

# Environmental Impact Assessment System: Historical Institutional Analysis of Trail, Logic, and Evolutionary Dynamics

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**Abstract:** From the analytical perspective of historical institutionalism, a comprehensive review of the tortuous historical process of the environmental impact assessment system can be found: since the formal establishment of China's environmental impact assessment system in 1979, it has gone through three phases: the system initiation period, the system standardisation period, and the system diversion period, and it is currently in the system equilibrium period. Accompanied by the transformation of China's ecological and environmental concepts, the transformation of the mode of economic development and the process of administrative system reform, the development of the system is characterised by path-dependence; top-down changes are still achieved under the impetus of the Party's conceptual innovation and self-revolution, as well as the EIA storm in 2015. In the new equilibrium stage, the EIA system should focus on strategic EIA and further seek to connect with other environmental protection systems, such as the sewage licensing system, to achieve institutional development; at the same time, by strengthening industry self-regulation, the system should avoid falling into vicious path dependence.

**Keywords:** environmental impact assessment system; historical institutionalism; path dependence; institutional change

## 1. Introduction

The Environmental Impact Assessment (EIA) system is a crucial tool for environmental protection in China, focused on averting pollution and ecological harm through upfront evaluation and control of activities with potential environmental risks. Originating in the United States in 1969, China adopted the concept in 1973 and formalized its EIA system for construction projects in 1979. Over more than four decades, this system has evolved from assessing individual projects to encompassing strategic and policy evaluations, transitioning from administrative approvals to broader expert consultation and public involvement. Its scope has broadened to include not only pollution prevention but also scientific decision-making and strategic planning, tailored to China's specific needs.

In 2022, the Ministry of Ecology and Environment introduced the "14th Five-Year Plan for Environmental Impact Assessment and Sewage Discharge Permit Work," marking a new phase of development. This plan emphasizes integrating the EIA system as the cornerstone of source prevention and establishing the sewage discharge permit system to regulate fixed pollution sources. The aim is to synergize economic growth with ecological protection. Enhancing the system and maximizing its utility requires a thorough reevaluation of its functions and alignment with other regulatory frameworks.

## 2. Literature Review

Existing studies have mainly focused on the following aspects: first, the experience of foreign countries in the construction of EIA systems and the comparative study of EIA systems between China and foreign countries. The EIA system, as an "imported product" at the beginning of its introduction, has gone through a localization process from experience borrowing to self-innovation. By studying the development history of EIA systems in other countries,<sup>[1]</sup> explores the differences in the construction of EIA systems between China and foreign countries, and reviews the achievements of the construction of China's EIA system from a comparative perspective.<sup>[2]</sup> The second aspect is the study on the improvement of the EIA system. On the one hand, we start from the system itself, such as improving

the mechanism of information disclosure and public participation in EIA, improving the legal system of EIA<sup>[3]</sup>, and promoting the planning<sup>[4]</sup> and policy EIA, etc. On the other hand, we seek to connect the EIA system with other environmental protection systems, such as the connection with the sewage licensing system<sup>[5]</sup>, the connection with the territorial spatial planning system<sup>[6]</sup>, and the connection with ecological and environmental law enforcement<sup>[7]</sup>, so as to promote the function of the EIA system by the connection between the systems. Thirdly, it is a retrospective and critical study of the EIA system, which aims to find out the problems and countermeasures in the operation of the EIA system by sorting out the history of the development of the EIA system<sup>[8]</sup> or describing the important events in the course of the development of the EIA system<sup>[9]</sup>.

In conclusion, existing studies have explored China's EIA system from multiple perspectives, and the research results have been fruitful, providing a solid foundation for the development of this study. However, most of the existing researches take some parts of the system operation process as an entry point to explore the problems and countermeasures of the system, and less analyze the overall development history and logic of change of the system from the overall level of the system. Based on this, we focus on China's environmental impact assessment (EIA) system and combine it with the analytical framework of historical institutionalism to explore the development trajectory, logic and dynamics of change of China's EIA system, with a view to better recognizing and understanding the functions and roles of the current EIA system, revealing the reasonableness and inadaptability of the system, and providing references for the further improvement of the EIA system.

### **3. Institutional mapping: the trajectory of the EIA system**

Historical institutionalism stresses the study of institutions in a specific context and time order, and by analysing the order of various elements in the time order, it is possible to accurately grasp the historical reasons for the emergence of events in political activities.<sup>[10]</sup> The history of the development of the environmental impact regime from 1973 to 2023 is divided into four time periods, based on the years of important contexts or key events as historical time points, such as the promulgation of key policies and major political conferences.

