

**INFORMAL  
SESSION TO  
ENGAGE**

SM/15/275  
Revision 1

November 25, 2015

To: Members of the Executive Board

From: The Acting Secretary

Subject: **The Managing Director's Statement on the Role of the Fund in Addressing Climate Change**

Board Action:	<b>Informal session to engage</b> Executive Directors
Tentative Board Date:	<b>Wednesday, November 25, 2015</b>
Additional Information:	This paper has been revised to reflect the change in format of the Board discussion and in light of Executive Directors' comments at the informal session on November 24, 2015.
Publication:	Proposed, after 3:00 p.m. on November 25, 2015
Questions:	Mr. Keen, FAD (ext. 34442) Ms. Pattillo, SPR (ext. 37319) Mr. Parry, FAD (ext. 39724)





NOVEMBER 25, 2015

## THE MANAGING DIRECTOR'S STATEMENT ON THE ROLE OF THE FUND IN ADDRESSING CLIMATE CHANGE

*The Fund has a role to play in helping its members address those challenges of climate change for which fiscal and macroeconomic policies are an important component of the appropriate policy response. The greenhouse gas mitigation pledges submitted by over 160 countries ahead of the pivotal Climate Conference in Paris in December represent an important step by the international community towards containing the extent of global warming.*

*Strategies for reducing emissions will reflect countries' differing initial positions, political constraints and circumstances. Carbon pricing can, however, play a critical role in meeting in the most efficient and effective way the commitments that countries are now entering into; it can also raise substantial revenues that can be used to reduce other, more distorting taxes. Through its incentive effects, carbon pricing will also help mobilize private finance for mitigation activities and spur the innovation needed to address climate challenges. Finance ministries have a key role to play in promoting and implementing these policies and ensuring efficient use of the revenue raised.*

*The process of climate change is set to have a significant economic impact on many countries, with a large number of lower income countries being particularly at risk. Macroeconomic policies in these countries will need to be calibrated to accommodate more frequent weather shocks, including by building policy space to respond to shocks; infrastructure will need to be upgraded to enhance economic resilience. It will be important that developing countries seeking to make these adaptations have access to sufficient financial support on generous terms.*

*Financial markets will play an important role in helping economic agents and governments in coping with climate change-induced shocks. And heightened climate vulnerabilities and the structural adjustments associated with a shift towards a low-carbon economy over the medium-term will have important implications for financial institutions and financial stability.*

*This paper identifies areas in which the Fund has a contribution to make in supporting its members deal with the macroeconomic challenges of climate change, consistent with national circumstances. It draws on materials contained in a forthcoming Staff Discussion Note (Farid et al. 2015) and has benefited from the discussions at informal Board meetings on IMF work on climate change held on September 30 and November 24, 2015.*

## 2015—ISSUES FOR THE PARIS COP21

### The international community is coming together at the December 2015 UN Climate Change Conference (COP21) in Paris to lay the foundations for a transition to low-carbon development.

Climate change has potential to do significant economic harm, especially to some of the poorest countries, and poses worrying tail risks.<sup>1</sup> It is a global externality—one country's emissions affect all countries by adding to the stock of heat-warming gases in the earth's atmosphere from which warming arises. So addressing it requires global cooperation.

Over 160 countries have submitted emissions mitigation pledges—'Intended Nationally Determined Contributions', or INDCs—for the Paris conference. If implemented, these commitments will substantially reduce projected future warming, though not by enough to meet the (internationally agreed) 2°C target.<sup>2</sup> At Paris, parties will seek to agree on a legal framework for assessing progress on, and updating, these pledges.

Parties will also discuss climate finance—the advanced countries' pledge to mobilize funds rising to \$100 billion a year by 2020, from public and private sources, for climate mitigation and adaptation in developing countries. Flows in 2014 have been estimated at \$62 billion (see below).

Climate Mitigation	
Country/region	Selected Mitigation Pledges Submitted for Paris Summit <sup>a</sup>
China	Lower emissions per unit of GDP 60-65% from 2005 levels by, and achieve peaking of emissions around, 2030
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Source. UNFCCC (2015b).

