

# Environmental Auditing for Industrial Green Transformation Governance

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**Abstract:** Industrial green transformation requires environmental auditing to extend beyond the verification of isolated compliance events. Existing arrangements can identify environmental problems, yet their scope, standards, procedures and data systems are not always connected to the processes that make production greener. This article develops a transformation-oriented environmental audit framework through institutional analysis and synthesis of recent research on natural-resource accountability, corporate environmental strategy and green productivity. Five structural gaps motivate the design: fragmented audit scope, weak links between indicators and transformation outcomes, discontinuity between detection and rectification, separated departmental data, and limited use of audit results. The proposed framework contains six connected modules. These cover audit content, indicators and standards, full-process control, collaborative governance, digital infrastructure, and result application. Together, they embed environmental responsibility across strategy, investment, production, disclosure, rectification and follow-up. The framework also separates mandatory compliance from broader transformation evaluation, preserving the legal boundary of audit judgement. A four-stage implementation pathway accommodates differences in pollution intensity, technological maturity, firm capacity and regional governance. Environmental auditing can support industrial green development when evidence remains traceable, correction addresses organisational causes, and lessons constrain future decisions. However, strong accountability without technical capacity, finance or proportionate standards may induce production contraction or strategic reporting. The framework provides a bounded institutional architecture for moving from retrospective inspection towards preventive transformation governance.

**Keywords:** Environmental Audit; Industrial Green Transformation; Audit Framework; Accountability; Digital Audit; Rectification

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## 1. Introduction

Industrial green transformation changes how firms invest, produce, disclose information and manage environmental risk. It therefore extends beyond compliance with a single emission limit or completion of one environmental project. Transformation is a linked process. Strategic commitments must enter budgets, projects must alter operations, and environmental gains must persist after inspection ends.

Environmental auditing has expanded alongside this agenda. Earlier work often focused on environmental funds, legality

and project completion. Contemporary audit mandates increasingly address natural resources, pollution control, ecological responsibility and performance. This expansion gives auditing a potential role in green transformation governance.

The potential remains only partly realised. Audit projects are usually organised around defined entities, officials, funds or resource categories. Industrial transformation crosses those boundaries. A project may be financially compliant but technically ineffective. A firm may increase environmental spending without changing resource efficiency. A local government may correct one finding while the organisational cause remains intact.

Recent research shows that these concerns are consequential. Natural-resource accountability audits have been associated with corporate environmental strategies <sup>[1]</sup>, green innovation <sup>[2]</sup>, environmental investment <sup>[3]</sup>, carbon efficiency <sup>[4]</sup> and industrial GTFP <sup>[5]</sup>. Other studies report heterogeneous or adverse productivity responses <sup>[6]</sup>. These findings suggest that audit design and implementation quality condition the eventual outcome.

The central institutional problem is therefore not whether environmental auditing matters. It is how audit content, evidence and follow-up should be organised around a continuing transformation process. An audit system designed for isolated compliance cannot automatically evaluate technological adjustment, organisational capability or long-term environmental productivity.

This article asks: how should an environmental audit system be designed to support industrial green transformation without exceeding its accountability mandate? The question contains two requirements. The system must capture substantive transformation. It must also preserve clear legal criteria, evidence standards and responsibility boundaries.

The article develops a six-module framework. The modules cover transformation-oriented content, layered indicators, full-process control, collaborative governance, digital infrastructure and result application. A four-stage pathway then explains how the framework can be implemented without imposing the same requirements on every industry or region.

The contribution is institutional rather than empirical. The article identifies where current audit logic becomes disconnected from transformation processes. It then specifies how responsibility, evidence, correction and learning can be reconnected. The framework does not treat auditing as a substitute for environmental regulation, industrial policy or corporate management. It defines how independent verification can make those systems more accountable and adaptive.

## **2. Analytical Approach and Institutional Boundary**

### **2.1 Normative Institutional Analysis**

This article uses normative institutional analysis. It synthesises peer-reviewed research on environmental accountability audits, audit evaluation, green innovation, environmental governance and green productivity. Existing work has developed audit evaluation and natural-resource reporting frameworks <sup>[7-9]</sup>. Other studies connect accountability audits to governance priorities and environmental attention <sup>[10-11]</sup>. Research on pollution reduction and industrial productivity further informs the outcome layer <sup>[12-13]</sup>. The analysis focuses on the alignment of five elements: responsibility, evidence, evaluation, correction and learning.