#### ***3.1. Institutional start-up phase (1973-2001): introduction of concepts and policy follow-up***

China's environmental assessment system traces its roots to the initial awareness of environmental protection and the adoption of the concept of Environmental Impact Assessment (EIA), first introduced in the US through the National Environmental Policy Act of 1969. The concept gradually spread to China in the 1970s, gaining momentum with the convening of the first National Environmental Protection Conference in Beijing in 1973. Subsequent to the Third Plenary Session of the Eleventh Central Committee of the CPC, the central government began issuing directives on environmental protection, notably mentioning "environmental impact assessment" in a 1978 document from the State Council's Leading Group of Environmental Protection.

Under the central government's guidance, the environmental impact assessment system began to take shape to meet China's emerging environmental protection needs. Key milestones include the issuance of notices in 1979 mandating environmental surveys and pre-evaluation reports for capital construction projects and the promulgation of the Environmental Protection Law (for trial implementation) in 1979. Subsequent measures and regulations further refined the requirements for environmental impact assessment.

During this period, the environmental assessment system was in its nascent stage, focusing on EIA for construction projects and establishing the "EIA veto" system. However, due to the lack of norms, specific operating rules, and robust supporting policies, coupled with the incomplete transformation of environmental protection concepts, environmental impact assessment often remained a procedural formality.

#### ***3.2. Institutional standardization phase (2002-2011): content expansion and institutional improvement***

China's evolving environmental consciousness and advancing environmental protection agenda have driven expansion and refinement of the Environmental Impact Assessment (EIA) system across three key dimensions. Firstly, in terms of legal framework. EIA Law 2002 elevated EIA system status in legal framework; 2009 policy improvements enhanced maturity. Secondly, regarding the scope of

EIA. Shift from project-based to planning and project assessments broadened EIA function; 2002 Law inclusion of planning EIA, 2009 Regulations expanded legal framework. Thirdly, regarding key stakeholders. Professional standards rise, expert and public involvement increase; SEPA measures standardize review, enhance participation.

While the EIA system has undergone systematic and comprehensive development during this period, shortcomings in the legal content and administrative approval processes, particularly for project EIA, have emerged. Addressing these gaps is crucial for enhancing the EIA system's role in ecological and environmental protection at its source.

### ***3.3. Institutional transformation phase (2012-2016): EIA decoupling and approval reforms***

Facing resource constraints, environmental pollution, and ecosystem degradation, the 18th Party Congress integrated ecological civilization into socialist modernization. Since then, with political and economic system reforms, the EIA system underwent transitions due to operational challenges.

Firstly, streamlining and Decentralization of Approval Authority. In 2013, the Ministry of Environmental Protection (MEP) delegated EIA approval authority to provincial departments. In 2016, macro-management of EIA was emphasized, simplifying micro-management and implementing a filing system, reducing approval burdens and enhancing standardization. Secondly, promoting "Decoupling" Reform of EIA\*\*: In 2014, MEP strengthened EIA organization management, promoting marketization, scientification, and specialization. In 2015, nationwide decoupling and restructuring of EIA organizations were implemented. Thirdly, strengthening EIA Process Management and Increasing Penalties: In 2013, MEP initiated supervision of the entire EIA process, emphasizing accountability and disclosure. In 2015, accountability for unlawful projects was strengthened, with penalties imposed. In 2016, revised EIA Law abolished retroactive procedures, increased penalties for illegal enterprises and managers.

Systematic adjustments during this period emphasized the EIA system's governance role, transitioning from approval to a registration and filing system. This broke interest linkages, abolished retroactive procedures, and enhanced system continuity.

### ***3.4. Institutional Equilibrium Phase (2017-present): Center of Gravity Shift and Institutional Articulation***

The 19th CPC National Congress in 2017 emphasised the importance of ecological civilisation and environmental protection. In 2018, the environmental protection authorities issued a series of regulations on public participation in EIA and the approval process to strengthen environmental protection. In 2019, the focus was on promoting ecological environmental zoning control and the establishment of a credit platform for EIAs, which was aimed at improving the transparency and creditworthiness of the management of EIAs. In 2020 and 2021, the policy focuses on the technical guidelines for ecological environmental impact analysis and the pilot work on ecological environmental zoning control, in order to strengthen the prediction and assessment of environmental impacts, as well as to regulate the management of ecological environmental zoning. In 2022, the policy further improves the system of ecological environmental zoning control and the system of sewage discharge permits, in order to strengthen the management and supervision of environmental protection work.

