



DUKE KUNSHAN  
Initiative for Sustainable Investment

Duke

NICHOLAS SCHOOL of  
*the* ENVIRONMENT

# Cross-border Market Linkages in Asia and the Pacific: Theoretical and Empirical Underpinnings

---

Junjie Zhang

Nicholas School of the Environment, Duke University  
Initiative for Sustainable Investment, Duke Kunshan University

2023-12-07

# Introduction

# Benefits of Linkage

## **Lowering emission reduction costs**

- Especially linking developed and developing countries' markets

## **Yielding financial and operational enhancements**

- Enriching price discovery, liquidity provision, and risk management

## **Ameliorating the concern of carbon leakage**

- Fostering the standardization of carbon market designs

## **Fortifying climate ambition**

- Heightening mutual trust among nations and fostering domestic support for climate policies

# International Agreements

## **The Kyoto Protocol (1997)**

- Emissions Trading (ET), Clean Development Mechanism (CDM), Joint Implementation (JI)

## **The Paris Agreement (2015)**

- Article 6.2: collaborating voluntarily through bilateral or multilateral agreements

### **Internationally Transferred Mitigation Outcomes (ITMOs)**

- Countries transfer greenhouse gas (GHG) mitigation outcomes internationally
- A recent comprehensive accounting framework for managing ITMOs cooperative mechanisms
- Article 6.4: promoting sustainable development while facilitating emissions reduction
- Article 6.8: including non-market mechanisms

# Existing Practices of ETS Linkages

## Europe

- The EU ETS linking with CDM and JI for compliance purposes
- The Swiss ETS + the EU ETS
- Discontinuation of international credits for compliance: New Zealand and the EU

## North America

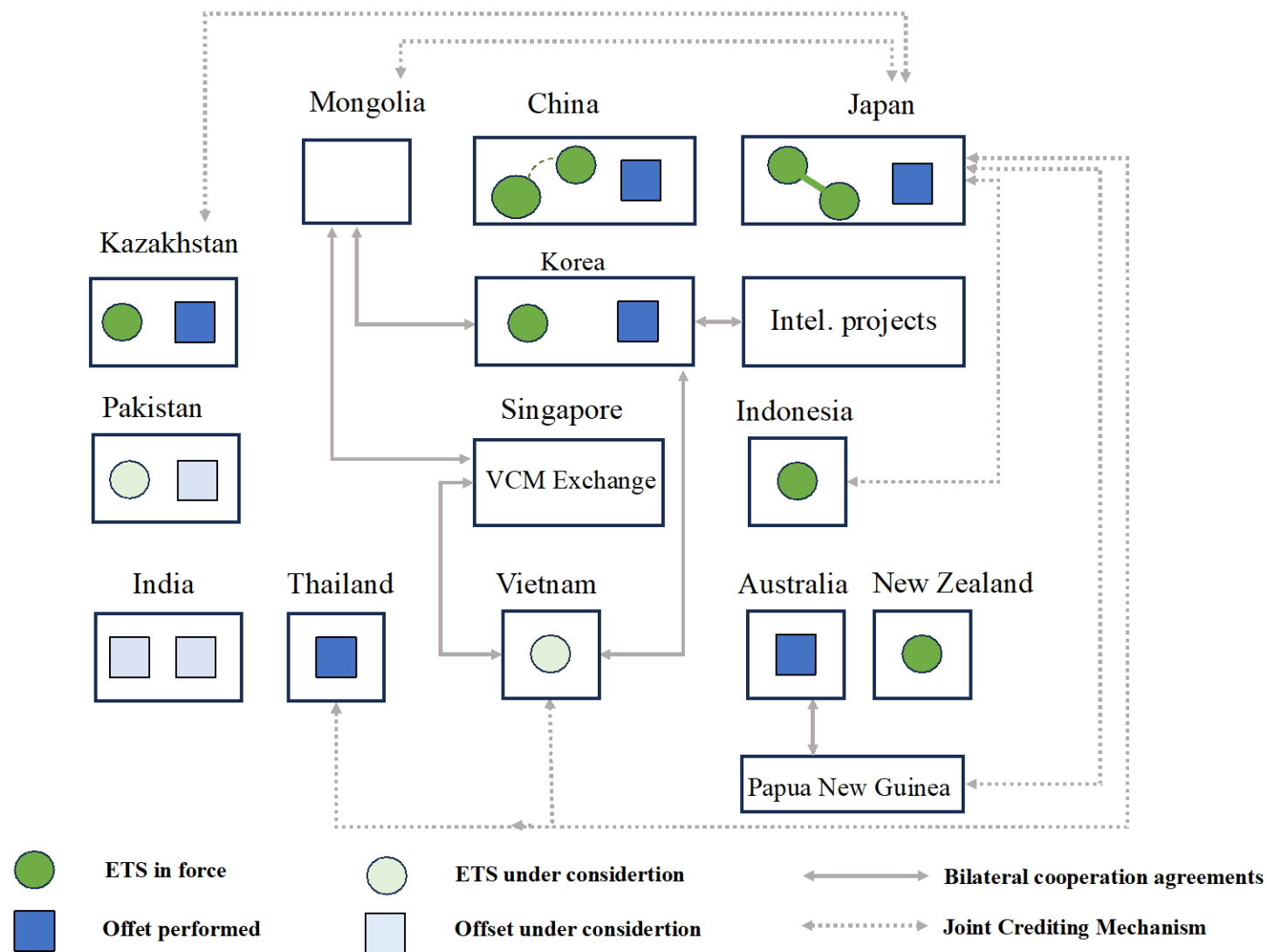
- The California ETS's linkage with the Quebec ETS

