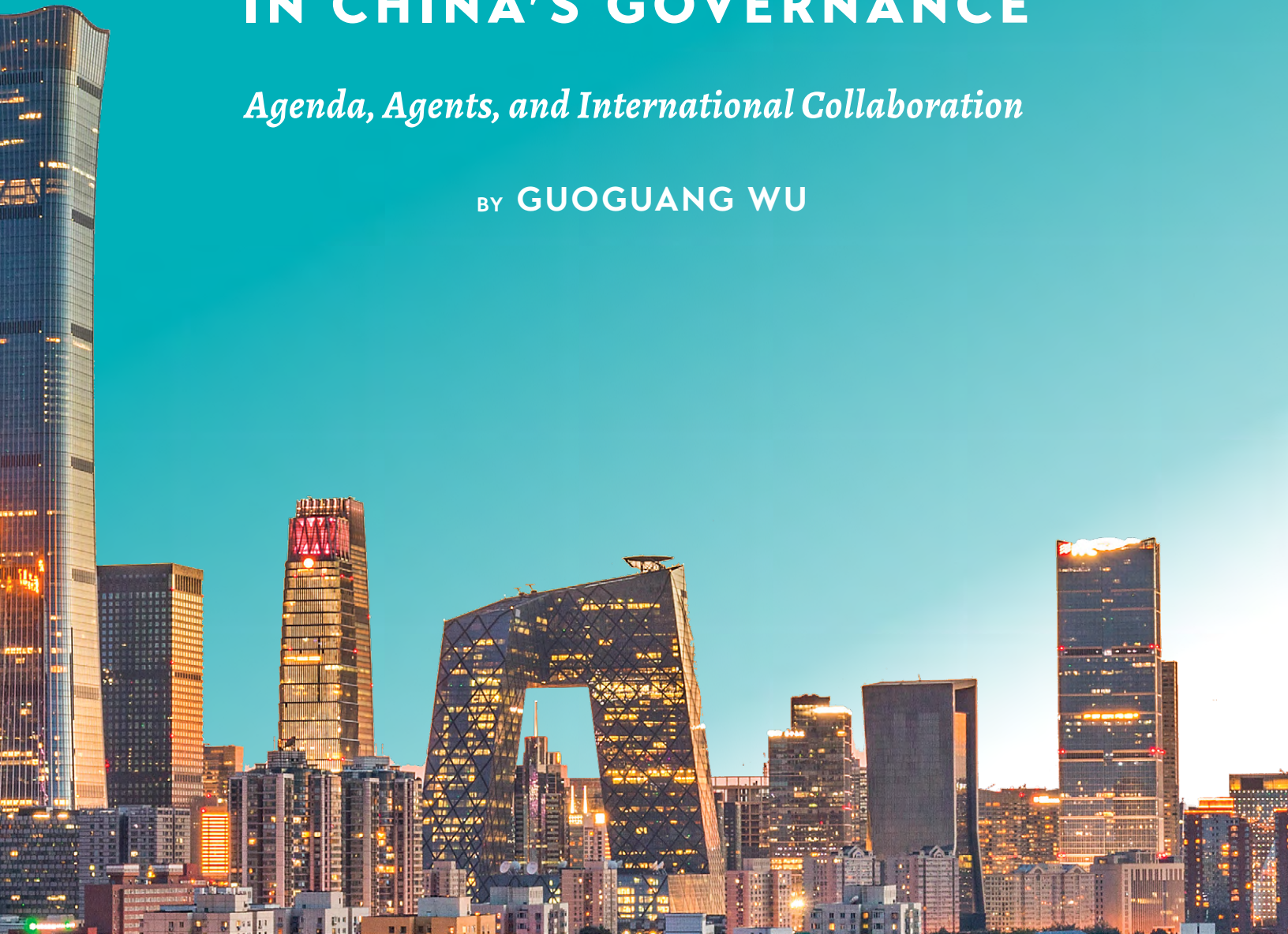


CLIMATE CHANGE IN CHINA'S GOVERNANCE

Agenda, Agents, and International Collaboration

BY GUOGUANG WU



CLIMATE CHANGE IN CHINA'S GOVERNANCE:

Agenda, Agents, and International Collaboration

GUOGUANG WU

Senior Fellow on Domestic Politics, Center for China Analysis, Asia Society
Policy Institute

JUNE 2024

A REPORT FROM THE ASIA SOCIETY POLICY
INSTITUTE'S CENTER FOR CHINA ANALYSIS



With a solution-oriented mandate, the Asia Society Policy Institute (ASPI) tackles major policy challenges confronting the AsiaPacific in security, prosperity, sustainability, and the development of common norms and values for the region. The Asia Society Policy Institute is a think- and do-tank designed to bring forth policy ideas that incorporate the best thinking from top experts in Asia and to work with policymakers to integrate these ideas and put them into practice. As part of ASPI, the Center for China Analysis (CCA) aims to unravel China's complexities to deliver independent policy-relevant analysis. Drawing on an “inside out” approach to China analysis, with an emphasis on Chinese-language sources, more than 30 CCA staff and fellows, located around the world, work on issues related to China's domestic politics; economy and technology; foreign policy and national security; climate, energy, and environment; and contemporary Chinese society, culture, public health, and education.

The Asia Society Policy Institute and the Asia Society take no institutional position on matters of public policy and other issues addressed in the reports and publications they sponsor. All statements of fact and expressions of opinion contained in this paper are the sole responsibility of its authors and may not reflect the views of the organization and its board, staff, and supporters.

ABOUT THE AUTHOR

Guoguang Wu is Senior Fellow on Chinese Politics at the Asia Society Policy Institute's Center for China Analysis. With a Ph.D. in politics from Princeton University, now he is a Senior Research Scholar at the Stanford Center on China's Economy and Institutions, Stanford University. His research specializes in Chinese politics and comparative political economy, including, in China studies, elite politics, national political institutions and policy making mechanisms, transition from communism, the politics of development, China's search for its position in the world, and, in comparative political economy, transition of capitalism with globalization, the emergence of capitalism in comparative perspectives, and the worldwide rise of the economic state. He is the author of four books, which include two major research monographs: *Globalization against Democracy: A Political Economy of Capitalism after Its Global Triumph* (Cambridge University Press, 2017), and *China's Party Congress: Power, Legitimacy, and Institutional Manipulation* (Cambridge University Press, 2015).

ACKNOWLEDGMENTS

I offer great thanks to colleagues at the Asia Society Policy Institute's Center for China Analysis for their tremendous help during the drafting and finalization of the report. I feel a special debt to Li Shuo, Kate Logan, Neil Thomas, and Jing Qian for their insightful comments and suggestions on the draft, and to Taylah Bland and Betty Wang for their feedback. Jing Qian, Neil Thomas, Taylah Bland, and Inger Marie Rossing provided indispensable administrative support. All shortcomings and errors are, of course, mine.

This project was made possible with support from The Rockefeller Foundation. The findings and conclusions contained within are those of the authors and do not necessarily reflect positions or policies of The Rockefeller Foundation.

THE ASIA SOCIETY POLICY INSTITUTE

Web: asiasociety.org/policy-institute/center-china-analysis

Twitter: @AsiaPolicy

Facebook: [Facebook.com/AsiaPolicy](https://www.facebook.com/AsiaPolicy)

Instagram: @asia_policy

Email: policyinstitute@asiasociety.org

NEW YORK

725 Park Avenue
New York, NY 10021
+1 212 288 6400

WASHINGTON, D.C.

1779 Massachusetts Avenue NW,
Suite 805
Washington, D.C. 20036
+1 202 833 2742

CONTENTS

EXECUTIVE SUMMARY	4
INTRODUCTION	6
CLIMATE CHANGE AND XI JINPING'S AGENDA	8
PARTY-STATE AGENTS AND CLIMATE CHANGE	13
INVOLVEMENT IN GLOBAL GOVERNANCE	19
INTERGOVERNMENTAL RELATIONSHIPS AMONG CLIMATE ACTORS	23
MAPPING THE TIMELINE: THE NEXT FIVE YEARS	26

EXECUTIVE SUMMARY

China's efforts at climate action, such as reducing greenhouse gas emissions and transitioning to a low-carbon economy, will undoubtedly have a tremendous impact on global efforts to mitigate climate change. In 2020, Chinese leader Xi Jinping announced that China aimed to peak carbon dioxide emissions by 2030 and achieve carbon neutrality by 2060—a pledge referred to as China's "dual carbon goals." This announcement raises a number of questions: What motivated Xi to make this pledge? How does Xi's top leadership view and prioritize climate-related policies and governance, and how does it manage international collaborations on climate change? What is the Chinese government's administrative apparatus for managing climate matters, and who are the government agents overseeing climate policy in the domestic and international domains? In a large authoritarian country like China, what role do local governments play in climate governance? And finally, how can we expect China to act on climate matters over the next five years, and what major challenges is China facing with regard to climate action?

To answer these questions, this report investigates China's climate-related policies, politics, governance, and international relations. The report is organized into five main sections. The first section explores how Xi's leadership views climate change, how it prioritizes climate policy, and what motivates the leadership to pursue climate action. The second section outlines the Party-state organizations, bureaucratic agencies, and major personnel charged with addressing climate change. The third section considers the agencies and personnel responsible for managing China's engagement with global governance and international collaborations, with an emphasis on China's special envoy for climate change. Central-local interactions on climate policy and implementation are analyzed in the fourth section, and the fifth section discusses China's climate action over the next five years.

The report's major findings are as follows:

- Xi Jinping's leadership has paid special attention to climate action. China's leaders are motivated to pursue climate action primarily by politics, although the goals of reducing energy dependence, upgrading China's development model to catch up with green technologies, improving the regime's governance capacity, and supporting China's global strategy and foreign conduct are also important.
- Among these goals, two stand out—catching up with the green technology revolution and increasing national security by reducing energy dependence—because of their impact on China's industrial policy and future industrial structures.
- Although official rhetoric on climate action has remained strong since the beginning of Xi's third term, there are signs that China may be relaxing rather than strengthening its climate commitment, especially since China made its "dual carbon" pledge in 2020 and completed a leadership reorganization in early 2023. For example, Xi's statement in July 2023 that "the 'dual carbon' goal we are committed to is unwavering, but the path and method, rhythm, and intensity of achieving this goal should and must be decided by ourselves and will never be influenced by others" suggests that climate change is not

China's top priority, as does the leadership's bottom-up approach to setting climate parameters for the 14th Five-Year Plan.

- Ding Xuexiang, currently the sixth-ranking member of the Chinese Communist Party's Politburo Standing Committee and the number-two leader of the State Council, is charged with overseeing environmental affairs and climate policy. So far, however, he has not convened meetings of the two top-level leadership groups on environmental affairs, the Central Leading Group on Ecological and Environmental Protection Inspection and the Leading Group on Carbon Peaking and Carbon Neutrality. This may indicate that climate action is a low priority for the current leadership and raises questions about the future of these groups.
- The appointment of professional diplomat Liu Zhenmin as China's special envoy for climate change in early 2024 seems to indicate that Xi prioritizes climate diplomacy over substantive climate action. Foreign policy goals often trump domestic ones in China's climate policy; the appointments of Ding and Liu suggest that this orientation will persist.
- Although the Ministry of Ecology and Environment is supposed to oversee China's climate action, the National Development and Reform Commission (NDRC) remains powerful in this regard. In 2018, the Department of Climate Change was transferred from the latter to the former agency, and the NDRC set up a new department for managing environmental and climate affairs.
- Local authorities play a significant role in implementing climate strategy and policies, but they are tightly controlled by the Party-state leadership and the central government. The central authorities have developed a series of measures to manage, monitor, and advocate for local governments' climate actions, while the provincial authorities seem to have gained new leverage in climate policymaking.
- The ultra-concentration of political power and the fragmentation of governance under Xi and the Chinese Communist Party pose obstacles to China's climate action over the next five years. Other challenges include pressure to promote economic growth; declining government fiscal capacity, especially among local governments; and the repression of environmental activism. All these challenges will have significant negative effects on China's climate action over the next five years.
- China's climate action in the near term will likely focus on achieving breakthroughs in green technology and green energy; upgrading industrial production in heavy-polluting sectors such as steel, cement, and coal; setting up and improving policy and institutional schemes for facilitating progress toward low-carbon goals; promoting climate-related policy research and strengthening climate regulations and legislation; relaxing the dual carbon goals requirement and tolerating localities that game the "low-quality peak" and manipulate the "peaking timeline"; and using China's global engagement in climate action to benefit China and developing nations in terms of standard making, technology transfer, and soft power.

