

# Central Bank Mandates, Sustainability Objectives and the Promotion of Green Finance\*

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This draft: 20 January 2019

## Abstract

This paper examines to what extent climate-related risks and mitigation policies fit into the current set of central bank mandates and objectives. To this end, we conduct a detailed analysis of central bank mandates and objectives, using the IMF's Central Bank Legislation Database, and compare these to current arrangements and sustainability responsibilities that central banks have adopted in practice. To scrutinise the alignment of mandates with climate-related policies, we differentiate between the impact of environmental factors on the conventional core objectives of central banking, and a potential promotional role of central banks with regard to green finance and sustainability. Furthermore, we review the potential risks and trade-offs involved when central banks act as catalysts for greening the financial system.

*JEL classifications:* Q5, E5.

*Keywords:* Central banks, central bank mandates, green finance.

\* This paper was prepared for the NGFS-Bundesbank-CEP Conference on “Scaling up Green Finance: The Role of Central Banks” held in Berlin on 8–9 November 2018. We thank Paul Fisher, Irene Heemskerk and participants of the Berlin conference for very helpful comments and discussions. The usual disclaimer applies.

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## **1. Introduction**

Against the backdrop of an increasing public awareness of the risks posed by climate change and the political commitment of the international community to address these challenges embodied in the Paris Agreement, recent years have seen an intensifying discussion on the role of central banks in addressing risks associated with climate change and in supporting the development of green finance (e.g., Volz et al. 2015; Batten et al. 2016; Volz 2017; Campiglio et al. 2018; Dikau and Volz 2018). This has not been a purely theoretical debate. A growing number of central banks have already adopted green finance policies or guidelines, or have started to incorporate climate risk into macroprudential frameworks (McDaniels and Robins 2018). This has led, among others, to the launch of initiatives such as the Sustainable Banking Network (SBN) and the Central Banks and Supervisors Network for Greening the Financial System (NGFS).

While a general consensus has developed that central banks (and other supervisory bodies) cannot ignore climate change (NGFS 2018), there is no agreement on the extent to which climate change (or other environmental risks) should be incorporated into existing operational frameworks or whether central banks should even play a promotional role in scaling up green finance. This may not be surprising, given the different histories and policy traditions of central banks in different parts of the world and also the differences in their mandates.

Historically, the role of central banks has evolved considerably. Changes have often occurred in response to crises or perpetual policy problems. For example, the financial crisis of 2008/2009 showcased the implications of the omission of a financial stability objective in most central bank mandates. The crisis hence triggered a change in the broad environment in which central banks are operating and thereby also necessitated a continued evolution of the role and governance of these institutions (BIS 2009). The financial crisis has raised concerns with regard to the role and ability of central banks in preventing and managing financial crises and provoked a discussion of the role of central banks in safeguarding financial stability and ultimately, the recognition of the need to reconsider or adjust mandates of central banks with regard to financial stability (BIS 2011). The impending climate crisis, which will have potentially disastrous impact on our economies and which requires urgent policy action (IPCC 2018), is once again changing the policy environment in which central banks are operating.

Climate change has potentially significant implications not only for the core operations of central banks but also poses the question of their broader role in addressing climate change risk and mitigation. How far central banks can go in playing a role as an overall catalyst for

mainstreaming green finance on the one hand, and incorporating climate risks in their core policy frameworks on the other hand, depends significantly on their mandates. A close investigation of the legal objectives of central banks is therefore essential in order to substantiate this on-going discussion against the background of the increasingly pressing issue of responding to global warming.

This paper seeks to contribute to the broader discussion of the implications of climate change for the operations, governance and role of central banks. It is not the aim of this paper to set out a one-size-fits-all approach regarding how central banks can become “greener”, but to contribute to the fundamental understanding of how climate change relates to the operational frameworks of monetary institutions. It is a first attempt at analysing to what extent climate-related risks and mitigation policies fit into the current set of central bank mandates and objectives. To this end, we conduct a detailed analysis of central bank mandates and objectives, using the IMF’s Central Bank Legislation Database, and compare these to current arrangements and sustainability responsibilities that central banks have adopted in practice. To scrutinise the alignment of mandates with climate-related policies, we differentiate between the impact of environmental factors on the conventional core objectives of central banking, and a potential promotional role of central banks with regard to green finance and sustainability. Furthermore, we review the potential risks and trade-offs involved when central banks act as catalyst for greening the financial system.

Our analysis of 133 central bank mandates shows that only few central banks operate under a mandate that explicitly includes the promotion of sustainable growth or development as an objective, but almost half are tasked to support their governments’ national policy objectives (often conditioned on not interfering with achieving their primary objective). However, the ensuing theoretical analysis dissects how climate risks may directly impact on traditional core responsibilities of central banks, most notably monetary and financial stability. The implication is that many central banks will have to incorporate climate- and mitigation-risks into their core policy implementation frameworks in order to efficiently and successfully safeguard price and financial stability, even if their mandates make no explicit reference to sustainability. A potential role of central banks in promoting sustainability in the financial system and “greening” the economy is more contentious, not least because of the possibility of distorting effects that direct interventions into the market aimed at “greening” the economy might have, as well potential conflicts with the central bank’s primary goals. It therefore is essential that such a potential promotional role of the central bank is covered by the mandate. As mentioned, numerous central banks are already mandated to support national policy objectives. To the

extent that the government’s policy objectives include climate change mitigation or adaptation, a change of mandate for these central banks to further support the mainstreaming of the financial system would not be required. However, for a majority of central banks such a promotional role is not covered by their mandate. Whether this should change is ultimately a political decision, which needs to carefully weigh the potential risks involved.

The paper is organised as follows. Section 2 empirically investigates the mandates of central banks with regard to objectives on sustainability in general or objectives securing the central bank’s support for national policy priorities, and contrast the results with the actual “green” activities of central banks in this area. Subsequently, Section 3 discusses to what extent scaling up green finance is covered by central banking mandates. It differentiates between the impact of environmental factors on the conventional objectives of central banking, and a potential promotional role of central banks with regard to green finance and sustainability. Section 4 reviews the potential risks and trade-offs involved when central banks act as catalyst for greening the financial system. Section 5 summarises and concludes.

## **2. Central Bank Mandates and Sustainable Central Banking in Practice**

We conduct an empirical examination of current central bank mandates to capture the extent to which central banks are equipped with objectives that task them to enhance sustainability and mainstream green finance. To this end, we examine the IMF Central Bank Legislation Database (Section 2.02, Objectives of the Central Bank, April 2017 version), which comprises 126 institutions, four of which are the central banks of monetary unions. To this we add seven central banks that are not part of the original database but that have adopted green finance policies.<sup>1</sup> The results of our investigation of a total of 133 central bank mandates provide a starting point for the ensuing discussion of whether it is necessary for central banks to further incorporate environmental, social and governance (ESG) criteria into their core activities in Section 3.

Table 1 summarises the results of the investigation of the mandates of 133 central banks with regard to whether they are assigned with objectives that would cover an active promotion or mainstreaming of green finance. The table lists the 54 central banks and monetary unions with a mandate assigning them an objective to either (1) enhance, promote or support “sustainability” or “sustainable development/growth”, or (2) support the government’s

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<sup>1</sup> These are the central banks of Singapore, Australia, Bangladesh, India, Mongolia, Nigeria and Pakistan.

economic objectives or policy goals. Central banks with this second objective are included here because governments' economic policy goals may comprise sustainability. Central banks with an objective to promote "sustained" growth or development are not considered to have a sustainability-enhancing mandate and are therefore not included in the table. Table 1 lists the parts of the mandates under which the institutions are assigned the aforementioned objectives and contrast the results with the actual "green" activities of central banks to date with regard to (a) incorporating climate change into their core objective policy implementation framework and (b) engaging in active of mainstreaming and promoting green finance.

