et. al. op. cit. p. 106.

<sup>35</sup> Ibidem.

of vulnerable groups was asked to speak.<sup>36</sup> An open and more transparent public involvement could strengthen disadvantaged groups that by being socially marginalized are also part of an under-represented portion of society.<sup>37</sup> China's literacy rate, despite having improved considerably since the 1990's, still represents an issue considering that 54 million people aged 15 and older are not able to read and write.<sup>38</sup> Thus, since most of the surveys requesting public opinion are to be compiled in written form, it is not possible for illiterates to participate. The most powerless individuals are in fact the most unlikely to participate to the EIA's public consultation.<sup>39</sup> The ultimate aim of true public involvement in the decision making process is the redistribution of power.<sup>40</sup> Power is unevenly distributed not only among singular individuals but also in terms of marginalised groups, such as in the case of China's NGOs. Even if the reviewed draft of the 2015 EPL Law has extended the scope of environmental public interest litigation by allowing nongovernmental organizations to sue polluters in support of the public interest, NGOs are still not involved in the EIA public participation.<sup>41</sup> In fact the legislation does not indicate that the "public" includes environmental groups hence NGOs are excluded from public consultation.<sup>42</sup> Nonetheless, in China environmental NGOs play an increasingly educative role. By undertaking educational projects in remote parts of the country, urban-based NGOs have access to local schools where the concept of environmental protection is not well established and can therefore encourage younger generation's awareness.<sup>43</sup> Despite the effort of environmental NGOs there is a need for their legitimization compared to their current precarious status for

---

<sup>36</sup> Brombal et. al. op. cit. p.57.

<sup>37</sup> Tang, S.; Tang C. and Wing-Hung Lo, C. (2005) 'Public Participation and Environmental Impact Assessment in Mainland China and Taiwan: Political Foundations of Environmental Management', *The Journal of Development Studies*, 41(1), p.3.

<sup>38</sup> *China | UNESCO UIS*. [online] Available at: <http://uis.unesco.org/country/CN> [Accessed 31 Mar. 2018].

<sup>39</sup> O'Faircheallaigh op. cit. p.23.

<sup>40</sup> Arnstein, S.R. (2007) 'A Ladder Of Citizen Participation', *Journal of the American Institute of Planners*, 35(4), p.216.

<sup>41</sup> 2015 EPL LAW Chapter 5, Art. 57. in Chinadialogue.net. (2018). [online] Available at: <https://www.chinadialogue.net/Environmental-Protection-Law-2014-eversion.pdf> [Accessed 31 Mar. 2018].

<sup>42</sup> Yang op. cit. p.105.

<sup>43</sup> Martens op. cit. p.218.

which the government considers them subversive civil forces. This could potentially lead to undesirable consequences in the nonviolent process of public mobilisation.<sup>44</sup>

### III. SELF-RESOLUTION AND RESULTS

The following paragraph analyses the effectiveness of public litigation against EIA through several cases. as a result it exposes how in a fractured system where public opinion is prescribed and stated in the law the most efficient way to impose opinions is external to legal procedures, yet through legal challenging.

The “Dynasty” Yachting Club case occurred from 1993 to 1996 in Dianshan Lake – Shanghai.<sup>45</sup> Most of the water provision of Shanghai depends on the Dianshan Lake, Huangpu’s River leading source.<sup>46</sup> The characteristic of this case resides in the fact that it was initiated by an anonymous letter to stop the project that was written by the public and delivered to the Municipal EPB (Environmental Protection Bureau). One can argue that the government gives the public a chance to raise complaints to authorities through the establishment of environmental hotlines or via letters.<sup>47</sup> The problem of the “Dynasty” case is that the \$9 million worth joint venture project had not only lacked in public participation and hearings, but presented no completed EIA at all.<sup>48</sup> The recreational site presented severe pollutant hazards, yet the local County EPB turned a blind eye to the project.<sup>49</sup> The developer’s misconduct can be observed in the non-compliance of many of the 1986 EIA Guidelines’ articles – especially against articles 4 and 11. In fact the EIA had neither been approved nor

---

<sup>44</sup> Dai, J. Zeng, F. and Wang, Y. (2017) ‘Publicity strategies and media logic: communication campaigns of environmental NGOs in China’, *Chinese Journal of Communication*, 10(1). p.14.