INTRODUCTION

China is a major contributor to environmental pollution and a key player in the fight against climate change. It is home to half the world's coal power plants and is the second-largest consumer of crude oil. With its ambitious programs of industrialization and economic growth, China's share of annual greenhouse gas (GHG) emissions has doubled over the past two decades, and each year since 2006, it has been the world's largest GHG emitter, producing roughly twice the carbon dioxide (CO₂) emissions of the United States. In 2022, China released 11.4 billion metric tons of CO₂, accounting for 26% of global GHG emissions—making it by far the world's largest polluter.¹

Although China only began to make significant contributions to global CO₂ emissions at the turn of the 21st century, it now ranks second in terms of cumulative CO₂ emissions, accounting for about half the cumulative total produced by the United States, where industrialization began far earlier.² In 2022, China's gross domestic product (GDP) per capita (\$12,670) was close to the global average (\$12,647) but only 16.6% of U.S. GDP per capita (\$76,343).³ Nevertheless, China's CO₂ emissions per capita reached 8.85 metric tons, nearly twice the global figure (4.66 metric tons) and more than 60% higher than the United States (14.44 metric tons).⁴ While most countries recorded dramatic emissions reductions in 2020 as a result of the COVID-19 pandemic, China was one of a handful of countries where emissions increased.

China faces tremendous challenges in controlling the human factors that contribute to pollution. In recent years, it has emphasized ecological and environmental protections in domestic governance and development, and it has actively participated in global governance on climate change, though its strategy has evolved. In September 2020, Chinese leader Xi Jinping announced that China aimed to peak CO₂ emissions by 2030 and achieve carbon neutrality by 2060. In China, this pledge is commonly referred to as the “dual carbon goals.” Xi also said that China would adopt more vigorous policies and measures for climate action and scale up its nationally determined contributions (NDCs) under the Paris Agreement.⁵ China's 14th Five-Year Plan (2021–2025) was the first to include climate goals.

On January 11, 2024, Chinese authorities released the first important document of the new year on the theme of ecological and environmental protection.⁶ The document claimed that since Xi came to power in 2012, the central leadership of the Chinese Communist Party (CCP) has “placed the construction of ecological civilization in a prominent position in its overall work, strengthened ecological and environmental protection in all aspects, all regions, and the entire process,” and thus “the construction of Beautiful China has made significant progress.”⁷ Propaganda aside, this document highlights Beijing's emphasis on environmental protection, particularly climate change, in 2024.

What is the position of climate action in Chinese governance? How does Xi's leadership view, prioritize, and manage climate change policies and their implementation, as well as pertinent international collaborations? These are the central questions that this report attempts to answer.

The report focuses on five substantive areas:

1. **Climate change and Xi Jinping's agenda:** Motivation and policy goals. How does the current Chinese leadership view climate change, and how are climate issues prioritized on its agenda? What political benefits does Xi expect to gain from prioritizing climate action? How has China's climate policy agenda changed during Xi's reign, and why?
2. **Party-state agents and climate change:** Leadership and bureaucracy. How does the Party-state organize the current leadership and the executive agents responsible for addressing climate change? Who are the major executives and policymakers involved in climate policy? How is the national bureaucratic system organized in terms of climate policy, and how does it operate?
3. **Involvement in global governance:** Mechanisms and platforms for bilateral and multilateral engagement. What are these mechanisms and platforms? How are their responsibilities allocated? How do they involve China in global governance to combat climate change? What are the implications of the recent change of personnel for the special envoy for climate change?
4. **Intergovernmental relationships among climate actors:** Policy formulation and division of responsibilities. What role do local governments play in the formulation of China's climate policy? How do they influence China's climate governance? What responsibilities do local governments have in climate action? And how does the central Party-state manage local agents and administer the implementation of its policies?
5. **Mapping the timeline:** The next five years. What areas will China emphasize in the next five years? What challenges will it face? How will those challenges affect China's domestic governance and international engagement on climate affairs?

1. CLIMATE CHANGE AND XI JINPING'S AGENDA: MOTIVATION AND POLICY GOALS

Since he assumed power in 2012, Xi has portrayed himself and his leadership as enthusiastic supporters of environmental protection and climate action. What is motivating the leadership under Xi to highlight ecological and environmental issues in China's governance? Why did the leadership prioritize climate action and support Xi's dual carbon pledge in 2020? Is this priority consistent with China's emphasis on maintaining the CCP's monopoly on power while promoting economic development? Does it support Xi's power and authority? How can the prioritization of climate action contribute to both the CCP's and Xi's political agendas?

By analyzing Xi's speeches and actions in the wider context of China's political economy and global interconnectedness, this section answers these questions by identifying five major motivations and policy goals.

STRENGTHENING XI JINPING'S IDEOLOGICAL AUTHORITY

In the CCP context, politics primarily means power, legitimacy, and ideology. Furthermore, it can be considered at two levels: at the individual leader level and at the CCP regime level. In essence, everything that benefits Xi's ability to control the Party-state apparatus and bolster the CCP's monopoly on power falls under the analytical category of politics. Why and how does climate action benefit both Xi's power and the CCP's?

Ideology supports legitimacy in communist politics; the supreme leader has a monopoly on the power to initiate, elaborate, and interpret official ideology.⁸ Fundamentally, and in contrast with the free circulation of ideas and nongovernmental initiatives in a democratic society, China under CCP rule allows only the supreme leader to initiate ideas; in turn, the person who initiates ideas can claim legitimacy, authority, and unchallengeable power. By propagating "Xi Jinping Thought," Xi gains ideological authority within the CCP and strengthens his legitimacy to rule the Party and the country.

By propagating "Xi Jinping Thought," Xi gains ideological authority within the CCP and strengthens his legitimacy to rule the Party and the country.

Communist ideology differs from ideologies in pluralistic societies in that it covers every aspect of human life.⁹ That is why Xi Jinping Thought on Ecological Civilization (习近平生态文明思想) has been elaborated as a necessary and significant part of Xi Jinping Thought. The relationship

between people and nature is one of the most vital aspects of life: how could a communist leader make himself the philosopher-king without elaborating "creative ideas" in this regard?

The supreme leader of a communist country must be viewed as a super-capable person with extraordinary vision and strategic capabilities. That is why the Chinese Party-state and official propaganda highlight Xi's long history of emphasizing environmental protection. They often claim

that Xi has been enamored with “clear waters and green mountains” for many years, and that he has paid close attention to ecological and environmental issues since his early career as a local official.¹⁰ This is partly a response to the reality of China’s severe pollution, but it also reflects Xi’s expectation that by building his own ideology, his authority will surpass that of his predecessors, Jiang Zemin and Hu Jintao.

Moreover, by talking about “man and nature coexisting harmoniously,” Xi can be easily portrayed in official discourse as a great leader who displays extraordinary vision in “guiding” China and the world in both sociopolitical actions as well as human-nature interactions.

Xi is widely regarded as poorly educated, a perception that undermines his reputation, authority, and legitimacy among both CCP members and the Chinese populace. Consequently, Xi is motivated to show off his knowledge, often in questionable ways. Climate change is a new field for most CCP cadres and thus a tempting topic for Xi to display his erudition.¹¹ CCP cadres must be lectured by Xi as he instructs them that “leading cadres at all levels must strengthen their study of the basic knowledge, implementation paths, and work requirements for the dual carbon goals to achieve true learning, true comprehension, true capabilities, and true application.”¹² This makes it sound as if Xi himself has already achieved these things.

LEVERAGING ECOLOGICAL CRISES TO ENHANCE GOVERNANCE

Climate action helps improve the CCP’s legitimacy in several ways. First, because China is in the midst of numerous ecological crises, it demonstrates the regime’s serious concern about the climate and its responsiveness to citizens’ demands. Air and water pollution have troubled China for decades, causing social discontent and spurring citizens’ environmental awareness. This has put pressure on the regime to pay attention to ecological and environmental problems and to climate change.

In 2023, China set new records for extreme temperatures, faced the heaviest rains in over a decade, and worked to combat the worst droughts in 60 years. The stark reality for China’s leaders is that climate change threatens both the stability of the country and the longevity of CCP rule.¹³ The prioritization of climate action on the leadership’s agenda is showcased as a responsible reaction to these problems.

Second, dealing with emerging challenges, including climate change, helps improve the regime’s governance capabilities. According to an official government statement, “achieving carbon peak and carbon neutrality is a major test of our party’s ability to govern the country.”¹⁴ In the CCP context, this justifies and strengthens China’s “centralized and unified leadership” and improves the supervision and assessment mechanisms that national leaders use to control subordinates.

JUSTIFYING SLOWER GROWTH, CATCHING UP WITH GREEN TECHNOLOGIES, AND PROMOTING “HIGH-QUALITY” DEVELOPMENT

The prioritization of climate action on the leadership agenda also helps justify the recent slowdown in economic growth. After decades of strong economic performance starting in 1978, China’s economy has slowed, with profound negative effects on China’s international competitiveness and social stability and the regime’s legitimacy. By proposing the “green and low-carbon development path with ecology as a priority” (生态优先、绿色低碳发展道路), the leadership uses the “new development concept” to

legitimize China's economic situation by persuading Party-state cadres and the Chinese people that the slowdown is a strategy that the regime has adopted to promote high-quality development, not the result of its failings.

More importantly, the leadership has strived to catch up with the revolution in green technology, promote a “comprehensive green transformation” of the economy and society, and upgrade China's energy system and other critical elements to foster sustainable development and make the Chinese economy less dependent on global supplies. The Chinese government's support for the development of the “new three” industries—solar, electric vehicles, and batteries—best illustrates this ambition.

Xi's comments on the green low-carbon transition at a February 2024 meeting of the influential Central Comprehensively Deepening Reform Commission reveal the important position of climate action in his development plan:

We must focus on key areas of economic and social development; build a green, low-carbon, and high-quality development spatial pattern (构建绿色低碳高质量发展空间格局); promote the green transformation of the industrial structure, energy structure, transportation structure, urban and rural construction, and development; and accelerate the formation of the production methods and lifestyles that save resources and protect the environment. We must seize the key links in promoting green transformation, promote comprehensive conservation, accelerate consumption transformation, and strengthen green technological innovation and the promotion and application of advanced green technologies. It is necessary to improve the fiscal, taxation, financial, investment, and price policies and related market mechanisms that support the green and low-carbon transformation, and provide policy support and institutional guarantees for the green transformation.¹⁵

REDUCING OVERSEAS DEPENDENCE

Xi has consistently emphasized security since coming to power, and almost all dimensions of governance have been incorporated in Xi's “overall concept of national security,” including ecological security. Climate action, therefore, aims to improve China's energy and resource security and echoes Xi's “dual circulation” strategy for economic growth, as the development of green energy resources is expected to greatly reduce China's dependence on international suppliers of traditional energy.¹⁶

China lacks viable domestic crude oil and natural gas supplies, creating a strong incentive to leapfrog to renewables. The leadership has urged the development of wind and solar power, setting formal targets to install at least 1,200 gigawatts of wind and solar power capacity by 2030.¹⁷ However, coal has also been prioritized as a flexible power source because of China's ample domestic supply.

Of the six points that Xi made in his January 2022 speech on climate change, three pertained to energy: upgrading industry in terms of energy utilization and green technologies, accelerating the green and low-carbon technological revolution, and stepping up the energy revolution.¹⁸

In elaborating on the energy revolution, Xi listed the following tasks:

- Planning and building a new energy supply and consumption system based on large-scale wind and photovoltaic power bases, supported by “clean, efficient, advanced, and energy-saving” coal power and “stable, safe, reliable,” ultra-high-voltage power transmission and transformation lines
- Controlling fossil fuel consumption, slowing the growth of coal consumption, and promoting the “three-reform linkage” of coal power energy-saving and carbon-reducing transformation, flexibility transformation, and heating transformation
- Consolidating domestic energy production, ensuring the safety of the coal supply, maintaining stable growth in crude oil and natural gas production, strengthening the capacity of coal, gas, and oil reserves, and promoting the large-scale application of advanced energy storage technology

Xi’s speech emphasized the development of new and cleaner energy sources, including light energy, silicon energy, hydrogen energy, renewable energy, wind energy, solar energy, biomass energy, geothermal energy, ocean energy, and hydrogen energy, in addition to the development of hydropower and nuclear power. These energy resources will not be provided by international suppliers. Their development will make China’s energy supply substantially more independent and, accordingly, enhance national security.

REALIZING GLOBAL AMBITION ON MULTIPLE FRONTS

China’s climate action has primarily been a response to international pressure. This is not contradicted by earlier arguments regarding Xi’s political and governance considerations, although they might not be so directly connected to climate action without international pressure. Within complicated foreign-domestic interactions, China’s climate goals combine powerful international considerations with its multifaceted global ambitions. By emphasizing China’s rejuvenation in “returning to the center of the world stage,” the leadership leverages its climate agenda for multiple diplomatic purposes.