**Table 1: Central Banks with Explicit or Potentially Implicit Sustainability Objectives in their Mandate**

Central Bank of	Primary Objective	Sustainability Objective	“Green” central banking activities
Botswana	Monetary stability	“(c) thirdly, to assist insofar as it is not inconsistent with the objectives as set out in paragraphs (a) and (b), in the attainment of <b>national economic development goals.</b> ”	
Brazil	Needs of the economy, development	“I. adapt the money supply to the real <b>needs of the national economy</b> and its <b>development process;</b> ”	2011: Banco Central do Brasil Resolution 3,988 incorporates risk of exposure to environmental damages into “Internal Process of Capital Adequacy Assessment” (ICAAP) requirements 2012: SBN member 2014: Banco Central do Brasil Guidelines on “Social and Environmental Responsibility for Financial Institutions” discusses and defines E&S risk exposure
Cambodia	Price stability	“The principle mission of the Central Bank is to determine and direct the monetary policy aimed at maintaining price stability in order to facilitate economic development within the framework of the Kingdom’s economic and financial policy.”	
Congo, Democratic Republic of	Price stability	“Without detriment to the principal objective of general price stability, the Bank shall support the <b>government’s general economic policy.</b> ”	
Cyprus (ESCB)	Price stability	“(2) Without prejudice to this primary objective and subject to the fulfilment of its obligations under Article 105 paragraph (1) of the Treaty, the Bank shall <b>support the general economic policy of the State.</b> ”	
Czech Republic (ESCB)	Price stability	“Without prejudice to its primary objective, the Czech National Bank shall support the general economic policies of the Government leading to <b>sustainable economic growth</b> and the general economic policies in the European Union with a view to contributing to the achievement of the objectives of the European Union”	

Egypt	Price stability	“The Central Bank shall work on realizing price stability and banking system soundness, within the context of the <b>general economic policy of the State.</b> ”	
Estonia (ESCB)	Price stability	“(1) The primary aim of the Bank of Estonia is to maintain price stability. The Bank of Estonia also supports the achievement of <b>other economic policy objectives</b> in accordance with the Treaty on the Functioning of the European Union.”	
Eurozone (ESCB)	Price stability	“Without prejudice to the objective of price stability, the ESCB shall <b>support the general economic policies</b> in the Union with a view to contributing to the achievement of the objectives of the Union as laid down in Article 3 of the Treaty on European Union.”	2018: ECB becomes becomes NGFS member
Fiji	Price stability	“(a) to protect the value of the currency in the interest of balanced and <b>sustainable economic growth;</b> ”	2017: Reserve Bank of Fiji becomes SBN member
Finland (ESCB)	Price stability	“Without prejudice to the objective laid down in paragraph 1, the Bank of Finland shall also support the achievement of other <b>economic policy objectives</b> in accordance with the Treaty.”	2018: Bank of Finland introduces responsible investment standards to the management of its investment portfolio, becomes NGFS member
France (ESCB)	Price stability	“Within this framework, and without prejudice to the primary objective of price stability, the Banque de France shall contribute to the <b>government's general economic policy.</b> ”	2017: Banque de France launches NGFS
Gambia	Price stability	“(d) encourage and promote <b>sustainable economic development</b> and the efficient utilisation of the resources of The Gambia through the effective and efficient operation of a financial system.”	
Georgia	Price stability	“2. The National Bank shall ensure stability and transparency of the financial system and facilitate <b>sustainable economic growth</b> in the country, if this is possible without posing a threat to attaining its main objective.”	2017: National Bank of Georgia becomes SBN member
Ghana	Price stability	“(2) Without prejudice to subsection (1) the Bank shall <b>support the general economic policy of the Government</b> and promote economic growth and effective and efficient operation of banking and credit systems in the country, independent of instructions from the Government or any other authority.”	2016: Bank of Ghana becomes SBN member
Greece (ESCB)	Price stability	“Without prejudice to this primary objective, the Bank shall <b>support the general economic policy of the government.</b> ”	

Hungary (ESCB)	Price stability	“(2) Without prejudice to its primary objective, the MNB shall <b>support</b> the maintenance of the stability of the financial intermediary system, the enhancement of its resilience, its <b>sustainable contribution to economic growth</b> ; furthermore, the MNB shall support the <b>economic policy of the government</b> using the instruments at its disposal.”	
Iceland	Price stability	“The Central Bank shall <b>promote the implementation of the Government’s economic policy</b> as long as it does not consider this inconsistent with its main objective as described in Paragraph 1 above.”	
Indonesia	Price stability	“(2) To achieve the goal referred to in paragraph (1), Bank Indonesia shall conduct monetary policy on a sustained, consistent, and transparent basis, <b>taking into account the general economic policies of the government.</b> ”	2012: Bank Indonesia issues Green Lending Model Guidelines for Mini Hydro Power Plant Projects
Iraq	Price stability, maintaining competitive market-based financial system	“The primary objectives of the CBI shall be to achieve and maintain domestic price stability and to foster and maintain a stable and competitive market-based financial system. Subject to these objectives, the CBI shall also promote <b>sustainable growth</b> , employment, and prosperity in Iraq.”	
Israel	Price stability	“(2) to <b>support other objectives of the Government’s economic policy</b> , especially growth, employment and reducing social gaps, provided that, in the Committee’s opinion, this support shall not prejudice the attainment of Price Stability over the Course of Time”	
Kenya	Price stability	“(3) Subject to subsections (1) and (2), the Bank shall <b>support the economic policy of the Government</b> , including its objectives for growth and employment. No. 9 of 2007”	2017: Central Bank of Kenya (with Kenya Bankers Association, Capital Markets Authority and the National Treasury) issues Green Bond Programme
Korea, Republic of	Price stability	“(1) The monetary and credit policies of the Bank of Korea shall be carried out in harmony with the <b>economic policy of the Government</b> insofar as this does not impeding the price stabilization.”	
Kosovo	Financial system stability, efficient payment system	“3. Without prejudice to attainment of these two objectives, the Central Bank shall <b>support the general economic policies of the Government.</b> ”	



Liberia	Price stability	“c. encourage and mobilization of domestic and foreign savings and their <b>efficient allocation for productive economic activities</b> ; [...] e. foster monetary, credit and financial conditions conducive to <b>orderly, balanced and sustained economic growth and development.</b> ”	2016: Central Bank of Liberia participates in Alliance for Financial Inclusion Global Policy Forum
Lithuania	Price stability	“[...] <b>support the economic policy carried out by the Government</b> of the Republic of Lithuania, without prejudice to the primary objective of the Bank of Lithuania and to the extent this meets the objectives of the European Central Bank and of the European System of Central Banks.”	2017: Bank of Lithuania initiates amendments to Law on Companies, triggering the countries’ first private green bond issuance
Macedonia, Former Yugoslav Republic of	Price stability	“(3) The National Bank shall <b>support the general economic policies</b> without endangering the achievement of the objective set forth in paragraph (1) of this Article and in conformity with the principle of open market economy and free competition.”	
Madagascar	Price stability	“To that end, the central bank shall be fully independent to develop and implement monetary policy. It shall carry out its mission in respect of credit <b>policy within the framework of the government’s general economic policy.</b> ”	
Malawi	Issue legal tender (external price stability 3 <sup>rd</sup> , national price stability 4 <sup>th</sup> )	“(2) In pursuing, or in performing any functions in the pursuit of, its principal objectives, the Bank shall act with due regard to the interest of the national economy and to the <b>economic policies of the Government.</b> ”	
Malaysia	Monetary stability, financial stability	“(1) The principal objects of the Bank shall be to promote monetary stability and financial stability conducive to <b>the sustainable growth of the Malaysian economy.</b> ”	2010: Bank Negara Malaysia (BNM) develops a Green Technology Financing Scheme to promote investment in the green technology industry in cooperation with the Ministry of Finance, the Credit Guarantee Corporation and the Ministry of Energy, Green Technology and Water. 2012: BNM hosts a Green Technology Financing Conference