## Voluntary programs

- Verified Carbon Standard (VCS)
- Gold Standard (GS)
- American Carbon Registry (ACR)

# Carbon ETSs in Asia and the Pacific

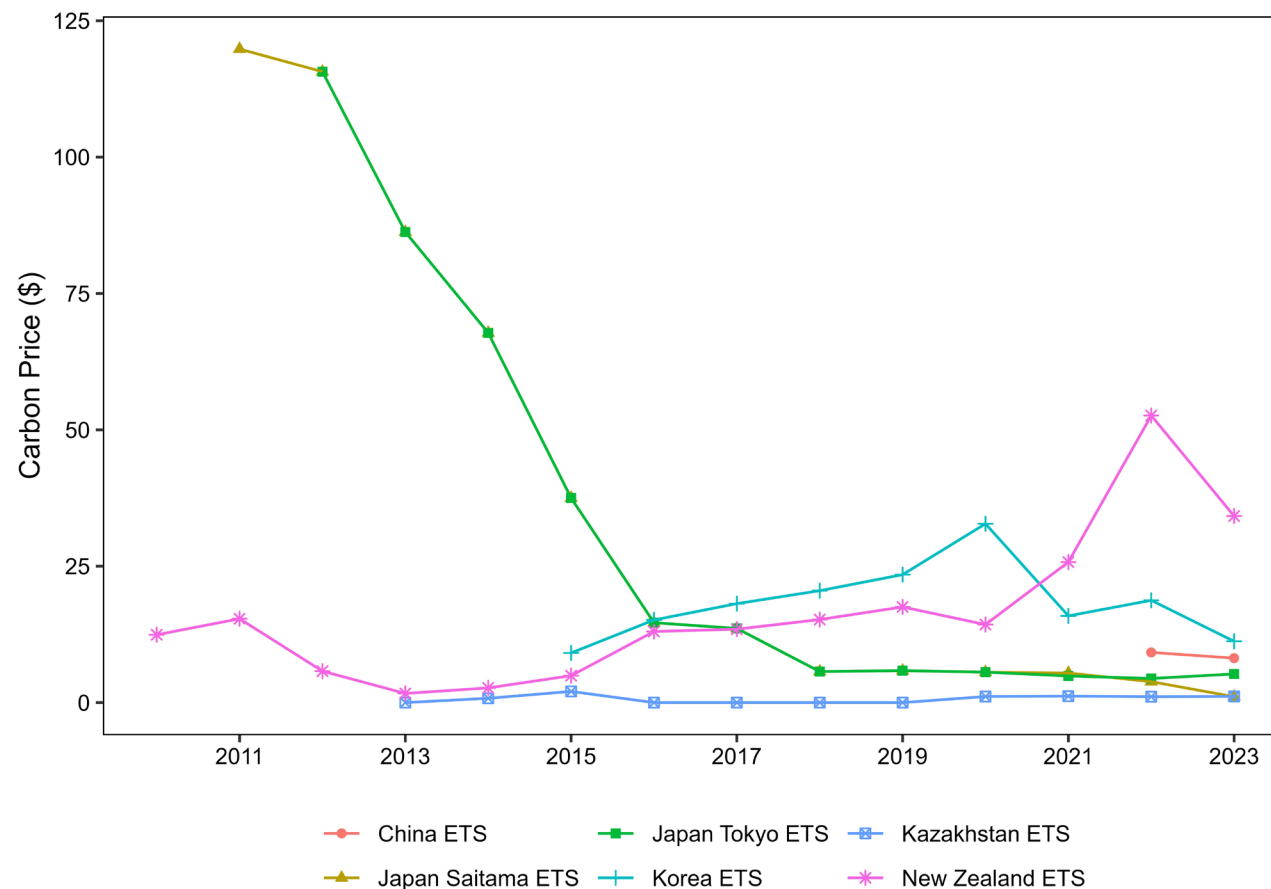
- **China:** 8 pilots (2013, Fujian, 2016), national ETS (2021)
- **Japan:** 2 sub-national ETSs in Tokyo (2010) and Saitama (2011), linked bilaterally
- **Korea:** K-ETS (2015)
- **Kazakhstan:** KAZ ETS (2013 – 2016; 2018 – now)
- **New Zealand:** forestry-based ETS (2008)



# Economic Incentive to Link Asia-Pacific ETSs

- The Asia-Pacific region is the world's most substantial contributor to carbon emissions, responsible for **52%** of global emissions.
- Significant disparities in marginal abatement costs across countries.
- The relatively modest carbon prices prevailing in these regions do not pose a substantial risk of generating international imbalances.