China’s rising profile in climate action can help it outcompete the United States in global governance, but it can also help build trust with the United States and stabilize the bilateral relationship.

First, China’s climate action aims to improve the country’s global image as a “responsible power.” In Xi’s words, China must change “from passive response to proactive action” in dealing with global climate requirements,¹⁹ and China’s “active participation in international negotiations on climate change” can “demonstrate China’s responsibility as a major country.”²⁰

Second, it leverages China’s position in state-to-state relations, especially in dealing with the United States. China’s rising profile in climate action can help it outcompete the United States in global governance, but it can also help build trust with the United States and stabilize the bilateral relationship.

Third, it involves geopolitical considerations that can help China expand its global footprint and

improve its image internationally. By emphasizing cooperation to address climate change, China attempts to speak for the Global South and woo second-rank industrial democracies, as the Green Silk Road project demonstrates.²¹

Fourth, taking the foregoing points together, Beijing competes for power in international relations on climate change in discourse shaping, agenda setting, rulemaking, and interest distribution (in terms of finance and technology). In Xi's words, China must "actively participate in and lead global climate governance"; "we must participate more actively in the global climate negotiation agenda and the formulation of international rules, and promote the construction of a fair, reasonable, cooperative, and win-win global climate governance system."²² A central government document issued in 2024 emphasized the change in China's role "from a global environmental governance participant to a leader."²³ Viewed in a wider perspective, China aims to reshape global political-economic trends through the vantage point of climate action, as repeatedly stressed by Xi in comments about how "Chinese solutions" should be provided to address the challenges facing human society.

Fifth, international achievements can be mobilized for domestic purposes to strengthen the regime's legitimacy and influence at home. This is particularly important for a regime that constantly suffers from a "legitimacy deficit."²⁴ International praise for China's climate actions is frequently reported by domestic and state-owned media outlets. A 2020 survey found that 86% of Chinese youth believed that China played a key role in global climate governance.²⁵

In sum, China's leadership has complicated, multilayered motivations for promoting climate action, with politics taking the lead. Other motivations must serve political purposes, and if they contradict those purposes, they will be compromised or even eliminated. This is especially obvious as Xi constantly plays down the role of international pressure in China's adoption of its dual carbon goals because it contradicts his supreme authority and goes against his nationalistic aims. In his own words, "to achieve the 'dual carbon' goal, we are not asked to do it by others, but we must do it ourselves" (实现“双碳”目标, 不是别人让我们做, 而是我们自己必须要做).²⁶

However, Xi's tone has evolved since July 2023, when he changed his position in a rather sophisticated way by repeating, as he put it at the National Ecological Environmental Protection Conference, that "the dual carbon goals we are committed to are unwavering, but the path, method, rhythm, and intensity of achieving them should and must be decided by ourselves, and never be influenced by others."²⁷ This attitude will affect China's progress toward implementing climate action over the next several years (discussed further in Section 5).

2. PARTY-STATE AGENTS AND CLIMATE CHANGE: LEADERSHIP AND BUREAUCRACY

The Chinese Party-state is an extremely complicated system; many agents are responsible for implementing climate change political directives in and across domestic governance structures and channels for international collaboration. This section examines these agents in leadership organizations at the top level and the bureaucratic system at the ministerial level, as well as nonexecutive agents in other branches of the national state. Those carrying out international cooperation on climate change will be discussed in Section 3. Section 4 covers local agents.

THE TOP LEVEL

Like every other realm of China's governance, leadership on ecological, environmental, and climate issues is dominated by Xi and the top decision-making bodies directly under him. These include the CCP Politburo and its Standing Committee, the State Council, the Central Financial and Economic Affairs Commission (中央财经委员会), the Central Comprehensively Deepening Reforms Commission (CCDRC, 中央全面深化改革委员会), the Central Commission on National Security (中央国家安全委员会), and the Central Commission on Foreign Affairs (中央外事委员会). Xi personally chairs all these bodies except the State Council. His leadership on climate matters is explicit in his role as head of the CCDRC.

Premier Li Qiang also has comprehensive responsibilities for China's overall governance, covering both domestic and foreign affairs. His role in climate matters is institutionalized in his supervision of the national ministries that have climate-related functions and in his position as a deputy head of the CCDRC.

Below Xi and Li, the sixth-ranking member of the Politburo Standing Committee (PBSC), Ding Xuexiang, is China's top leader overseeing environmental protection, including climate change policy, in his capacity as executive vice premier of the State Council. Ding is not a deputy director of the CCDRC, however, in contrast with his predecessor, Han Zheng, who occupied that position in his capacity as the second-ranking official on the State Council with delegated responsibility for overseeing environmental issues.

Instead, the fifth-ranking member of the PBSC, Cai Qi, is a deputy director of the CCDRC. Cai oversees the CCP's machine operations through his leadership of the CCP Central Secretariat; he has responsibility for state security but no position in the government leadership. This Cai-versus-Ding arrangement within the CCDRC indicates Xi's special attention to the security implications of developmental affairs and signals a reduced emphasis on environmental and climate issues during Xi's third term.

Party-state leaders are usually organized into committees and leadership groups to oversee policy in different areas. Below the top leadership organizations, three leadership groups have roles in climate change governance: the National Leading Group on Climate Change, Energy Conservation, and Emission Reduction (NLGCC, 国家应对气候变化及节能减排工作领导小组); the Central Leading Group

on Ecological and Environmental Protection Inspection (CLGEEPI, 中央生态环境保护督察工作领导小组);²⁸ and the Leading Group on Carbon Peaking and Carbon Neutrality (LGCCPN, 碳达峰碳中和工作领导小组).²⁹

However, the reshuffling of the Party-state leadership at the 20th CCP National Congress in October 2022 and the National People's Congress (NPC) in March 2023 has put the future of these three groups in doubt.

NATIONAL LEADING GROUP ON CLIMATE CHANGE, ENERGY CONSERVATION, AND EMISSION REDUCTION

The NLGCC was set up in 2007 with dual responsibilities: policymaking for climate affairs and policy implementation for energy conservation and emissions reduction. Its climate responsibilities include the following: “discuss and formulate major national strategies, principles, and countermeasures to address climate change; unify the deployment of climate change efforts; study and review international cooperation and negotiation proposals; and coordinate the resolution of major issues in addressing climate change.” Its role is to “organize and implement the State Council’s guidelines and policies on energy conservation and emissions reduction, unify the deployment of energy conservation and emissions reduction work, study and review major policy recommendations, and coordinate and solve major problems in the work.”³⁰

This leading group has also been referred to as the National Leading Group on Climate Change (国家应对气候变化领导小组) and the State Council Leading Group on Energy Conservation and Emission Reduction (国务院节能减排工作领导小组). Initially, it had two separate offices: one for climate change within the State Environmental Protection Administration (SEPA, 国家环境保护总局), which is now the Ministry of Ecology and Environment (MEE),³¹ and one for policy implementation in the National

Development and Reform Commission (NDRC). These offices were combined during the government restructuring of 2018; the Department of Climate Change (DCC, 应对气候变化司) within the MEE has taken over daily administrative support.³²

The premier of the State Council served as head of the NLGCC from the outset: first Wen Jiabao (2007–

2013) and then Li Keqiang (2013–2023), with two other leaders of the State Council as their deputies—one to oversee economic affairs and one to supervise foreign relations. The NLGCC was therefore considered the top-level leadership group on climate change.

Since the leadership reshuffle of 2022–2023, it is unclear whether Premier Li Qiang has taken the position of head of the NLGCC or whether the NLGCC even continues to function, although the DCC’s website still says that the department’s responsibilities include the specific work of the NLGCC.³³

Without the NLGCC, the Party-state system seemingly has no specific leadership organization for ecological and environmental affairs in general or climate action in particular.

However, there are two reasons to doubt that this leading group is still operational. First, the NLGCC was established as a State Council group rather than as a CCP Central Committee group, and it was organized when the State Council and Premier Wen enjoyed relatively more autonomy. That changed after Xi became leader and began to reduce the State Council's power, an effort that was institutionalized through the 2022–2023 leadership reorganization. Second, official media reports about Li's instructions on climate matters since March 2023 have mentioned neither the NLGCC nor Li's role in it.

Without the NLGCC, the Party-state system seemingly has no specific leadership organization for ecological and environmental affairs in general or climate action in particular—at least, it has no active leadership organization in these areas. This is a new and potentially negative development in terms of China's Party-state agents with responsibility for climate change.

CENTRAL LEADING GROUP ON ECOLOGICAL AND ENVIRONMENTAL PROTECTION INSPECTION

When the CLGEEPI was set up in June 2019 to ensure the implementation of ecological and environmental regulations,³⁴ it was reported that Xi had “personally initiated this major reform initiative.”³⁵ Central environmental inspections, however, have taken place since at least 2016, when the first round of environmental inspections began.³⁶

The creation of the CLGEEPI elevated the authority of environmental inspections from the ministerial level to the central government level. The CLGEEPI's initial head was the second-ranking State Council leader, Han Zheng, who at the time was the executive vice premier and seventh-ranking member of the PBSC. It also had several high-ranking leaders as deputies, including Vice Premier Liu He and NDRC director He Lifeng, who were said to be among Xi's most trusted allies. This arrangement could have been a political measure to reduce Premier Li Keqiang's authority in environmental and climate matters while concentrating power in Xi's hands. This is consistent with the theory that the NLGCC was dissolved after Li Keqiang left the leadership.

The CLGEEPI organizes and supervises Central Ecological and Environmental Inspection Teams (CEEITs), which are dispatched to localities to inspect their environmental protection efforts and report back to the central leadership.³⁷ Within the MEE, the Central Supervision Office of Ecological and Environmental Protection was established to work with the CLGEEPI.³⁸

After Ding Xuexiang joined the PBSC at the 20th Party Congress in October 2022 and replaced Han Zheng on the State Council in March 2023, he was expected to take over most of Han's portfolio. His responsibility for supervising environmental and climate matters has been confirmed, and in 2023, he headed the Chinese delegation at COP28. So far, however, there have been no reports indicating that he has replaced Han Zheng as head of the CLGEEPI and LGCPCN, nor have any meetings of either group been reported by official media.³⁹

However, there were some reports of these groups' activities at lower levels after the new State Council leadership took office in 2023. For example, CEEITs were sent to various provinces in November 2023.⁴⁰ This was the third round of inspections since this initiative began in 2019. Ding's name was mentioned along with Xi's and Premier Li's as the national leaders who gave instructions for the inspection.⁴¹

LEADING GROUP ON CARBON PEAKING AND CARBON NEUTRALITY

The establishment of the LGPCPN was announced in May 2021, when it held its first meeting.⁴² The creation of this group followed the inclusion of long-term climate pledges for 2030 and 2060 in the 14th Five-Year Plan—the first Five-Year Plan in China's history to include climate goals. As with the CLGEEPI, Han Zheng was head of the LGPCPN at its founding. Since March 2023, there have been no reports of Ding Xuexiang's role as head of the LGPCPN. However, the corresponding leading groups at the county and urban district levels were reported to have held meetings in 2023.⁴³

There are different views on whether the NLGCC and LGPCPN still exist. The truth is that the abolishment of a group can only be confirmed if it is announced, which is unlikely. If the CLGEEPI or LGPCPN calls a meeting in the near future, Ding Xuexiang would certainly chair it, and his role as head would be confirmed. It is significant that calling for meetings of these two leading groups has been a low priority during Xi's third term, and it is not a positive sign of the Chinese leadership's climate commitment.

THE MINISTERIAL LEVEL

The day-to-day management of environmental affairs is carried out by the ministries of the State Council, mainly the MEE and the NDRC. Within the MEE, the DCC plays the primary role in bureaucratic governance on climate matters, though the NDRC's Department of Resource Conservation and Environment Protection is also important. The foreign affairs system is deeply involved in international conduct on climate change (discussed further in Section 3).

THE MEE SYSTEM

The MEE is a cabinet-level agency headed by two ministerial-level leaders. The top leader is Sun Jinlong in his capacity as Party secretary. Minister Huang Runqiu is not a CCP member but rather a member of one of China's satellite political parties, making him ineligible to hold CCP leadership positions. Both are in their second terms in these positions, and both trained as geologists.

Huang is regarded as more of an expert because he had a long career in academia before becoming a deputy minister in the Ministry of Environmental Protection (the predecessor of the MEE) in 2016.⁴⁴ In contrast, Sun worked as an engineer before joining the central leadership of the Communist Youth League (CYL) in 1995, and he was promoted to deputy ministerial rank at the age of 39. Once a rising star during the Hu Jintao era, Sun's career stagnated after Xi took office.⁴⁵ But Sun's deep grassroots experience, effective governance abilities, and attentive social skills—rare attributes among the CYL gang—may have helped him survive as many of his CYL colleagues were purged or sidelined under Xi.