In the new phase, China's EIA system has undergone an all-round adjustment and optimisation: the focus has shifted from project EIA to strategic EIA, and planning EIA and policy EIA have been upgraded; supervision has been strengthened, and the approach has been innovated; and there has been a convergence with the sewage licensing system.

## **4. Institutional Development: Institutional Creation, Path Dependence and Institutional Change**

The theory of historical institutionalism on the origin and change of institutions, which is based on a fusion of the conflict analysis framework and rational choice institutionalism, mainly involves three variables: the old institutions, the environment and the actors. Different combinations of the three variables determine the origin, mode and timing of institutional change. Based on the framework of historical institutionalism, this paper tries to construct the "break-equilibrium" logic of the development of the EIA system from the path dependence and key nodes; and construct the dynamic framework of the EIA system's creation and its evolution from the macro-environment and political variables.

#### **4.1. Macro-institutional context and EIA system generation**

Historical institutionalism proposes three modes of institutional origins: external pressure leads to internal conflict; the system itself stimulates conflict; and the import of new ideas triggers institutional change.<sup>[11]</sup> The founding of China's EIA system was influenced by the intensification of environmental pollution and the introduction of international environmental protection concepts, while the initial period, which was dominated by project EIA, was influenced by the macro-institutional context.

##### **4.1.1. Increased environmental pollution after the establishment of the State**

In the early years of the founding of the PRC, the pursuit of economic development led to large-scale environmental damage. The crude economic model brought about serious problems such as soil erosion and forest reduction. The political concept that environmental problems are unique to capitalism led to the neglect of environmental issues.<sup>[12]</sup> In the early years of New China, man and nature were in "opposition" to each other: man had to conquer nature to obtain the resources he needed for construction, and at the same time, he had to fight against the "disasters" that came from nature. Man and nature are in a vicious circle, which needs to be broken by the change of concepts and the establishment of relevant systems.

##### **4.1.2. Global environmental problems and the introduction of international environmental protection concepts**

The global environmental problems triggered the reflection on the industrial civilisation; from the 1930s to the 1960s, environmental pollution incidents occurred frequently, resulting in the death, disability and illness of many people, and the citizens' environmental protection movement and the United Nations environmental conferences in the 1970s prompted the western countries to strengthen the environmental protection.<sup>[13]</sup> Through participation in international conferences, China's leaders recognised the seriousness of the domestic environmental pollution problem, and in August 1973, a conference on environmental protection work was held in Beijing, which aroused the people of China, especially leaders at all levels, to pay more attention to environmental protection issues.<sup>[14]</sup> Whether a system arises from conflict or from design, it is inevitably the product of a certain conception. The concept of environmental protection was introduced into the country from abroad, and spread from the central to the local level, providing the ideological foundation and thought leadership for the establishment of governmental environmental protection agencies, the promulgation of environmental protection policies and laws, and the establishment of the environmental impact assessment system.

##### **4.1.3. Administrative Approval System under the Transition of the Economic System**

From the concept of environmental protection and environmental impact assessment to the specific environmental impact assessment system, we need to first consider what content and form to start building China's EIA system. Compared with the United States, where the EIA system is based on the laws, plans, and decisions made by the government agencies since the birth of the EIA system,<sup>[15]</sup> China's EIA establishes the main position of project EIA in China's EIA system at the beginning of its establishment, and adopts the administrative approval method to determine the important role of the government in the EIA system.<sup>[16]</sup> The vastly different establishment of the system stems from the differences in the national macro-institutional context.

The establishment of the EIA system took place during the period of transition from the planned economic system to the market economic system in China. This period of government administration also occurred in the corresponding transition: direct administrative orders, administrative guidance and other means began to weaken, instead of the emergence of a large number of administrative approval behaviour of the administrative approval system gradually established, and become a plan and the market under the two streams of thought of the government intervention in the market under the means of compromise.<sup>[17]</sup> The environmental impact assessment (EIA) system established under this institutional background has also established the systematic form of EIA approval, which seeks to intervene in the behaviour of market entities to achieve environmental protection purposes by way of EIA approval.

