

China green investment

Carbon pricing an accelerator

- Green investment set to take off, to both stabilise the economy in the short term and drive growth in the long term
- Public investment will take the lead, but then it's critical to mobilise private participation. Carbon pricing is the key
- The transition to emission double controls, combined with the ETS enhancement, should accelerate the process

Jump-start green investment. All eyes are on China's economic growth now: the new year has brought new challenges, with sporadic outbreaks of Omicron further weighing on the already slowing economy. We see green investment as a key growth driver. We discuss how quickly it could pick up steam and to what extent it can help fill in the gap left by the cooling property sector.

Not just talks. Green projects are being deployed, following the Five-year Plan (FYP). As we expected, power and industrial sectors are taking the lead. State Grid recently announced its plan to launch 38 ultra-high voltage transmission lines with a total of RMB380bn new investment during the 14th FYP. State-owned power producers are investing more to gear towards renewables. Capex in industrial firms is also poised to surge in order to comply with the new efficiency benchmarks.

Carbon pricing an effective tool to catalyse private investment. State-owned enterprises (SOEs) have led most of the green projects, similar to the state infrastructure programmes deployed as a countercyclical tool. But other than regulations and incentives, we believe that carbon pricing - the most cost-effective lever to reduce carbon emissions - should be utilised to mobilise private investment. A price on carbon internalises the environmental cost for producers, and sends a financial signal to investors. China established its national emission trading system (ETS) in July 2021, yet the effect remains limited. Indeed, experience from other carbon-trading market highlights the importance of the mechanism design, including scope of coverage, allocation of emission allowance, carbon price levels, supervision and penalties.

Central Economic Work Conference encouraged the transition from energy to emission double controls. The existing double controls focus on energy consumption and intensity, but do not restrict process emissions (e.g. from chemical reactions of cement production). Emission controls directly relate to China's 30/60 goal and we believe they can better guide China's green transformation and lowcarbon growth. But the transition will take time to implement, after the fundamental regulatory framework, such as disclosure rules and emission verifications, is set up.

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Carbon pricing

- Green is the new game, supplementing infrastructure investment as a counter-cyclical tool
- Large green projects have kicked off including renewable energy and ultra-high voltage lines, but private participation remains lacklustre
- Carbon pricing, if designed properly, could make it cheaper for enterprises to invest in green tech than to continue their emissions

Green investment is picking up steam in China

Slowing economy calls for new growth drivers

Headwinds are mounting as the growth outlook is overshadowed by the triple pressures of demand contraction, supply shocks, and weakening economic expectations in official government language.

Indeed, despite the upside surprise in headline GDP growth in Q4, the December activity data shows challenges from the recent outbreak of Delta and Omicron cases in multiple regions, a sharper slowdown in the property sector and yet-to-rebound infrastructure investment. So far the easing, including the surprise rate cuts in December and January, liquidity injection via old and new re-lending schemes, fine-tuning of property policies, and front-loading of RMB1.5trn local government special bonds, has only marginally buffered the slowdown. Although the effect of these policies is likely to have a lag, we still believe China needs other growth drivers to stabilise the economy.

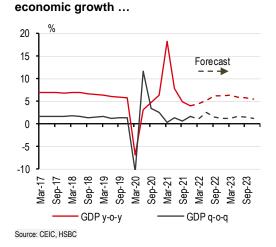
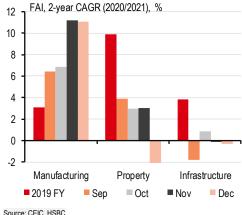


Chart 1: Mounting pressure on the

Chart 2: ... amid slowing property sector and sluggish infrastructure investment





Green investment as a counter-cyclical tool

Beijing is pushing through the structural change that it hopes will transition China from a construction-led growth model to one relying on capex and consumption. Among the three new engines: 1) investment in higher-end manufacturing has already geared up - manufacturing investment has registered double-digit growth over the past several months, with the higher-end manufacturing capex even stronger; 2) consumption growth will likely be a longer-term story after the current bumpy recovery amid COVID-19 flare-ups, and when the share of the middle income group increases meaningfully; and 3) green investment is taking off and has the potential to grow faster.