During the organizational restructuring of the central government in 2018, the DCC was transferred from the NDRC to the MEE.⁴⁶ According to the DCC's official website, it is responsible for addressing climate change and reducing GHG emissions. Its specific tasks include the following:

- Comprehensively analyzing the impact of climate change on economic and social development
- Organizing and implementing the national strategy to actively respond to climate change
- Taking the lead in formulating and coordinating the implementation of the country's major goals, policies, plans, and systems for controlling GHG emissions

- > Promoting green and low-carbon development and adaptations to climate change
- > Guiding governmental departments, industries, and localities in implementation

The DCC's website emphasizes its responsibilities in work related to the implementation of the UN Framework Convention on Climate Change, as well as organizing and participating in international negotiations and conferences and promoting bilateral, multilateral, and South-South cooperation and exchanges.⁴⁷ The DCC's founding director was Li Gao, who has served as the major Chinese negotiator in international negotiations since 2005. Xia Yingxian was the DCC's director as of October 2023.⁴⁸

The DCC's weight in global cooperation is reflected in its organizational structure. Among its five divisions, two directly concern global climate affairs: the International Policy Division and the Office of Cooperation and Exchange.⁴⁹

The International Policy Division's full title is the International Policy and Negotiations Division (国际政策和谈判处). Its official responsibilities include the following:

- > Analyzing and judging the overall situation of global climate governance and trends in various countries
- > Advancing overall policy and program suggestions for China's participation in international negotiations
- > Organizing participation in convention negotiations and negotiations on multilateral mechanisms outside the convention
- > Organizing and participating in bilateral and multilateral consultations

The Office of Foreign Cooperation and Exchange (对外合作与交流处, also referred to as the Office of Cooperation and Exchange) is responsible for conducting dialogue and exchanges on climate change with other countries and international organizations, such as organizing and implementing bilateral and multilateral practical cooperation projects and undertaking work related to South-South cooperation.

Many other MEE departments are deeply involved in domestic and global governance on climate matters. Primarily, they include the Department of Atmospheric Environment (大气环境司)⁵⁰ and the Department of International Cooperation (国际合作司).⁵¹ Some affiliated organizations established under the umbrella of the MEE as platforms for international collaboration are discussed in Section 3.

The NDRC is often regarded as a “mini-State Council,” as it plays a pivotal role in coordinating governance matters, including those related to the environment and climate change.

NATIONAL DEVELOPMENT AND REFORM COMMISSION

The NDRC is often regarded as a “mini-State Council,” as it plays a pivotal role in coordinating governance matters, including those related to the environment and climate change. It is far more powerful than the MEE. After the DCC was transferred to the MEE as part of the 2018 government restructuring, the NDRC set up its own department, the Department of Resource Conservation and

Environmental Protection (资源节约和环境保护司 or 环资司). This department is responsible for formulating and implementing strategies, plans, and policies related to green development; promoting the implementation of sustainable development strategies; and undertaking work related to the construction and reform of ecological civilization. Much of its focus is closely related to climate action, especially energy-related matters.⁵²

The National Energy Administration is also managed by the NDRC. A vice ministerial-level agency, it is empowered by the NDRC to administer energy issues at the national level. Its current director is Zhang Jianhua, a CCP member who is nearly 60 years old and has a background in the oil industry.⁵³

The 2018 government restructuring was designed to leverage the MEE's comparative strengths in pollution monitoring and enforcement, especially as China rolled out its national carbon market, which requires extensive monitoring of CO₂ and GHG emissions, as well as verification and enforcement, to function properly. But the trade-off was a reduction of the MEE's expertise—and impact—on the systemic economic and energy transformation side. Public opinion questioned whether this weakened the bureaucratic functions responsible for climate action, at least in terms of interministerial and central-local coordination.⁵⁴

NONEXECUTIVE STATE ORGANS

The NPC, China's legislature, also plays a significant role in climate issues. The NPC's Environment and Resources Protection Committee (ERPC) was set up in 1993 as the Environment Protection Committee; its current title was adopted in 1994.⁵⁵ The ERPC is responsible for legislation and supervision pertaining to the prevention and control of environmental pollution and the protection of natural resources and the environment.⁵⁶ The committee consists mostly of retired Party-state cadres; former commerce minister Lu Xinshe currently serves as chair of the ERPC, and 14 NPC delegates serve as deputy chairs. The committee's membership includes several retired provincial Party secretaries and governors.⁵⁷

The Chinese People's Political Consultation Conference (CPPCC), the so-called United Front organization that operates in parallel with the NPC in the state system, has a special committee that deals with climate issues: the Population, Resources, and Environment Committee (PREC).⁵⁸ Chaired by Che Jun, a retired provincial Party secretary, the PREC has 14 vice chairs, including several retired national ministers. Without a constitutional remit, the CPPCC mainly serves as a mechanism for "multiparty cooperation" and political consultation under the CCP's leadership.⁵⁹ Accordingly, the PREC serves as a major policy forum for providing consultation to the Party-state leadership.

3. INVOLVEMENT IN GLOBAL GOVERNANCE: MECHANISMS AND PLATFORMS FOR BILATERAL AND MULTILATERAL ENGAGEMENT

Climate change is a global challenge that requires international collaboration. As noted in Section 1, China's climate agenda prioritizes its global ambitions in accordance with its foreign policy goals. A number of channels and platforms have been established to carry out China's international climate-related activities. The most important is China's special envoy for climate change. This section provides an overview of China's state-affiliated organizations for multilateral and bilateral engagement on climate matters.

CHINA'S SPECIAL ENVOY FOR CLIMATE CHANGE

International affairs have a prominent position in China's climate action. This is not only because climate change is a global challenge, but also, as analyzed in Section 1, because the Chinese leadership has intentionally mobilized climate issues to advance its foreign policy priorities. The Central Office of Foreign Affairs and the Ministry of Foreign Affairs (MOFA) are thus deeply involved in climate matters. Foreign Ministers Yang Jiechi and Wang Yi previously sat on the NLGCC as deputy heads.⁶⁰

In 2015, during Xi's first term, the Chinese government created the official position of the Chinese Representative on Climate Change, appointing Xie Zhenhua to fill it. In 2021, when Xi's leadership attempted to raise the country's international profile in climate initiatives, Xie became China's special envoy for climate change.⁶¹ Xie retired at age 74 in January 2024. He was replaced by Ambassador Liu Zhenmin, an under-secretary-general of the United Nations and a former deputy foreign minister.⁶²

The special envoy for climate change is the main channel for China's involvement in global climate governance. Its creation signaled the leadership's intention to strengthen China's bargaining power when dealing with industrialized democracies, especially the United States. The initial appointment of Xie Zhenhua, who brought diplomatic skills and extensive experience in environmental administration to the position, did much to accomplish this. Xie served as the founding director of the SEPA when it was organized in 1998, and in that position, he was promoted to full minister. He then joined the NDRC as a leader overseeing environmental affairs, which expanded his connections in the national bureaucracy as well as his power base. Xie enjoyed a positive international reputation and benefited from his friendship with John Kerry, the U.S. special presidential envoy for climate, which helped maintain contact between the two countries and build mutual trust on climate affairs.

Whether Ambassador Liu's appointment to the position signals any change is unclear at this time. A lifelong diplomat, Liu spent his entire career in the MOFA. This may indicate that China's climate policy priorities are focused more on diplomacy than on domestic governance. In addition, Liu spent most of his career in the Department of Treaties and Laws, the MOFA section responsible for climate change negotiations; this is different from the close connections that Xie enjoyed within the environmental bureaucracy and the powerful NDRC.

As special envoy for climate change, Xie was housed in the MEE, with an MEE deputy minister, Zhao Yingmin, serving as office director. Simultaneously, NDRC staff provided key support for Xie, led by Su Wei, an NDRC deputy secretary-general with deep experience in both the MOFA and the NDRC.⁶³ Xie's cross-departmental experience seemed to smooth MEE-NDRC cooperation. This office is absent from the MEE's current organizational chart, however, and it is not clear which department now has

Liu's international experience is rich, but it remains to be seen how he will leverage it in his new role. Clearly, there is a window of opportunity for Liu to raise his stature.

this responsibility. It remains unclear how the MEE, NDRC, and MOFA are supporting Liu in his new role, but there are no signs to suggest that the office moved from the MEE to the MOFA with Liu's appointment.

Recent years have seen other personnel changes to Xie's team. Xie was China's lead negotiator at most UN Climate Change Conferences starting in 2009. He

was replaced in 2019 by his aide Zhao Yingmin, and Su Wei took up this role in 2023. Zhao worked under Xie for almost his entire career, starting in the SEPA, and became Xie's chief of staff when Xie was the ministerial-level director of the SEPA.⁶⁴ It is not yet clear how Liu and Su divide and coordinate their responsibilities.

Liu's international experience is rich, but it remains to be seen how he will leverage it in his new role. Clearly, there is a window of opportunity for Liu to raise his stature.

CHINA COUNCIL FOR INTERNATIONAL COOPERATION ON ENVIRONMENT AND DEVELOPMENT AND CENTER FOR FOREIGN COOPERATION AND EXCHANGE

Organized in 1992, the China Council for International Cooperation on Environment and Development (CCICED, 中国环境与发展国际合作委员会) can be considered a track-1.5 international exchange platform. It is not a formal government organization but rather a mechanism for China's central authorities to demonstrate that they are actively seeking foreign advice on climate and environmental matters and to make foreign experts feel that the Chinese government is listening to them. Although it claims to be an "international high-level policy advisory body endorsed by the Chinese government," the CCICED has had little substantive impact on policy, although China's national leaders regularly attend major CCICED events and listen to its policy recommendations.⁶⁵ For protocol considerations, the CCICED's presidents have been national leaders: Han Zheng in 2018 and Ding Xuexiang since 2023. Currently, Xie Zhenhua and MEE minister Huang Runqiu are among the body's vice presidents, along with a number of high-ranking UN officials and international leaders.⁶⁶

The CCICED is intended to function as "a unique channel to contribute Chinese wisdom and Chinese solutions to promote the construction of a reasonable global environmental governance system."⁶⁷ Ding Xuexiang, the current top leader responsible for environmental affairs, unveiled this new responsibility at the CCICED's annual meeting in August 2023,⁶⁸ rather than calling for a meeting of the CLGEEPI or the LGPCPN, which seems to indicate that the new leadership prioritizes its climate change work in terms of its international image.

The MEE provides support to the CCICED. Within the MEE, the Center for Foreign Cooperation and Exchange (CFCE, 生态环境部对外合作与交流中心) serves as the CCICED Secretariat,⁶⁹ and Zhao Yingmin as head of it. The CFCE also provides administrative and policy research support for bilateral and multilateral international cooperation mechanisms on the environment and climate change. This makes it a major bureaucratic platform for China's global ambitions. Specifically, the CFCE manages bilateral cooperation as well as cooperation on foreign investment projects with the UN Environment Programme, the Global Environment Facility, the World Bank, the Asian Development Bank, other international institutions, and governments. It also cooperates on ecological and environmental protection under multilateral frameworks such as ASEAN-China, the Shanghai Cooperation Organisation, and the Lancang-Mekong Cooperation and manages the implementation of international agreements on protecting the ozone layer.

OTHER PLATFORMS

Within the MEE, there are two other primary channels for bilateral and multilateral engagement on climate affairs: the Environmental Development Center (EDC, 生态环境部环境发展中心) and the National Center for Climate Change Strategy and International Cooperation (NCSC, 国家应对气候变化战略研究和国际合作中心, abbreviated as 国家气候战略中心).