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Goals for 2020 and beyond	Mobilize from advanced countries \$100 billion per year for climate mitigation and adaptation in developing countries.
Flows in 2014	\$23.1 billion Bilateral public finance (e.g., Overseas Development Assistance).
	\$20.4 billion Multilateral public sources (mostly from Multilateral Development Banks).
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	\$1.6 billion Export credits (mainly for renewable energy).
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Source: OECD (2015).

## NATIONAL ACTION

**Carbon pricing should be the centerpiece of climate mitigation efforts—but choosing the right instrument, and designing it to suit national conditions, are critical for meeting mitigation objectives at lowest cost.**

### Choosing Mitigation Instrument

**The success of Paris will hinge critically on carbon dioxide (CO<sub>2</sub>) mitigation in large emitters**

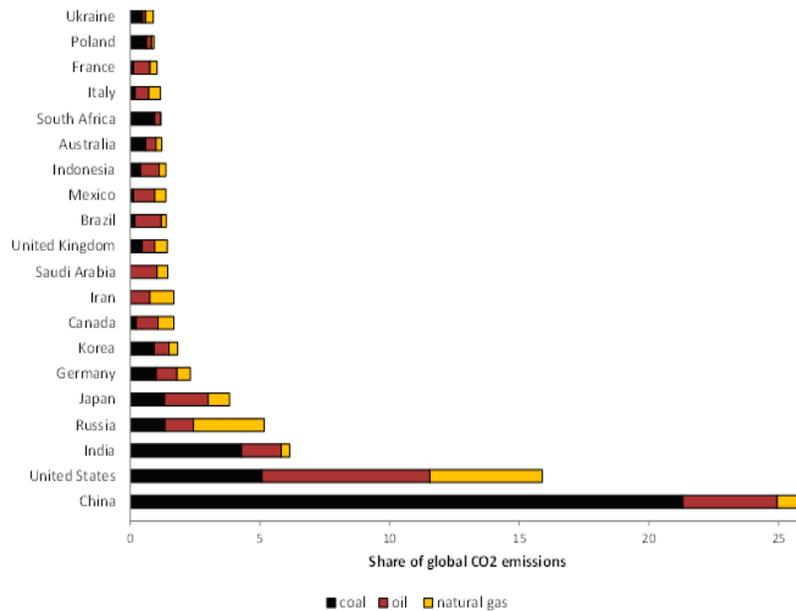
**The key practical issue is what policy instruments are best suited for progress on INDCs and how they should be designed**

CO<sub>2</sub> emissions from fossil fuel combustion are easier to tax than other greenhouse gases and are by far the largest source of emissions. Twenty countries—including some emerging market economies—account for about 80 percent of global CO<sub>2</sub> emissions (Figure 1).<sup>3</sup>

Policymakers face a wide array of instruments by which to meet commitments to reduce emissions: carbon taxes, emissions trading systems (ETSs), regulations for energy efficiency and renewables, and so on. Choosing the right instrument, and designing it appropriately, is critical for meeting the targets set in INDCs at the lowest overall cost.

<sup>3</sup> Ranking countries by per capita emissions would give a very different picture, raising questions about equitable burden sharing across countries.

**Figure 1. Top Twenty Carbon Dioxide Emitters, 2012**



Source: IEA (2015).

**Carbon pricing is preferable to regulation**

Carbon pricing—charging for the carbon content of fossil fuels—is preferable to regulatory approaches to curbing emissions, because it:

- Promotes the full range of mitigation opportunities across all sectors—investments in cleaner fuels and energy efficiency, conserving on the use of vehicles and energy-using equipment, and so on;
- Aligns the private cost of emissions with their true social cost;
- Can raise significant revenue which, if used productively, minimizes overall burdens on the economy; and
- Is simpler, administratively, than multiple regulatory programs targeting different behavior in different sectors.

**ETSs should look like, and be accompanied by, taxes**

ETSs<sup>4</sup> can be as efficient as carbon taxes if well-designed and managed, with key tax-like features, by:

- Auctioning allowances to raise revenue; and
- Including price stability measures, such as price floors and ceilings (to create a stable environment for the development and deployment of clean technologies).

ETSs typically focus downstream on industrial emissions and should be accompanied by taxes to cover other significant emissions sources (from transport and heating fuels, for instance).