			2017: BNM creates a Technical Working Group on Green Finance, leading to issuance of first green Islamic bond 2018: BNM becomes NGFS member
Mauritania	Price stability	“In addition, and without prejudice to the objective of price stability, the Bank shall strive to ensure the stability of the financial system and shall <b>contribute to the implementation of the general economic policies defined by the government.</b> ”	
Moldova	Price stability	“(2) Without prejudice to the primary objective, the National Bank shall foster and maintain a stable market-based financial system and <b>support the general economic policy of the State.</b> ”	
Montenegro	Financial system stability, price stability	“The Central Bank shall, without prejudice to pursuing its objectives, <b>support the pursuing of economic policy of the Government of Montenegro</b> (hereinafter: the Government), acting thereby in accordance with the principles of free and open market and freedom of entrepreneurship and competition.”	
Morocco	Price stability	“Without prejudice to the price stability objective established in coordination with the Minister of Finance, the Bank performs its functions in the <b>framework of the government’s economic and financial policy.</b> ”	2014: Bank al-Maghrib becomes SBN member 2018: Bank al-Maghrib becomes NGFS member
Myanmar	Price stability	“The Central Bank shall, in accordance with its aim, also endeavor to attain the following objectives: [...] (d) to <b>support the general economic policy of the Government</b> conducive to the sustained economic development.”	
Namibia	Monetary stability, credit and financial system stability	“(e) to assist in the attainment of national economic goals.”	
Nepal	Price stability,	“(1) The objectives of the Bank shall be as follows:- (a) To formulate necessary monetary and foreign exchange policies in order to maintain the stability of price and balance of payment <b>for sustainable development</b> of economy, and manage it; [...] (2) The Bank shall,	2014: Nepal Rastra Bank becomes SBN member

		without any prejudice to the objectives referred to in subsection (1), extend co-operation in the <b>implementation of the economic policies of Government</b> of Nepal.”	
Paraguay	Price stability, stability of financial system	“A State Central Bank, which will be a technical organization, is hereby established. It will be exclusively charged with issuing currency and, <b>in accordance with the objectives of the national government</b> ’ economic policy, will participate with other State technical organizations in formulating monetary, credit, and foreign currency exchange policies”	2016: Banco Central del Paraguay becomes SBN member
Philippines	Price stability	“The primary objective of the Bangko Sentral is to maintain price stability conducive to a balanced and <b>sustainable growth of the economy</b> . It shall also promote and maintain monetary stability and the convertibility of the peso.”	2013: Bangko Sentral ng Pilipinas becomes SNB member
Poland	Price stability	“1. The basic objective of the activity of the NBP shall be to maintain price stability, while <b>supporting the economic policy of the Government</b> , insofar as this does not constrain the pursuit of the basic objective of the NBP.”	
Qatar	State policy, Exchange rate stability	“The Bank shall act to <b>implement the general economic and developmental policy of the State</b> in a way which does not contradict the following objectives: [...]”	2018: Qatar Central Bank cooperates with Qatar Development Bank to promote sustainable investment
Russian Federation	Price stability	“The principal objective of the Bank of Russia’s monetary policy shall be to protect and ensure stability of the rouble by way of maintaining price stability, including for the creation of conditions for <b>balanced and sustainable economic development</b> .”	
San Marino	Financial system stability, protection of savings	“c. providing adequate support to the financial system of the Republic, to include <b>performing the functions of incentive and guidance</b> ;”	
Serbia, Republic of	Price stability	“Without prejudice to its objectives referred to in paragraphs 1 and 2 of this Article, the National Bank of Serbia shall <b>support the pursuance of economic policy of the Government</b> of the Republic of Serbia (hereinafter: the Government), operating in accordance with the principles of a market economy.”	

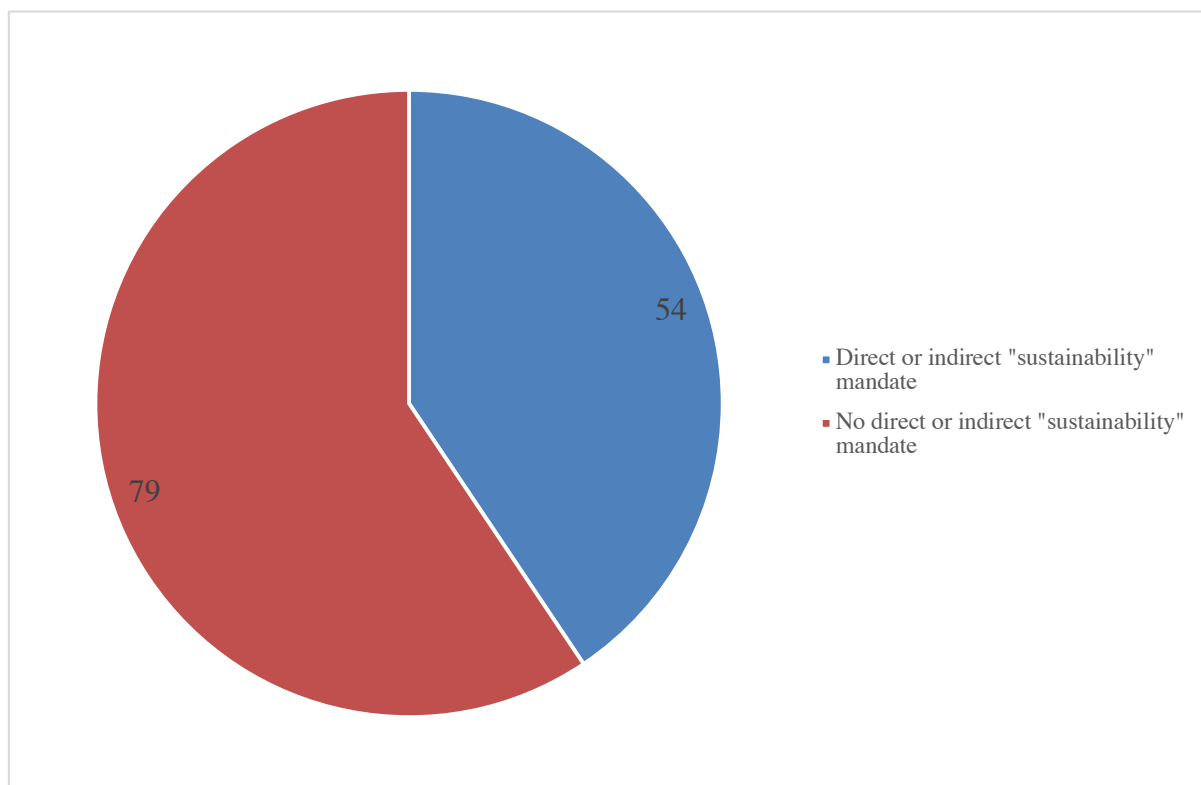
Singapore (monetary authority)	Price stability	“maintain price stability conducive to <b>sustainable</b> growth of the economy;”	2017: Monetary Authority of Singapore launches Green Bond Grant Scheme, becomes founding member of NGFS and TCFD supporter
South Africa	Price stability	“The primary objective of the Bank shall be to protect the value of the currency of the Republic in the interest of <b>balanced and sustainable economic growth in the Republic</b> ”	
Switzerland	Interest of the country, price stability	“1. The National Bank shall pursue a monetary policy <b>servicing the interests of the country as a whole</b> . It shall ensure price stability. In so doing, it shall take due account of the development of the economy.”	2016: Swiss National Bank issues Annual Environmental Report, explaining its strategy in connection with climate change
Tanzania	Price stability	“(1) The primary objective of the Bank shall be to formulate, define and implement monetary policy directed to the economic objective of maintaining domestic price stability conducive to a <b>balanced and sustainable growth of the national economy</b> . (2) Without prejudice to subsection (1), the Bank shall ensure the integrity of the financial system and <b>support the general economic policy of the Government</b> and promote sound monetary, credit and banking conditions conducive to the development of the national economy.”	
Thailand	monetary stability, financial institution system stability, payment systems stability	“To undertake the tasks in paragraph one, the implementation of economic policy of the government shall be taken into consideration.”	
Turkey	Price stability	“The Bank shall, provided that it shall not conflict with the objective of maintaining price stability, <b>support the growth and employment policies of the Government</b> .”	
Ukraine	Monetary stability	“The National Bank shall also promote <b>sustainability of the economic growth</b> and second the <b>economic policy of the Cabinet of Ministers of Ukraine</b> provided that it does not prevent the NBU from attainment of the objectives determined in the second and third parts of this article.”	