The EDC, also known as the Sino-Japan Friendship Center for Environmental Protection (中日友好环境保护中心), is a joint initiative of the Chinese and Japanese governments. Launched in 1996, it is a platform for environmental cooperation and exchanges with Japan, providing technical support and services for ecological and environmental management.⁷⁰

The NCSC conducts strategic research and manages international cooperation, particularly on matters pertaining to developing countries' NDCs.⁷¹ Its general responsibilities include organizing and conducting research on climate change policies, regulations, strategies, and plans and providing technical support for a range of climate-related projects, including domestic implementation of international agreements, statistical accounting and assessment, carbon emissions trading management, international negotiations, and foreign cooperation and exchanges. It also organizes dialogues on climate change among think tanks; manages projects related to the United Nations' Clean Development Mechanism; and promotes publicity, capacity building, and consulting services on climate change.⁷²

At least two of the NCSC's six sections are responsible for global engagement. The International Policy Research Section (IPRS) is responsible for research and technical support for international negotiations, bilateral and multilateral consultations, global climate governance, and assessment reports of the Intergovernmental Panel on Climate Change.⁷³ The Foreign Cooperation and Exchange Section is responsible for policy research, project implementation, and technical support in bilateral and multilateral cooperation on climate change, South-South cooperation, and the Belt and Road Initiative, as well as international cooperation and exchanges.⁷⁴

The current NCSC director, Xu Huaqing, is an expert on energy, the environment, and climate change, specifically low-carbon development. Since 2000, he has participated in negotiations and expert working groups as part of China's climate change delegation.⁷⁵ Some other NCSC researchers, such as

Fan Xing and IPRS director Gao Xiang, have also been members of official Chinese delegations to UN climate change negotiations.⁷⁶

China pays special attention to its cooperation on climate change with the Global South. The China Climate Change South-South Cooperation Fund (中国气候变化南南合作基金) was established with an investment from the Chinese government of 20 billion yuan (US\$3.1 billion). It aims to “support other developing countries in coping with climate change and transitioning to green and low-carbon development.”⁷⁷ The fund was announced in 2015 as part of President Barack Obama and Xi Jinping’s joint statement prior to the Paris climate talks, but only after China refused to participate in the Green Climate Fund,⁷⁸ which was established under the UN Framework Convention on Climate Change as an operating entity of the financial mechanism to assist developing countries’ efforts to counter climate change.

Chinese academics, activists, and other experts continue to play a relatively open role in climate policy through organizations such as the National Climate Change Expert Committee and various university research centers (primarily at Peking and Tsinghua Universities), think tanks, and NGOs.

4. INTERGOVERNMENTAL RELATIONSHIPS AMONG CLIMATE ACTORS: POLICY FORMULATION AND DIVISION OF RESPONSIBILITIES

China is a large country: a single Chinese province can have a population of more than 50 million and be larger in area than a mid-sized country.⁷⁹ Uneven development across geographical regions is a serious challenge. The complicated organizational structure of the Party-state, with its multiple hierarchies of power, presents unique problems for China's governance, including its policy processes to address climate change. Provinces thus play a critical role in climate action. In fact, four Chinese provinces—Shandong, Hebei, Jiangsu, and Inner Mongolia—ranked among the top 10 contributors to global CO₂ emissions in 2019.⁸⁰ Six countries, including the United States, made up the rest of the top 10.

This section examines the relationship between climate actors at different levels of government, and specifically the relationship between the national power center and provincial-level authorities. It looks at the division of responsibilities and the policy formulation process by paying special attention to two issues: central domination of policymaking and policy implementation, and local responses to these dynamics, especially the way that local interests are articulated in the climate policy process.

CENTRAL CONTROL

A key aspect of the Chinese political system is the central government's domination of the policy process. Xi's concentration of power in the last decade has strengthened this feature. That does not mean there are never challenges to central control, especially when it comes to policy implementation. As one Chinese source noted, "The biggest problem with environmental enforcement in the past was that it was difficult to restrain local party committees and governments."⁸¹ To deal with this problem, the central authorities have developed several ways to incentivize, constrain, and monitor local governments.

A key aspect of the Chinese political system is the central government's domination of the policy process. Xi's concentration of power in the last decade has strengthened this feature.

First, environmental protection and climate action are included in the scheme for assessing the performance of local authorities and cadres. Since 2014, officials' performance ratings—a key criterion for promotion—have included the implementation of climate goals.⁸² This is supposed to create an incentive to pay special attention to environmental issues, but the real impact is difficult to discern as a result of many factors, including the way that central authorities monitor local conditions.

The second measure is strengthening "campaign-style" central inspections of local implementation of environmental protection measures and other climate action. In 2019, Xi proposed the establishment of the CLGEEPI (see Section 2) to push local authorities to follow central policies for climate and the environment. This followed the pattern seen throughout Xi's rule of increasing central inspections of local governance in key areas, starting with anti-corruption. Under the CLGEEPI, several rounds

of inspections have been conducted; the inspection teams are tasked with exposing and disrupting the protection of high-polluting, energy-consuming industries by local authorities, government departments, and other enterprises.⁸³

Third, regular bureaucratic supervision is carried out. Many government agents supervise the local implementation of environmental and climate policies. For example, within the MEE, there are regional inspection bureaus in the North (Beijing, Tianjin, Inner Mongolia, Shanxi, Hebei, and Henan), East (Shanghai, Jiangsu, Zhejiang, Fujian, Jiangxi, Anhui, and Shandong), South (Guangdong, Guangxi, Hainan, Hubei, and Hunan), Northeast (Liaoning, Jilin, and Heilongjiang), Northwest (Shaanxi, Gansu, Qinghai, Ningxia, and Xinjiang), and Southwest (Chongqing, Sichuan, Guizhou, Yunnan, and Tibet). In addition, regional offices conduct nuclear and radiation safety inspections in these regions, and regional bureaus supervise and administer seven major river or water environments: the Yangtze River Basin, Yellow River Basin, Huaihe River Basin, Song-Liao River Basin, Haihe River Basin and North Sea Area, Pearl River Basin and South China Sea Area, and Taihu Lake Basin and East China Sea Area.⁸⁴ However, the establishment of the CLGEEPI and its inspection teams seems to indicate that these bureaucratic agents are not effective or, at the very least, have insufficient supervisory authority.

Fourth, central government–affiliated research organizations are mobilized to play a role in coordinating intergovernmental strategy on climate change. For example, in 2014, the Statistical Assessment Project Section of the National Climate Strategy Center (later transferred to the MEE as the NCSC) was entrusted by the NDRC's Climate Change Department to evaluate and approve provincial GHG inventory reports.⁸⁵

Fifth, central requirements align local authorities' climate action with national plans. For example, when the MEE announced the formulation of an action plan for peaking emissions by 2030, it required each provincial government to formulate a peak emissions action plan by April 2021. According to the technical guidelines, this plan was to include detailed indicators such as total energy consumption, energy mix, share of fossil fuels in total energy consumption, and dual CO₂ emission caps—intensity and absolute emissions—for industry, construction, transport, agriculture, and residents' daily life.⁸⁶

In general, the Chinese political system employs top-down control mechanisms, but as a result of institutional and geographic factors, this does not always mean that central control of policy implementation is effective.⁸⁷ Under Xi, the regime has repeatedly highlighted the advantages of its centralized, nondemocratic system. Climate action has become a major policy area in which these institutional advantages are mobilized and notionally justified.

ARTICULATING LOCAL INTERESTS

It is impossible for the central leadership, despite its power, to ignore local interests. Since Xi upgraded his climate goals with international pledges, local authorities have tried to express their reservations, especially during the process of putting together the 14th Five-Year Plan in 2020–2021.

The 14th Five-Year Plan was the first to include climate goals, but it did not specify a formal cap on carbon emissions. It simply stated that China would “implement a system based primarily on carbon-intensity controls, with the carbon cap as a supplement.” The vagueness of this statement provoked

considerable concern about China's determination to achieve its carbon-control pledges. However, Chinese authorities argued that "a top-down approach would not address the reality faced by local officials," as past experience had shown.

In the 13th Five-Year Plan, China introduced a "dual control" policy, demanding that energy consumption per unit of GDP—energy intensity—be reduced by 15% between 2015 and 2020. This policy also required that total energy consumption remain under 5 billion tons of standard coal equivalent. The State Council then divided the national dual control target into goals for individual provinces. However, many provincial leaders were unhappy because these goals were unrealistic in their eyes. As a result, the central government's mandatory top-down instructions to resolve issues regarding energy consumption and energy intensity resulted in "substantial disadvantages and setbacks," such as cutting power at the end of the year, which forced factories to halt production and left many residents without heat.

In the 14th Five-Year Plan, China adopted a bottom-up approach, allowing each province and sector to determine its own carbon targets that the central government would aggregate into a "more reliable plan" for a national carbon cap. A Chinese expert likened this shift to the way international climate agreements have worked, citing the change from the Kyoto Protocol, which set a top-down, compulsory allocation of national targets, to the Paris Agreement, which introduced a bottom-up approach, with individual countries setting their own NDCs every five years under the so-called ratchet mechanism.⁸⁸

Would a change from top-down to bottom-up planning, in which each province sets its own carbon cap, lead to looser emissions goals? Yes, according to experts. It seems that provinces have developed their own strategies in response, such as pushing up to "a new and higher peak of carbon emissions" under the 14th Five-Year Plan, and only rolling back those targets after reaching the new peak. One expert explained that the central government lists a carbon peak as a "guiding" indicator in assessing local leaders' performance—"guiding" in this context contrasts with "binding." Carbon intensity, on the other hand, is a binding indicator for provincial leaders' performance in governance, meaning that a governor who fails to meet this goal will be removed by the central government.⁸⁹

5. MAPPING THE TIMELINE: THE NEXT FIVE YEARS

To analyze China's climate action over the next five years, this report has viewed China's climate pledge and its accomplishments in a dynamic rather than linear way. This echoes the point made in Section 1 highlighting the politics of China's climate action. "Dynamic" primarily means that political factors, including the government's consideration of various economic factors, are behind the major challenges that will influence China's climate action in the foreseeable future.

These challenges include the ultra-concentration of power, increasing pressure to promote economic growth, the declining fiscal capacity of local authorities, political repression of societal actors in environmental protection, and new personnel arrangements suggesting the prioritization of climate diplomacy over substantive action.⁹⁰ These challenges already seem to have prompted the national leadership to retreat from its dual carbon goals.

This section will discuss some of the latest developments and summarize the most likely priorities for China's climate action over the next five years.

THE MAJOR CHALLENGES AHEAD

ULTRA-CONCENTRATION OF POWER

Xi's third term in office has been marked by an ultra-concentration of power, epitomized by the elevation of his personal leadership over the Party-state system. This presents a series of challenges to China's governance, including its climate agenda.

Generally speaking, a high concentration of power reduces the autonomy and initiative of subordinates while, on the other hand, encouraging systematic manipulation of the information flowing up from the

All cadres below Xi, including top-level leaders, are inclined to wait for Xi's instruction before making any substantive decisions, let alone take action in governance matters.

bottom. Furthermore, in the current Chinese context, it seems that all cadres below Xi, including top-level leaders, are inclined to wait for Xi's instruction before making any substantive decisions, let alone take action in governance matters.

Elsewhere, this is defined as "Xi Jinping's governance dilemma"—overall control by the supreme leader results in the impotence of the regime and, accordingly, institutional decay.⁹¹ For climate action, the symptoms of this phenomenon are evident in how subordinates simply repeat Xi's pronouncements, as this is the safest way to do their jobs, politically speaking.

PRESSURE TO PROMOTE ECONOMIC GROWTH

China now confronts increasing pressure to promote economic growth. The regime's expectation of an economic rebound following the COVID-19 pandemic proved to be an illusion, and China's recent

economic sluggishness has resulted in the first decline in the ratio of China-U.S. GDP since 1992. In 2021, this ratio stood at roughly 75.3%, but in 2022, it declined to 70.3%.⁹² The economic slowdown has increasingly stirred popular discontent, which could threaten social stability as well as the regime's legitimacy. Both to support its nationalistic ambitions and to strengthen the CCP's rule, the Chinese leadership must struggle to ensure economic growth.

Moreover, one feature of the economic success that China has achieved since the late 1970s is that the regime was unable to balance the need to promote economic growth and maintain political stability, on one hand, and to deal with the social, environmental, and public costs of development, on the other.⁹³ The leadership, as analyzed in Section 1, has attempted to remedy this problem with an emphasis on green technologies, but the transformation of China's economic development model is far off track. Multiple imperatives—national, local, and social—are behind the need to revitalize economic growth, and this will work against the success of China's climate pledge.

FISCAL CHALLENGES TO LOCAL IMPLEMENTATION

China's economic slowdown has increased fiscal pressure, especially at the local level, and financing climate action has become a formidable challenge for local governments. Climate has never been a spending priority for local governments, which bear significant fiscal responsibilities for pensions, medical care, and unemployment insurance. Expenditures in these areas have grown rapidly because of aging and urbanization.

In addition, the existing stockpile of local debt compromises local governments' capacity to deliver public goods. By the end of 2022, official explicit local government debt reached 35.06 trillion RMB (US\$4.8 trillion), but the implicit debt estimated by the market surpassed 60 trillion RMB (US\$8.2 trillion), with Goldman Sachs projecting a total debt balance exceeding US\$13 trillion. For example, Guangxi has one of the nation's highest debt-to-revenue ratios, and its fiscal strain became evident in the first half of 2023, when expenditures on social security and employment dropped by 8.7% and health and wellness expenditures slipped by 0.4%.⁹⁴

POLITICAL REPRESSION OF ENVIRONMENTAL ACTIVISM

The Chinese regime has tightened control over NGOs and other social activism, which has made citizen engagement in climate action more difficult and even politically dangerous. The 2017 Foreign NGO Law cut off foreign funding streams to many grassroots organizations. The most effective groups operate largely in the "shadow of the state" rather than with full autonomy. Their main role is to provide technical analysis to undergird government efforts rather than analyze government policies and their effectiveness.