**Where regulations are used they should conform to the same broad design principles as taxes**

Initial conditions, political constraints and preferences mean that some countries may use regulatory approaches for some time. In these cases, the regulations should:

- Promote a broad range of mitigation responses (e.g., incentives for reducing the emissions intensity of power generation are more effective than policies targeted only at renewables, because they also encourage switching from coal to gas);
- Promote price-like mechanisms (for example, energy efficiency and emission rate standards can be converted into explicit tax/subsidy schemes with fees for those below, and rebates for those above, a standard);
- Harmonize (explicit or implicit) carbon prices across programs and sectors and align them with environmental objectives.

**Credible policy plans facilitate transition**

Early announcement of credible mitigation policies is key to easing transition, including by providing proper signals to encourage long-lived, low emission investments.

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<sup>4</sup> Under an ETS, firms need an allowance for each ton of their emissions and the government caps total emissions at a target level by restricting the number of allowances. Trading of those allowances sets a market price on emissions.

## Carbon Pricing Design

### **Carbon taxes are a practical extension of what most governments do already**

Carbon taxes can be a highly practical extension of road fuel excises, which are widely accepted and well established in most countries and are among the most straightforward of all taxes to administer. Carbon taxes involve building a carbon charge into those excises and extending similar charges to the supply of other petroleum products, coal, and natural gas (perhaps at the point of extraction or refinery gate) with an accompanying system of charges/rebates for imported/exported fuel products.

The administrative and fiscal benefits of carbon taxes over other mitigation instruments may be particularly marked in developing countries where administrative capabilities to monitor ETSs are constrained, the potential market for allowances may be thin, and large informal sectors enhance the fiscal attractiveness of energy taxation relative to broader taxes.

### **A transition to greater emissions coverage, with higher prices, is needed**

Currently, about 40 countries are implementing some form of carbon pricing at the national level (counting the EU ETS as 31 countries) and over 20 sub-national governments have carbon pricing schemes.<sup>5</sup> But these schemes cover only about 12 percent of global emissions (though coverage will roughly double when, as it has announced, China introduces pricing on industrial sources in 2017). Prices are typically below \$10 per ton.

### **Productive use of revenues is critical for containing the gross costs of carbon pricing**

The revenue at stake from carbon pricing is significant—around 1 percent of GDP or more for large emitters imposing near term carbon prices of \$30 per ton. Efficiently using these revenues produces large economic benefits, for example:

- Revenues can be used to cut broader taxes on labor and capital that distort economic activity and harm growth. Carbon pricing can be about more efficient tax systems rather than higher taxes.
- If revenues fund new (environmental or general) spending or deficit reduction, this should generate economic efficiency benefits comparable to those from other revenue uses like cutting distortionary taxes.

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<sup>5</sup> WBG (2015). Some countries of course have quite heavy taxes on a subset of fossil fuels, such as gasoline.

If revenues are earmarked for low-value spending, or allowances are freely allocated in an ETS, the costs to the economy from carbon pricing are considerably higher.

**Domestic environmental benefits warrant substantial carbon pricing**

Besides global climate benefits, carbon pricing can generate substantial domestic environmental gains, most importantly fewer air pollution deaths due to less use of coal and other polluting fuels. Domestic environmental benefits would have warranted carbon prices of \$57 per ton of CO<sub>2</sub> in 2010 (averaged across large emitters), even in the absence of global climate benefits.<sup>6</sup> An implication is that countries can have a strong incentive to move forward unilaterally with carbon pricing simply in terms of their own national interest and without reference to the global public bad of climate change. If all large emitters priced carbon in their own interests they would make significant progress on their INDCs, and global emissions would fall by over 10 percent.<sup>7</sup>

**Impacts on vulnerable households need attention**

Higher energy prices burden households and the impact on the poor is a particular concern. But holding down energy prices is a highly inefficient way to help them, because 90 percent or more of the benefits typically leaks away to higher income groups.<sup>8</sup> Instead, these groups are better helped through targeted measures such as stronger social safety nets, which require only a fraction of the revenues from carbon pricing. The focus should be on the distributional impact of the whole policy package, not only the component that raises energy prices.

**Another concern is impacts on energy-intensive, trade exposed firms**

Impacts on energy-intensive, trade-exposed firms (e.g., petrochemicals, metals, refining, paper, glass, cement) are a particular concern. Border tax adjustments linked to the embodied carbon content of imports have sometimes been suggested as a way to level the playing field and encourage broader country participation in carbon pricing. However, there are considerable practical issues (e.g., measuring embodied carbon), legal uncertainties (e.g., compatibility with World Trade Organization obligations), and risks of retaliatory actions.

