

Research on Audit Difficulties and Solution Paths for Wastewater Treatment Projects under the Concession Model

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Abstract

With the policy adjustment of the public-private partnership (PPP) model, the concession model has become a major implementation mechanism for public projects in fields such as wastewater treatment. In operation, such projects face multiple audit difficulties, including insufficient external supervision, incomplete policies and regulations, inadequate performance by both government and enterprise parties, and weak operational control. Risks in the construction stage, such as schedule delay, investment overrun and quality defects, further increase the difficulty of ex post audit tracing and responsibility determination. To address these problems, this paper conducts research from two perspectives. First, it applies the DSR model to systematically analyze the causes of internal and external problems in wastewater treatment concession projects and to reveal the links among the policy environment, operating status and rectification response. Second, it introduces whole-process follow-up auditing and constructs audit focuses and methods covering preliminary preparation, construction implementation, completion settlement and post-evaluation. The findings may provide a reference for standardizing audit practice, preventing hidden debt risks and improving the efficiency of public investment.

Keywords

Concession; Wastewater Treatment; Engineering Audit; DSR Model; Whole-process Follow-up Audit.

1. Introduction

The concession model was once an important form of the PPP model. Since policy requirements have made it clear that, in principle, existing PPP projects that had not started construction by the end of 2024 should no longer proceed under the original model [1], the concession model has evolved from a partial component of PPP into a new mechanism replacing the traditional PPP implementation path.

Today, the concession model occupies a dominant position in specific industries directly related to the public interest, including municipal engineering, energy and transportation. Since the State Council issued the 13th Five-Year Plan for Ecological and Environmental Protection in 2016 [2], ecological civilization construction has been elevated to the level of a national strategy for the first time. During the 14th and 15th Five-Year Plan periods, this process has continued to deepen, and the proposals for the 15th Five-Year Plan clearly put forward the goal of accelerating the comprehensive green transformation of economic and social development and building a Beautiful China.

Against this background, wastewater treatment, as a key field of ecological protection and livelihood security, has gradually moved toward institutionalization and standardization under the concession model. The Regulations on Urban Drainage and Wastewater Treatment [3] encourage the adoption of concessions in the wastewater treatment sector and establish an institutional linkage between the two. Subsequently, the Measures for the Administration of

Municipal Public Utility Concessions [4] also provided a complete institutional framework for wastewater treatment projects. Based on this institutional arrangement, concessions have gradually become a relatively mature and widely applied implementation model in the wastewater treatment sector. However, with the continuous advancement of ecological civilization construction and the upgrading of discharge standards, this model is also facing increasingly strict operational compliance requirements.

2. Overview of Wastewater Treatment Concessions

2.1. Suspension of the PPP Model

As the predecessor of the concession model, the PPP model has undergone major adjustment since 2023. Projects that had not completed bidding and procurement procedures before the clean-up and verification process, as well as newly implemented projects thereafter, should be implemented under the new mechanism and should no longer be included in the original PPP project management database [9]. This represents a very important policy turning point in the field of public investment. A comprehensive review of audit reports on many PPP projects suggests that the suspension of the model mainly resulted from the following reasons.

First, the source of some projects deviated from their public nature. The PPP model was mainly applicable to market-oriented public services and infrastructure projects such as municipal facilities, elderly care and education, water conservancy and environmental protection. However, some local governments packaged commercial projects as PPP projects for application, crowding out public resources and weakening the effectiveness of fiscal fund use.

Second, the credit mechanism between government and enterprise parties failed. Some governments had problems such as arrears of funds and arbitrary changes to agreements, which affected the expectations of social capital. Meanwhile, some social capital parties engaged in illegal subcontracting after winning bids or privately lowered construction standards. As a result, mutual trust between the two sides was seriously damaged.

Third, hidden debt risks continued to accumulate. Some projects departed from the essence of user payment and became illegal financing tools for governments. Through government payment and similar arrangements, fiscal expenditure was rigidified, forming hidden debts that were large in scale and high in risk.