United Kingdom	Price stability, financial stability	“(a) to maintain price stability, and (b) subject to that, to support the economic policy of Her Majesty’s Government, including its objectives for growth and employment.”	2015: Bank of England (BoE) Governor Mark Carney highlights the Bank’s view on climate change 2016: BoE publishes research on climate change and central banks and organizes workshops and conferences on the subject on climate risks and financial stability; co-chairs the G20 Green Finance Study Group (renamed in G20 Sustainable Finance Study Group in 2018) 2017: BoE becomes founding member of NGFS
West African Monetary Union (WAMU)	Price stability	“Without prejudice to this objective, the Central Bank shall lend its support to the economic policies of the West African Economic and Monetary Union (WAEMU), with a view to <u>achieving sound and sustainable growth.</u> ”	
Zimbabwe	“Regulate the monetary system”	“(b) To protect the currency of Zimbabwe in the interest of <u>balanced and sustainable economic growth.</u> ”	

Source: Compiled with data from the IMF Central Bank Legislation Database, Volz (2018), Dikau and Volz (2018) and central bank websites.

An initial result is that out of 133 investigated mandates, 54 central banks and monetary unions are equipped with a mandate to either directly or potentially, through the government’s policy objective, enhance the sustainability of economic growth or enhance sustainability in general (Figure 1). The mandates of 79 central banks and monetary unions on the other hand include neither a direct sustainability nor indirect sustainability objective.

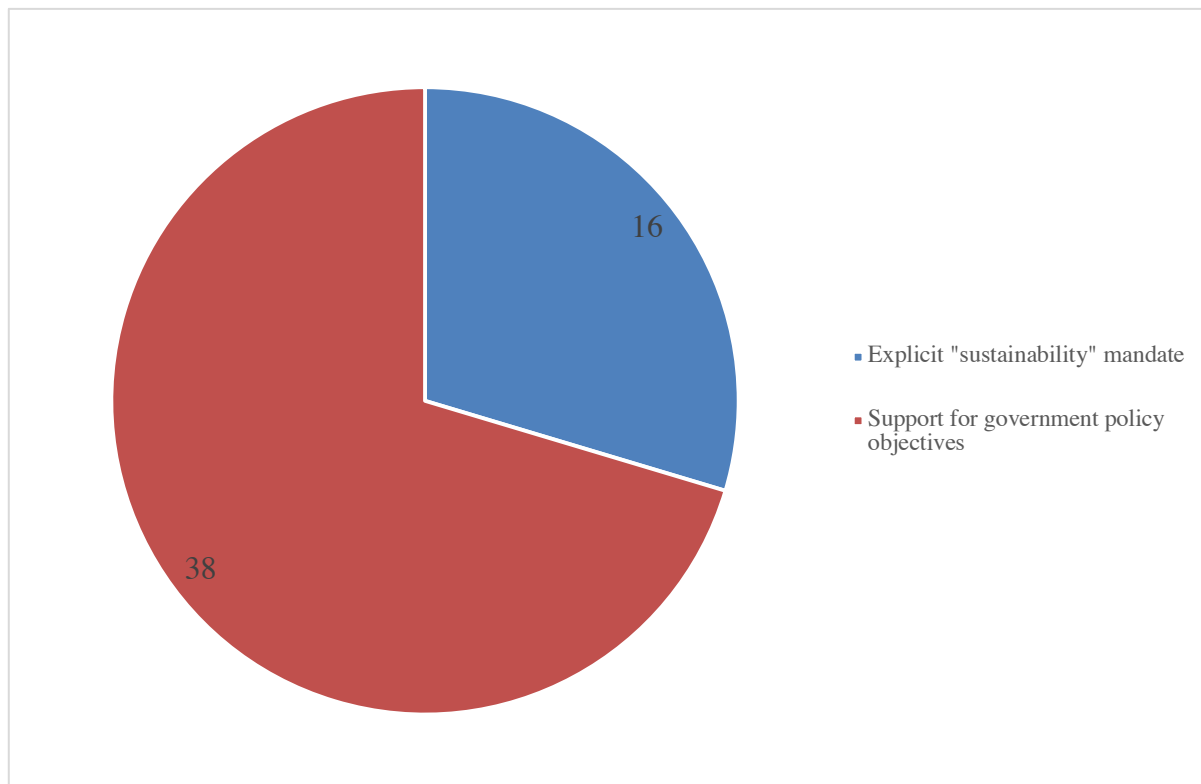
**Figure 1: Central Banks with and without “Sustainability” Mandates**



Of the 54 central banks and monetary unions with a potential sustainability objective, the central banks of 15 countries (Czech Republic, Fiji, Gambia, Georgia, Hungary, Iraq, Malaysia, Nepal, Philippines, Russian Federation, Singapore, South Africa, Tanzania, Ukraine, Zimbabwe), as well as one monetary union (West African Monetary Union, WAMU) are charged with mandates that include an explicit objective for the promotion or support of “sustainable” economic growth or development (Figure 2). In almost all cases, the pursuit of this promotional sustainability objective is subject to achieving the core objective of price stability. The other 38 central banks are mandated with the objective of supporting the government’s policy priorities. This objective is in almost all cases subject to not impeding the central bank’s ability to pursue the primary objective, which usually is price stability. The analysis also shows that a large proportion of central banks with direct or indirect sustainability

mandates are in emerging market and developing country economies, where mandates have traditionally not only been broader, but in part also included explicit “promotional” objectives.

**Figure 2: Explicit and Potential Sustainability Objectives**



While just 12% of the investigated central banks have explicit sustainability mandates and 29% are mandated to support or the government’s policy priorities and hence potentially sustainability, 59% of those investigated have no direct or indirect mandate ensuring the central bank’s engagement with climate change related topics. However, there are several other central banks whose mandates don not mention sustainability or support of government policy (which are therefore not listed in Table 1) that nevertheless have started to address climate change-related risks and sustainability challenges. These are listed in Table 2, which first presents the green activities of the respective central bank, and then their mandated core objectives.

**Table 2: Central Banks Engaged in “Green” Activities and Their Core Objectives**

Central Bank of	“Green” central banking activities	Mandated objectives
Austria (ESCB)	2018: Oesterreichische Nationalbank becomes NGFS member	Price stability, “needs of the national economy with regard to economic growth and employment trends shall be taken into account and the general economic policies in the European Union shall be supported”
Australia	2018: Reserve Bank of Australia becomes NGFS member	“a) the stability of the currency of Australia; b) the maintenance of full employment in Australia; c) and the economic prosperity and welfare of the people of Australia.”
Bangladesh	2009: Bangladesh Bank introduces green refinancing lines 2012: Bangladesh Bank becomes a SNB member 2016: Bangladesh Bank issues “Integrated Risk Management Guidelines for Financial Institutions”, green portfolio ceilings, Green Transformation Fund 2017: Bangladesh Bank issues Guidelines on Environmental & Social Risk Management for Banks and Financial Institutions	Price stability, “towards fostering growth and development of country’s productive resources in the best national interest”
Belgium	2017: Nationale Bank van België becomes TCFD supporter 2018: Nationale Bank van België becomes NGFS member	Price stability, financial stability
People’s Republic of China	2007: People’s Bank of China (PBOC), China Banking Regulatory Commission (CBRC) and Ministry of Environmental Protection (MEP): Green Credit Policy (“Opinions on Enforcing Policies and Regulations on Environmental Protection to Prevent Credit Risk”) 2016: PBOC issues Guidelines for Establishing the Green Financial System 2016: Co-chairs the G20 Green Finance Study Group (renamed in G20 Sustainable Finance Study Group in 2018) 2017: PBOC becomes a founding member of NGFS 2017: PBOC incorporates green finance into the macro-prudential assessment system, including through positive incentives for commercial banks to increase their stock of green credit and boost green deposits to supplement green credit 2017: PBOC and other ministries and commissions jointly issue a Financial Industry Standardisation System Construction Development Plan (2016–2020), including “green financial standardization” with a focus on product standards, information disclosure standards and green credit rating standards for financial institutions 2018: PBOC accepts green loans with AA rating as collateral in the medium-term loan facility 2018: PBOC issues a trial Green credit performance evaluation plan for banking deposit financial institutions, further refining the evaluation criteria for the green credit performance of banking financial institutions	Price stability “and thereby promote economic growth.”
Germany	2017: Deutsche Bundesbank becomes a founding member of NGFS	Price stability
India	2015: Reserve Bank of India introduces Priority Sector Lending – Targets and Classification	“maintain price stability while keeping in mind the objective of growth”
Jordan	2016: Central Bank of Jordan becomes SBN member	“The objectives of the Central Bank shall be to maintain monetary stability in the Kingdom and to ensure the convertibility of the Jordan Dinar, and to promote the sustained economic growth in the Kingdom in accordance with the general economic policy of the Government.”