Catalysing private participation is critical

Longer-term green investment calls for private participation

In the short term, public-led green investment is supplementing the traditional infrastructure investment as a counter-cyclical tool. In the longer term, however, the green transition requires private participation. In China's case, hundreds of trillions of renminbi will be needed in the next 30-40 years (International Energy Agency estimated cRMB200trn from now to 2060, and China Green Finance Committee estimated RMB487trn in the next 30 years), which we believe cannot be sourced solely from public finance, due to budget constraints and efficiency considerations. For the latter, the rationale is the same as why a market economy usually better allocates resources.

Mobilising finance, particularly private capital, to achieve net zero is a critical task globally. It requires governments, regulators, financial institutions, etc to join forces. The utmost issue is to make green projects appealing to private capital, and in some cases, mandatory.

China has announced a "1+N" policy framework detailing its climate strategy and set an official road map to meet the 30/60 target. The "Working guidance for carbon peaking and carbon neutrality" (working guidance) released by NDRC in October 2021 is the "1" template for core guidance to achieve carbon peak and neutrality. "N" includes the peak carbon action plan by 2030, as well as policy measures and actions in key areas and industries.

Incentives and penalties are both integrated in the framework. The former includes renewable energy subsidies, tax rebates for green technology, to name just two. The latter involves energy or emission standard benchmarks, and the companion policies (fines, sanctions, etc.). The mechanism is complicated, and has engaged private capital.

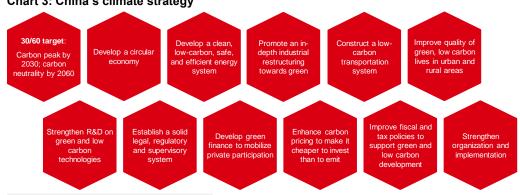


Chart 3: China's climate strategy

Source: State Council, National Development and Reform Commission



Carbon pricing to play a bigger role

More can and needs to be done by leveraging the powerful tool of carbon pricing. The way it works is to make it less expensive for companies to invest in decarbonising technologies than to continue emitting carbon. It is widely recognised as the most cost-effective lever to reduce carbon emissions at the scale and speed that is necessary. In economics jargon, carbon emission is a typical example of an externality. Emitters do not necessarily have the incentives to reduce their emissions if costs are nil or low compared with the investment needed to 'green' their production. This is how negative externalities occur. This is a problem a free market cannot solve by itself. Governments need to step in to establish a proper regulatory framework to internalise emission costs. Carbon pricing works to internalise the externalities by sending a price signal to emitters and letting them decide whether to pay to transform or pay to emit. A successful carbon pricing scheme, which effectively reduces GHG emissions, requires a comprehensive design and implementation. In the case of emissions trading schemes (ETS), experience from other economies suggests key considerations include allocations of emission allowance, management of surplus quotas, carbon prices, liquidity, windfall profits for enterprises with too many free emission allowances that can be sold for a profit in the market, and offset arbitrage, as well as issues relating to environmental integrity and domestic low-carbon transformation, etc.¹

China's national and regional ETS

So far China has one national ETS and eight pilot regional ETS running concurrently, while a ninth regional trading scheme (Shenyang) is in the trial stage. This is in line with the prediction by HSBC analysts Wai-shin Chan et al in 2017: at the initial stages, the higher threshold of the national scheme only covers large emitters (first stage only power generators); the regional schemes continue to cover medium to large emitters; and the smallest emitters will likely be covered by a carbon tax.

The system targets reductions in carbon intensity, in line with the national climate change mitigation goals, which are stated in terms of CO_2 emissions intensity in the five-year plans. This is largely referred to as a "rate-based" tradable standard, which has strong support among those concerned about the burden of the ETS on covered firms, and more broadly, the potential conflict between the climate and growth targets. A recent study by Cui et al. (2021) shows clear evidence that, despite low carbon prices and infrequent trading, China's ETS leads to a reduction in carbon emissions – a 16.7% reduction in total emissions and a 9.7% reduction in emission intensity.²

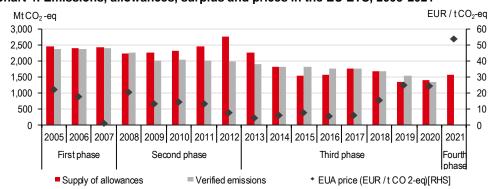
We expect China's national ETS to be one of the key policy instruments to realise its climate ambition. The working guidance pledges to "accelerate the development of the national market for trading carbon emission permits by gradually expanding its coverage, diversifying trading types and means, and improving the allocation and management of allowances." At the current stage, allocation of quota is free, coverage is narrow (power sector only), verification of GHG reports is reliant on document reviews, and fines are minimal. Not surprisingly, the carbon price was trading flat in H2 2021 (below RMB45/tonne) and only surged as the compliance deadline in December was approached (peak at RMB54.6/tonne).