2.2. Current Status of Concession Projects

The concession model refers to a mechanism in which the government selects social capital with relevant project experience, a sound management system and strong professional capacity as the concessionaire through open competition according to law. Through a concession agreement, the rights and obligations of the parties and the allocation of risks are specified. The concessionaire is authorized to invest in, construct and operate infrastructure and public utilities within a certain period and scope, obtain returns, and provide public products or services. Throughout the entire operation of a concession project, ownership remains with the government, and the social capital party must transfer all project facilities to the government upon expiration. The model is characterized by long-term cooperation, the public nature of operating resources, multiple participants, benefit sharing and risk sharing [5].

Article 4 of the 2024 revised Measures for the Administration of Infrastructure and Public Utility Concessions states that concessions are a PPP model based on user payment [6]. Compared with the traditional PPP model, the concession model places greater emphasis on government authorization and focuses more closely on specific industries related to the public interest.

As of April 2025, wastewater treatment concession projects were intensively opened for bidding in many regions of China, such as projects in Nansha of Guangzhou, the Xin'an River in

Yantai and water purification plants in Nanning. The accumulated investment scale exceeded RMB 10 billion and covered more than ten provinces, indicating a highly active market and showing the research value of the concession model in this field.

2.3. Classification of Concession Projects

According to the PPP Project Information System of the National Online Approval and Supervision Platform for Investment Projects under the National Development and Reform Commission, as of February 13, 2026, the number of publicly disclosed concession projects had increased to 389, involving a total investment of hundreds of billions of yuan.

In terms of operation mode, among the 389 projects, there were 196 BOT projects, 115 TOT projects, 31 BOOT projects, 22 ROT projects, 14 DBFOT projects, 4 BOO projects and 7 other projects. BOT accounted for the largest number and was the main way for social capital to participate in infrastructure and public service projects. TOT ranked second, reflecting the practical orientation of revitalizing existing assets and improving operating efficiency. The distribution is shown in Figure 1.

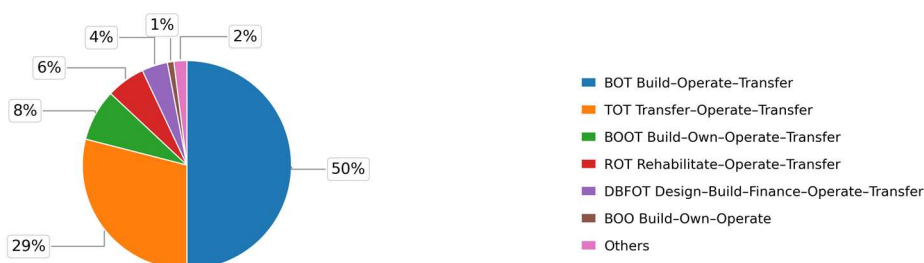


Figure 1. Summary of PPP projects by operation mode

By construction nature, there were 239 new projects, 116 existing projects that did not involve new construction, reconstruction or expansion, and 34 reconstruction or expansion projects. Overall, new projects were the main type, existing operational projects played a supplementary role, and reconstruction or expansion projects accounted for a relatively small share. This indicates that current projects are still mainly characterized by new investment and construction while also taking into account the optimization, quality improvement and efficiency enhancement of existing assets. The distribution is shown in Figure 2.