#### **4.2. Path Dependence and EIA System Equilibrium**

Institutions evolve over time and are branded as path dependent.<sup>[18]</sup> To a certain extent, path dependence can explain the long-term equilibrium of the EIA system, which is mainly used to describe the mechanism of incremental payoffs and self-reinforcement in the institutional change, once the

institutional change enters a certain path, it will develop along the established path, even though this path may be inefficient or even ineffective.<sup>[19]</sup> Throughout the development of the EIA system, the self-reinforcement and path-dependence of the system have three main reasons and manifestations.

#### ***4.2.1. Institutional improvement: self-development of the EIA system***

The self-development of the Environmental Impact Assessment (EIA) system has continuously enhanced its effectiveness, leading to positive feedback that propels the system into a path-dependent trajectory. Three main aspects illustrate the self-improvement of China's EIA system: Firstly, the expansion of institutional content. Initially focusing solely on project-level assessments, the EIA system gradually broadened its scope to encompass strategic assessments such as planning and policy evaluations. Secondly, the enhancement of institutional frameworks. At the legislative level, a legal framework consisting primarily of the Environmental Impact Assessment Law, the Regulations on the Administration of Environmental Protection for Construction Projects, and the Regulations on Environmental Impact Assessment for Planning has been established. Additionally, complementary regulations such as the Measures for Public Participation in Environmental Impact Assessment have been promulgated, augmenting the legal basis of the EIA system. Thirdly, the refinement of practical implementation and regulatory oversight. Various technical guidelines for EIA implementation across different sectors have been introduced, standardizing EIA practices. Moreover, stringent regulatory measures and penalties for violations have been enacted, strengthening oversight and enforcement. Through this process of self-improvement and refinement, the EIA system has evolved from a focus on project management to encompassing strategic planning, transitioning from micro to macro perspectives, and from unilateral to comprehensive approaches, thereby more effectively fulfilling its role in mitigating environmental pollution and ecological degradation. Simultaneously, the maturation of the EIA institutional framework implies increased costs of institutional change, inadvertently pushing the EIA system into a path-dependent phase.

#### ***4.2.2. Target replacement: self-consistent operation of the EIA system***

Due to the relative separation between institutional designers and operators, the pursuit of self-interest by institutional operators during system operation often leads to goal substitution within the EIA system. From the perspective of government departments and officials, the goal of environmental protection within the EIA system has been supplanted by the imperative of economic development. Initially, China's EIA system established environmental assessment as a prerequisite for construction projects, employing a "veto system" for significant local development projects, reflecting the tension between economic development and environmental protection. Early establishment of the EIA system coincided with an emphasis on GDP growth among government officials and policies, leading local governments to ally with developers to undermine the mandatory nature of the EIA process. On the other hand, from the standpoint of project developers, the goal of mitigating adverse environmental impacts within the EIA system has been replaced by the goal of obtaining administrative permits through expedited approval processes. For enterprises, environmental impact assessments serve merely as tools to secure administrative approvals. Utilizing these tools, enterprises may either manipulate project plans to meet lenient EIA requirements or resort to bribery to expedite approvals. Consequently, the administrative approval process, instead of facilitating the achievement of EIA objectives, inadvertently fosters rent-seeking behaviors among government officials, replacing the original goal of environmental improvement within the EIA system.

The occurrence of goal substitution within the EIA system fosters internal coherence but undermines the impetus for reform, ultimately leading to path dependency.

#### ***4.2.3. Interests: resistance to change in EIA systems***

Under the early arrangement of the EIA system, environmental assessment agencies were directly affiliated with environmental protection departments, resulting in the emergence of so-called "red-top intermediaries." Due to intertwined interests, these intermediary agencies wielded significant, if not monopolistic, power in the EIA market. For instance, local governments may recommend specific EIA agencies to receive subsidies, exerting pressure on developers to select these agencies. However, such intermediaries often compromise the integrity of EIA reports, exacerbating environmental pollution and ecological degradation. Nonetheless, discussions about separating EIA agencies from environmental protection departments emerged as early as 2008, gaining momentum by 2010, but substantial reforms did not materialize until 2015. Essentially, entrenched interests have hindered reforms within the EIA system. For EIA practitioners, decoupling threatens their career prospects; for EIA agencies, environmental assessments represent a significant revenue stream, jeopardized by decoupling; for environmental protection departments, decoupling not only reduces avenues for illicit income but also

complicates administrative procedures and increases costs.<sup>[20]</sup> Consequently, central environmental authorities, with their affiliated EIA agencies operating independently, enjoy greater autonomy and operational flexibility. The institutionalization of roles has engendered vested interests, impeding reforms within the EIA system.