Over the longer term, it is better for governments to assist the re-allocation of resources away from carbon-intensive

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<sup>6</sup> Parry et al. (2014a).

<sup>7</sup> Parry et al. (2014a).

<sup>8</sup> Clements et al. (2013).

sectors, for example through worker retraining programs, rather than permanently subsidize firms unable to compete when energy is efficiently priced.

These difficulties also highlight the potential importance of international coordination, discussed further below.

## Adaptation and Macroeconomic Policies

### **Role for government policies: overcoming market failures and providing public goods and services to facilitate private sector adjustment**

For many developing countries, growth prospects will be significantly threatened without effective adaptation to climate change. Analysis of appropriate adaptation policies must be inherently local and customized to the evolving climate impact on a particular region or sector. It is clear, nonetheless, that developing country governments can face very large adaptation costs: importantly, the need for growth-enhancing scaled up infrastructure provides an opportunity for climate-resilient, low-carbon infrastructure spending. To be successful, the management of this spending, and of financial assistance for it, should be undertaken within a medium-term financial framework consistent with available resources, macro-stability, and debt sustainability.

## Role of the Financial System

### **Monitor and address systemic risks**

Global climate change can entail significant risks to macro-financial stability. Financial and nonfinancial corporate sectors face risks from climate damages and stranded assets (such as coal reserves that become uneconomic with carbon pricing). The disruption could affect corporate balance sheet quality. Some financial regulators and central banks have started thinking about systemic risks related to climate change, but this work is in its early stage and more action is needed at the national level to monitor and address these risks.

### **Provide an enabling environment for the financial system to support mitigation and adaptation**

The financial system can play a key role by supporting reductions in climate change risk and mitigating the impact of adverse climate events. Long term institutional investors can help with rebalancing and redistributing of climate related risks and maintaining financial stability. Hedging instruments (e.g., catastrophe bonds, indexed insurance) help insure against increasing natural disaster risk, and other financial instruments (e.g., green stock indices, green bonds, voluntary de-carbonization

initiatives) can help re-allocate investment to “green” sectors. Financial sector regulation and supervision should help manage risks to financial stability associated with climate-related shocks, while providing an enabling environment that promotes safe and sound functioning of financial institutions, instruments and markets for hedging risks. Stress-testing of climate risks and its macro-financial effects by banks, insurers, and pension funds needs to be developed further, and more work is need to capture these risks in system-wide stress tests.

## FACILITATING GLOBAL PROGRESS

### The potential for price floors and international fuel charges.

#### **Countries need not impose the same emissions price**

Uniformity of carbon prices across countries is not efficient if they have different fiscal needs, different domestic environmental benefits from carbon pricing, or if, on equity grounds, developing countries have a lesser capacity to pay. Political acceptability of carbon pricing also differs across countries, while the principle of common but differentiated responsibility is also relevant here.

#### **Carbon price floors are the natural analog of other tax coordination regimes**

Underpricing from an international perspective is familiar from situations where countries compete for mobile tax bases, in which context some progress has been made through tax floor agreements (such as for excises on alcohol, tobacco and energy products in the EU). The climate analog would be a coordinated CO<sub>2</sub> price floor among a coalition of willing countries. Such an arrangement, complementary to the process of mitigation pledges, would:

- Recognize the diversity of efficient carbon prices across countries;
- Avoid holding back countries wishing to price emissions more aggressively, for domestic environmental, fiscal, or other reasons;
- Require agreement on just one target (the price floor) rather than multiple emissions targets across countries;
- Involve some monitoring issues (e.g., accounting for special exemptions and changes in broader fiscal

provisions affecting energy); these require closer examination, but seem likely to be manageable; and

- Ultimately need incentives to promote broader participation and compliance over time.