An audit arrangement is treated as transformation-oriented when it satisfies five conditions. Responsible actors can be identified. Evidence is traceable to its source and period. Evaluation covers both behaviour and relevant outcomes. Corrective action can be verified. Lessons alter later decisions or controls.

The analysis operates at three connected levels. The enterprise level covers strategy, investment, production, internal control and disclosure. The industry level covers technology, pollution characteristics and differentiated standards. The government level covers public accountability, coordination, data governance and result application.

The proposed framework is conceptual. It does not claim that every module has already been implemented or causally validated. Instead, each module responds to a recurrent weakness identified in the literature and in the logic of existing audit arrangements.

### **2.2 The Boundary between Compliance and Transformation Evaluation**

Environmental auditing must retain a clear basis for judgement. Laws, regulations, approved standards and assigned responsibilities provide that basis. Auditors should not impose preferred technologies or industrial strategies without an authorised criterion. Transformation governance does not expand audit discretion without limit.

The framework therefore separates two evaluative layers. Mandatory compliance asks whether legal duties and approved requirements were fulfilled. Transformation performance asks whether programmes, investments and controls produced intended environmental and efficiency outcomes. The second layer should evaluate authorised objectives, not create new obligations retrospectively.

This distinction protects both independence and fairness. It also prevents a weak outcome from being treated automatically as misconduct. Poor performance may reflect design uncertainty, technology failure or external shocks. Audit findings must distinguish non-compliance, ineffective management and residual uncertainty.

## 2.3 Design Principles

Five principles guide the framework. Materiality directs resources towards responsibilities and activities with substantial ecological, financial or governance consequences. Life-cycle coverage connects decisions, implementation, outcomes and rectification. Differentiation recognises variation in pollution, technology and organisational capacity.

Evidence traceability requires each finding to link a criterion, condition, source, responsible actor and corrective status. Interoperability allows evidence to support environmental, fiscal, industrial and state-asset governance within lawful boundaries. These principles shape the six modules that follow.

## 3. Structural Gaps in Current Audit Logic

### 3.1 Fragmented Scope

Environmental audit projects often focus on a fund, official, resource type or pollution problem. Clear boundaries support accountability and project management. However, they can separate decisions that belong to one transformation chain.

Industrial project approval, financing, equipment procurement, production, energy use and pollution treatment may be reviewed at different times. Different agencies may also hold responsibility for each stage. An organisation can therefore satisfy individual requirements while the overall programme remains ineffective.

Fragmentation creates three risks. The first is omission of causal links. An ineffective treatment facility may originate from weak project appraisal rather than poor operation. The second is duplicated inspection without shared learning. The third is responsibility transfer between departments.

A transformation-oriented audit should follow the responsibility chain while retaining manageable project boundaries. It should test whether strategic objectives entered investment decisions, whether investment altered production, and whether outcomes informed later action.

### 3.2 Indicators Disconnected from Transformation

Audit indicators commonly emphasise legality, expenditure, completion and document availability. These measures are necessary. They are not sufficient to establish green transformation.

Environmental expenditure may rise because pollution is severe or project management is inefficient. A completed facility may not operate consistently. Green patent counts may increase while innovation quality remains unchanged. Studies of accountability audits identify differences in both direction and quality of corporate green responses<sup>[1-2]</sup>. Productivity effects also vary across firms and time<sup>[5-6]</sup>. Wider evidence likewise links local-official accountability auditing to heterogeneous corporate green responses and governance outcomes<sup>[14-15]</sup>.

The indicator problem is therefore structural. Input and activity measures are often easier to audit than capability and outcome measures. Organisations then have incentives to optimise visible activity. The audit may verify a target while missing the purpose behind it.

Indicators should instead be arranged as a causal sequence. Inputs support processes, processes generate outputs, outputs contribute to outcomes, and repeated action builds capability. Evidence at one level cannot substitute automatically for evidence at another.

### 3.3 Detection Separated from Rectification

Audit value declines when a finding is closed procedurally but not corrected operationally. A written response, payment adjustment or reassignment of responsibility may satisfy an immediate requirement. The production process that caused the problem can nevertheless remain unchanged.