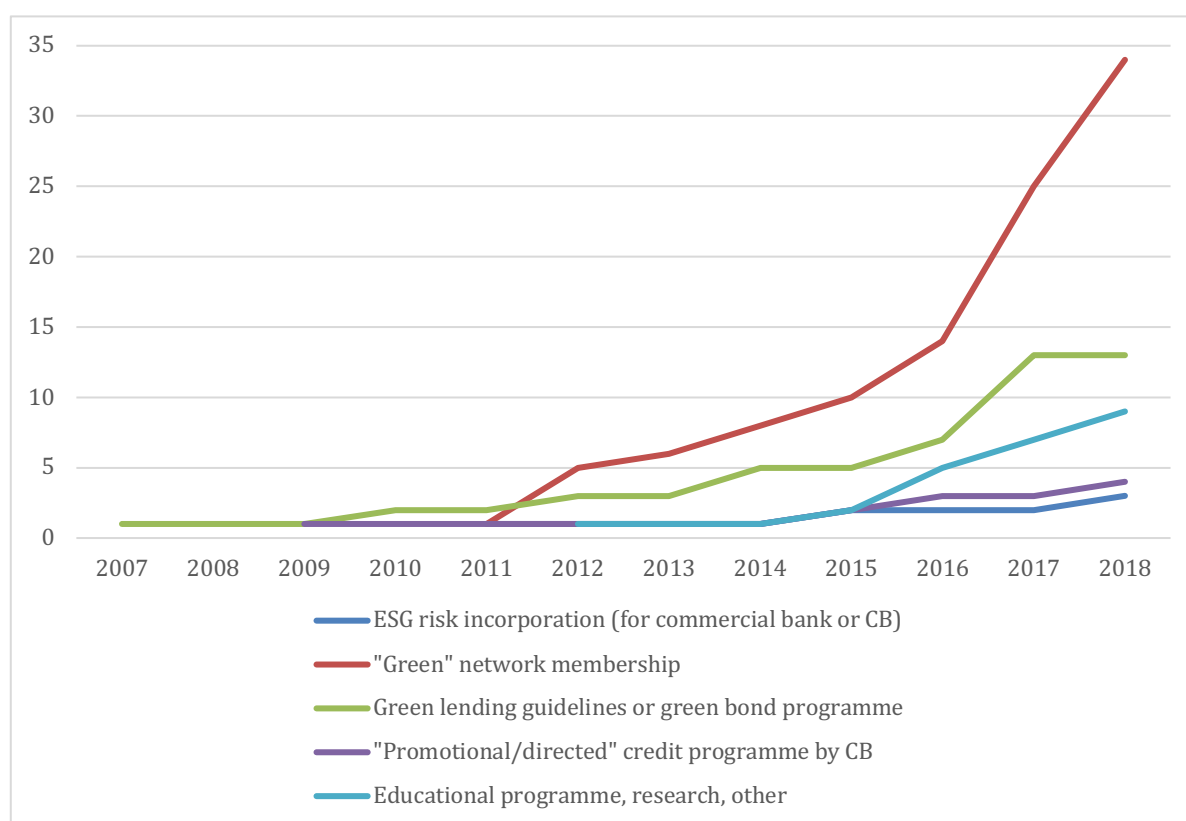


Lao PDR	2012: Bank of Lao becomes SBN member	“maintaining stability of the value of Kip and contributing to the growth and efficiency of the socio-economic development of the Lao PDR.”
Luxembourg	2018: Banque Centrale du Luxembourg becomes NGFS member	Price stability
Mexico	2017: Banco de México becomes founding member of NGFS	Price stability, “thereby strengthening the State’s guidance of national development”
Mongolia	2012: Bank of Mongolia becomes SBN member 2014: Bank of Mongolia issues Mongolia Sustainable Finance Principles and Sector Guidelines (with Mongolia Banking Association)	Price stability, “maintain[ing] the stability of financial market and banking system to support balanced development of national economy”
Nigeria	2012: Central Bank of Nigeria becomes SBN member	“Monetary and price stability”, financial stability, economic and financial advice to government
Netherlands	2014: De Nederlandsche Bank’s (DNB) mandate is updated to include “sustainable prosperity” and “financial stability,” as well as equipping the DNB with new macro-prudential instruments and tools to fulfil the task 2017: DNB becomes TCFD supporter 2017: DNB becomes founding member of NGFS 2018: DNB organizes International Climate Risk Conference for Supervisors and becomes first central bank to sign up to the UN’s Principles for Responsible Investment	Price stability
Pakistan	2015: State Bank of Pakistan becomes SBN member	“regulate the monetary and credit system of Pakistan and to foster its growth in the best national interest with a view to securing monetary stability and fuller utilisation of the country’s productive resources”
Spain	2018: Banco de España becomes NGFS member	Price stability, “(1) The public authorities shall promote favourable conditions for social and economic progress and for a more equitable distribution of regional and personal income within the framework of a policy of economic stability. They shall in particular carry out a policy aimed at full employment.”
Sri Lanka	2016: Central Bank of Sri Lanka becomes SBN member	“(a) economic and price stability; and (b) financial system stability, with a view to encouraging and promoting the development of the productive resources of Sri Lanka.”
Viet Nam	2012: State Bank of Vietnam (SBV) becomes SBN member 2015: SBV issues directive on Promoting Green Credit Growth and Managing Environmental and Social Risks in Credit Extension SBV: Action Plan of Banking Sector to Implement the National Green Growth Strategy until 2020 2017: SBV renews commitment to implementing the Green Growth Program and the Program of Preventing Climate Change	“3. The State Bank performs the state management of monetary, banking and foreign exchange (below referred to as monetary and banking) operations and performs the function of a central bank in issuing money, a bank of credit institutions and a provider of monetary services for the Government.”

Source: Compiled by authors, drawing on Volz (2018), Dikau and Volz (2018) and central bank websites.

Most of the “green” central banking activities listed in Tables 1 and 2 appear to be aimed at incorporating climate change-related risks into the financial system, as well as at mainstreaming and pricing-in more general ESG risks into the activities of financial institutions by providing them with tools, knowledge and adequate green guidelines. Furthermore, most of these policies appear to aim at enhancing the efficiency of central banks’ core objective (mostly price or financial stability) policy implementation frameworks by allowing central banks to operate in financial systems that increasingly incorporate climate risks and price in ESG criteria. Figure 3 provides an overview of the adoption of different types of “green” activities by central banks over time.

**Figure 3: Number of Central Banks that Have Adopted “Green” Activities (by Type)**



Importantly, Table 2 shows that several central banks address climate change-related and ESG risks even in the absence of explicit sustainability mandates. For instance, not all central banks that have joined the NGFS have an explicit or potentially implicit sustainability objective in their mandate. However, all central banks that are members of the NGFS have explicitly accepted climate change risks as a source of financial risk and have hence concluded that ensuring the financial system’s resilience towards these risks lies within the mandates of central banks and

financial supervisors (NGFS 2018). This highlights an important point: central banking activities depend in practice not only on the formal mandate but also its interpretation, which can be ambiguous. In the following, we illustrate the interpretation of mandates relating to climate risk and sustainability for three cases, namely the European System of Central Banks (ESCB), the Bank of England, and the Dutch central bank.