Carbon Prices in the Asia-Pacific Carbon Markets



# Research Goals

- To summarize the status of carbon market linkage in the Asia-Pacific region
- To explore the economic, climate, political, market foundations for ETS linkages
- To overview Asia-Pacific ETSs and explore potential linkage mechanisms
- To present prospective attempts for cross-border market linkages
- To identify challenges faced and offer corresponding policy recommendations



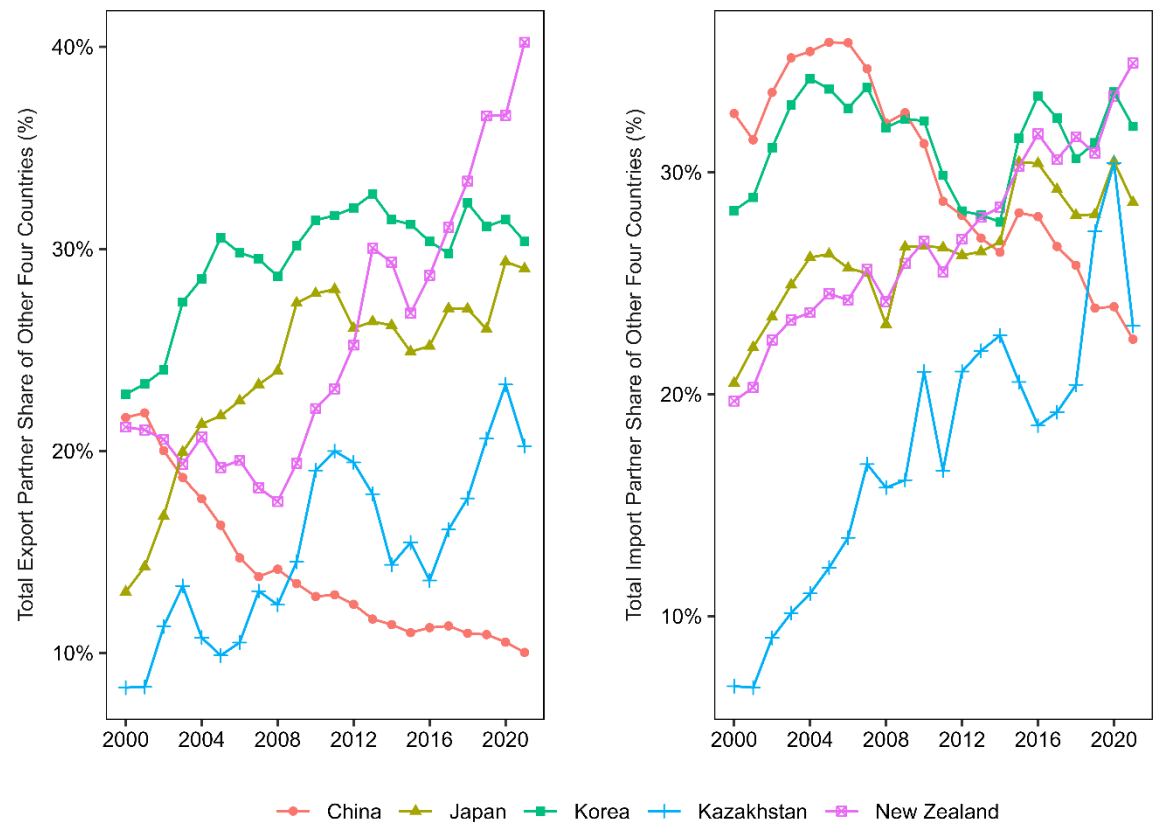
# Foundations of ETS Linkage

# Cultivation of Political Trust

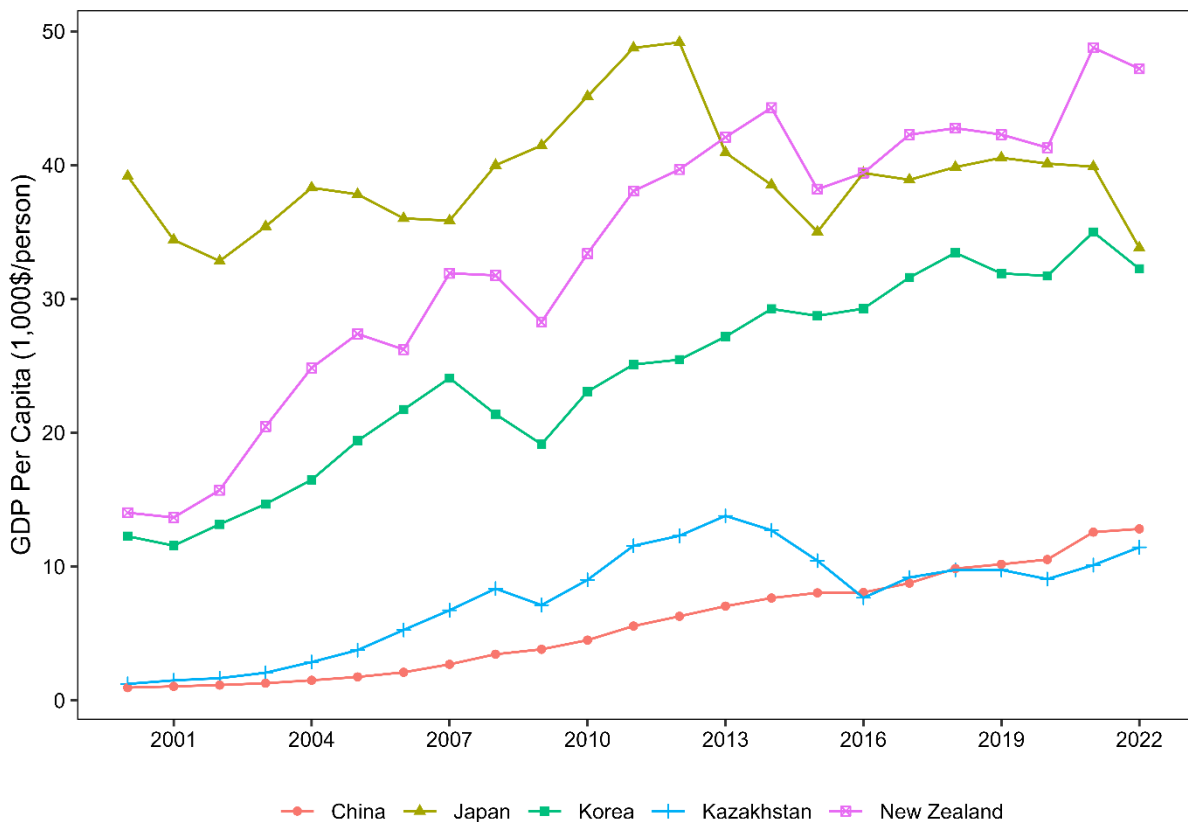
- Countries exhibit a greater propensity for collaboration when they possess pre-existing, trustworthy relationships, particularly those sharing similar policy objectives and climate frameworks.
- The Asia-Pacific countries have initiated interactions about climate change and environmental issues, laying a foundation for potential ETS linkages.
  - Bilateral and multilateral collaborations through dialogues, memorandum of understanding (MOUs), forums, and action plans.
- Among the five countries, China, Korea, and Japan are engaged in frequent interactions relevant to carbon markets.