### ***4.3. Political variables and the evolution of EIA systems***

Institutions often refine themselves through expansion and refinement, but they may undergo goal substitution to protect the interests of operators. This phenomenon, if tolerated by the macro environment, can lead to continued path dependence. However, when it exceeds tolerance limits, significant ruptures can occur. Historical institutionalism distinguishes three paths of change: functional, evolutionary, and ruptural. In China's environmental impact assessment (EIA) system, we see features of both rupture and balance. Institutional change is not solely driven by institutions; socio-economic development and the distribution of ideas also play crucial roles. In the EIA transition process, emphasis is placed on the roles of ideas, economics, and administrative power as key political variables.

#### ***4.3.1. Conceptual factors: changes in the concept of environmental protection***

Historical institutionalism posits a coherence between institutions and ideologies.<sup>[21]</sup> China's Environmental Impact Assessment (EIA) system reflects shifts in environmental consciousness. From the Party's Fifteenth National Congress in 1997, establishing sustainable development as a core strategy, to the incorporation of the Scientific Outlook on Development in 2007, there's been a gradual ideological shift towards balancing economic growth with environmental protection. A deeper transformation occurred with the Eighteenth National Congress, integrating ecological civilization into China's socialist blueprint. This ideological evolution has catalyzed nationwide environmental awareness, prompting citizen activism and reshaping government responsibilities. Despite these strides, the practical efficacy of the EIA system, pivotal for environmental stewardship, falls short. It lacks robust citizen participation mechanisms and is marred by corruption and the influence of "red-top intermediaries." Thus, comprehensive reform is imperative to revitalize the EIA system.

#### ***4.3.2. Economic factors: transformation of the economic development approach***

In 2005, China became the top consumer of coal, steel, and copper globally, and the second-largest consumer of oil and electricity.<sup>[22]</sup> However, this economic growth, driven by high energy consumption and waste emissions, led to severe environmental pollution and resource scarcity issues, signaling a developmental bottleneck.

In December 2007, the 17th National Congress of the Communist Party of China introduced the idea of shifting the economic development mode. Unlike previous emphasis solely on "economic growth mode," this new concept broadened to "economic development mode," encompassing both growth mode transformation and economic structural adjustments. The 18th National Congress in 2012 stressed the importance of adjusting the economic structure as the primary approach to accelerate this transformation.

To achieve this shift, it requires a more scientific approach to government macroeconomic regulation. This involves crafting strategic plans based on China's resource reserves and environmental capacity while ensuring policies are both scientifically sound and environmentally friendly. This transition has also elevated the role of China's Environmental Impact Assessment (EIA) system, moving from project-based assessments to strategic evaluations focused on planning and policy. In 2005, China had become the world's largest consumer of coal, steel and copper, and the second largest consumer of oil and electricity. The increase in the production of energy and raw materials has been much higher than the increase in GDP over the same period.. Economic growth has been "sloppy growth" at the expense of high energy consumption intensity and high levels of waste emissions, making it difficult to return to the problems of environmental pollution and resource shortages, while economic development has entered a bottleneck.

#### ***4.3.3. Administrative Power: Transformation of Government Functions and Reform of "Management of Services"***

The reform of the administrative management system, initiated during the Second Plenary Session of the Eleventh Central Committee of the Party in 2008, emphasized the transformation of government functions. This shift aimed to enhance the efficiency of public service provision, leveraging the market's role in resource allocation while empowering citizens and social organizations in public affairs

management. Following the 18th National Congress of the Communist Party of China (CPC), the focus shifted to decentralizing government authority, streamlining administration, and optimizing services. This involved reducing government overreach in microeconomy regulation, fostering market-driven resource allocation, and breaking down barriers to business operation. The environmental impact assessment (EIA) system reform exemplifies this approach, emphasizing decentralization of approval authority, transitioning from approval to reporting, and innovating supervision methods to better align with market needs and enhance service quality for enterprises.<sup>[23]</sup>

#### **4.3.4. Actor: Self-revolution of the Party**

China's EIA reform is driven both by grassroots public participation and top-down improvements and functional innovations in the EIA system. This dual approach enables a comprehensive reform of the EIA system itself. The top-down impetus for change is closely linked to the Party's conceptual renewal and self-purification.<sup>[24]</sup>

The Party's self-revolution entails two main aspects: firstly, it requires reformers to possess the spirit of self-revolution, breaking through ideological barriers and entrenched interests. The Party's evolving ecological concepts exemplify this spirit, guiding the establishment and refinement of environmental protection institutions and driving changes in the EIA system.<sup>[25]</sup> Secondly, it involves self-supervision and purification to combat corruption within the Party. Since the 18th National Congress, relentless anti-corruption efforts have uncovered hidden corruption, providing opportunities for systemic change and facilitating qualitative improvements in development.

