

Greening China's Belt and Road Initiative: From Norm Localization to Norm Subsidiarity?

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Abstract

From 2015, China began to promote eco-sustainability in the Belt and Road Initiative (BRI) through not only vision statements but also specific guidelines and governance initiatives. What has driven these policy changes? Bringing together theories of norm localization, norm subsidiarity, and policy deliberation, we argue that China's move toward green BRI began as a norm localization process where environmental norms emerged in the open policy space created by China's top leaders carrying the ambition to make the BRI a new global governance model. After adopting a broad norm on environmental stewardship, state bureaucracies found opportunities to create procedural and operational rules. A novel procedural rule-making methodology emphasizing inclusive dialogue with host countries has emerged, driven by top leaders' pursuit of international leadership and preexisting local norms guiding South-South cooperation. With operational rules, different actors follow their preferences to localize existing international standards or develop new ones.

In 2013, the Chinese government launched the Belt and Road Initiative (BRI) as a platform for global and regional cooperation focusing on infrastructure development, trade, finance, policy coordination, and people-to-people exchange. Since then, many researchers have raised concerns regarding negative environmental impacts of large-scale infrastructure development brought by the initiative and stressed the need for China to introduce stronger regulatory frameworks that promote ecological sustainability (hereinafter "eco-sustainability") within the BRI (Ascensão et al. 2018; Lechner et al. 2018). Since 2015, China has made

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many efforts to govern the BRI's environmental impacts, which are reflected at three levels, including setting broad policy goals, developing governance methodologies, and making operational rules and standards.

First, the central government published several high-level documents, most notably the "Visions and Actions on Jointly Building Silk Road Economic Belt and 21st Century Maritime Silk Road" (2015) (hereinafter "Visions and Actions"), that show the goal to treat environmental stewardship as an indispensable target of the BRI (Coenen et al. 2021; Zhou et al. 2018). Second, regarding the methodology to design substantial rules and policies, China has stressed a "dialogue-based" approach, anchored on inclusive collective deliberation and innovation by China, host countries, and other international stakeholders (Tao 2020). A typical example of this approach is the BRI International Green Development Coalition (BRIGC), a policy dialogue platform cohosted by the Ministry of Ecology and Environment (MEE) and international partners from both the Global South and the Global North. By emphasizing the voices of and cooperation between developing countries, providing host country governments with opportunities to participate in the decision-making processes, and allowing flexibility in the rule adoption, this rule-making methodology differs from that of the West.¹ Third, at the operational level, we are observing debates and uncertainties regarding some critical issues for environmental governance of the BRI, such as new areas of cooperation, standards for project design and implementation, and rules of development financing.

Hence, Beijing's green BRI policy seems not just a rhetorical strategy. Instead, by building new institutions and redesigning projects, China has made a clear shift in policy. China's rapid move toward green BRI seems to contrast with the limited attention it had given to environmental impacts of its overseas activities in the past. Through the lens of constructivist international relations theories, Beijing's move toward green BRI can be seen as a process of engagement with norms regarding appropriate ways to govern environmental impacts of international development cooperation and investment adopted by Western actors like the World Bank and the Organization for Economic Co-operation and Development (OECD) (Park 2005).² In this process of normative engagement, Chinese policy makers have not only adopted key elements of some international norms—a "norm localization" dynamic—but also actively incorporated Chinese ideas, a "norm subsidiarity" dynamic (Acharya 2011).

What has led China to gradually develop this green BRI policy, which concerns not only the import of existing environmental norms but also attempts to construct new ones? We argue that different types of norm dynamics exist in three phases of China's green BRI policy. Initially, the green BRI development

1. Although Western donors and multilateral institutions have adopted the "ownership principle" in the project design since 2005, the processes of making environmental and social safeguards have remained top-down, with limited input from developing countries.
2. By "norms," we refer to a standard of appropriate behavior for actors with a given identity (Finnemore and Sikkink 1998).