<sup>45</sup> Gu, L. and Sheate, W. (2018) ‘Institutional Challenges for EIA Implementation in China: A Case Study of Development Versus Environmental Protection’, *Environmental Policy and Management Group Department of Environmental Science and Technology*, p.131.

<sup>46</sup> Song, Y., Dong, B., Gao, N. and Xia, S. (2010). Huangpu River water treatment by microfiltration with ozone pretreatment, *Desalination*, 250(1). p.71.

<sup>47</sup> Martens op. cit. p. 219.

<sup>48</sup> Gu and Sheate op. cit. p.131.

<sup>49</sup> Idem. p.135.

carried out at the project's feasibility stage.<sup>50</sup> The imposition of the public into the decisional sphere goes beyond the mere EIA project approvals. It highlights the necessity of more reliable local governments' transparency in EIA and other related environmental disputes. However the episode proves that treating developmental procedures secretly without informing the public and appropriate specialists can lead to failure since the project was then blocked.

Ten years after the "Dynasty" Yachting Club episode, another case of public awareness outside of the EIA domain and motivated by environmental protection desire occurred. In 2006 10.8 billion Yuan were invested for the construction of a chemical plant in Fujian, Haicang district, Xiamen.<sup>51</sup> Despite these types of developments are usually located 70 kilometres away from residences when completed in Taiwan or Korea and that the chemical station was planned to be just 4-6 kilometres far from two universities campuses and 100,000 people living city centre, the project still approved by the National Development and Reform Commission (NDRC).<sup>52</sup> In response to this incongruence 15000 protesters marched to Xiamen's government headquarters on the 1<sup>st</sup> June 2007. The problem was not only related to the absurdity of the project's hazards, but primarily due to locals not being informed about it. This resulted in a complete lack of participation to the EIA consultation process. The city government took action by announcing the introduction of another EIA process available for public consultation. An online survey was opened for approximately 24 hours. Nevertheless the results indicated that a 55,376 votes were opposed to the project compared to the 3078 in favour. As a result the plant was relocated to a safer area.<sup>53</sup> Other two almost identical episodes presented by Liu et. al. in their article show how ineffective EIAs can be if

---

<sup>50</sup> SEPA-Guidelines, Chapter 1, Art 3 in Moorman and Ge op. cit. p.327.

<sup>51</sup> Li, W., Liu, J. and Li, D. (2012). 'Getting their voices heard: Three cases of public participation in environmental protection in China' *Journal of Environmental Management* 98, p. 68.

<sup>52</sup> Ibidem.

<sup>53</sup> Idem.p.69.

public opinion is not set forth. Many projects can fail to be discovered at an early stage by the public, however demonstrations and petitions have resulted in the reopening of EIA documentations and in the striking aversion of the public leading finally to the success of public opinion. This episode among others displays how justice can triumph in China's environmental disputes. The EIA's exclusive nature is however leading to protests in order to obtain results. The lack of public consultation has resulted in people protesting on the streets and under the government's headquarters. This would not have happened if truly inclusive policies would have been in place.

In Jin Ziming's analysis of 107 judicial decisions that have been acknowledged as challenging the EPB's decisions during the EIA process, he recognizes that the interested parties such as local residents and home owners accounted as 42.1% of the total plaintiffs – and among them the success rate stayed at 17.8%. In other words only eight cases of 45 won the lawsuit.<sup>54</sup> A rather low percentage. However, social injustice has occurred in some of these cases. It is the example of case No. 69 where the EPB approved the EIA documents that didn't cover the statement of the public involvement. The judges observed this incompliance as a "flaw" rather than breaching a law and therefore did not indict the EPB.<sup>55</sup> The case shows that judges did not fight for the strengthening of public participation and Jin suggests that it would be more convenient to "turn to the legislatures, not the courts"<sup>56</sup> in order to improve public involvement in the EIA process.

---

<sup>54</sup> Jin op. cit., p.36.

<sup>55</sup> Idem. p.39.

<sup>56</sup> Idem. p.40.