# Economic Interdependency

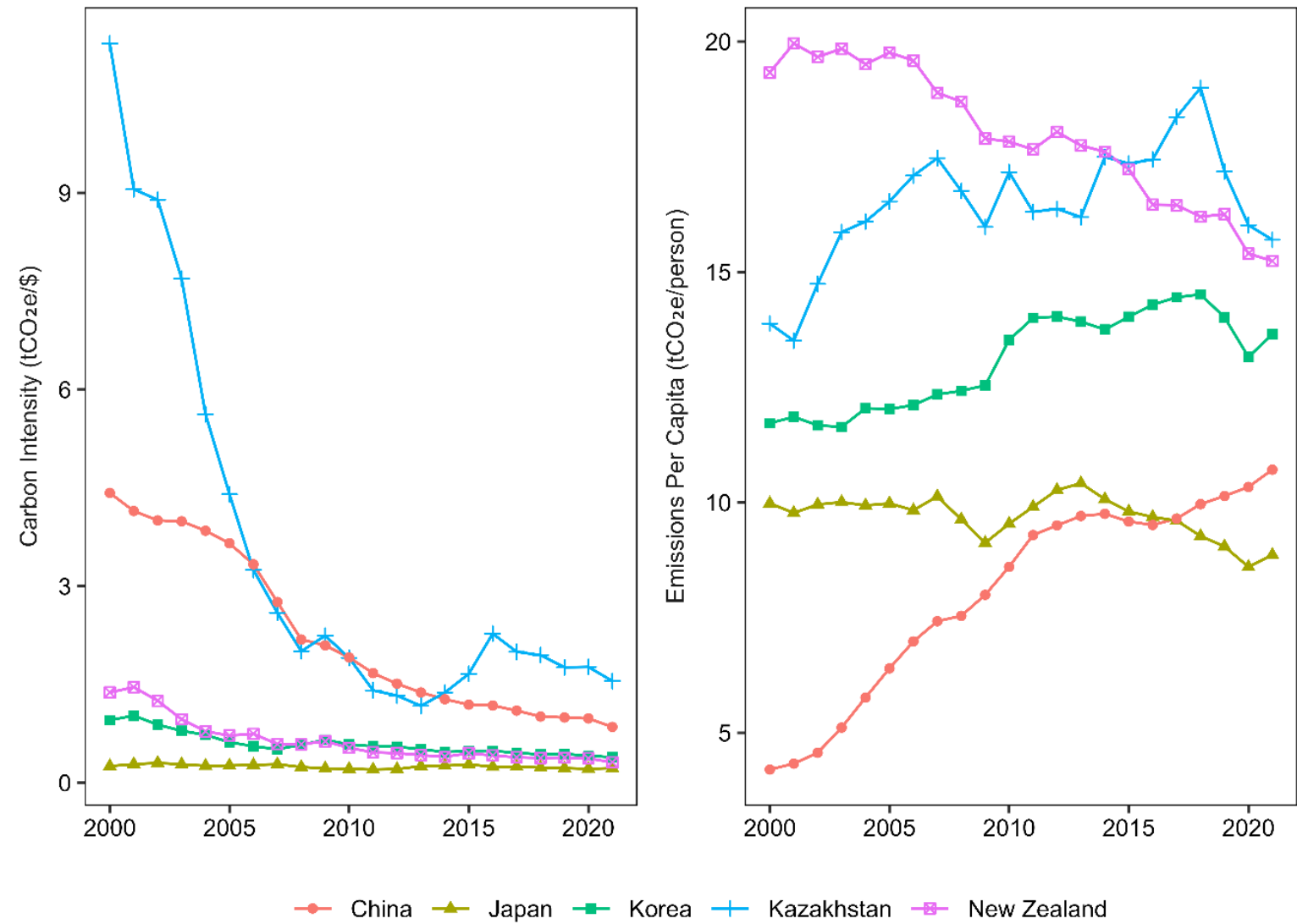
Bilateral Trades



Economic Growth



# Pressure of Climate Change Mitigation Efforts



# Alignment of Climate Goals

Country	Abatement Target in 2030			Carbon Neutrality Year
	Mass/ Intensity	Abatement	Base Year	
China	Intensity	60%-65%	2005	2060
Japan	Mass	46%	2013	2050
Korea	Mass	35%-40%	2018	2050
Kazakhstan	Mass	15%-25%	1990	2060
New Zealand	Mass	50%	2005	2050

# Linking Asia-Pacific ETSs

# Linking Mechanisms

**Direct linkage:** a system accepts allowances or credits from another one

- Joint cap-and-trade system: countries integrate their ETSs directly, allowing entities in one jurisdiction to use allowances from another
- Harmonization of regulations: a higher degree of harmonization in market rules, regulatory frameworks, and monitoring and verification systems

**Indirect linkage:** linking through the intermediation of a third system

- Indirectly linking compliance markets by participating in voluntary offset markets

# Direct Linkage

## **One-way linkage (unilateral linkage)**

- One system allows covered emitters to utilize allowances or credits from another system; however, the latter system does not reciprocate this mechanism.
- The linkage is asymmetrical and may have different regulatory frameworks or levels of development.