Rectification has three levels. Problem correction addresses the identified condition. Cause correction changes the control, incentive or capability that produced it. Recurrence prevention verifies whether the improvement persists. Each level requires different evidence and timing.

Green transformation makes this distinction important because technical projects need time. Equipment must operate under changing production conditions. Staff must learn new routines. One deadline cannot establish whether the change became durable.

Weak follow-up can also distort incentives. Organisations learn that formal closure is more important than sustained improvement. A transformation-oriented system must therefore treat rectification as a monitored process rather than an attachment to the original report.

### 3.4 Separated and Inconsistent Data

Industrial transformation generates data across environmental monitoring, energy, finance, taxation, land, assets, patents and production. These systems often use different identifiers, periods and units. Auditors must reconcile basic records before substantive analysis begins.

Data separation creates verification gaps. Reported environmental investment may not match financial records. Monitoring data may not align with production schedules. Corporate disclosure may use indicators that cannot be compared with regulatory data.

Digitalisation does not solve these problems by itself. A dashboard can reproduce inconsistent definitions at greater speed. The underlying evidence architecture must define entities, fields, sources, transformations and access rights.

Data quality also affects accountability. A missing or inconsistent record does not always indicate misconduct. Auditors need rules for distinguishing poor data governance from substantive environmental failure. Those rules should remain transparent and reviewable.

### 3.5 Limited Result Use

Audit findings usually support rectification and accountability. Their influence on later industrial policy, budgeting, project approval, state-owned asset supervision and financing may be weaker. Prevention remains limited when findings do not change future decisions.

Result use also tends to emphasise negative findings. Yet successful controls can reveal effective practices. A system that records only failures loses opportunities for institutional learning and transfer.

The central gap is therefore temporal. Retrospective evidence is not consistently connected to prospective governance. Environmental auditing remains an inspection mechanism when it could also inform risk assessment and decision design.

## 4. A Six-Module Environmental Audit Framework

### 4.1 Transformation-Oriented Content

The first module defines what the audit examines. Six objects should be connected: governance responsibility, green investment, production processes, environmental outcomes, information disclosure and transformation capability.

Governance auditing asks whether duties are assigned, understood and monitored. It examines links among boards, managers, operational departments and oversight functions. Responsibility should follow decision authority rather than job title alone.

Green-investment auditing covers project selection, financing, procurement, implementation and asset use. It should test whether expenditure corresponds to an authorised environmental objective. It should also examine whether the asset operates and contributes to the intended process.

Production-process auditing follows energy, materials, technology, prevention and treatment. The aim is not to replace engineering inspection. It is to determine whether responsible management established appropriate controls and responded to known risks.

Outcome auditing covers emissions, resource efficiency, carbon efficiency and GTFP where suitable. Outcome evidence should be interpreted against changes in production volume and structure. A fall in emissions caused by temporary closure differs from cleaner production. City-level studies associate accountability audits with carbon-emission reductions and improved carbon-emission efficiency<sup>[16-17]</sup>, while firm-level evidence links the reform to emissions reduction and

environmental investment<sup>[18-19]</sup>. These differences justify keeping outcome indicators disaggregated by level and mechanism. Disclosure auditing examines completeness, consistency and verifiability. It should compare public claims with internal and regulatory evidence. Capability auditing assesses whether data systems, technical staff, finance and internal controls can sustain improvement.

The six objects form a responsibility chain. They prevent expenditure or disclosure from being treated as transformation without operational and outcome evidence.

## 4.2 Layered Indicators and Standards

The second module organises indicators into five layers. Input indicators cover finance, staff, equipment and research resources. Process indicators address project execution, cleaner production, energy management and monitoring. Output indicators record completed projects, treatment capacity, patents and disclosures.

Outcome indicators cover pollution, energy, carbon and productivity. Capability indicators assess data quality, internal control, technical learning and rectification continuity. The layers make causal assumptions visible. They also help auditors identify where a transformation programme became disconnected.

Standards require a clear hierarchy. Mandatory law and national standards define minimum compliance. Industry technical standards support differentiation. Historical and peer benchmarks provide context. Approved organisational targets can be used when they are measurable and consistent with higher requirements.