was driven by the localization of the international norm on environmental stewardship due to Chinese top leaders' ambition to make the BRI a flagship program of international cooperation; after this broad goal had been set, the norm subsidiarity dynamic kicked in, which was largely driven by top leaders' strategic ambition and preexisting local norms guiding South–South cooperation; and finally, for the development of operational rules and standards, different bureaucracies have followed their preferences to localize existing international norms or develop new norms.³

We proceed as follows. After reviewing the literature on green BRI, we introduce our analytical framework building on Acharya's (2011) framework of norm localization and norm subsidiarity. Considering China's political context, we further stress the importance of local deliberation—a process of collective policy deliberation among top leaders and political actors in functional areas—in triggering the localization dynamic and (potentially) transforming the localization dynamic into the subsidiarity dynamic. We then conduct a theory-guided process-tracing study on the evolution of China's efforts to green the BRI. By unpacking the logic of China's green BRI policy, we advance understanding of China's strategy for governing environmental impacts of its global activities and also China's engagement with international environmental norms.

Literature on Environmental Governance of the BRI

The rapid expansion of the BRI has generated many studies by environmental scientists to identify the scope and location of BRI projects and assess their biodiversity and climate impacts (Ascensão et al. 2018; Hughes 2019; Ng et al. 2020). In comparison, the question of how China governs environmental impacts of its overseas activities under the BRI has been rarely examined in the literature. Among a few studies, some indicate the lack of capacity and knowledge for the Chinese government to measure and monitor environmental risks (Hale et al. 2020); others highlight the lack of binding environmental policies in China's regulations for overseas investments (Gallagher and Qi 2021; Harlan 2021). However, given that the Chinese government has made a significant effort in greening the BRI since 2015, it is important to understand the political dynamics that have made this major policy shift possible.

Two broad explanations of China's move toward green BRI can be drawn from existing discussions. First, from an international relations perspective, some argue that China's position has been driven by criticisms from outside, including from actors in both the West and in host countries of BRI projects (Coenen et al. 2021; Jiang 2019; Lee 2021). This argument is plausible but cannot fully explain China's recent policy changes. As we will show, international

3. Herein we seek to explain norm dynamics underpinning China's green BRI policy, instead of the policy's effects. While recent evidence shows that China has significantly reduced its overseas investment in high-polluting projects, it is too early to identify the causal impacts of the green BRI policy on such changes.

pressure on the environmental governance of China's international development cooperation (IDC) and overseas investment emerged long before the launch of the BRI, but no major policy changes took place during that time. Moreover, if China's policy is driven by host countries' rising environmental concerns, Beijing can simply better monitor Chinese companies' compliance with host countries' environmental regulations, rather than developing a comprehensive governance system. Therefore, one must pay greater attention to the dynamics of policy development within China.

Second, considering domestic drivers of green BRI policy, one may argue that China's efforts simply align with the country's recent ambition to lead global environmental and climate governance (Finamore 2018; Shen and Xie 2018). We agree that strategic ambitions served as a powerful force driving the green BRI policy, but it falls short in explaining the development of specific norms. In addition to Beijing's political motives, it may also be in China's economic interests to build a green BRI by promoting strategic industries, such as renewable energies, and preventing Chinese overseas investments from becoming stranded assets (Gallagher 2018). However, as green industries have become a pillar of China's economic development only recently, their political influence cannot be overstated (Shen and Power 2017). This explanation also cannot shed light on key features of the system that China has built to govern the BRI's environmental impacts.

All in all, the existing research cannot fully explain what has driven Chinese policy makers to develop the green BRI policy. To fill this gap, we need to draw on theories of norm dynamics and social learning and conceptualize the Chinese government's efforts to green the BRI as an evolving process, involving dynamic interactions among different actors.

