



## **Publishing Pollution Data in China: Ma Jun and the Institute of Public and Environmental Affairs Epilogue**

Ma Jun and his colleagues at the Institute of Public and Environmental Affairs (IPE) decided to go ahead with the planned publication of *Blue Sky Roadmap II* in January 2014.<sup>1</sup> The report gave an overview of progress by provincial environmental protection bureaus (EPBs) in monitoring and reporting real-time emissions data from state-owned enterprises (SOEs), and cited specific companies as habitual violators of emissions limits. Local media picked up the report, drawing further attention to the errant SOEs.

As anticipated, management at some SOEs insisted the information was incorrect, and demanded that IPE retract the report. However, IPE was able to resolve the conflicts without retractions, thanks in large part to preparation. In drafting the report, IPE researchers had followed a protocol developed over years of targeting multinational companies (MNCs) and their Chinese suppliers (and, later, listed Chinese companies and their institutional investors). IPE contacted companies in advance of publication and provided an opportunity for comment. It returned to unresponsive companies repeatedly by email, fax and phone. When a company disputed published information, IPE staff could point to these unanswered efforts to communicate. Reticent companies would, at this point, often start to talk to IPE.

As always, Ma and his team tried to be collaborative rather than confrontational. If a company believed its emissions data had been misreported, IPE added a footnote to the *Roadmap II* report or provided space on its website for company comments. In general, IPE researchers tried to persuade SOEs that retracting data and hiding information would not solve the problem.

Acknowledging that inaccuracies were likely, especially during the rollout phase of real-time monitoring, IPE lowered the threshold for correcting data in its reports and on its website. (The website and app were still under development when *Roadmap II* was released in January 2014.) Rather than demand a third-party audit, as in its green supply-chain initiative, IPE required only confirmation from an EPB that an SOE's emissions

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<sup>1</sup> *Blue Sky Roadmap II: Real-Time Disclosure Begins* (January 2014). See: <http://www.ipe.org.cn/Upload/IPE->

data had been misreported, and that the EPB had since corrected its own records. Still, in the interest of transparency IPE inserted a note of explanation when it changed data.

For its app, IPE developed a rapid-response system for reporting discrepancies between the in-app data and data displayed by the EPBs or the companies themselves (some companies posted their real-time emissions on their own websites, as well as streaming the data to the local EPB). Users would be able to report an inconsistency by either phoning IPE or using Weibo to send a private message. IPE staff would follow-up on queries and verify the data.

But as long as IPE's data mirrored those published by the EPBs, it did not alter numbers to placate an SOE. IPE and its partner non-governmental organizations (NGOs) set this parameter after seeking guidance from a legal advisor, who affirmed that it should be safe to publish even controversial or unflattering data as long as the same numbers appeared in official sources. Ma notes the importance of staying alert to legal issues:

When it comes to legal risks, we need to do some preparation. We need to study these ourselves, all the laws and regulations. But we also need to keep up our contact with the lawyers and try to be ready for any sort of legal cases.<sup>1</sup>

IPE staff also realized they needed access to data archives held by the EPBs, so they could double-check questionable numbers and rule out the possibility of a technical mishap on IPE's part. In late-2013, IPE had started to press EPBs to preserve data and keep archives open to the public, and to assist in resolving data disputes. It also tried to minimize the risk that EPBs would change archived data under political pressure. Altering official records—especially if done without notice or explanation—confused IPE's efforts to double-check its own data, and undermined the new monitoring rules. As Ma notes:

We recognize that there are possibilities for some problems with data sampling and gathering and transmission and presentation. There are possibilities where it could go wrong in some cases. But we do hope that any revision of the data should be publicly explained.

IPE tried to strengthen ties with EPBs, setting up meetings with environmental authorities to urge closer coordination and mutual support. IPE also presented its demands—make data archives public and do not alter data without notice—in a formal petition to the Ministry of Environmental Protection in March 2014.

In early 2014, Ma and his team continued to build the online platform and work out the technical challenges of presenting real-time data. They resolved one issue: since it was impractical to capture a screenshot of every violation under real-time monitoring, they gathered occasional screenshots for companies they identified as serial violators. This way, users

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<sup>1</sup> Author's telephone interview with Ma Jun, in Beijing, on March 12, 2014. All further quotes from Ma, unless otherwise attributed, are from this interview.

would have access to a sampling of supporting documents, and IPE would have some evidence to offer when an SOE questioned the accuracy of its information. Says Ma:

It's not just about mitigating the risk. It's also about giving fair treatment to all these companies. We understand it matters to them and we want to handle it very cautiously. I think that's very important.