Benchmarks should not become automatic findings. Industrial structure, climate, resource endowment and technology can affect performance. Auditors should use benchmarks to identify questions, then establish responsibility and cause through evidence. Regional studies also show that natural-resource endowment and local innovation capacity condition environmental-quality and carbon-reduction effects<sup>[20-21]</sup>.

GTFP belongs in the outcome layer. It can capture desirable output, resource input and undesirable output within one productivity measure. However, its value depends on data quality and modelling assumptions. It should support judgement rather than replace the audit evidence chain.

Indicator design also requires resistance to gaming. Once an indicator becomes consequential, organisations may redirect effort towards its measured form. Balanced layers and periodic review can reduce this risk. They cannot eliminate it completely.

## 4.3 Full-Process Audit Control

The third module connects risk assessment, planning, evidence, findings, rectification and follow-up. Each stage should produce records that the next stage can use.

Risk assessment identifies material industries, processes, projects and responsibilities. It should combine prior findings, environmental monitoring, financial exposure and changes in technology or policy. Risk scores guide attention but should not determine conclusions.

Audit planning converts risks into questions, criteria and evidence requirements. A strong plan states what would support or contradict the expected control. It also identifies likely data limitations before fieldwork begins.

Evidence collection can integrate documents, financial records, monitoring, physical inspection, interviews and remote sensing. Triangulation is important where self-reporting incentives are strong. The provenance of transformed or modelled data must remain visible.

Each finding should state criterion, condition, cause, consequence and responsibility. It should also specify corrective action and verification. Findings should separate confirmed non-compliance from management weakness or unresolved uncertainty.

Follow-up should be staged for long projects. An immediate review confirms action. A medium-term review assesses system change. A later review examines recurrence and outcome persistence. The timing should reflect the relevant technology and risk.

## 4.4 Collaborative Governance

The fourth module defines how departments and stakeholders use audit evidence. Environmental agencies hold monitoring and enforcement data. Fiscal agencies oversee funds. Industrial departments manage transformation programmes. State-asset

authorities supervise public enterprises. Financial institutions influence capital access.

Collaboration requires clear division of responsibility. A shared audit map should identify who creates data, who verifies it, who corrects a finding and who monitors recurrence. Shared information should reduce duplicated inspection rather than expand uncontrolled access.

Audit independence must remain protected. Other departments can supply evidence and implement correction, but they should not determine audit conclusions. Similarly, audit institutions should not assume operational management responsibility.

Public participation can supplement official oversight when information is specific and understandable. Research suggests that public monitoring changes interactions among government and firms <sup>[22]</sup>. Dual supervision may also strengthen environmental strategy <sup>[23]</sup>. These findings support disclosure, but they do not justify releasing protected information.

External assurance and technical experts can improve evidence in specialised fields. Their methods, interests and limitations should be disclosed. Professional judgement cannot be outsourced without accountability.

#### **4.5 Digital Audit Infrastructure**

The fifth module builds digital capability around the evidence chain. The minimum architecture includes a unified entity identifier, indicator dictionary, source register, validation rules, risk-warning model, finding ledger, rectification tracker and access log.

Entity resolution is foundational. Company names, facilities, projects and administrative units change over time. Weak matching can assign environmental data to the wrong entity. The platform should preserve historical identifiers and record matching decisions.

Automated checks can identify unusual changes in emissions, energy, expenditure or project progress. Geographic information and remote sensing can support resource verification. Text analysis can compare commitments, reports and correction statements.

Algorithms should identify risk, not assign final responsibility. Models can produce false positives because of data error, structural change or unusual operating conditions. Auditors must understand the logic sufficiently to challenge results.

Algorithmic accountability requires version control, validation records and human review. Access controls should follow purpose limitation. Sensitive data should be used only for authorised audit tasks and retained under defined rules.

Digital systems should also preserve institutional memory. Earlier findings, causes and corrections should inform later risk assessment. Repeated problems can then be distinguished from isolated events.

#### **4.6 Result Application and Preventive Learning**

The sixth module connects findings with correction, accountability, decision adjustment and learning. These four uses should be distinguished because they involve different actors and evidence.

Correction addresses the identified problem. Accountability assigns consequences when duties were not fulfilled. Decision adjustment changes budgets, approvals, procurement or strategy. Institutional learning improves rules, indicators, data and future audit plans.