Theoretical Framework: Between Norm Localization and Norm Subsidiarity

As China's development of green BRI is based on interactions between local and global norms, constructivist international relations theories on norm diffusion are a useful analytic tool to answer our research question. While early theories focused largely on how international norm entrepreneurs spread existing norms (i.e., displacing local norms) by pressuring, teaching, and persuasion (Finnemore and Sikkink 1998), Acharya's (2004) norm localization theory improves our understanding of local norm dynamics by emphasizing local norm takers' agency and creativity. That said, the localization theory still does not cover all the possible trajectories of local norm change. Another type of local norm dynamic can exist: even when orthodox local norms collapse, local actors can still creatively "re-construct foreign norms" using local knowledge and thus "shape the emergence of new norms" (Pu 2012, 349). This dynamic is labeled "norm subsidiarity" in Acharya's (2011) later work. Building on the understanding of these two types of norm dynamics, we further argue that localization and

subsidiarity dynamics can take place in a sequence. This is especially possible in functional areas where a package of norms can be divided into general goals, procedural norms, and operational norms (Yu 2019). Accordingly, local actors may adopt only general ideas about an issue (e.g., environmental stewardship for overseas activities) but then try to incorporate local ideational elements while developing operational norms (e.g., specific rules to guarantee eco-sustainability in project design and implementation).

If local actors have the agency to choose between localizing international norms and making subsidiary norms, what determines their choices? Drawing on literature on cognitive evolution (Adler 2019) and policy deliberation (Yu 2022), we argue that what makes the transition between the two norm dynamics possible is local actors' collective deliberation (referred to as "local deliberation"). This deliberation process can be a trigger for localization and also a powerful engine driving actors to create new norms.

Local deliberation is a mechanism of local norm change centered on local communities. Therefore, it is helpful first to identify key actors in China's policy community under our investigation (see Figure 1). In China's decision-making

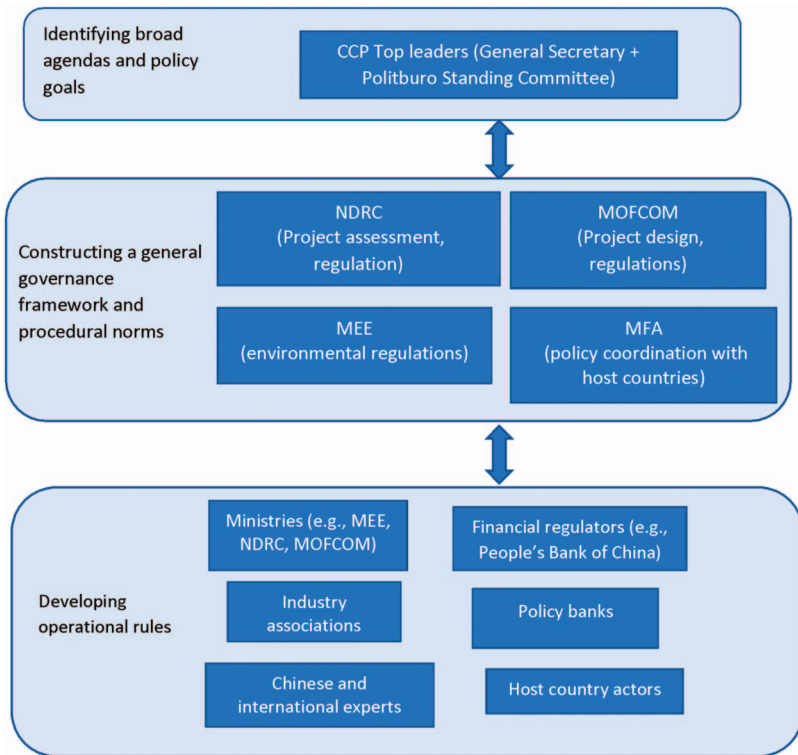


Figure 1
Policy Circle for the BRI

processes, the Chinese Communist Party's (CCP) top leaders hold the ultimate decision-making authority on state affairs. However, they tend to provide broad slogans or formulations on national agendas and let bureaucrats at national and subnational levels identify ways for policy implementation (Ang 2016; Stern and O'Brien 2012). Although Xi Jinping has significantly recentralized his power, this policy-making model continues to dominate in the BRI, which is characterized by vision setting at the top and rule-making by functional bureaucracies, including the National Development and Reform Commission (NDRC), the Ministry of Commerce (MOFCOM), MEE, and the Ministry of Foreign Affairs (MFA) (Ang 2019). This is not to say that nonstate and international actors have no influence at all—they can certainly feed new ideas to key bureaucracies, but their influence should be conditioned by the political space defined by top leaders and their engagement with relevant government agencies (Guttman et al. 2021; Sun 2022).