The Chinese government launched a six-month nationwide crackdown on NGOs in 2023, the latest in a wave of similar campaigns. During the first two months of the campaign, over 700 NGOs were investigated, with many banned or dissolved, although the exact number is unknown. Many prosecutions were also carried out.⁹⁵ Over the years, international reports have noted crackdowns on nonregistered NGOs and the collapse of civil society under Xi,⁹⁶ as well as the measures that the regime takes to ensure that activist green movements remain under its control.⁹⁷ This is an additional obstacle to China's climate action.

NEW PERSONNEL ARRANGEMENTS

As Xi dominates virtually every policy area, the Party-state agencies and the major personnel responsible for climate change have little power to influence China's agenda. However, organizational and personnel changes can be reliable indicators of the evolution of the policy process. This is especially true for China's international engagement in climate change, as it is a highly technical domain with a measure of professional autonomy.

Two changes made during Xi's third term sent seemingly complicated signals. Ding Xuexiang's assumption of the environmental portfolios can be viewed as a positive sign, as Ding had served as Xi's chief of staff for a long time, which may reflect Xi's trust and Ding's understanding of Xi's style. But, as discussed in Section 2, Ding's positions in the two central leading groups on environmental issues have yet to be announced, which seems to indicate that environmental affairs are a lower priority than other policies in his portfolio, such as technology. In addition, Ding's local experience is weak, which may affect his ability to deal with provincial authorities—the critical players in climate action.

The second personnel change is the appointment of Liu Zhenmin, a professional diplomat, as China's new special envoy for climate change. Just as Ding has apparently prioritized international image building rather than policy implementation in domestic governance, Liu's appointment indicates that China's climate action priority is firmly on the international front and may imply that China now sees the special envoy position as more diplomatic than substantive.

SIGNS OF CHINA'S RETREAT FROM ITS GLOBAL PLEDGE

As a result of the challenges described here, the Chinese regime has displayed some signs of retreat from its climate pledge, especially in terms of relaxing the carbon-control requirements for local and sectoral actors. As one international expert documented, the second half of 2021 marked the peak of China's climate momentum; a steady decline became evident in 2022 because of the weak economy, China's zero-COVID policy, the suspension of U.S.-China climate talks, and anxiety about energy security.⁹⁸

Xi's speech at the National Ecological Environmental Protection Conference, held on July 17–18, 2023, provides evidence for this observation. Xi emphasized the general goals of China's ecological and environmental protection efforts in this way:

The next five years are an important period for the construction of Beautiful China. We must thoroughly implement the socialist ecological civilization thought with Chinese characteristics for a new era, adhere to the people-centered approach, firmly establish and practice the concept that clear waters and lush mountains are invaluable assets, and put the construction of Beautiful China at the forefront.⁹⁹

At least three signals, however, indicate a relaxation—or at least an adjustment—of China's climate policies.

First, Xi highlighted five “relationships”: between high-quality development and high-level environmental protection, between key tasks and coordinated governance, between natural restoration and artificial restoration, between external constraints and endogenous motivation, and between the dual carbon goals and independent action. This way of thinking is obviously modeled on Mao Zedong's

famous speech on the “ten great relationships.”¹⁰⁰ In the CCP’s political practice, “relationships” are usually emphasized when the need to balance conflicting interests becomes urgent. On climate matters, the “five relationships” implicitly, but undeniably, point to the diminishment of climate action as a priority on China’s governance agenda.

Second, the last two of the five relationships, especially the fifth, which is explicitly about carbon action, indicate that China has relaxed its climate commitments. In Xi’s words, “the dual carbon goals we are committed to are unwavering, but the path, method, rhythm, and intensity of achieving this goal should and must be decided by ourselves and will never be influenced by others.”¹⁰¹ In a 2024 domestic policy statement, this goal is flexibly formulated as “a climate-adaptive society will be basically established by 2035.”¹⁰²

Third, government pronouncements and official media outlets have regularly repeated a phrase from Xi’s report to the 20th Party Congress: “actively and steadily promote carbon peak and carbon neutrality.”¹⁰³ In the CCP’s political language, when “actively and steadily” (积极稳妥) are used in combination, “steadily” modifies “actively,” which often implies that strong voices have been raised against forcefully pushing forward a policy.

CHINA’S CLIMATE PRIORITIES IN THE NEXT FIVE YEARS

In light of the challenges discussed in this report and other foreseeable factors, China’s climate action in the next five years may emphasize the following measures:

- Breakthroughs in green technology and its commercialization, especially green energy, as exemplified by promoting new energy vehicles and, more generally, developing the “new three” industries that are contributing to China’s economy (solar, electric vehicles, and batteries)
- Technologies to upgrade traditional industrial production, especially in heavy-polluting sectors such as steel, cement, and coal
- Setting up and improving the policy and institutional schemes for facilitating green and low-carbon progress, including the following:
 - Dual control system for energy consumption (能耗“双控”制度)
 - Dual carbon standards, a unified and standardized carbon emission statistical accounting system (碳排放统计核算体系)
 - Dual control system for total carbon emissions and intensity (碳排放总量和强度“双控”)
 - Carbon pricing mechanism
 - Markets for trading carbon emissions, energy rights, and electricity
- Promoting policy research and strengthening regulations and legislation
- Relaxing the dual carbon goals and tolerating localities that game the “low-quality peak” and manipulate the “peaking timeline”¹⁰⁴
- Global engagement to seek better deals for China as well as developing nations in terms of standard setting, technology transfers, and soft power

ENDNOTES

- 1 Statista, "China's Share in the Global Carbon Emissions in Selected Years from 2002 to 2022," January 3, 2024, <https://www.statista.com/statistics/1037051/china-global-carbon-emission-share>.
- 2 Statista, "Territorial Carbon Dioxide (CO₂) Emissions from Fossil Fuel Combustion and Industrial Processes in China from 1960 to 2022," January 30, 2024, <https://www.statista.com/statistics/239093/co2-emissions-in-china>.
- 3 For China, see Statista, "Gross Domestic Product (GDP) Per Capita in Current Prices in China from 1985 to 2022 with Forecasts until 2028," October 10, 2023, <https://www.statista.com/statistics/263775/gross-domestic-product-gdp-per-capita-in-china>; for the world average, see Macrotrends, "World GDP Per Capita 1960–2024," <https://www.macrotrends.net/countries/WLD/world/gdp-per-capita> (accessed January 4, 2024); for the United States, see Statista, "Gross Domestic Product (GDP) Per Capita in the United States in Current Prices from 1987 to 2028," November 23, 2023, <https://www.statista.com/statistics/263601/gross-domestic-product-gdp-per-capita-in-the-united-states>.
- 4 For China and the United States, see M. Crippa et al., "GHG Emissions of All World Countries," European Union, 2023, https://edgar.jrc.ec.europa.eu/report_2023; for global numbers, see Statista, "Average Per Capita Carbon Dioxide Emissions Worldwide from 1960 to 2022," December 7, 2023, <https://www.statista.com/statistics/268753/co2-emissions-per-capita-worldwide-since-1990>.
- 5 Each party to the Paris Agreement is required to maintain NDCs to reduce national emissions and pursue domestic mitigation measures to achieve them.
- 6 State Council, "Zhonggong zhongyang guowuyuan guanyu quanmian tuijin meili zhongguo jianshe de yijian" 中共中央、国务院关于全面推进美丽中国建设的意见 [Opinion of the Central Committee of the Communist Party of China and the State Council on comprehensively promoting the construction of a beautiful China], December 27, 2023, https://www.gov.cn/zhengce/202401/content_6925405.htm. For the pivotal role of Party-state documents in ruling China, see Guoguang Wu, "'Documentary Politics': Hypotheses, Process, and Case Studies," in *Decision-Making in Deng's China: Perspectives from Insiders*, eds. Carol Lee Hamrin and Suisheng Zhao (Armonk, NY: M. E. Sharpe, 1995), 24–38.
- 7 State Council, "Zhonggong zhongyang guowuyuan guanyu quanmian tuijin meili zhongguo jianshe de yijian" [Opinion of the Central Committee of the Communist Party of China and the State Council on comprehensively promoting the construction of a beautiful China].
- 8 Franz Schurmann, *Ideology and Organization in Communist China* (Berkeley: University of California Press, 1968), chap. 1.
- 9 Carl J. Frederick and Zbigniew K. Brzezinski, *Totalitarian Dictatorship and Autocracy* (Cambridge, MA: Harvard University Press, 1965), 22.
- 10 See, for example, Xinhua, "Xi Jinping xinzhong de lushui qingshan shi shenme yangzi?" 习近平心中的绿水青山是什么样子? [What does Xi Jinping think of clear waters and green mountains?], December 28, 2015, http://hk.ocmfa.gov.cn/chn/zt/gjzf/201601/t20160115_8123714.htm.
- 11 That said, Xi did learn something and develop semi-sophisticated views about environmental policy during his several decades as a leading local cadre in charge of these issues.
- 12 State Council, "Xi Jinping zhuchi zhonggong zhongyang zhengzhiju disanshiliuci jiti xuexi bing fabiao zhongyao jianghua" 习近平主持中共中央政治局第三十六次集体学习并发表重要讲话 [Xi Jinping presided over the 36th collective study session of the Political Bureau of the CPC Central Committee and delivered an important speech], January 25, 2022, https://www.gov.cn/xinwen/2022-01/25/content_5670359.htm.
- 13 Mallie Prytherch, Kenneth G. Lieberthal, and Ryan Hass, "Unpacking China's Climate Priorities," Brookings Initiative on Climate Research and Action, August 23, 2023, <https://www.brookings.edu/articles/unpacking-chinas-climate-priorities>.
- 14 State Council, "Xi Jinping zhuchi zhao kai Zhongyang caijing weiyuanhui dijiuci huiyi" 习近平主持召开中央财经委员会第九次会议 [Xi Jinping presided over the ninth meeting of the Central Financial and Economic Affairs Commission], March 15, 2021, https://www.gov.cn/xinwen/2021-03/15/content_5593154.htm.
- 15 People's Daily, "Xi Jinping zhuchi zhao kai zhongyang quanmian shenhua gaige weiyuanhui dicisi huiyi" 习近平主持召开中央全面深化改革委员会第四次会议 [Xi Jinping chaired the fourth meeting of the Central Comprehensively Deepening Reform Commission], February 19, 2024, <http://cpc.people.com.cn/n1/2024/0219/c64094-40179548.html>.
- 16 For example, see State Council, "Zhonggong zhongyang guowuyuan guanyu quanmian tuijin meili zhongguo jianshe de yijian" [Opinion of the Central Committee of the Communist Party of China and the State Council on comprehensively promoting the construction of a beautiful China].
- 17 Hongqiao Liu et al., "The Carbon Brief Profile: China," Carbon Brief, November 29, 2023, <https://interactive.carbonbrief.org/the-carbon-brief-profile-china>.
- 18 State Council, "Xi Jinping zhuchi zhonggong zhongyang zhengzhiju disanshiliuci jiti xuexi bing fabiao zhongyao jianghua" [Xi Jinping presided over the 36th collective study session of the Political Bureau of the CPC Central Committee and delivered an important speech].
- 19 State Council, "Zhonggong zhongyang guowuyuan guanyu quanmian tuijin meili zhongguo jianshe de yijian" [Opinion of the Central Committee of the Communist Party of China and the State Council on comprehensively promoting the construction of a beautiful China].