Findings can be classified by severity, recurrence, systemic relevance and transformation impact. Serious systemic findings require coordinated action and later verification. Repeated findings indicate that earlier correction did not remove the cause.

Positive practice should also be recorded. A control that produces reliable environmental information may be transferable. A successful correction can reveal which combination of technology, governance and finance was feasible. Evidence that accountability audits can reduce land-resource misallocation illustrates why result use should track allocation changes rather than only formal closure <sup>[24]</sup>.

Result use must remain proportionate. A single indicator should not automatically trigger major financing or administrative consequences. Material decisions require verified evidence, review procedures and an opportunity to correct error.

Preventive learning closes the framework. Audit experience should alter later risk models and evidence requirements. Without that feedback, the system repeats inspection without becoming more effective.

### **5. Connecting the Six Modules**

The modules are designed as one architecture rather than six independent reforms. Transformation-oriented content defines the audit object. Indicators translate that object into evaluative questions. Full-process control produces traceable evidence. Collaboration assigns correction and enables lawful data use.

Digital infrastructure preserves and analyses the evidence. Result application then changes decisions and standards. Feedback from result use returns to content and risk assessment. A weakness in one module can therefore limit the entire system.

For example, sophisticated indicators have little value when entity identifiers are inconsistent. Strong digital warnings remain unhelpful when no department owns correction. Detailed findings do not prevent recurrence when follow-up is absent. Institutional design should prioritise connections before adding complexity.

The architecture also clarifies responsibility. Audit institutions verify and evaluate. Operational departments manage transformation. Regulators enforce sectoral requirements. Enterprises make production and investment decisions. Collaboration should connect these roles without collapsing them.

## **6. A Phased Implementation Pathway**

### **6.1 Stage One: Establish a Minimum Evidence Chain**

The first stage should prioritise responsibility lists, common identifiers, indicator definitions and a rectification ledger. These foundations improve traceability without requiring an advanced platform. Pilot audits should focus on material industries or resource risks.

The minimum evidence chain should answer five questions. What criterion applies? What condition was observed? Which evidence supports it? Who had responsibility? How will correction be verified? If these questions cannot be answered, digital expansion should wait.

### **6.2 Stage Two: Develop Differentiated Industry Modules**

General requirements should be supplemented by industry modules. Energy-intensive process industries need detailed energy, material and emission evidence. Technology-intensive manufacturing requires attention to research quality, equipment adoption and supply chains.

Small and medium-sized enterprises require proportionate demands. Excessive reporting can divert scarce technical capacity from actual improvement. Proportionality does not weaken mandatory compliance. It adjusts evidence burden and support to material risk.

Industry modules should be reviewed as technology evolves. A static benchmark can reward outdated practices. Experts, regulators and auditors should participate without allowing regulated entities to control the standard.

### **6.3 Stage Three: Connect Results with Governance Decisions**

Once evidence quality is stable, audit results can inform budgets, industrial policy, state-owned enterprise evaluation and project approval. Financing applications may also use verified information where legal conditions permit.

These connections should follow transparent rules. Organisations need procedures to correct inaccurate data and explain exceptional circumstances. Otherwise, result use may magnify an early error across multiple systems.

The aim is to make verified performance consequential. It is not to convert every audit indicator into a rigid target. Decision-makers should retain space to consider transition cost, technology and distributional effects.

### **6.4 Stage Four: Evaluate Audit Quality and Learning**

The audit system itself should be evaluated. Relevant dimensions include risk coverage, evidence reliability, finding materiality, correction, recurrence and preventive improvement. Counting projects or findings rewards volume rather than effect.

Quality assessment should also examine burden. An audit can be technically complete but unnecessarily costly. Repeated demands for the same data indicate weak coordination. Evaluation should therefore consider both assurance value and implementation cost.

Independent review can identify systematic bias in indicators or algorithms. Lessons should be published where possible, with protected details removed. This process supports confidence and method improvement.

## 7. Risks, Safeguards and Limits

Transformation-oriented auditing creates several risks. The first is mandate expansion. Auditors may be asked to judge technical strategy without an authorised criterion. The compliance and performance layers proposed here limit that risk.