In the case of the Eurozone, Article 127 (1) of the Treaty on the Functioning of the European Union clearly defines price stability as the primary objective of the ESCB. However, it also states that “[w]ithout prejudice to the objective of price stability, the ESCB shall support the general economic policies in the Union with a view to contributing to the achievement of the objectives of the Union as laid down in Article 3 of the Treaty on European Union.” Article 3 (3) of the Treaty on European Union in turn includes the objective of “sustainable development of Europe based on balanced economic growth and price stability, a highly competitive social market economy, aiming at full employment and social progress, and a high level of protection and *improvement of the quality of the environment*” (emphasis added). This means that the ESCB’s mandate does indeed include, inter alia and without prejudice to the objective of price stability, supporting the European Union’s environmental objectives (Volz 2017). This opens up the question to what extent the political authorities and the public at large want the ESCB to play an active role in supporting environmental objectives. As the current discussions in the Eurozone show, it is not solely up to the central bank to interpret its mandate – ultimately, central bank policies need to be based on public and political support.

Recent research has begun to explore in more detail the Eurozone’s ability to promote environmental protection (Solana 2018) and, in particular, the policy space created by the ECB’s mandate for green monetary policy (Fischer 2018). Benoît Cœuré, a Member of the Executive Board of the ECB, has also addressed the underlying question of whether environmental issues are part of the ECB’s mandate, arguing that while the Treaty mandates the protection and improvement of the quality of the environment, it also opens up the question of “why the ECB should not promote industries that promise the strongest employment growth, irrespective of their ecological footprint” (Cœuré 2018), thereby pointing to potentially conflicting objectives outside of the ECB’s core functions. On the issue of how climate change affects the conduct of monetary policy, Cœuré (2018) reasons that it may “complicate the correct identification of shocks relevant for the medium-term inflation outlook, [...] increase the likelihood of extreme events and hence erode central banks’ conventional policy space more often, and [...] raise the number of occasions on which central banks face a trade-off forcing them to prioritise stable prices over output” (Cœuré 2018). However, Cœuré argues

that generally, “there is scope for central banks themselves to play a supporting role in mitigating the risks associated with climate change while staying within [their] mandate” (ibid.). Furthermore, with regard to the threat of material climate-related risks, the ECB states that while it does not see that these risks pose a threat in the short-term for financial stability in the euro area, banks may be indirectly but substantially affected by “more frequent and severe extreme weather events or by the ongoing transition to a low-carbon economy” (ECB 2018: 5).

The Bank of England provides an example of a central bank whose mandates has no explicit references to sustainability and which has been accused of over-stepping its mandate by addressing climate change challenges. The Bank of England’s pro-active stance towards addressing climate-risks has been condemned by a few of being part of the bank’s “mission creep” of offering warnings on topics some consider too political for the institution (Binham and Crow 2018, Crow and Binham 2018). However, Bank of England Governor Carney strongly maintains that the Bank considers it a central part of its responsibility to identify, warn against and mitigate any kind of threats to financial stability, including those from climate change related risks; Carney “bristled at suggestions he was overstepping the mark by asking banks to do more to model climate risks, from the impact of floods on their mortgage books to whether new green policies could hurt the creditworthiness of their corporate clients” (Crow and Binham 2018). With regard to the Bank’s approach to mitigating climate risks or greening the financial system, Carney has voiced his distaste for a “surreptitious” approach or implicit guidance through central bank soft power and “against lowering capital requirements for a bank if they invest in a green project per se” (ibid.). Instead, Carney voiced support for explicit climate change-related regulation or carbon pricing.<sup>2</sup> Regarding a “promotional” role in enhancing green climate policy, Carney points to the limits of the mandated role of central banks, which, he claims, cannot “substitute for governments in climate policy” (Crow and Binham 2018).

The case of the De Nederlandsche Bank’s (DNB) mandate and objectives offers further insights into the complexity of assessing a central bank’s “green” role based on its legal objectives. As part of the ESCB, the DNB’s objectives and tasks are determined by the same provisions of the treaty that determine the mandates of all national EU central banks, namely, price stability,

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<sup>2</sup> Governor Mark Carney compared the Bank of England’s plan to stress tests the balance sheets of the largest UK banks against potential threats from climate change in order to assess the adequacy of capital to hold off a shock with “the traditional “eyebrow raise” governors would use to signal their displeasure at certain banking activity in the past” (Binham and Crow 2018).

support for the general economic policies in the EU and to act in accordance with open market principles (DNB Bank Act 1998, section 2). Despite the absence of “sustainability” from its statutory act, today the DNB is widely credited for having formally integrated sustainability into its operational framework. This was due to the deliberate decision in 2011 by the then newly-appointed board of the DNB to update the central bank’s mission statement at the time (Knot 2018). Against the background of the Financial Crises in 2008, financial stability was considered by the DNB’s board to be a necessarily central pillar of its mission statement in order to differentiate a new approach from the pre-crisis one, the latter of which had proved to create “prosperity [that] had turned out not to be sustainable” (ibid.). The DNB’s mission statement, both as a central bank and financial supervisor, since 2011 hence requires the DNB “to safeguard financial stability and thus contribute to sustainable prosperity in the Netherlands” (ibid.). However, the term “sustainability” was not necessarily connotated at the time with the same meaning it has today with regard to climate change and greening of financial systems (ibid.). Nonetheless, this has led the DNB to incorporate sustainability considerations in most of its core operations, including in economic research (Knot 2018). Furthermore, the DNB recognises the necessity to contribute to sustainable development (Knot 2015). While the DNB is careful to emphasise that “as a central bank and supervisor, we must not overstretch our mandate”, it does consider ways to “impact investment decisions and credit allocation” and help “transform the financial infrastructure” to take into account the transition to a low carbon economy to fall under its mission of “safeguarding sustainable prosperity” (Elderson 2018).

### **3. Central Banking and Climate Change – Theoretical Considerations<sup>3</sup>**

The above analysis has not only shown significant differences in central banks’ mandates. It has also revealed large differences in practice in how central banks have started to address climate related concerns. Against this background, this section first considers how climate change risks and mitigation relate to central bank mandates and how these new challenges and potential responsibilities fit into conventional policy frameworks and affect the traditional core responsibilities of central banks. It subsequently discusses the second, more contentious dimension of green central banking – i.e., an active contribution to a greening of the financial system and the economy as a whole by central banks. The distinction between core and promotional objectives in central bank mandates also relates to a recognition of the different

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<sup>3</sup> This section draws on Dikau and Volz (2018).

time horizon of objectives, as well as to the broad differences between advanced and emerging and developing countries. In the latter, central bank mandates have tended to include promotional objectives more often.

### **3.1 Central Banks' Core Objectives and Climate Change**

A first question concerns the mandated objectives and governance arrangements required for the effective conduct of core monetary policy functions given the risks and policy challenges posed by climate change. The core responsibility of most central banks – often specified in the mandate as the singular or primary objective of monetary policy – is safeguarding low and stable inflation. Sometimes embedded in an inflation-targeting framework, this primary focus of central banks on price stability is based on the strong empirical evidence that in the short-run, high inflation (and high volatility) distort the decision-making process with regard to savings, investment and production and hence slows economic growth (Fischer 1993). Low and stable inflation is therefore understood to be a necessary precondition for growth or development to take place. Apart from maintaining low and stable inflation, safeguarding financial stability has traditionally been the other important concern for central banks, which, throughout history, have acted as lender of last resort. Although there was a trend since the 1990s to assign responsibility for financial stability to dedicated financial regulatory authorities, it has received renewed attention as a crucial central banking objective against the background of the Global Financial Crisis. As discussed, a further (often secondary) goal of central banking is supporting wider economic policy objectives such as sustainable growth or, in some cases, maximum employment. A strong argument for central banks to take environmental factors into account in the conduct of monetary policy in the pursuit of their core objectives can be derived from how these central goals are affected by climate change and other environmental risks.