- 20 State Council, "Xi Jinping zhuchi zhonggong zhongyang zhengzhiju disanshiliuci jiti xuexi bing fabiao zhongyao jianghua" [Xi Jinping presided over the 36th collective study session of the Political Bureau of the CPC Central Committee and delivered an important speech].
- 21 State Council, "Xi Jinping zhuchi zhao kai Zhongyang caijing weiyuanhui dijiuci huiyi" [Xi Jinping presided over the ninth meeting of the Central Financial and Economic Affairs Commission].
- 22 State Council, "Xi Jinping zhuchi zhonggong zhongyang zhengzhiju disanshiliuci jiti xuexi bing fabiao zhongyao jianghua" [Xi Jinping presided over the 36th collective study session of the Political Bureau of the CPC Central Committee and delivered an important speech].
- 23 State Council, "Zhonggong zhongyang guowuyuan guanyu quanmian tuijin meili zhongguo jianshe de yijian" [Opinion of the Central Committee of the Communist Party of China and the State Council on comprehensively promoting the construction of a beautiful China].
- 24 Guoguang Wu, *China's Party Congress: Power, Legitimacy, and Institutional Manipulation* (Cambridge: Cambridge University Press, 2015), chap. 2.
- 25 Liu et al., "The Carbon Brief Profile: China."
- 26 State Council, "Xi Jinping zhuchi zhonggong zhongyang zhengzhiju disanshiliuci jiti xuexi bing fabiao zhongyao jianghua" [Xi Jinping presided over the 36th collective study session of the Political Bureau of the CPC Central Committee and delivered an important speech].
- 27 State Council, "Xi Jinping zai quanguo shengtai huanjing baohu dahui shang qiangdiao: Quanmian tuijin meili zhongguo jianshe jiakuai tuijin re yu ziran hexie gongsheng de xiandaihua" 习近平在全国生态环境保护大会上强调:全面推进美丽中国建设 加快推进人与自然和谐共生的现代化 [Xi Jinping at the National Ecological and Environmental Protection Conference emphasized: Comprehensively promote the construction of a beautiful China and accelerate the modernization of the harmonious coexistence of nature and man], July 18, 2023, https://www.gov.cn/yaowen/liebiao/202307/content_6892793.htm.
- 28 The Chinese name of the CLGEEPI is sometimes translated as Central Ecological and Environmental Protection Inspection Team (CEEIT), but this confuses the CLGEEPI and the inspection teams under its leadership.
- 29 The LGPCPN is also known as the Dual Carbon Work Leading Group (双碳工作领导小组).
- 30 State Council, "Guowuyuan guanyu chengli guojia yingdui qihou bianhua ji jieneng jian pai gongzuo lingdao xiaozu de tongzhi" 国务院关于成立国家应对气候变化及节能减排工作领导小组的通知 [Notice of the State Council on the establishment of the National Leading Group for Addressing Climate Change, Energy Conservation, and Emission Reduction], June 12, 2007, <https://www.ccchina.org.cn/Detail.aspx?newsId=28014&TId=60>.
- 31 Ministry of Ecology and Environment, "History," https://english.mee.gov.cn/About_MEE/History (accessed March 24, 2024).
- 32 State Council, "Guowuyuan bangongting guanyu tiaozheng guojia yingdui qihou bianhua ji jieneng jian pai gongzuo lingdao xiaozu zucheng ren yuan de tongzhi" 国务院办公厅关于调整国家应对气候变化及节能减排工作领导小组组成人员的通知 [Notice of the General Office of the State Council on adjusting the national response to climate change and members of the Leading Group for Energy Conservation and Emission Reduction], Notice 66, 2018, https://www.gov.cn/zhengce/content/2018-08/02/content_5311304.htm.
- 33 Ministry of Ecology and Environment, "Yingdui qihou bianhua si: jigou zhizi" 应对气候变化司: 机构职责 [Department of Climate Change: Institutional Responsibilities], <https://www.mee.gov.cn/zjhb/bjg/qhs> (accessed January 9, 2024).
- 34 Supreme People's Procuratorate, "Zhonggong Zhongyang bangongting guowuyuan bangongting yifa 'Zhongyang shengtai huanjing baohu ducha gongzuo guiding'" 中共中央办公厅 国务院办公厅印发《中央生态环境保护督察工作规定》 [The General Offices of the CPC Central Committee and State Council issued "Regulations on the Central Ecological and Environmental Protection Inspection Work"], December 2, 2019, https://www.spp.gov.cn/spp/gyssshmsh/201912/t20191202_440086.shtml.
- 35 State Council, "Weile jianshe meili Zhongguo—yi Xi Jinping tongzhi wei hexin de dang zhongyang guanxin tuidong zhongyang shengtai huanjing baohu ducha jishi" 为了建设美丽中国——以习近平同志为核心的党中央关心推动中央生态环境保护督察纪实 [To build a beautiful China—The Party Central Committee with Comrade Xi Jinping as the core cares about and promotes the central ecological and environmental protection inspection record], July 6, 2022, https://www.gov.cn/xinwen/2022-07/06/content_5699420.htm.
- 36 Ministry of Ecology and Environment, "2016 nian diyi pi zhongyang huanjing baohu ducha gongzuo quanmian qidong" 2016年第一批中央环境保护督察工作全面启动 [The first round of central environmental protection inspection work began in 2016], July 19, 2016, https://www.mee.gov.cn/gkml/sthjbgw/qt/201607/t20160719_360975.htm.
- 37 Supreme People's Procuratorate, "Zhonggong Zhongyang bangongting guowuyuan bangongting yifa 'Zhongyang shengtai huanjing baohu ducha gongzuo guiding'" [The General Offices of the CPC Central Committee and State Council issued "Regulations on the Central Ecological and Environmental Protection Inspection Work"].
- 38 Ministry of Ecology and Environment, "Zhongyang shengtai huanjing baohu ducha xietiao ju" 中央生态环境保护督察协调局 [Central Supervision Office of Ecological and Environmental Protection], <https://www.mee.gov.cn/zjhb/bjg/dcb> (accessed January 5, 2024).
- 39 According to an official report, the LGPCPN's last meeting took place in March 2022. See State Council, "Han Zheng zhuchi zhao kai tanda fengtan zhonghe gongzuo lingdao xiaozu quanti huiyi" 韩正主持召开碳达峰碳中和工作领导小组全体会议 [Han Zheng presided over the plenary meeting of the Leading Group on Carbon Peaking and Carbon Neutrality], March 2, 2022, https://www.gov.cn/xinwen/2022-03/02/content_5676475.htm.

- 40 See, for example, Ministry of Ecology and Environment, “Zhongyang diyi shengtai huanjing baohu ducha zu ducha Fujian sheng dongyuanhui zai Fuzhou zhaokai” 中央第一生态环境保护督察组督察福建省动员会在福州召开 [The Fujian Provincial Mobilization Meeting of the First Central Ecological and Environmental Protection Inspection Team was held in Fuzhou], November 22, 2023, https://www.mee.gov.cn/ywgz/zysthjbhdc/dcjz/202311/t20231122_1057025.shtml;
- 41 “Di san lun di yi pi Zhongyang shengtai huanjing baochu du cha guanbu shixian ducha jinzhu” 第三轮第一批中央生态环境保护督察全部实现督察进驻 [The first batch of the third round of central ecological and environmental protection inspections is in place], November 24, 2023, http://www.cecrpa.org.cn/sxyw/gnzc/202311/t20231124_1057136.shtml.
- 42 Yicai News, “Gao guige! Zhege zhongyang lingdao xiaozu shou du liangxiang shuangtan gongzuo maichu zhongyang yibu” 高规格!这个中央领导小组首度亮相 双碳工作迈出重要一步 [High ranking! This central leading group debuts, taking an important step in dual-carbon work], May 28, 2021, <https://www.yicai.com/news/101064929.html>.
- 43 See, for example, in Mengcun Hui Autonomous County, Hebei Province: “Xianwei shuji zhangguohui zhu zhuchi zhaokai tan da feng tan Zhong he gongzuo lingdao xiaozu huiyi” 县委书记张国辉主持召开碳达峰碳中和工作领导小组会议 [County Party Secretary Zhang Guohui chaired a meeting of the Leading Group for Carbon Peak and Carbon Neutrality Work], December 13, 2023, <https://www.mengcun.gov.cn/mengcun/c101149/202312/ea18546758b34e788b7cfb0380828302.shtml>; and in Xuhui, Shanghai, “Xuhui qu zhaokai tanda fengtan zhonghe gongzuo lingdao xiaozu (kuoda) huiyi” 徐汇区召开碳达峰碳中和工作领导小组(扩大)会议 [Xuhui District held a meeting of the Leading Group on Carbon Peaking and Carbon Neutrality (enlarged)], April 21, 2023, <https://www.shanghai.gov.cn/nw15343/20230421/27b476e81261491eb1184b635709d4e4.html>.
- 44 Ministry of Ecology and Environment, “Bu lingdao: Huang Runqiu” 部领导: 黄润秋 [Ministry leaders: Huang Runqiu], <https://www.mee.gov.cn/hrq> (accessed January 9, 2024).
- 45 Ministry of Ecology and Environment, “Bu lingdao: Sun Jinlong” 部领导: 孙金龙 [Ministry leaders: Sun Jinlong], <https://www.mee.gov.cn/sjl> (accessed January 9, 2024).
- 46 Jia Liu, “Cong fagaiwei zhuanli huanbaobu, qihousi sizhang: zhineng bub hui jianruo” 从发改委转隶环保部, 气候司司长: 职能不会减弱 [Climate director transferred from the NDRC to the MEE: Functions will not be weakened], *Southern Weekly*, November 2, 2018, https://www.infzm.com/contents/141064?source=202&source_1=141063.
- 47 Ministry of Ecology and Environment, “Department of Climate Change.”
- 48 State Council, “Chixu jiaqiang yingdui qihou bianhua xingdong—shengtai huanjing bu youguan fuze ren huiying wo guo yingdui qihou bianhua xiangguan wenti” 持续加强应对气候变化行动—生态环境部有关负责人回应我国应对气候变化相关问题 [Strengthen actions to respond to climate change—Responsible MEE official answers questions about China’s response to climate change], October 27, 2023, https://www.gov.cn/lianbo/bumen/202310/content_6912440.htm.
- 49 Ministry of Ecology and Environment, “Department of Climate Change.”
- 50 Ministry of Ecology and Environment, “Daqi huanjing si” 大气环境司 [Department of Atmospheric Environment], <https://www.mee.gov.cn/zjhb/bjg/dqhj> (accessed January 9, 2024).
- 51 Ministry of Ecology and Environment, “Guoji hezuo si” 国际合作司 [Department of International Cooperation], <https://www.mee.gov.cn/zjhb/bjg/gjs> (accessed January 9, 2024).
- 52 Ministry of Ecology and Environment, “Huan zi si” 环资司 [Department of Environmental Protection], <https://www.ndrc.gov.cn/fzggw/jgsj/hzs> (accessed January 3, 2024).
- 53 National Energy Administration, “Juzhang: Zhang Jianhua” 局长: 章建华 [Director: Zhang Jianhua], <https://www.nea.gov.cn/ldhd/zjh/index.htm> (accessed February 29, 2024).
- 54 Shixin Liu, “Qihousi wancheng zhuanli Zhongguo yingdui qihou bianhua you naxie xin qixiang?” 气候司完成转隶 中国应对气候变化有哪些新气象? [The Department of Climate Change transferred. What are the new trends in China’s response to climate change?], *Xinhua*, November 1, 2018, http://www.xinhuanet.com/politics/2018-11/01/c_1123643979.htm.
- 55 National People’s Congress (NPC), “Weiyuanhui lishi” 委员会历史 [Committee History], http://www.npc.gov.cn/npc/c34354/c34381/c34468/202009/t20200922_307742.html (accessed January 9, 2024).
- 56 NPC, “Weiyuanhui zhize” 委员会职责 [Committee Responsibilities], http://www.npc.gov.cn/npc/c34354/c34381/c34469/202009/t20200922_307740.html (accessed January 9, 2024).
- 57 NPC, “Huanjing yu ziyuan baohu weiyuanhui” 环境与资源保护委员会 [Environment and Resources Protection Committee], <http://www.npc.gov.cn/npc/c34354/c34381> (accessed January 9, 2024).
- 58 Chinese People’s Political Consultation Committee (CPPCC), “Renkou ziyuan huanjing weiyuanhui zucheng renyuan” 人口资源环境委员会组成人员 [Population, Resources, and Environment Committee], <http://www.cppcc.gov.cn/zxww/newcppcc/rkzyhjwyh/index.shtml> (accessed March 24, 2024).
- 59 CPPCC, “Roles and Functions of Chinese People’s Political Consultative Conference,” August 26, 2021, <http://en.cppcc.gov.cn/overview.html>.
- 60 On the Central Office of Foreign Affairs, see Guoguang Wu, “The Emergence of the Central Office of Foreign Affairs: From Leadership Politics to ‘Greater Diplomacy,’” *China Leadership Monitor*, no. 69 (September 2021), <https://www.prcleader.org/post/emergence-of-the-central-office-of-foreign-affairs-from-leadership-politics-to-greater-diplomacy>.