The second risk is indicator overload. Too many measures increase burden and obscure material issues. A core indicator set should be supplemented only where sectoral risk justifies detail.

The third risk is data misuse. Cross-department integration can weaken purpose limitation and access control. The platform should record who used data, for what purpose and under which authority.

The fourth risk is algorithmic opacity. A warning model can appear objective while embedding weak assumptions. Models require documentation, validation and human review. Final responsibility cannot be delegated to an algorithm.

The fifth risk is transformation pressure without capacity. Firms may contract output, relocate or report strategically when they lack finance and technology. Audit evidence should reveal this distinction, while policy institutions address the support gap. Spatial evidence that outgoing natural-resource audits can shift industrial-pollution effects across locations makes relocation and spillover checks essential <sup>[25]</sup>.

The framework also has analytical limits. It is a normative design rather than an evaluated intervention. Its modules require adaptation to legal mandates and administrative capacity. Implementation effects should be studied before broad claims are made about performance.

## 8. Discussion

The framework changes the unit of analysis from an isolated violation to a transformation responsibility chain. It also changes the temporal orientation from retrospective inspection to detection, correction and prevention. Neither change weakens legal compliance. Both place compliance within a system that can evaluate environmental purpose and organisational cause.

The framework gives GTFP a defined but limited role. GTFP can indicate whether production becomes more efficient after accounting for undesirable output. It cannot identify who was responsible or whether a change came from innovation, contraction or exit. Audit judgement still requires disaggregated evidence.

The design also separates audit from management. Auditors should not select a firm's technology or operate environmental controls. Their role is to verify responsibility, evidence and implementation against authorised criteria. This separation preserves independence while making transformation claims more credible.

A broader implication concerns institutional learning. Environmental problems often recur because systems treat each finding as a separate event. Linking findings, causes, correction and later performance creates a memory that can improve both policy and audit design.

The framework also provides a sequence for prioritising reform. Institutions with weak evidence traceability should not begin with complex productivity indicators or predictive algorithms. Their first task is to establish identifiers, criteria and correction records. Advanced analysis becomes useful only after the underlying evidence can be reproduced and challenged.

This sequencing addresses a common digital-governance problem. Technology is often introduced as a visible solution to fragmented management. Yet digital tools can entrench inconsistent definitions and unclear responsibility. The proposed architecture places data governance before automated judgement. It treats technology as infrastructure for professional reasoning rather than a substitute for that reasoning.

The six modules also create an audit trail for policy evaluation. If a transformation programme underperforms, reviewers can locate the break in the chain. The problem may lie in strategy, investment, operation, data, correction or institutional support. Such diagnosis is more useful than a single composite score because it identifies which actor can respond.

Nevertheless, modular diagnosis should not fragment responsibility again. One accountable owner should coordinate correction when several modules fail together. The audit report can identify contributing departments while preserving an integrated account of the transformation risk.

### 8.1 Implications for Future Evaluation

The proposed framework requires evaluation before broad adoption. Pilot studies should assess whether the modules improve

evidence quality, correction durability and coordination. Evaluation should also record administrative cost and reporting burden. A system that improves traceability but consumes disproportionate resources may need simplification.

Comparisons should focus on implementation quality rather than project labels. Two jurisdictions may both claim to use digital or performance auditing while applying very different evidence standards. Researchers should therefore measure data lineage, finding specificity, correction verification and result use.

Unintended effects deserve equal attention. Stronger audit links may discourage experimentation when managers fear that uncertain projects will be treated as failure. Safe procedures are needed for authorised pilot activity, provided that risks, assumptions and monitoring are documented. This safeguard can preserve innovation without weakening responsibility.

## 9. Conclusion

Environmental auditing can support industrial green transformation when it connects responsibility, evidence, correction and learning. Isolated compliance inspection cannot capture the full sequence through which industrial decisions become environmental outcomes.

The six-module framework integrates audit content, indicators, process control, collaboration, digital infrastructure and result application. Its four-stage pathway begins with traceable evidence and progresses towards differentiated standards, consequential result use and audit-quality learning.

The framework does not imply that stronger auditing always produces greener industry. Accountability must remain proportionate and supported by technical capacity, finance and lawful data governance. Within those boundaries, auditing can move from retrospective verification towards preventive transformation governance.

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