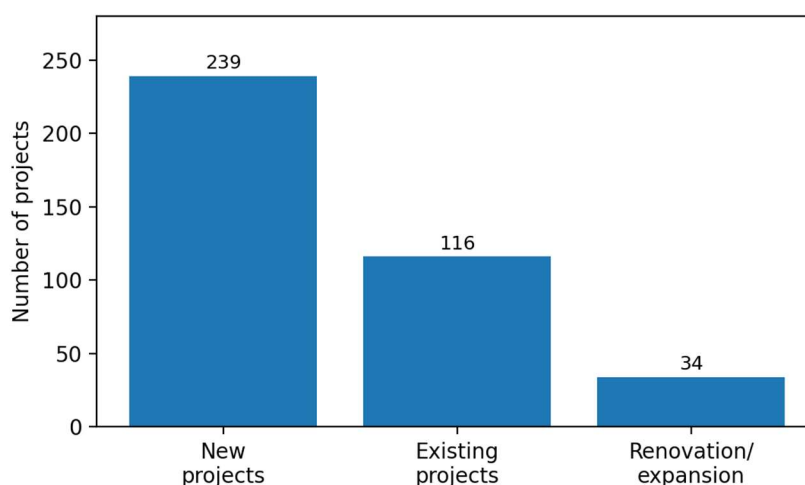


Figure 2. Summary of PPP projects by construction nature

Among these 389 projects, 128 involved water-related fields such as wastewater treatment, reclaimed water reuse and hydrological irrigation, accounting for nearly one-third of the total. Wastewater treatment and reclaimed water projects dominated the water-related category, showing that the concession model has strong adaptability and promotion value in the wastewater treatment field. This not only reflects the deepening of market-oriented reform in this field, but also indicates favorable conditions for attracting continuous participation by social capital in terms of technological maturity and rigid livelihood demand.

2.4. Concepts Related to Wastewater Treatment Concessions

By extension, concession projects centered on wastewater treatment are essentially a practical form of applying the concession model to the wastewater treatment field. Their operating mechanism is as follows: in accordance with legal procedures, the government signs a concession agreement with selected social capital, grants it the right to invest in, construct, operate and maintain wastewater treatment facilities within an agreed term and scope, and allows it to recover costs and obtain reasonable returns by collecting wastewater treatment fees from dischargers.

Concession projects must strictly follow investment management procedures. For projects to which the government provides investment support through capital injection, approval procedures shall be performed in accordance with the relevant provisions of the Regulations on Government Investment. For projects invested in solely by the social capital party, approval or filing procedures shall be performed in accordance with the relevant provisions of the Regulations on the Approval and Filing of Enterprise Investment Projects. Project adjustment procedures must also be standardized. For projects that have completed approval, verification or filing procedures, if major changes occur, such as a change in construction location, adjustment of main construction contents or adjustment of construction standards, the original approval or verification authority shall be requested to re-conduct the project review procedures. When necessary, the feasibility demonstration of the concession model and the review of the concession scheme shall be carried out again [7].

During the operating period, pricing rights for concession projects can be divided into three categories according to project differences: projects that directly charge users and implement government pricing or government-guided pricing; projects that implement market-adjusted pricing; and projects that do not directly charge users, are subject to unified government collection and expenditure, and implement the price agreed in the concession agreement. Most wastewater treatment projects studied in this paper belong to the third category [8].

Accordingly, the government, the public and social capital form a multi-directional collaborative relationship. The government undertakes regulatory functions to ensure service quality and protect the public interest. The public, as the direct beneficiary of services, pays attention to supply effects and provides social supervision. Social capital injects sustainable development momentum into the project by relying on technology, funds and operational management experience.

2.5. Current Status of Concession Audit

While inheriting the institutional advantages of the PPP model, the concession model also specifically avoids the main defects that occurred during the operation of PPP projects. Compared with the tendency of PPP projects to rely excessively on government payment and deviate from their operating nature, concession reform places greater emphasis on returning to the project itself and on the operating attributes and sustainability of projects. It strengthens the normativity of concession operation from the institutional level.

Compared with the previous PPP model, the concession model focuses more on the principle of user payment and greatly reduces the accumulation risk of hidden debt. At the same time, audit

research shifts its focus from preventing government payment risks to evaluating the profitability and market risks of projects themselves, and audit priorities include the accuracy of demand forecasts and the rationality of charging mechanisms. However, concession projects still face the dual constraints of internal operation and external supervision in practice [10]. Internally, problems such as insufficient certainty in government-enterprise performance and weak operating capacity pose challenges to profitability evaluation under the user-payment orientation. Externally, regulatory capacity remains weak and the policy and regulatory system needs further refinement.