#### **4.4. Critical Nodes and EIA System Breakdown**

When a system remains stuck in path dependence, accumulating shortcomings over time, it faces increasing pressure. Once this pressure exceeds the system's self-regulation capacity, internal and external forces drive it to fracture, restoring balance. In historical institutionalism, this is seen through the emergence of historical veto points, which catalyze institutional change at key junctures, ultimately leading to transformation.

##### **4.4.1. Historical veto points: institutional design gaps and operational deviations**

Historical Veto Points (HVPs) represent critical junctures where power shifts can create strategic opportunities for political actors. In the Environmental Impact Assessment (EIA) system, HVPs emerge due to the system's absence and its profit-oriented operation. The absence of the EIA system is evident in inadequate institutional constraints and a "heavy approval, light regulation" approach.<sup>[26]</sup> Inadequate constraints compromise principles like allowing projects to proceed without EIA approval, while weak accountability mechanisms and lenient penalties enable widespread irregularities. The lack of regulation for EIA personnel leads to qualification abuses and affiliations, undermining the system's integrity. The profit-oriented operation stems from the administrative approval format of EIA vetoes. Administrative approval commercializes departmental power interests, leading to complex approval processes aimed at revenue generation. However, flaws in the EIA system have turned environmental protection departments into hotbeds for corruption.<sup>[27]</sup> Awareness of these issues prompts stakeholders to advocate for systemic changes through recommendations and public discourse.

##### **4.4.2. Key point: top-down "EIA storm"**

Historical institutionalism underscores the role of historical events in shaping institutional change. In China, events of varying significance drive such changes.<sup>[28]</sup> A pivotal moment for the Environmental Impact Assessment (EIA) system was 2014. The revision of the Environmental Protection Law mandated local governments to be accountable for environmental quality, leading to stricter requirements for officials. Additionally, the Third Inspection Group's investigation from November 26 to December 26, 2014, revealed major issues plaguing the EIA system, including pre-approval construction, corruption in the EIA process, and lax supervision.<sup>[29]</sup> The crackdown on corrupt practices triggered an EIA reform wave, halting irregular projects and punishing officials. These events marked crucial junctures in the EIA system's evolution in 2015, breaking free from institutional path dependence and facilitating its functional transformation, signifying significant progress in China's environmental protection efforts.

## **5. Conclusions**

Taking the lens of historical institutionalism, a nuanced exploration of China's environmental

impact assessment (EIA) system reveals its evolution through distinct phases since its inception in 1979. These phases include the initiation, standardization, diversion, and current equilibrium periods. The system's development has been intricately intertwined with shifts in China's ecological ideologies, economic development models, and administrative reforms, showcasing a trajectory marked by path-dependence. Notably, despite this inertia, significant top-down changes have been instigated by the Party's conceptual innovations and the transformative "EIA storm" of 2015. As the system enters a new equilibrium phase, it must prioritize strategic EIA and integrate with complementary environmental frameworks like the sewage licensing system to foster institutional growth. Simultaneously, industry self-regulation should be bolstered to prevent regression into detrimental path-dependence patterns.

After profound changes such as the decoupling of EIA and the cancellation and decentralisation of approvals, the EIA system is now in a new equilibrium phase. This implies a shift in the centre of gravity of EIA, in particular the interface with the sewage licensing system, which has provided a new impetus for the continued development of the EIA system. Based on the analysis of historical institutionalism, looking ahead, the EIA system needs to focus on two key points in the new equilibrium period: first, self-improvement, including regulating the content and process of EIA, promoting strategic EIA and optimising the interface of the system; and, second, avoiding pernicious path dependency by strengthening regulation, promoting the rule of law in EIA, and enhancing the disclosure of information in order to raise the normativity of EIA, and to avoid the obstruction of the system's development.

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