## **Two-way linkage (bilateral or multilateral linkage)**

- Both participating systems mutually accept allowances or credits from each other.
- This involves harmonization of regulatory frameworks and policies to facilitate trading.



# Linking Strategies

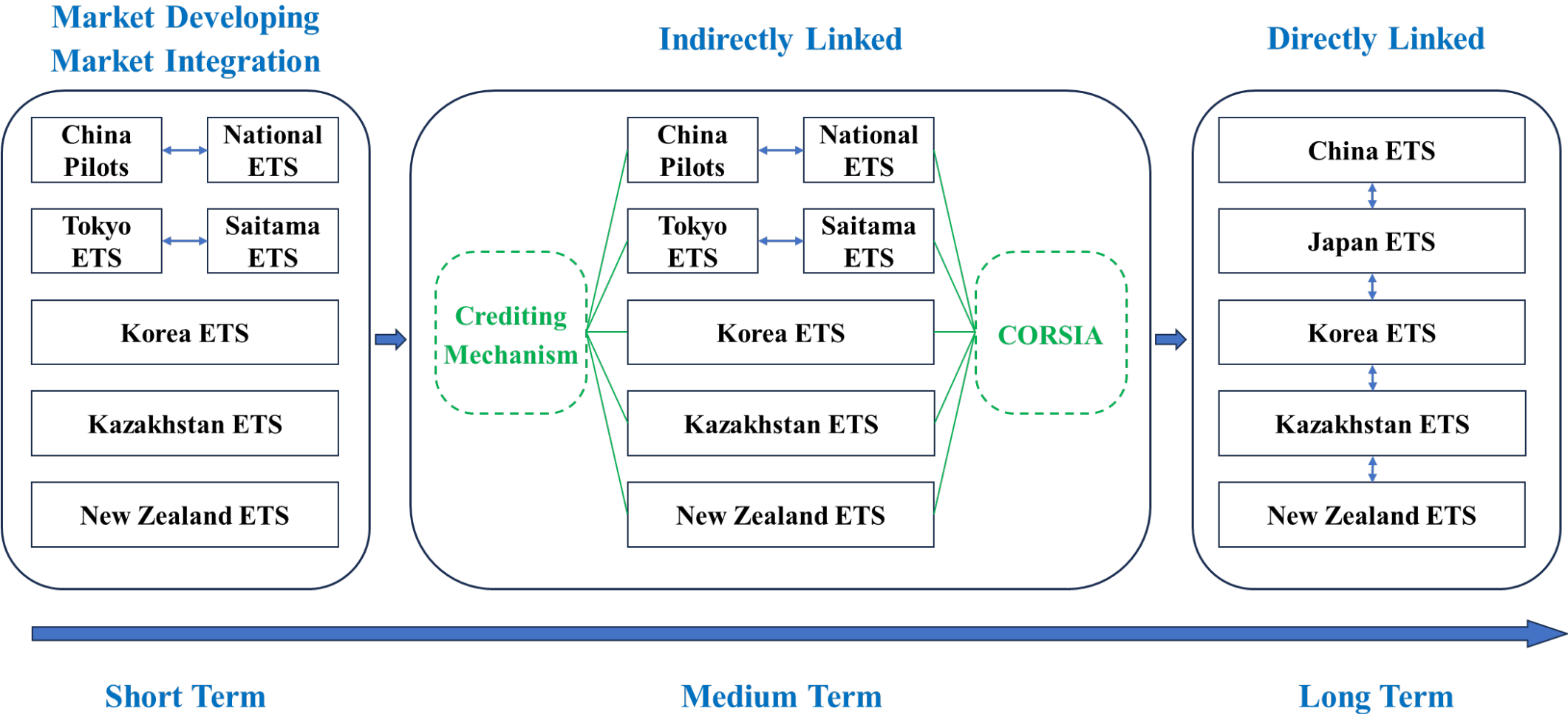
## Advantages of bilateral or multilateral linkages

- Avoiding unilateral funds transfer
- Adapting to situations where marginal abatement costs change

## Carbon market linkage in three stages

- Each compliance market should be further developed and prepared for linkage
- The compliance markets will be linked indirectly through the voluntary markets
- The compliance markets will be linked directly, with restrictions on the conditions under which allowances can be used for compliance