3. Audit Difficulties in Wastewater Treatment Concessions

3.1. Policy Drawbacks in Wastewater Treatment Concessions

Table 1. Analysis of internal and external defects and audit difficulties

Category	Specific defect	Manifestation	Audit difficulty
External defects	Insufficient external supervision [11]	Incomplete regulatory system	Ensure information sharing among departments within the audit framework
External defects	Insufficient external supervision [11]	Large differences in assessment standards	Ensure information sharing among departments within the audit framework
External defects	Insufficient external supervision [11]	Weak handling of violations	Ensure information sharing among departments within the audit framework
External defects	Incomplete policies and regulations [11]	Laws and regulations are too general	Auditors need research-oriented thinking and dynamic tracking of policy changes
External defects	Incomplete policies and regulations [11]	Limited role of industry consensus	Auditors need research-oriented thinking and dynamic tracking of policy changes
External defects	Incomplete policies and regulations [11]	Insufficient industry standards	Auditors need research-oriented thinking and dynamic tracking of policy changes
Internal defects	Insufficient two-way performance mechanism between government and enterprise [12]	Weak contract execution	Audit supervision requires high fairness and professionalism
Internal defects	Insufficient two-way performance mechanism between government and enterprise [12]	Government arrears	Audit supervision requires high fairness and professionalism
Internal defects	Insufficient two-way performance mechanism between government and enterprise [12]	Improper competition by enterprises using monopoly advantages	Audit supervision requires high fairness and professionalism
Internal defects	Insufficient two-way performance mechanism between government and enterprise [12]	Illegal financing by social capital	Audit supervision requires high fairness and professionalism
Internal defects	Weak project operation and risk control capacity [11]	Large deviation in demand forecasts	Focus on reviewing the accuracy of demand forecasts and the rationality of charging mechanisms
Internal defects	Weak project operation and risk control capacity [11]	Technical and financial weaknesses	Focus on reviewing the accuracy of demand forecasts and the rationality of charging mechanisms
Internal defects	Weak project operation and risk control capacity [11]	Operating results fail to meet standards	Focus on reviewing the accuracy of demand forecasts and the rationality of charging mechanisms

3.2. Construction Risks in Wastewater Treatment Concessions

Different construction stages of such projects also contain various construction risks. In the preliminary preparation stage, problems such as delayed land acquisition, insufficient depth of survey and design, and frequent changes may occur. In the construction stage, schedule delays, investment overruns, quality defects and work stoppage or idle work caused by inadequate supporting conditions are likely to arise. In the completion acceptance stage, common legacy problems include incomplete records of concealed works and missing completion materials. These risks run through the entire construction process, making it difficult for ex post audits to fully trace the causes of problems and clearly define the responsibilities of all parties, thereby forming audit difficulties.

4. Research on Audit Paths

4.1. DSR Model

In research on environmental governance and public project governance, the PSR model, namely Pressure-State-Response, has long been used to analyze the interactive relationship between internal and external factors of a system. The DSR model, namely Driving force-State-Response, is an important extension and adaptation of PSR. The DSR model shown in Figure 3 originates from the PSR model. Considering that the concession model places greater emphasis on government policy support and project sustainability, Pressure (P) is adjusted to Driving Force (D) to reflect the positive traction of policy guidance on project operation.

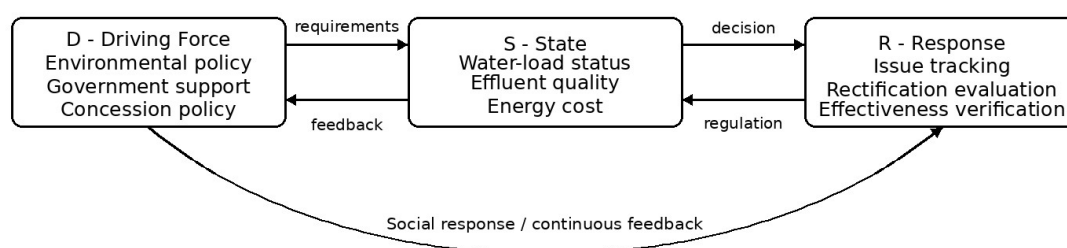


Figure 3. DSR model

In this model, D, or driving force, can be understood as the assessment of the macro environment, such as environmental protection policies, government economic support policies and concession policies. S, or state, can be regarded as monitoring of each operational link, such as water-load status, water quality and energy consumption cost. R, or response, can be understood as issue tracking and subsequent rectification, forming a cycle of problem identification, rectification promotion and effectiveness verification.