Prices and price variability, which are at the centre of attention of most central banks, could be affected through various channels by anthropogenic climate change and an associated increase in the frequency and severity of extreme weather events. To start with, climate change may have a significant impact on agricultural production, both domestic and abroad, and hence on food prices, which are an important component of consumer price inflation. For instance, climate change-related droughts and floods may have a significant impact on agricultural output and cause supply shocks and hence rising prices and cost-push inflation. For economies in which agricultural production is a central pillar of the economy – which is often the case in

developing economies – climate change effects on the agricultural sector may also have a broader impact on aggregate income and employment. More broadly, climate change can lead to supply-side shocks that may cause a trade-off for central banks between stabilising inflation and stabilising output fluctuations (Cœuré 2018). For instance, natural hazards may destroy production capacity, while extreme temperatures may lead to productivity shocks. These can cause pressure on both input and output prices.

While a first concern is how climate change-related hazards may directly affect prices, a second issue of concern is the potential impact of climate-change-mitigation policy on inflation. An important issue in this context is the potential impact that climate-change-mitigation policies may have on energy production and prices (Volz 2017). McKibbin et al. (2017) discuss how different climate change policy regimes – carbon policies such as a carbon tax, a permit trading system, and other regulatory measures – could theoretically affect different monetary policy regimes. In a scenario where the introduction of a carbon tax causes aggregate output to decline and inflation to spike, no response by the central bank would yield a permanently lower output level and no change in the long-term growth rate. In the case of a strict inflation-targeting regime, the central bank would respond to the spike in inflation by raising interest rates, thereby further slowing the economy, but also causing exchange rate appreciation. While both would have a depreciating effect on inflation, the overall decline in output would be worse than in the case without central bank intervention. McKibbin et al. also discuss implications for other monetary policy regimes, including flexible-inflation targeting and price-level targeting, and come to the overall conclusion that solely responding to the inflationary component, without taking rising prices and decreasing output resulting from climate policy into account, may lead to unnecessarily large output losses. Monetary policy therefore has to consider climate-related effects on food or energy prices, as well as the impact of climate mitigation policies because of potentially important implications for core inflation.

To the extent that environmental damages and climate-related risks affect the stability of banks, insurance firms and other financial actors, they need to be of concern for central banking. Thus far, only a few central banks and financial regulators have been concerned with environmental risk, and even fewer have considered it as part of their systemic risk framework, even though risks arising from climate change can constitute a significant systemic risk for the financial sector and economies at large (Volz 2017). However, a broad consensus is emerging that climate change and related mitigation policies will have substantial repercussions on the functioning of economies and hence, financial systems (Bank of England 2015; Carney 2015, Monnin 2018).

Three different types of risk through which climate change may affect financial systems have been identified: transitional risk, physical risk, and liability risk (Carney 2015). Transitional risk describes the uncertainty associated with policy, price, and valuation changes that may occur in the process of mitigating climate change and reducing carbon emissions. International goals, such as limiting global warming to two degrees, will require powerful policy initiatives, such as the introduction of carbon taxes or extensive environmental regulation, which will affect the valuation of carbon-intensive businesses and may render assets of coal, gas, and oil companies less valuable with potential systemic repercussions in case these policy changes have not been priced in. Volz (2017) also discusses the development of new technologies in the process of climate change mitigation that may render existing technologies redundant, and the associated revaluation of assets, as a potential source of financial instability, which, if they do not occur in a gradual manner, may have systemic implications. Physical risk describes the risk of natural hazards, such as floods and storms, which may cause direct damages to an economy, as well as indirectly through the disruption of global supply chains. Climate-related damages and risks are understood to be potentially significant and to not only cause disruptions for individual firms or sectors, but also have systemic repercussions for the economy and therefore, financial stability. Increasing levels of physical risk can be expected to have particularly large repercussions for the insurance sector. As recognized by the Bank of England (2015), climate change-induced and other vital environmental changes therefore have clear implications for central banks because they may negatively affect the stability of financial institutions and systems. Pricing in physical risks is an essential step in avoiding these negative repercussions for the economy and seems especially crucial for the valuation of long-term investments. Thirdly, liability risk describes climate or environmental risks that occur from uncertainty surrounding potential financial losses and compensation claims stemming from damages caused by climate change related natural hazards (Bank of England 2015; Carney 2015). For instance, agents may seek compensation for financial damages from carbon extractors or emitters and environmental polluters, creating repercussions for the insurance sector and hence, for central banks that provide third-party liability insurance (Bank of England 2015).

An important aspect of the role of central banks in addressing climate risks relates to the time inconsistency problem. Unlike government, central banks are well positioned to solve time inconsistency problems by committing to medium term policies, usually low and stable inflation, that would allow for a maximum of sustainable growth. Given the nature of climate change, the sustainability agenda is extending time horizons for economic policies, which



essentially implies that policy makers ought to maximise the sustainable growth rate not just over a business or credit cycle but over (at least) a generation (Fisher 2018). Central banks are uniquely placed to address the time inconsistency problem. Of course, it will be crucial not to lose focus on monetary and financial stability – which are indeed necessary pre-requisites for long-term sustainability policies.

Overall, a consensus has been emerging in the central banking community that climate change-related natural disasters can create and intensify risks to the stability of the financial system, and that potential disruptions from climate change ought to be analysed and considered by central banks, especially if central banks are responsible for safeguarding financial stability (Bank of England 2015; Carney 2015; NGFS 2018).

### **3.2 “Promotional” Objectives**

The second dimension of green central banking – an active contribution to a greening of the financial system and the economy as a whole – has been more contentious. Promotional objectives generally address long-term targets for central banks, such as economic development or growth, the promotion of sustainability and, theoretically, also the greening of the economy or climate change mitigation. First coined by Keynes (1993) in the context of central banking in the developing country context, promotional objectives have historically usually only explicitly been stated in the statutes of central banks in emerging and developing countries, while having remained absent from those of advanced economies’ central banks, where, at most, promotional objectives were informally and implicitly conveyed.

Theoretically, central banks have numerous powerful tools at their disposal to affect credit allocation and the investment behaviour of financial firms.<sup>4</sup> Whether and to what extent a central bank should use its powers and actively engage in “greening” the financial system and the economy depends on two factors: its legal mandate, and the extent to which it is best placed to correct certain types of market failures, considering the ability and suitability of other policy institutions to steer the green transformation (Volz 2017).

For central banks to assume an active “greening” role, an explicit legal mandate is required to pursue environmental and sustainability objectives, given the potentially distributive consequences. As discussed in Section 2, central banks in most of today’s advanced economies have a relatively narrow mandate with a primary objective of pursuing price stability and, in some cases, financial stability. As just discussed, such narrow mandates arguably require

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<sup>4</sup> For an overview, see Volz (2017) and Dikau and Volz (2018).

central banks to explore climate and environmental risks with regard to these core goals, but they do not mandate them to go further and to actively promote sustainability and green finance. In many developing and emerging economies, central bank mandates are more comprehensive and include sustainability, as well as social and economic objectives. This is reflected by the fact that central banks in many developing and emerging economies have been comparatively more active in promoting green finance and sustainable development, as discussed above. In specific circumstances, there may be indeed good reasons why central banks should be mandated to play a promotional role with regard to green finance and sustainability (if they aren't already). We will discuss these reasons in the following, before turning to potential risks and trade-offs in Section 4.