# A Roadmap of Linking Asia-Pacific ETSs



# Short Term

# Addressing Domestic Market Fragmentation

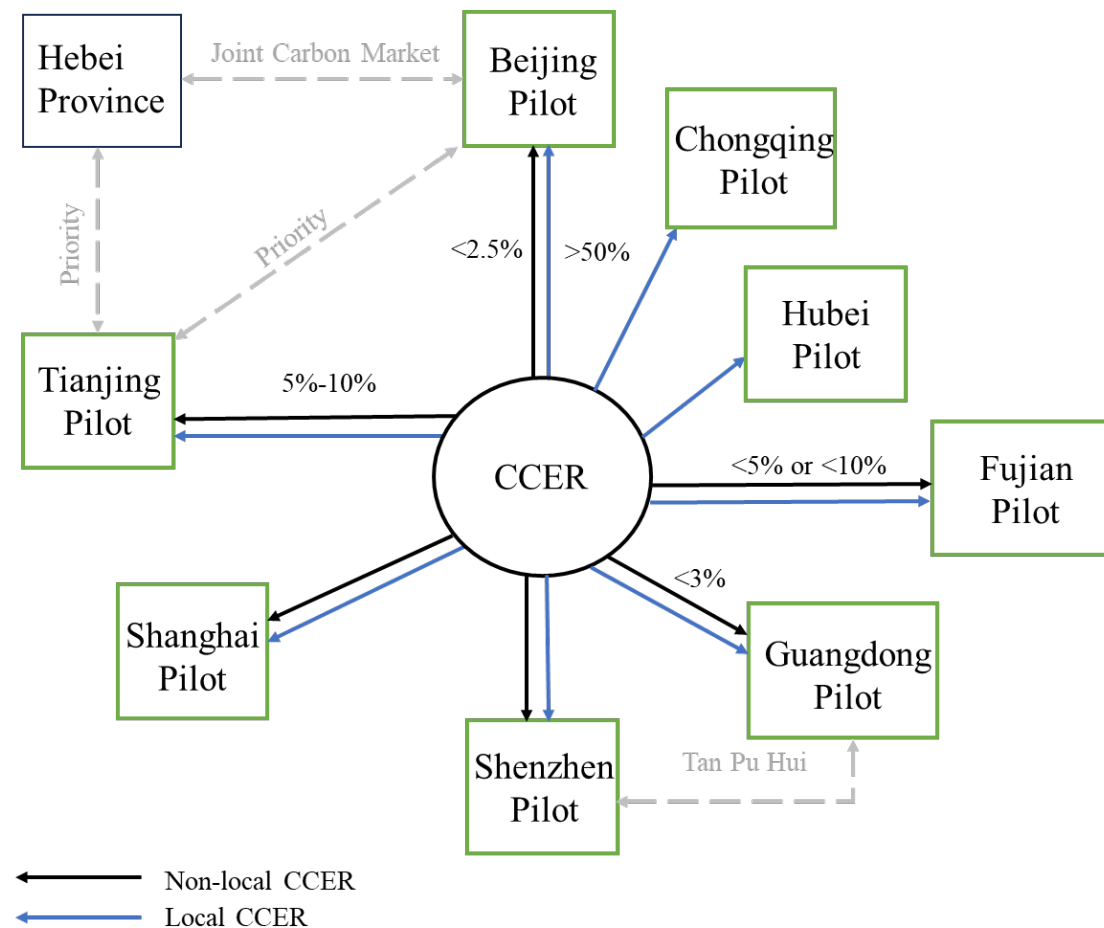
## The case of China

- Co-existence of the national ETS and regional ETS pilots

## Feasibility of utilizing offset mechanisms to link national and regional ETSs

- All voluntary markets recognize China Certified Emission Reduction (CCER), but the offset ratios differ
- Providing experience for exploring the linkage of Asia-Pacific carbon markets

## CCERs in China's Regional Carbon Markets



# Improving the Performance of Carbon ETSs

## Gaps of market coverage

- Currently, only the Korea ETS and the Kazakhstan ETS set emission caps that exceed more than 50% of the country's total emissions.

## Liquidity of carbon allowances

- China's national ETS is a thin market with infrequent buying and selling activities