Using the DSR model can systematically analyze all links of wastewater treatment concession projects, help identify potential problems and risks, and support the implementation of audit projects. It provides a systematic framework for audit projects, facilitates source tracing and tracking of problems, and can effectively infer construction-stage problems from abnormal phenomena during project operation. It therefore serves as a tool to remedy external defects by strengthening regulatory capacity and accuracy.

4.1.1. Policies and Audit Difficulties

Based on the above DSR analytical framework, typical policy-related problems in wastewater treatment concession projects can be classified into the three dimensions of driving force, state and response. At the driving-force level, incomplete policies and regulations and insufficient

government support constitute basic environmental constraints on project operation. At the state level, the quality of government-enterprise performance, operational control capacity and regulatory implementation directly reflect the medium-term performance of projects. At the response level, the ability to form a closed loop of rectification for existing problems determines the long-term sustainability of projects.

4.1.2. Cause Analysis of External Problems

The causes of external problems mainly correspond to the driving-force (D) level in the DSR model, namely the basic constraints imposed on projects by macro policies, regulatory environment and market conditions. They also partly involve the response (R) level, namely the ability of external mechanisms to provide feedback and promote rectification.

Regulatory driving force: the regulatory mechanism is incomplete. Wastewater treatment concession projects involve multiple regulatory departments, including ecological environment, housing and urban-rural development, and water affairs. However, different agencies may have inconsistent sampling point settings, testing indicators and frequency requirements. This can easily lead to contradictory testing results for key indicators and a lack of fair decision-making basis. Meanwhile, in the absence of a whole-process dynamic supervision platform, real-time water-load data, online monitoring data and sludge disposal destinations of wastewater treatment plants cannot be effectively tracked, making it difficult for auditors to obtain continuous and credible operating data. This regulatory defect also leads to insufficient response. When water quality exceeds standards or equipment operates abnormally, the lack of a unified cross-departmental coordination mechanism may cause repeated problems without clear accountability.

Policy driving force: deviations exist in the implementation of relevant policies. The conditions for applying tax incentives are not uniformly determined. Some projects illegally enjoy VAT rebates without providing compliance testing reports, and the starting point of income tax exemption periods may not meet regulatory requirements. Government subsidies are not linked to performance indicators, and untimely allocations may trigger illegal financing behavior or even mutual default by both parties.

Market driving force: the market environment fluctuates. Wastewater treatment chemicals, equipment maintenance and material prices are easily affected by market conditions and may fluctuate sharply. Project companies may inflate costs to offset losses, causing material misstatements. However, auditors lack specialized standards for identifying cost fluctuations.

Legal driving force: the legal system is incomplete and relies heavily on industry consensus. Specialized laws and regulations on concessions are still relatively homogeneous with old PPP projects. When disputes arise, there may be no clear legal basis, making it difficult to judge audit results. Legal ambiguity also weakens response capacity and obstructs dispute resolution mechanisms.

4.1.3. Cause Analysis of Internal Problems

According to the above research, the causes of internal problems in wastewater treatment concession projects can be summarized as follows. These causes mainly reflect operational management defects at the state (S) level, that is, the specific performance of project implementation stages deviates from expectations.

Project-approval state: preparation in the decision-making stage is insufficient. Project approval documents may be incomplete, contract terms may be irregular, and feasibility studies may become a formality without in-depth analysis based on specific wastewater treatment technologies and industrial planning. The main reason is that some construction enterprises invest insufficient resources in early research and conduct inadequate risk assessment in order to obtain contracting rights as quickly as possible. In addition, their

internal decision-making procedures are not sound enough, resulting in shortcomings and inherent weaknesses in preliminary work.

Bidding state: bidding and contract management are irregular. The tenderer may set unreasonable qualification requirements for the winning bidder, the winning bidder's qualifications may not match actual project needs, and contract terms may differ from bidding documents. This indicates that the tenderer may lack relevant professional capacity or tailor bidding documents for a specific entity. Bidders may overstate their qualifications in order to win bids, and contract signing may lack strict review and control.