### **Carbon pricing could scale up climate finance**

Carbon pricing could play a central role in meeting targets for climate finance:

- In developing countries, as an effective way to attract private financial flows for mitigation;
- Enhance developed countries' ability to meet their climate finance commitments: 5 percent of the revenue from a \$30 per ton carbon charge in 2020 would amount to about \$25 billion; and
- A similar amount of revenue could be raised with the same charge applied to international aviation and maritime fuels from advanced countries. These fuels are attractive as a source of climate finance as governments have a weaker claim on the tax base than for domestic fuels. They are also undertaxed from a fiscal and environmental perspective and tax administration would be straightforward.<sup>9</sup>

## **THE FUND'S ROLE**

**The Fund is not an environmental organization, but climate change poses significant risks for macroeconomic performance and several of the appropriate policy responses lie within the Fund's expertise.**

### **Analytical work underpins the Fund's contributions**

The IMF draws on the specialist analysis of others (e.g., the Intergovernmental Panel on Climate Change, the International Energy Agency, the World Bank) and focuses on the practical design and administration of fiscal instruments for climate policy and broader energy policy. For example, Fund staff work has quantified, for over 150 countries, the environmental, fiscal, and economic benefits of energy pricing reform, including the removal of subsidies.<sup>10</sup> This information helps policymakers craft the specifics of legislation to meet environmental and fiscal

<sup>9</sup> Keen et al. (2013). Due to international mobility of the tax base, especially for maritime, globally coordinated charges are needed. Compensation schemes for developing countries should be feasible, however.

<sup>10</sup> See Parry et al. (2014b).

objectives and enlightens stakeholders on the case for reform.

An overarching issue, which staff intends to analyze, is the growth impact of transitioning to a less carbon-intensive economy.

**Technical assistance, surveillance and training**

The Fund is well positioned to provide technical assistance and training, given its global membership and expertise in fuel tax design, tax administration, and energy price reform. Climate and energy policy developments are sometimes discussed in Article IV consultations, and this seems likely to become increasingly common. Next steps on further integration in surveillance will be informed by assessing experience with selected pilot countries.

**Promoting dialogue**

The Fund collaborates with other international organizations (e.g., World Bank, Organisation for Economic Co-operation and Development, and United Nations Environment Programme) to promote policy dialogue among finance ministries, emphasizing the benefits of carbon pricing as one component of an effective tax structure.

**Integrating natural disaster risks and preparedness strategies in macroeconomic forecasts and debt sustainability analyses**

Low-income and small developing states are especially vulnerable to increasing risks of extreme weather events. Staff, collaborating with other international institutions, will work with countries to develop comprehensive risk management frameworks to assess risks and determine the right mix of building domestic buffers versus risk transfer through insurance or financial market instruments, while tailoring investment and growth policies to building resilience.

**Help countries incorporate adaptation strategies in medium-term budget frameworks**

More analysis of the macroeconomic implications of adaptation policies is needed. Where macro-critical, the fiscal costs of adaptation, and the effective use of climate-related financial flows, will need to be integrated in sustainable medium-term fiscal frameworks.

**Work closely with other institutions to encourage consistent climate-related disclosures, prudential requirements, and stress testing for the financial sector**

Staff work, in close coordination with other institutions, such as the World Bank, Financial Stability Board and International Association of Insurance Supervisors (IAIA) will: i) enhance understanding of the transmission mechanisms from climate risks to financial stability, ii) contribute to the design of appropriate disclosure rules for climate risk exposure, iii) provide technical assistance to promote safe and sound development of markets and instruments to help manage climate-related risks,

iv) contribute to the development of best practices for stress-testing for climate risks, and v) support ongoing work on globally consistent prudential requirements for the insurance sector, including on a Global Insurance Capital Standard being developed by IAIS to allow for catastrophe risk in capital requirements.

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**THE MANAGING DIRECTOR'S STATEMENT ON THE ROLE OF THE FUND IN ADDRESSING CLIMATE CHANGE: "ADDRESSING GLOBAL CLIMATE CHANGE—THE ROLE OF THE FUND"**