## CONCLUDING REMARKS

The evolution and growing complexity of today's Chinese society, together with an increasing openness towards the outside world in order to improve education and exchange ideas requires the continuous approval of the public. As a result, China appears as a country who needs to develop a more comprehensive approach towards the inclusion of the public in the decisional sphere. With the righteous involvement of the public – including marginalised groups – during decisional stages of development projects, numerous qualitative improvements would become possible. Despite their authoritative nature, Chinese governing bodies that have promoted openness and inclusion of local residents in the EIA process as stated by the changing law, need to overcome the current marginalisation of public opinion in order to avoid upheavals and loss of credibility.

WORD COUNT:3916

## Bibliography

- Alberton, M. (2017). 'Public Participation in Environmental Impact Assessment in China' , *Routledge Handbook of Environmental Policy in China*.
- Arnstein, S.R. (2007) 'A Ladder Of Citizen Participation' , *Journal of the American Institute of Planners*, 35(4).
- Brombal, D., Moriggi, A. and Marcomini, A. (2016). 'Evaluating public participation in Chinese EIA. An integrated Public Participation Index and its application to the case of the New Beijing Airport'. *Environmental Impact Assessment Review* (62).
- *China | UNESCO UIS*. [online] Available at: <http://uis.unesco.org/country/CN> [Accessed 24 Mar. 2018].

- Chinadialogue.net. [online] Available at: <https://www.chinadialogue.net/Environmental-Protection-Law-2014-eversion.pdf> [Accessed 8 Mar. 2018].
- Dai, J. Zeng, F. and Wang, Y. (2017) 'Publicity strategies and media logic: communication campaigns of environmental NGOs in China', *Chinese Journal of Communication*, 10(1).
- Enserink, B., Koppenjan, J. (2007) 'Public participation in China: sustainable urbanization and governance', *Management of Environmental Quality: An International Journal*, 18:(4).
- Glucker, A., Driessen, P., Kolhoff, A. and Runhaar, H. (2013). 'Public participation in environmental impact assessment: why, who and how?'. *Environmental Impact Assessment Review* (43).
- Gu, L. and Sheate, W. (2018) 'Institutional Challenges for EIA Implementation in China: A Case Study of Development Versus Environmental Protection', *Environmental Policy and Management Group Department of Environmental Science and Technology*.
- Jin, Z. (2015). 'Environmental Impact Assessment Law in China's courts: A study of 107 judicial decisions'. *Environmental Impact Assessment Review* (55).
- Li, W., Liu, J. and Li, D. (2012). 'Getting their voices heard: Three cases of public participation in environmental protection in China' *Journal of Environmental Management* 98.
- Li, T., Thomas Ng, S. and Skitmore, M. (2012). Public participation in infrastructure and construction projects in China: From an EIA-based to a whole-cycle process. *Habitat International* (36)1.
- Martens, S. (2006) 'Public participation with Chinese characteristics: Citizen consumers in China's environmental management'. *Environmental Politics*, 15:(2).

- McElwee, C. (2011). *Environmental law in China*. New York: Oxford University Press.
  
- Moorman, J. L.; Ge, Z. (2007). Promoting and strengthening public participation in china's environmental impact assessment process: Comparing china's EIA Law and U.S. Nepa. *Vermont Journal of Environmental Law* 8(2).
  
- Npc.gov.cn. (2012). *laws*. [online] Available at: [http://www.npc.gov.cn/englishnpc/Law/2007-12/06/content\\_1382122.htm](http://www.npc.gov.cn/englishnpc/Law/2007-12/06/content_1382122.htm) [Accessed 22 Mar. 2018].
  
- O'Faircheallaigh, C. (2010). 'Public participation and environmental impact assessment: Purposes, implications, and lessons for public policy making' *Environmental Impact Assessment Review* 30.
  
- Song, Y., Dong, B., Gao, N. and Xia, S. (2010). Huangpu River water treatment by microfiltration with ozone pretreatment, *Desalination*, 250(1).
  
- Tang, S.; Tang C. and Wing-Hung Lo, C. (2005) 'Public Participation and Environmental Impact Assessment in Mainland China and Taiwan: Political Foundations of Environmental Management', *The Journal of Development Studies*, 41(1).
  
- Wang, Y., Morgan, R. and Cashmore, M. (2003). Environmental impact assessment of projects in the People's Republic of China: new law, old problems. . *Environmental Impact Assessment Review* (23).
  
- Yang, S. (2008) 'Public participation in the Chinese Environmental Impact Assessment (EIA) System' *Journal of Environmental Assessment Policy and Management*, 10(1).