## Involvement of non-compliance entities

- Financial institutions, carbon asset management companies

## Carbon derivative markets

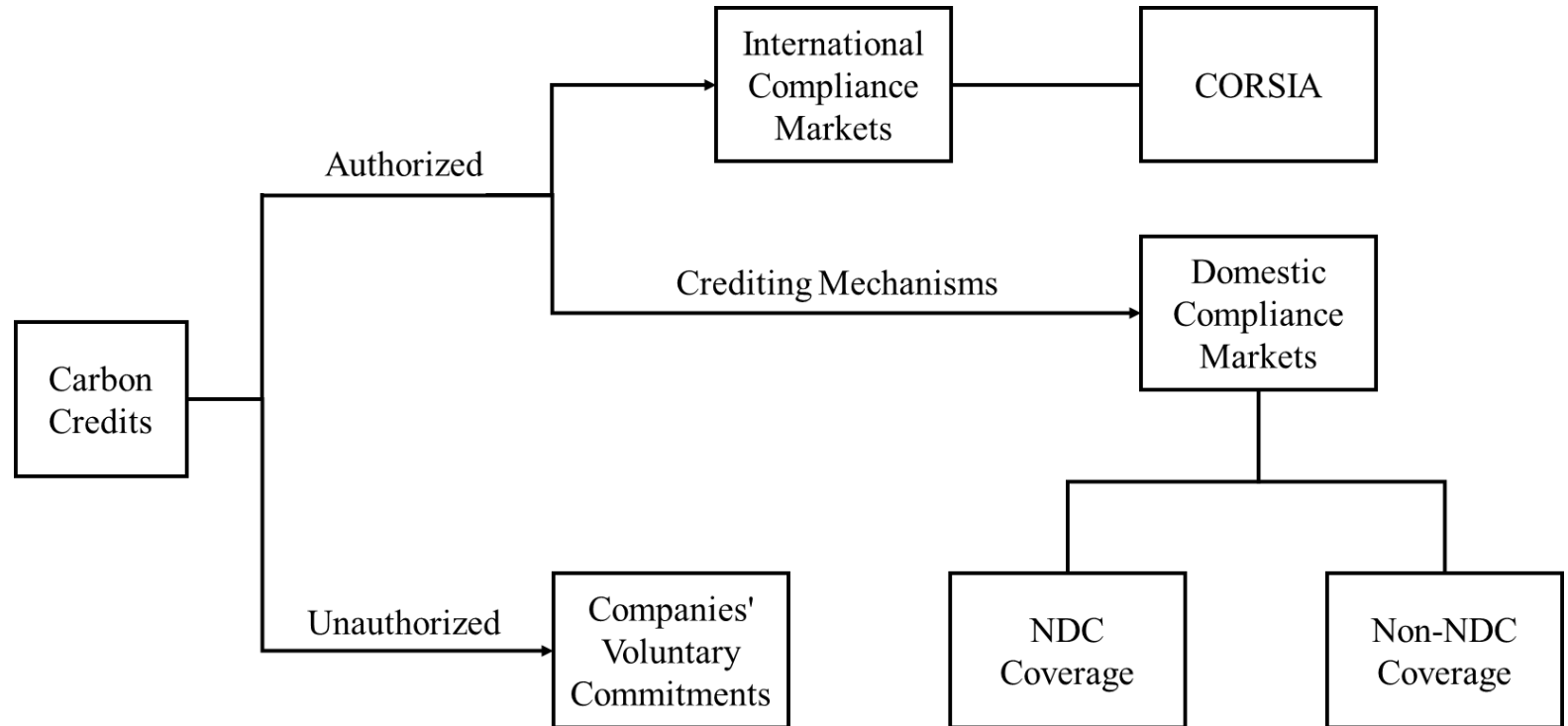
- Carbon futures, forwards, and options

# Medium Term

# Indirect Linkage through Voluntary Carbon Markets (VCMs)

## VCMs demonstrate enhanced flexibility

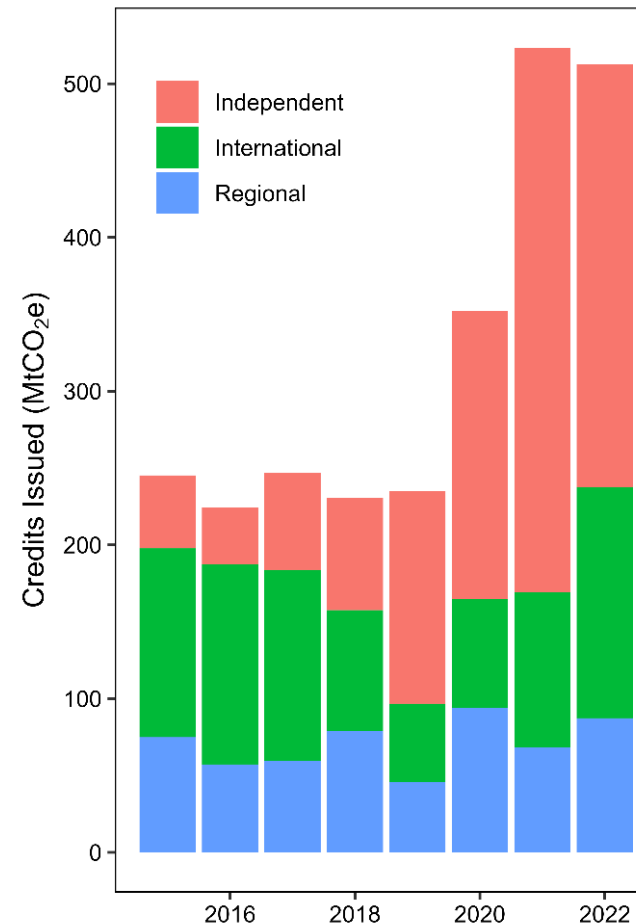
- Authorized or unauthorized carbon credits
- Independent, international and regional crediting mechanisms.
- Carbon credits can be traded through third-party platforms



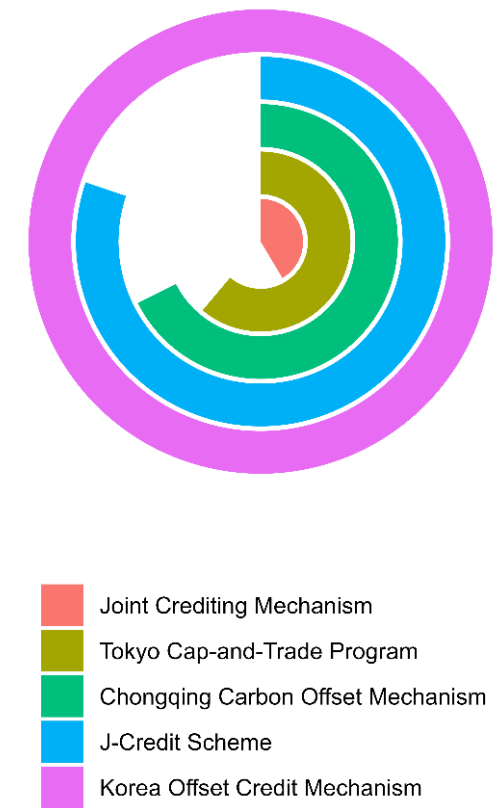
# Linking Using Offset Mechanism

- JI's discontinuation, discrepancy in CDM supply and demand, and quality issues makes **international** credit mechanisms no longer suitable
- **Independent** crediting mechanisms lacks standardized process to be recognized as convertible to NDCs
- **Regional** credit mechanisms would become the option for ETSs to be indirectly linked