The launch of ETS is only a start, with enhancement and amendment necessary to meaningfully change firms' emission behaviours. Various governments have tried to put a price on emissions with varying success, and the experience of EU, the longest-running ETS market, is of particular interest.

¹ Asian Development Bank, "Emissions trading schemes and their linking - challenges and opportunities in Asia and the Pacific", 2016.

² Cui, J., C. Wang, J. Zhang, and Y. Zheng (2021), "The effectiveness of China's regional carbon market pilots in reducing firm emissions," *Proceedings of the National Academy of Sciences of the USA 118(52)*, December 28.





EU ETS Chart 4: Emissions, allowances, surplus and prices in the EU ETS, 2005-2021

Source: European Commission, European Environment Agency, Refinitv. Note: Figures from 2005-2020 cover EU27, Norway, Iceland, Liechtenstein and the UK, 2021 figures are for just the EU27 countries. For 2021, verified emissions haven't been released.

Launched in 2005, the EU ETS is currently in its fourth stage (2021-2030). This scheme is a cornerstone of the EU's policy to combat climate change and a key mechanism for reducing GHGs in a cost-effective way. It is essentially a "*cap* (the emissions) and *trade* (the emission permits)" system of carbon pricing, with the overall cap decreased slowly each year. It has got off the ground slowly, and gone through several rounds of reforms. In January 2019, the market stability reserve (MSR) came into operation to address and improve the system's resilience to major shocks, as observed during the global financial crisis, can be avoided.

In July 2021, the European Commission released its "Fit for 55" package, including a comprehensive set of changes to the EU ETS, such as accelerated reduction of emission allowance, phasing out free allocation of allowance, and introduction of a cross border adjustment mechanism (CBAM). CBAM aims to prevent the so-called carbon leakage, where businesses move their operations outside of the EU to jurisdictions with less-strict emissions requirements. It is essentially the world's first carbon tariff. If the "Fit for 55" package can be fully implemented, we believe the reform will not only deepen and broaden the decarbonisation of Europe's economy, but also accelerate multilateral decarbonisation and initiate the international race on climate ambitions with its carbon tariff.

So what are the key takeaways from the EU ETS development? First, enhancement of China's ETS is necessary, especially in terms of allocation of allowances, and relatedly the carbon price levels; second, a wider coverage and declining overall cap is preferable to facilitate China's green transition. Last but not the least, the changes should be introduced sooner than later, otherwise a hefty amount of tariff will be surrendered to EU once its CBAM is in place.

ETS enhancement and emission double controls important to watch

The EU ETS sets a good example on the direction of enhancement China could consider following. Reportedly, China's national ETS may expand its coverage to emissions-intensive industries other than power, such as steel and cement (*Bloomberg*, 20 January 2021). Gradual migration from free to auction-based allowance is also a target. Another major change could be from a rate-based system to a mass-based system (cap and trade, with declining cap ideally).

With China's 30/60 climate goal firmly set, Beijing has suggested upgrading to double controls based on carbon emissions, rather than energy consumption (Central Economic Work Conference, December 2021). Emission controls directly relate to the climate goal, and can better guide the country towards its green ambition. On the other hand, the existing energy controls can at best restrict fuel emissions, but not process emissions. Transition to emission controls is a must for China to achieve its climate ambition, we believe, but the successful implementation not only hinges on regulations, but also more importantly, on technology development.

To summarise, carbon pricing will be core to China's green ambition. By making it cheaper to invest than emit, a properly designed carbon pricing system could incentivise voluntary participation. After all, the multi-hundred trillion renminbi green investment requires not only the government's lead, but also private participation.



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