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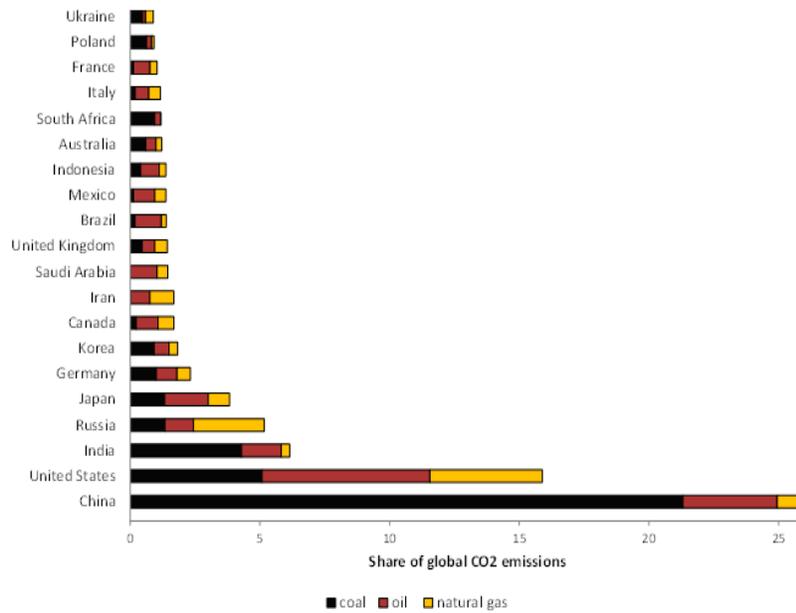
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The administrative and fiscal benefits of carbon taxes over other mitigation instruments may be particularly marked in developing countries where administrative capabilities to monitor ETSs are constrained, the potential market for allowances may be thin, and large informal sectors enhance the fiscal attractiveness of energy taxation relative to broader taxes.

### **A transition to greater emissions coverage, with higher prices, is needed**

Currently, about 40 countries are implementing some form of carbon pricing at the national level (counting the EU ETS as ~~28-31~~ countries) and over 20 sub-national governments have carbon pricing schemes.<sup>6</sup> But these schemes cover only about 12 percent of global emissions (though coverage will roughly double when, as it has announced, China introduces pricing on industrial sources in 2017). Prices are typically below \$10 per ton.

### **Productive use of revenues is critical for containing the gross costs of carbon pricing**

The revenue at stake from carbon pricing is significant—around 1 percent of GDP or more for large emitters imposing near term carbon prices of \$30 per ton. Efficiently using these revenues produces large economic benefits, [for example](#):

- Revenues can be used to cut broader taxes on labor and capital that distort economic activity and harm growth. Carbon pricing ~~is~~ [can be](#) about more efficient tax systems rather than higher taxes.
- If revenues fund new (environmental or general) spending [or deficit reduction](#), this should generate economic efficiency benefits comparable to those from other revenue uses like cutting distortionary taxes.

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<sup>6</sup> WBG (2015). [Some countries of course have quite heavy taxes on a subset of fossil fuels, such as gasoline.](#)

If revenues are earmarked for low-value spending, or allowances are freely allocated in an ETS, the costs to the economy from carbon pricing are considerably higher.

**Domestic environmental benefits warrant substantial carbon pricing**

Besides global climate benefits, carbon pricing can generate substantial domestic environmental gains, most importantly fewer air pollution deaths due to less use of coal and other polluting fuels. Domestic environmental benefits would have warranted carbon prices of \$57 per ton of CO<sub>2</sub> in 2010 (averaged across large emitters), even in the absence of global climate benefits.<sup>7</sup> An implication is that countries can have a strong incentive to move forward unilaterally with carbon pricing simply in terms of their own national interest and without reference to the global public bad of climate change. If all large emitters priced carbon in their own interests they would make significant progress on their INDCs, and global emissions would fall by over 10 percent.<sup>8</sup>

**Impacts on vulnerable households need attention**

Higher energy prices burden households and the impact on the poor is a particular concern. But holding down energy prices is a highly inefficient way to help them, because 90 percent or more of the benefits typically leaks away to higher income groups.<sup>9</sup> Instead, these groups are better helped through targeted measures such as stronger social safety nets, which require only a ~~small fraction~~ of the revenues from carbon pricing. The focus should be on the distributional impact of the whole policy package, not only the component that raises energy prices.

**Another concern is impacts on energy-intensive, trade exposed firms**

~~Over the longer term, it is better for governments to assist the re-allocation of resources away from carbon-intensive sectors, for example through worker retraining programs, rather than permanently subsidize firms unable to compete when energy is efficiently priced.~~

Impacts on energy-intensive, trade-exposed firms (e.g., petrochemicals, metals, refining, paper, glass, cement) are ~~nonetheless~~ a particular concern. Border tax adjustments linked to the embodied carbon content of imports have sometimes been suggested as a way ~~can to~~ level the playing field and encourage broader country participation in carbon pricing. However, there are considerable

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<sup>7</sup> Parry et al. (2014a).