## Status of Crediting Issuance



## Regional Credits Issued in 2022





# Linking through CORSIA

- CORSIA, through implementing MRV mechanisms for aircraft operators, is determined to encompass all international flights and become obligatory for most nations.
- CORSIA purchases offsets from accredited programs and applies them to international flights. Thus, the projects conducted under CORSIA facilitate international carbon reduction with cross-border flights.
- This process serves as a valuable precedent, offering insights that can be extrapolated to other industries with transnational dimensions.
- However, criticisms exist regarding using CORSIA to link efforts in carbon emission reduction.

# Long Term

# Prospective Full Linkage

## Full linkage after restricted linkage

- China, Japan, and Korea are suitable candidates for a full linkage due to their geographical, economic, and climate goal proximities.

## Harmonizing cap types

- Asia-Pacific ETSs will eventually employ absolute caps

## Allocation method considerations

- The combination of auction and free allocation (benchmarking rather than grandfathering)

## Sector diversity as an advantage

- Non-overlapping sectors motivate linkage and reinforce the expansion of sector coverage

# Encompassing Compliance and Voluntary Participants

Asia-Pacific ETSs encompass compliance and voluntary markets, except for New Zealand, which exclusively operates a compliance market.

- Regulations govern the utilization of offsets and credits with quantitative restrictions, which vary from country to country (China and Korea: 5%, Japan: up to 50%, Kazakhstan: No limit).
- Except for the Korea ETS, all other countries restrict the use of offsets to domestic credits for offsetting emissions.

# Converging to Absolute Caps

Emissions coverage differs, with the

- Korea: 86% of its emissions
- Japan: 2%.

Cap setting

- Absolute emission caps: Korea, Kazakhstan, and New Zealand
- Intensity-based emission targets: China's national ETS and Japan's two sub-national ETSs

# Extending ETS Coverage

- New Zealand ETS
  - Power, buildings, industry, transport, waste, and forestry.
- China's national ETS
  - Now only covers the thermal power sector
  - Sectoral expansion: petrochemicals, chemicals, building materials, iron and steel, non-ferrous metals, paper-making, and aviation.
- Types of greenhouse gases
  - CO<sub>2</sub>: China, Japan, and Kazakhstan
  - Six Kyoto GHGs: Korea and New Zealand

# Increasing the Share of Auctions

- Allowance allocation
  - Free allocation
  - Auction
- Free allocation: benchmarking and grandfathering. All the countries permit benchmarking: China's ETSs utilize output-based benchmarking, and the New Zealand ETS adopts an output- and intensity-based baseline. China, New Zealand, and Kazakhstan do not permit grandfathering.
- Entities receiving allowances for free through grandfathering may gain a competitive advantage through linkage with countries that do not permit grandfathering.
- China's national ETS and Japan's two ETSs do not allow auctions.

# **Governance of ETS Linkage**



# Comparable MRV Systems

## Current

- New Zealand: self-reporting with a selected sample for compliance assessment
- Japan: covered emitters are obligated to report their emission reduction plans
- Korea: revisions are mandated to ensure precise emission estimation in cases of inaccuracy
- China and Kazakhstan: non-compliance entities are also obliged to report their annual emissions

## Future

- Internationally recognized standards, such as those from ISO and IPCC, can guide MRV processes for linked ETSs.

# Coordinating Market Stabilization Mechanisms

## Price-based Mechanisms

- China: max daily allowance price fluctuations
- Korea: temporary price limits under specific conditions
- New Zealand: reserve price for allowances auctions

## Supply-based Mechanisms

- Banking is permitted in all ETSs but is subject to different constraints
- Borrowing is allowed in both China's and Korea ETSs
- Market stabilization reserves in Japan, Korea, and New Zealand

# Strengthening Enforcement

## **Financial penalties for non-compliance must be robust, exceeding the cost of non-compliance**

- All five ETSs incorporate financial penalties to address non-compliance and behaviors that could impact the fairness of the carbon market.
  - Flat-rate penalty: China, Japan, and New Zealand
  - Allowance-based penalty: Korea and Kazakhstan
- ETSs in Korea and New Zealand introduce a penalty equivalent to three times the market price of the allowance as an additional measure.
- China's national ETS incorporates additional penalties, such as reductions in the allowances allocated for the following year, to incentivize compliance.



# Challenges and Recommendations

# Challenges

- Methodological dispute exists over adjustments for direct and indirect emissions
- Addressing domestic economic consequences, such as capital outflows, exchange rate depreciation, and welfare deterioration
- Variations in legal frameworks and the extent of climate policy legislation can impede the process
- The issue of sovereignty loss becomes particularly pronounced in multilateral linkages
- Linkage may facilitate the creation of climate clubs

# Recommendations

## Before linking

- Initially, focus on improving domestic carbon markets
- Revise international offsetting policies to accelerate VCM. Pilot markets may serve as a testing bed
- Regularly update NDCs and establish a national registration system for ITMOs

## After linking

- Multi-party communication platform; Legal MRV framework for compliance tracking
- Authorized cooperative organization for trading infrastructure
- International carbon allowance calculator
- Strengthen financial regulations on fraud, misleading information, manipulation, and transfer pricing
- Cooperative policies to ensure the environmental integrity