Achieving the global climate targets will not only require the financial sector to play a central role in financing sustainable and green investment, but also to curb funding for environmentally harmful activities. In the absence of public intervention, banks and other financial institutions may allocate their resources to environmentally and socially undesirable activities, such as carbon-intensive or polluting ventures in order to maximize their private returns. This discrepancy between environmental and social returns, and private returns represents a market failure or imperfection that may call for efficiency-enhancing government intervention. That free markets do not necessarily yield Pareto-efficient allocations has been investigated by Greenwald and Stiglitz (1986), based on the understanding that if information is incomplete or asymmetric, or when markets are incomplete, outcomes may not be efficient and can be improved through government intervention. With regard to the allocation of credit, Stiglitz (1994) discusses an efficiency-enhancing role of credit policies based on the assumption that the private returns of commercial bank lending are not necessarily congruent with social returns. He argues that in order to overcome these discrepancies between private and social return, directed credit, restricted lending to some activities, and promoting investment in others may be justified. With regard to sustainable growth and green finance, externalities that cause an environmentally suboptimal allocation of credit by commercial banks and other market participants may call for a more active, market-correcting role of central banks. Nonetheless, intervention by the central bank conceptually constitutes a second-best solution to the problem of market imperfection. The preferable first-best solution would be the removal of the market failure. For instance, a carbon pricing mechanism that internalizes the social costs of carbon emissions would constitute a preferred, first-best, market failure-correcting policy that may prevent or dis-incentivize environmentally undesirable investment; the problem, however, is that such first-best policies may not always be politically feasible or may take a long time to

establish (Volz 2017). In the case where the optimality conditions of fixing market failure cannot be satisfied, the intervention of the central bank through environmental financial regulation or the interference into the allocation of resources can be interpreted as a second-best solution based on the theory of the second best by Lipsey and Lancaster (1956) (Volz 2017). In practice, second-best policies could be implemented by mandating central banks to address such externalities by affecting the creation and allocation of credit.

Central banks and other financial regulatory authorities can influence investment decisions and the allocation of resources and credit through a number of different policy implementation instruments. Their regulatory oversight over money, credit, and the financial system puts central banks in a uniquely powerful position that enables them to incentivize or direct resources away from carbon-intensive sectors and towards green investment. Especially in developing countries, central banks typically have a strong institutional standing that enables them to shape policy outcomes in ways that other public institutions, such as environmental ministries, are unlikely to achieve. However, given their power, the points made about central banks' mandate and accountability discussed above are very important.

Historically, credit allocation policies and various other instruments of “financial repression” were widely used and have led in many cases to substantial distortions of financial systems with often unwanted repercussions for savings and prices; in many cases, the consequence was the underdevelopment of financial markets. While the historic success or failure of credit allocation and financial repression policies is subject to on-going debate, such instruments stand in strong contrast to the widely accepted notion of the neutrality of monetary policy and central banks in general towards different investment classes, sectors, or types of firms. Allocating financial resources towards or away from certain sectors and companies implies favouring certain segments of the economy over others and appears to be incompatible with our modern understanding of independent central banks. Nonetheless, many central banks in emerging and developing economies have resorted to these policies as viable, second-best solutions to promote sustainable development and green investment. The notion of the neutrality of monetary policy has come under intense scrutiny more recently, not least in the context of discussions about the distributional consequences of the negative interest and quantitative easing policies adopted by major central banks.

Another kind of market failure involves missing or incomplete financial markets that impede the trading of different forms of credit, assets, or risks (Volz 2017). While central banks most certainly have a role to play in financial market development and in establishing primary and secondary markets for securities, as well as money and exchange markets where none exist

(Gray and Talbot 2007), they may also be in a position to aid development of new green market segments by, for instance, creating a regulatory environment that promotes green bonds issuances and trading in secondary markets.

#### **4. Risks and Trade-offs**

While the paper has argued thus far that there may be a case for a pro-active, “sustainable development role” of central banks, one needs to be clear about the risks of overstressing central banks’ mandates. Two risks are particularly important.

First, on a functional level, central banks will encounter problems if they are supposed to achieve too many objectives and have too few tools – this is the so-called Tinbergen rule (Volz 2017). In principle, if central banks were tasked with environmental goals, they would need to be equipped with effective instruments in order to achieve these goals without compromising other goals. It should be noted though that the financial and macroeconomic risk challenges stemming from climate change discussed above are issues central banks have to deal with in any case. That is, as far as the traditional core responsibilities of central banks – safeguarding macroeconomic and financial stability – are affected, there is no need to add environmental goals to central banks’ mandates as these are implicitly already part of the mandate. Yet, it will be critical to analyse in detail how environmental and climate change risks can be adequately incorporated into existing frameworks. Recent years have seen considerable efforts by central banks and academics to develop macroprudential frameworks and instruments (e.g., Mendoza 2016). The understanding of how to best incorporate climate risk into macroprudential analysis is still at an early stage, but a consensus seems to be slowly emerging that climate and environmental risks need to be addressed in financial supervision and regulation to the extent that they pose material risk to the financial sector. At the same time, the extent to which central banks should use tools at their disposal to play a pro-active sustainable development role to promote green investment and dis-incentivize dirty investments is still heavily disputed, and there are indeed concerns that promoting specific sectors such as the green economy may cause conflict with other central bank goals, including financial stability.

Second, there is a danger that too much power may be extended to unaccountable institutions. Since the 1980s, a relatively broad consensus has developed that central banks should be granted institutional independence, i.e., the conduct of monetary policy in pursuit of goals set by the government should be free from political influence. As central bank policies have adopted unconventional monetary policies in the post 2008-crisis era, they have faced

increased criticism for taking policy decisions that critics say go beyond their mandate. For example, a quasi-fiscal role of central banks is widely considered problematic as central banks have no political legitimacy for taking decisions about the allocation of public spending. Still, it is important to recognise that monetary policy has always distributional consequences and that central banking cannot be reduced to a purely technical exercise. One way of addressing this issue is by improving central bank accountability, for example by enhancing reporting requirements.

Central banks need to create the legitimacy of their actions through clearly communicating their assessment of the risks and the rationale for their policy actions. Otherwise, they may be at risk of losing their independence (Eichengreen et al. 2011). As highlighted by Groepe (2016: 1), “the biggest risk to central bank independence is the possible backlash from being unable to deliver on unreasonable expectations. Central bank mandates have expanded – perhaps appropriately so – but there are limits to what monetary policy was designed to achieve. Central banks cannot be, and should not be regarded as, “the only game in town”.” Indeed, there is a danger that “governments, parliaments, public authorities, and the private sector assume central bank policies can substitute for the structural and other policies they should take themselves” (G30 2015: xii).

## **5. Conclusions**

Our empirical investigation has shown how central bank mandates relate to green activities of supporting sustainable growth, mainstreaming green finance or incorporating climate-related risks into core policy implementation frameworks. We show that on the one hand, around 40% of the investigated central banks and monetary unions are already mandated to either enhance the sustainability of growth and development or to support the government’s potential sustainability policy objectives. ESG criteria would not have to be added to the mandates of these institutions. On the other hand, while 60% of central banks have no direct or potential sustainability objectives, several of them have nonetheless started to engage in various green activities. However, most of these activities aim at incorporating environmental and climate change related risks into the core policy implementation frameworks under the objectives of price and financial stability. As we show, climate risks may directly impact on traditional core responsibilities of central banks, most notably monetary and financial stability. As a consequence, an integration of ESG factors into central bank’s core policy implementation frameworks may not only be necessary to efficiently and successfully safeguard price and

financial stability, in such cases it would be also covered by mandates that make no explicit reference to sustainability. A potential role of central bank in promoting sustainability in the financial system and “greening” the economy is more contentious because of the possible distorting effects of such policies. It therefore is crucial that such a potential promotional role of the central bank is covered by the mandate.

While central banks have a potentially large number of instruments to affect the allocation of capital towards green investment, this does not imply that they should necessarily be tasked to do everything they possibly could. Starting with existing central bank mandates – which differ across countries/monetary areas – and also taking into consideration different central banking traditions, a discussion is needed about the extent to which central banks should support their respective government’s sustainability policies. The outcomes of such deliberations are likely to differ across countries and will be contingent also on institutional legacies (Johnson 2001; North 1990). The path-dependent nature of institutional change, which includes also cultural patterns, requires that institutional traditions are taken care of so that resistance to change does not undermine attempts at institutional redesign.

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