<sup>8</sup> Parry et al. (2014a).

<sup>9</sup> Clements et al. (2013).

~~significant~~ practical issues (e.g., measuring embodied carbon), legal uncertainties (e.g., compatibility with World Trade Organization obligations), and risks of retaliatory actions.

Over the longer term, it is better for governments to assist the re-allocation of resources away from carbon-intensive sectors, for example through worker retraining programs, rather than permanently subsidize firms unable to compete when energy is efficiently priced.

These difficulties also highlight the potential importance of international coordination, discussed further below.

~~Significant competitiveness impacts are, however, likely confined to a few industries (e.g., metals, refining, paper, glass, cement) and would be less pronounced with global progress on mitigation.~~

## Adaptation and Macroeconomic Policies

### **Role for government policies: overcoming market failures and providing public goods and services to facilitate private sector adjustment**

For many developing countries, growth prospects will be significantly threatened without effective adaptation to climate change. Analysis of [appropriate](#) adaptation policies must be inherently local and customized to the [evolving](#) climate impact on a particular region or sector. It is clear, nonetheless, that developing country governments can face very large adaptation costs: importantly, the need for growth-enhancing scaled up infrastructure provides an opportunity for climate-resilient, low-carbon infrastructure spending. To be successful, the management of this spending, and of financial assistance for it, should be undertaken within a medium-term financial framework consistent with available resources, macro-stability, and debt sustainability.

## Role of the Financial System

### **Monitor and address systemic risks**

Global climate change can entail significant risks to macro-financial stability. Financial and nonfinancial corporate sectors face risks from climate damages and stranded assets (such as coal reserves that become uneconomic with carbon pricing). The disruption could affect corporate balance sheet quality. Some financial regulators and central banks have started thinking about systemic risks related to climate change, but [this work is in its early stage](#)

**Provide an enabling environment for the financial system to support mitigation and adaptation**

[and](#) more action is needed at the national level to monitor and address these risks.

The financial system can play a key role by supporting reductions in climate change risk and mitigating the impact of adverse climate events. Long term institutional investors can help with rebalancing and redistributing of climate related risks and maintaining financial stability. Hedging instruments (e.g., catastrophe bonds, indexed insurance) help insure against increasing natural disaster risk, and other financial instruments (e.g., green stock indices, green bonds, voluntary de-carbonization initiatives) can help re-allocate investment to “green” sectors. Financial sector regulation and supervision should [help manage risks to financial stability associated with climate-related shocks, while providing an enabling environment that promotes safe and sound functioning of financial institutions, instruments and markets for hedging risks, support market development and protect financial stability, while ensuring affordable and sustainable insurability](#). Stress-testing of climate risks and its macro-financial effects by banks, insurers, and pension funds needs to be developed further, [and more work is need to capture these risks in system-wide stress tests](#).

## FACILITATING GLOBAL PROGRESS

### The potential for price floors and international fuel charges.

**Countries need not impose the same emissions price**

Uniformity of carbon prices across countries is not efficient if they have different fiscal needs, different domestic environmental benefits from carbon pricing, or if, on equity grounds, [small-emitting](#) developing countries have a lesser capacity to pay. Political acceptability of carbon pricing also differs across countries, [while the principle of common but differentiated responsibility is also relevant here—](#).

**Carbon price floors are the natural analog of other tax coordination regimes**

Underpricing from an international perspective is familiar from situations where countries compete for mobile tax bases, in which context some progress has been made through tax floor agreements (such as for excises on alcohol, tobacco and energy products in the EU). The climate analog would be a coordinated CO<sub>2</sub> price floor among a coalition of willing countries. Such

an arrangement, complementary to the process of mitigation pledges, would:

- Recognize the diversity of efficient carbon prices across countries;
- Avoid holding back countries wishing to price emissions more aggressively, for domestic environmental, fiscal, or other reasons;
- Require agreement on just one target (the price floor) rather than multiple emissions targets across countries;
- Involve some monitoring issues (e.g., accounting for special exemptions and changes in broader fiscal provisions affecting energy); these require closer examination, but seem likely to be manageable; and
- Ultimately need incentives to promote broader participation and compliance over time.