Construction state: management is deficient during construction implementation. Problems may include quality and safety management loopholes, falsified testing reports and disorderly use of funds. These problems point to weak on-site management capacity of construction units and failure of supervision units to perform their duties diligently. The construction party may also manage engineering changes and visas in a rough manner and lack an effective dynamic cost-control mechanism.

Completion state: completion settlement and final-account review are improper. Errors may occur in the calculation of quantities and unit prices. Construction components may not be correctly recorded in accounts according to concession policy requirements, and the service life, replacement cycle and replacement cost of specialized equipment may not receive enough attention. Some enterprises may exaggerate or conceal information in pursuit of performance or settlement amounts. Financial personnel and engineering personnel may be disconnected, and they may know little about the concession system or even engineering audit.

Operation and transfer state: behavior in the operation and transfer stage is short-sighted. For example, in the later operating period close to transfer, the concessionaire may reduce or stop maintenance investment in core equipment, causing accelerated depreciation and poor equipment condition so that transfer standards cannot be met. It can be inferred that operators may compress necessary maintenance costs to maximize profits, forcing the government to provide follow-up support and aggravating fiscal expenditure [13].

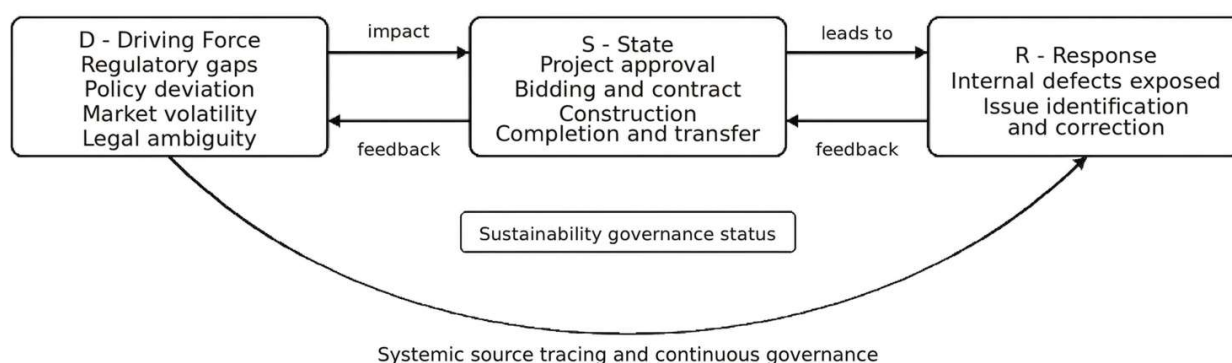


Figure 4. Specific DSR-based analysis

4.2. Whole-process Follow-up Audit Model

Traditional ex post audit usually intervenes after completion. It is therefore difficult to effectively trace the details of key construction links and the implementation process of concealed works, and it cannot fully restore the specific circumstances of project construction. When economic disputes occur, evidence collection is difficult and responsibility is unclear. It is also difficult to reveal excessive fund expenditure, leaving a large supervisory blind spot.