- 61 “Xie Zhenhua danren zhongguo qihou bianhua shiwu tebie daibiao” 解振华担任中国气候变化事务特别代表 [Xie Zhenhua becomes Chinese representative on climate change], China News Network, April 10, 2015, <https://www.chinanews.com.cn/gn/2015/04-10/7198847.shtml>; and “Xie Zhenhua churen zhongguo qihou bianhua shiwu teshi” 解振华出任中国气候变化事务特使 [Xie Zhenhua appointed as China's special envoy for climate change], China News Network, February 25, 2021, <https://www.chinanews.com.cn/gn/2021/02-25/9418953.shtml>.
- 62 Ziwen Jiang, “Waijiaobu yuan fubuzhang Liu Zhenmin jieren Zhongguo qihou bianhua shiwu teshi, Xie Zhenhua xieren” 外交部原副部长刘振民接任中国气候变化事务特使,解振华卸任” [Former Vice Minister of Foreign Affairs Liu Zhenmin takes over as China's special envoy for climate change, Xie Zhenhua steps down], *Paper*, January 12, 2024, https://www.thepaper.cn/newsDetail_forward_25990499.
- 63 See Su's bio at <https://baike.baidu.com/item/苏伟/10698> (accessed January 20, 2024).
- 64 See Zhao's bio at <https://baike.baidu.com/item/赵英民/237657> (accessed January 12, 2024).
- 65 See China Council for International Cooperation on Environment and Development (CCICED), “Gaikuang” 概况 [Overview], <http://www.cciced.net/gywm/gk> (accessed January 3, 2024).
- 66 See CCICED, “Weiyuan” 委员 [Commissioners], <http://www.cciced.net/gywm/zuc/wy> (accessed January 3, 2024).
- 67 (CCICED), “Gaikuang.” [Overview]
- 68 Xinhua, “Ding Xuexiang chuxi Zhongguo huanjing yu fazhan guoji hezuo weiyuanhui 2023 nian nianhui bing jianghua” 丁薛祥出席中国环境与发展国际合作委员会2023年年会并讲话 [Ding Xuexiang delivered a speech at the 2023 Annual Meeting of the China Council for International Cooperation on Environment and Development], August 30, 2023, http://www.news.cn/politics/leaders/2023-08/30/c_1129835597.htm.
- 69 Foreign Cooperation and Exchange Center of the Ministry of Ecology and Environment, “Danwei jianjie” 单位简介 [Introduction], http://www.fecomee.org.cn/zxjs/dwjj/200712/t20071214_564131.html (accessed January 3, 2024).
- 70 Economic Development Center (EDC), “Zhongxin jianjie” 中心简介 [Introduction to the Center], http://www.edcmep.org.cn/zxgk_14970/zxjj (accessed January 3, 2024).
- 71 For example, see National Center for Climate Change Strategy and International Cooperation (NCSC), “Fan Xing: geren jianjie” 樊星: 个人简介 [Fan Xing: personal profile], http://www.ncsc.org.cn/jgsz/gjhzb/yjtd_22538/fx (accessed January 2, 2024).
- 72 NCSC, “Zhongxin jianjie” 中心简介 [Introduction to the center], <http://www.ncsc.org.cn/gyzx/zxjj> (accessed January 2, 2024).
- 73 NCSC, “Guoji zhengce yanjiu bu” 国际政策研究部 [International Policy Research Section], <http://www.ncsc.org.cn/jgsz/gjhzb> (accessed January 2, 2024).
- 74 NCSC, “Duiwai hezuo jiaoliu bu” 对外合作交流部 [Foreign Cooperation and Exchange Section], <http://www.ncsc.org.cn/jgsz/xyyxb> (accessed January 2, 2024).
- 75 NCSC, “Xu Huaqing zhuren” 徐华清 主任 [Director Xu Huaqing], http://www.ncsc.org.cn/gyzx/zxjr/xhq_zr (accessed January 2, 2024).
- 76 NCSC, “Gao Xiang” 高翔 [Gao Xiang], http://www.ncsc.org.cn/jgsz/gjhzb/yjtd_22538/gx_29463 (accessed January 2, 2024). Gao has participated in United Nations climate change negotiations as a member of the Chinese government delegation since 2009. He is mainly responsible for mitigation and transparency issues. Since 2014, he has served as an alternate member of the Compliance Committee of the Kyoto Protocol and an international reviewer of the UN Framework Convention on Climate Change (UNFCCC) National Implementation Report. From 2016 to 2018, Gao served as co-chair of the negotiations on transparency issues of the Paris Agreement Ad Hoc Working Group. Since 2019, he has served as co-chair of the negotiation on methodological issues of the Paris Agreement of the Scientific and Technological Advisory Body affiliated with the UNFCCC.
- 77 Belt and Road Energy Cooperation, “Zhongguo qihou bianhua nan-nan hezuo jijin” 中国气候变化南南合作基金 [The China Climate Change South-South Cooperation Fund], January 22, 2018, http://obor.nea.gov.cn/v_financial/toFinancialDetails.html?countryId=215&status=2.
- 78 Chermaine Lee, “China Says It Won't Pay into Climate Fund for Developing Countries,” *Voice of America*, November 10, 2022, <https://www.voanews.com/a/china-says-it-won-t-pay-into-climate-fund-for-developing-countries/6828347.html>.
- 79 China's 31 subnational units include 22 provinces, 5 autonomous regions, and 4 municipalities, but all are referred to as “provinces” in this section.
- 80 This is based on countries' (including Chinese provinces') emissions from fossil fuels and cement in millions of tons. Xiaoying You, “Why China's Provinces Are So Important for Action on Climate Change,” *Carbon Brief*, October 10, 2022, <https://www.carbonbrief.org/explainer-why-chinas-provinces-are-so-important-for-action-on-climate-change>.
- 81 “Qin Tianbao: Qiangshi ducha nengfou tupo huanbao nanti” 秦天宝: 强势督察能否突破环保难题 [Qin Tianbao: Can powerful inspectors break through environmental protection challenges?], November 4, 2019, <http://persulphate.com/a/renwu/648.html>. Qin is an expert on environmental law based at Wuhan University.
- 82 Liu et al., “The Carbon Brief Profile: China.”

- 83 State Council, "Zhonggong zhongyang bangongting guowuyuan bangongting yifa 'Zhongyang shengtai huanjing baohu ducha gongzuo guiding'" [The General Offices of the CPC Central Committee and State Council issued "Regulations on the Central Ecological and Environmental Protection Inspection Work"].
- 84 Ministry of Ecology and Environment, "Zuzhi jigou" 组织机构 [Organization], <https://www.mee.gov.cn/zjhb/?name=0> (accessed January 3, 2024).
- 85 See, for instance, National Center for Climate Change Strategy and International Cooperation, "Sheng ji wenshi qiti qingdan baogao zhongnan pianqu pinggu yanshou hui chenggong zhaokai" 省级温室气体清单报告中南片区评估验收会成功召开 [The evaluation and acceptance meeting for the central and southern regions of the provincial greenhouse gas inventory report was successfully held], http://www.ncsc.org.cn/gzqx/zxzx/xhq_zr/xwbd_883/201407/t20140731_609710.shtml; and Chinese Academy of Sciences, "Guangzhou shi guojia di tan shidian xiangmu tongguo yanshou" 广州市国家低碳试点项目通过验收 [Guangzhou National Low Carbon Pilot Project is accepted], Sina, August 1, 2018, <https://news.sina.cn/2018-08-01/detail-ih hacrcf0057580.d.html?from=wap>. In both, the NCSC was involved (both accessed January 12, 2024).
- 86 Carbon Brief, "What Does China's 14th 'Five Year Plan' Mean for Climate Change?" March 12, 2021, <https://www.carbonbrief.org/qa-what-does-chinas-14th-five-year-plan-mean-for-climate-change>.
- 87 This is conceptualized in China studies as "fragmented authoritarianism," as seen in Kenneth G. Lieberthal and David M. Lampton, eds., *Bureaucracy, Politics, and Decision Making in Post-Mao China* (Berkeley: University of California Press, 1992).
- 88 Carbon Brief, "What Does China's 14th 'Five Year Plan' Mean for Climate Change?"
- 89 Carbon Brief, "What Does China's 14th 'Five Year Plan' Mean for Climate Change?"
- 90 The geopoliticization of global governance on climate change and the changing U.S.-China climate dynamic are also significant influences on China's climate action, as analyzed by Li Shuo, "What Does China Want from COP28?" Asia Society Policy Institute, November 6, 2023, <https://asiasociety.org/policy-institute/what-does-china-want-cop28>.
- 91 See an analysis of these dilemmas in Guoguang Wu, "From the CCP Dilemma to the Xi Jinping Dilemma: The Chinese Regime's Capacity for Governance," *China Leadership Monitor*, no. 63 (March 2020), <https://www.prcleader.org/post/from-the-ccp-dilemma-to-the-xi-jinping-dilemma-the-chinese-regime-s-capacity-for-governance>.
- 92 See Country Economy, "GDP – Gross Domestic Product," <https://countryeconomy.com/gdp?year=2022>.
- 93 Guoguang Wu, "Human Security Challenges with China: Why and How the Rise of China Makes the World Vulnerable," in *China's Challenges to Human Security: Foreign Relations and Global Implications*, ed. Guoguang Wu (London: Routledge, 2013), 16.
- 94 Di Lu, "China's Local Government Credit Dilemma," East Asia Forum, November 3, 2023, <https://eastasiaforum.org/2023/11/03/chinas-local-government-credit-dilemma>.
- 95 "China Expands Crackdown on Illegal NGOs," China Development Brief, September 12, 2023, <https://chinadevelopmentbrief.org/reports/china-expands-crackdown-on-illegal-ngos>.
- 96 Michael Standaert, "As It Looks to Go Green, China Keeps a Tight Lid on Dissent," *Yale Environment360*, November 2, 2017, <https://e360.yale.edu/features/as-it-looks-to-go-green-china-keeps-a-tight-lid-on-dissent>.
- 97 Mark Schaub and Serena Guo, "China Crackdown on Non-Registered NGOs," King & Wood Mallesons, August 11, 2021, <https://www.kwm.com/cn/en/insights/latest-thinking/china-crackdown-on-non-registered-ngos.html>; and "How China's Civil Society Collapsed under Xi," Agence France-Presse, April 10, 2022, <https://www.france24.com/en/live-news/20221004-how-china-s-civil-society-collapsed-under-xi>.
- 98 Li Shuo, "What Does China Want from COP28?" November 6, 2023, <https://asiasociety.org/policy-institute/what-does-china-want-cop28>.
- 99 State Council, "Xi Jinping zai quanguo shengtai huanjing baohu dahui shang qiangdiao: Quanmian tuiji meili zhongguo jianshe jiakuai tuijin re yu ziran hexie gongsheng de xiandaihua" [Xi Jinping at the National Ecological and Environmental Protection Conference emphasized: Comprehensively promote the construction of a beautiful China and accelerate the modernization of the harmonious coexistence of nature and man].
- 100 Mao Zedong, "Lun shi da guanxi" 论十大关系 [On the 10 big relationships], *People's Daily*, December 26, 1976.
- 101 State Council, "Xi Jinping zai quanguo shengtai huanjing baohu dahui shang qiangdiao: Quanmian tuiji meili zhongguo jianshe jiakuai tuijin re yu ziran hexie gongsheng de xiandaihua" [Xi Jinping at the National Ecological and Environmental Protection Conference emphasized: Comprehensively promote the construction of a beautiful China and accelerate the modernization of the harmonious coexistence of nature and man].
- 102 State Council, "Zhonggong zhongyang guowuyuan guanyu quanmian tuijin meili zhongguo jianshe de yijian" [Opinion of the Central Committee of the Communist Party of China and the State Council on Comprehensively Promoting the Construction of a Beautiful China].
- 103 For example, see China Meteorological Administration, "2023 nian qihou bianhua lupishu fabu jujiao jiji wentuo tuijin tanda fengtan zhonghe" 2023年气候变化绿皮书发布聚焦积极稳妥推进碳达峰碳中和 [2023 green paper on climate change released, focus on actively and steadily promoting carbon peak and carbon neutrality], December 29, 2023, https://www.cma.gov.cn/2011xwzx/2011xqxw/2011xqxyw/202312/t20231229_5984287.html; and Cyberspace Administration of China, "Qiushiwang pinglunyan: Jiji wentuo tuijin tanda fengtan zhonghe" 求是网评论员:积极稳妥推进碳达峰碳中和 [Qiushi commentator: Actively and steadily promote carbon peak and carbon neutrality], January 9, 2023, http://www.cac.gov.cn/2024-01/09/c_1706468513193526.htm.

¹⁰⁴ On what a “low-quality peak” and manipulation of “peaking timeline” might mean in the Chinese context, see an interview with Ma Jun, director of the Institute of Public and Environmental Affairs, an environmental research NGO based in Beijing, in Carbon Brief, “What Does China’s 14th ‘Five-Year Plan’ Mean for Climate Change?”