### **Carbon pricing could scale up climate finance**

Carbon pricing could play a central role in meeting targets for climate finance:

- In developing countries, as an effective way to attract private financial flows for mitigation;
- ~~Enhance in~~ developed countries' ability to meet their climate finance commitments, as a potential source of public funding—a 5 percent of the revenue from a \$30 per ton carbon charge in 2020 would amount to about yield about \$25 billion; and for climate finance (with about 5 percent apportioned); and
- A similar amount of revenue could be raised with the same charge applied to international aviation and maritime fuels from advanced countries. These fuels are attractive as a source of climate finance as governments have a weaker claim on the tax base than for domestic fuels. They are also undertaxed from a fiscal and environmental perspective and tax administration would be straightforward.<sup>10</sup>

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<sup>10</sup> Keen et al. (2013). Due to international mobility of the tax base, especially for maritime, globally coordinated charges are needed. Compensation schemes for developing countries should be feasible, however.

## THE FUND'S ROLE

**The Fund is not an environmental organization, but climate change poses significant risks for macroeconomic performance and several of the appropriate policy responses lie within the Fund's expertise.**

**Analytical work underpins the Fund's contribution provides guidance on policy designs**

The IMF draws on the specialist analysis of others (e.g., the Intergovernmental Panel on Climate Change, the International Energy Agency, the World Bank) and focuses on the practical design and administration of fiscal instruments for climate policy and broader energy policy. For example, Fund staff work has quantified, for over 150 countries, the environmental, fiscal, and economic benefits of energy pricing reform, including the removal of subsidies.<sup>11</sup> This information helps policymakers craft the specifics of legislation to meet environmental and fiscal objectives and enlightens stakeholders on the case for reform.

An overarching issue, which staff intends to analyze, is the growth impact of transitioning to a less carbon-intensive economy.

**Technical assistance, surveillance and training**

The Fund is well positioned to provide technical assistance and training, given its global membership and expertise in fuel tax design, tax administration, and energy price reform. Climate and energy policy developments are sometimes discussed in Article IV consultations, and this seems likely to become increasingly common. Next steps on further integration in surveillance will be informed by assessing experience with selected pilot countries.

**Promoting dialogue**

The Fund collaborates with other international organizations (e.g., World Bank, Organisation for Economic Co-operation and Development, and United Nations Environment Programme) to promote policy dialogue among finance ministries, emphasizing the benefits of new revenue from an efficient and easily administered source carbon pricing as one component of an effective tax structure.

**Integrating natural disaster risks and preparedness strategies in macroeconomic forecasts and**

Low-income and small developing states are especially vulnerable to increasing risks of extreme weather events. Staff, collaborating with other international institutions, will work with countries to develop comprehensive risk

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<sup>11</sup> See Parry et al. (2014b).

**debt sustainability analyses**

management frameworks to assess risks and determine the right mix of building domestic buffers versus risk transfer through insurance or financial market instruments, while tailoring investment and growth policies to building resilience.

**Help countries incorporate adaptation strategies in medium-term budget frameworks**

More analysis of the macroeconomic implications of adaptation policies is needed. Where macro-critical, the fiscal costs of adaptation, and the effective use of climate-related financial flows, will need to ~~should~~ be integrated in sustainable medium-term fiscal frameworks.

**Work closely with other institutions to Support initiatives to encourage consistent climate-related disclosures, prudential requirements, and stress testing for the financial sector**

Staff work, in close coordination with other institutions, such as the World Bank, Financial Stability Board and International Association of Insurance Supervisors (IAIA) will ~~cover~~: i) enhancing understanding of the transmission mechanisms from climate risks to financial stability, ii) contribute to the design of helping design appropriate disclosure rules for climate risk exposure, iii) provide technical assistance to promote safe and sound development of markets and instruments to help manage climate-related risks, iv) contribute to the development of ing best practices for stress-testing for climate risks, and v) support ongoing ing work on globally consistent prudential requirements for the insurance sector, including on a Global Insurance Capital Standard being developed by IAIS to that allows for catastrophe risk in capital requirements.

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