Table 2. Analysis of audit focuses and audit methods

Construction stage	Audit focus	Audit method
Preliminary preparation	Project approval audit	Review whether project approval documents are complete and compliant. Review whether the project has sufficient research feasibility, combining analysis of wastewater treatment technology and industrial planning. Review whether the project funding chain is complete so as to avoid the arrears problem seen in old PPP projects.
Preliminary preparation	Bidding audit	Review the normativity of bidding documents, including qualification requirements for the winning bidder and project nature, so as to avoid recurrence of project-nature deviation or monopolization by the winning bidder. Review the qualifications of the winning bidder to avoid mismatch with treatment conditions and subsequent disputes.
Preliminary preparation	Contract and legal-compliance audit	Ensure consistency between contract terms and bidding documents. Since laws related to the concession model are not sufficiently detailed, communicate in advance about which industry consensus should be applied to minimize disputes.
Construction implementation	Schedule control audit	Compare actual construction progress with the schedule expectations in the winning bid documents and horizontally compare it with similar engineering projects.
Construction implementation	Quality and safety audit	Conduct spot checks of concealed-work materials and trace testing reports.
Construction implementation	Fund management audit	Continue strict review of relevant funds to ensure smooth implementation of subsequent project work. Reasonable use of funds, without large fluctuations, can also reflect engineering quality to some extent. Carry out the audit through tracking of fund flows and engineering cost evaluation and investigation.
Completion settlement	Engineering settlement audit	Recheck quantities and unit prices. Classify different construction components into different accounts according to concession policies to avoid hidden debt risks. Specialized wastewater treatment equipment should be audited as a priority, including its planned service life, replacement cycle and replacement cost, so as to confirm the depreciation that each item of equipment should have after project completion and transfer.
Completion settlement	Final-account audit	Ensure the completeness of the asset delivery list and avoid confusion in asset accounting during the operating period. Analyze and audit project-related bonds, confirm financial risks and debt repayment capacity, and ensure the smooth subsequent operation and transfer of the project.
Post-evaluation	Operational performance and cost audit	Audit the authenticity of indicators and their implementation through field investigation and third-party testing reports, so as to prevent governments from embellishing relevant data in order to ensure smooth operation and transfer of the project.
Post-evaluation	Asset condition audit	Audit the depreciation condition of core equipment and evaluate whether the project construction and operating parties have fulfilled their equipment maintenance obligations. Estimate and analyze whether equipment can meet final transfer standards.
Post-evaluation	Pre-transfer status audit	Track the expected arrangements of the project, such as maintenance implementation and major repair plans, to prevent the operator from completely stopping investment at the end of the project and causing disputes such as operational difficulty after transfer.

Whole-process follow-up audit extends audit supervision to the entire construction stage and dynamically monitors the construction work of all project links. It has a series of advantages, including a long supervision cycle, broad audit coverage and rapid problem response. In the process of whole-process follow-up audit, auditors can effectively identify violations or potential violations, address specific internal problems such as insufficient project approval, irregular contracts and construction not conforming to design requirements, and effectively prevent various violations from occurring.

Although the theory of whole-process follow-up audit has gradually improved and been put into practice since the 1970s, it still faces problems such as low acceptance, unclear objectives and standards, and an underdeveloped theoretical system. It therefore needs to continue developing through interaction between theory and practice. The whole-process follow-up audit model helps transform audit thinking, standardize procedures and internal control, provide full-process guidance for project construction, purify the audit environment, standardize market order and realize the shift from passive review to active prevention and control [14].

Analysis of audit issues in implementation

The whole process of wastewater treatment concession projects can be roughly divided into four major stages: preliminary preparation, from project approval to formal commencement; construction implementation, from commencement to completion acceptance; completion settlement; and project transfer and post-evaluation. Based on the method of whole-process follow-up audit, the audit focuses and audit methods of each stage can be inferred, as shown in Table 2.

5. Conclusion

This study analyzes the audit difficulties of wastewater treatment projects under the concession model and reaches the following conclusions.

The audit difficulties of wastewater treatment concession projects mainly originate from internal operation and external supervision. Internally, the insufficient government-enterprise performance mechanism and weak operation and risk-control capacity lead to frequent problems in contract execution, fund use and operational compliance. Externally, the incomplete regulatory system and imperfect policies and regulations further increase the complexity of audit work. These problems run through project approval, construction, completion, operation and transfer, and have obvious stage-specific characteristics.

The coordinated application of the DSR model and the whole-process follow-up audit model provides a systematic path for resolving these audit difficulties. The DSR model, namely Driving force-State-Response, constructs an analytical framework from the three dimensions of macro environment, operating status and feedback rectification. It reveals the relationship between external policy defects and internal states, thereby enhancing audit traceability. Whole-process follow-up audit takes account of the whole project life cycle and realizes dynamic monitoring and timely correction in stages such as preliminary preparation, construction implementation, completion settlement and post-evaluation.

Based on the above framework, this study constructs the audit focuses and methods for wastewater treatment concession projects, which can provide operational guidance for audit practice in such projects. Future research may further explore quantitative methods for indicators in each dimension of the DSR model, as well as the integration path of follow-up audit and smart audit technologies, so as to promote concession project auditing toward greater systematization, precision and intelligence.

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