Given these policy-making processes, Figure 2 shows the intervening role of local deliberation in local norm dynamics. The framework is both about the general logic of local norm change and adapted to the characteristics of China's policy circle introduced earlier. First, the theories on cognitive change generally agree that demand for new norms is triggered by local actors' growing uncertainty about the orthodox norm (Hoffmann 2011; Schmidt 2014). Such uncertainty can be caused by international pressure or incremental learning but may also emerge internally from a country. Existing policies may generate negative performance (e.g., failure of project implementation), forcing policy makers in functional bureaucracies to reflect on local norms (Thisted and Thisted 2020). In the Chinese context, uncertainty in the policy circle may also originate from top leaders who develop new mandates, new definitions of the problem, and new measurements of success (He and Feng 2013). In this situation, top leaders' new thinking renders existing norms obsolete, opening the door for norm localization.

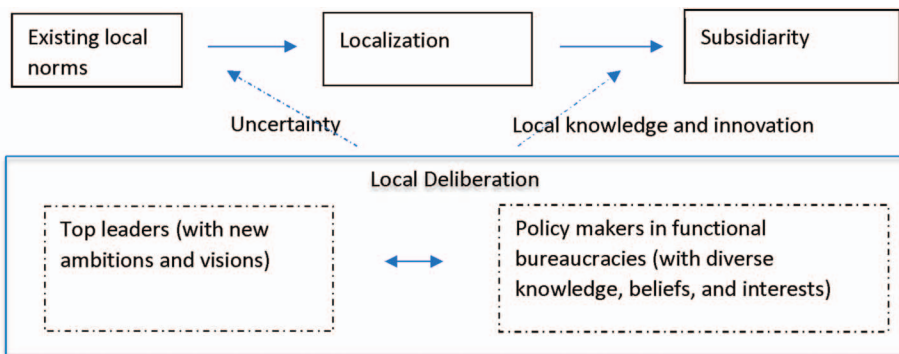


Figure 2
Local Deliberation and Local Norm Dynamics

Beyond triggering localization effects, local deliberation, under some conditions can also serve as an engine of norm subsidiarity. On one hand, top leaders' changing agenda can not only promote transnational learning but also drive local-centric norm innovation, especially when leaders have strong strategic ambitions (Hu 2019). As some scholars argued, when an emerging power has the strategic ambition to change the existing international normative structure, it can do so using distinctive local cultural and political values (Schweller and Pu 2011). Acharya (2011, 100) also finds that local norm innovation can be driven by countries' motivation "to challenge their exclusion or marginalization from global norm-making processes" and "great power hypocrisy." In the BRI case, in pursuit of an alternative model of international development and building leadership in global governance, China may seek to embed the non-conditionality principle into the BRI's governance system.

On the other hand, besides top leaders' ambitions, beliefs and interests of bureaucrats in functional issue areas play an equally important role in driving norm subsidiarity attempts. The precondition of norm subsidiarity (especially on operation norms) is that local actors must have seeds of novel ideas on which to build (Schindler and Wille 2015; Schmidt 2014). Local actors may find novel policy ideas by borrowing transferable local ideas that effectively guide the governance of other similar issue areas (Yu 2021). For example, practitioners in IDC can borrow project implementation and development financing experiences from domestic experiences (Chen 2020). If such seeds of novel ideas exist, local actors can have more agency in evaluating different ideas' potential. Facing various candidate ideas, policy makers conduct policy experiments and select the idea showing the most promise. The evaluation and selection processes are then heavily influenced by contingent factors like interpretation and framing: promoters for candidate ideas can construct and try to sell specific interpretations of events in favor of their preferred idea (Yu 2021, 2022). Additionally, bureaucrats' political calculations matter, as they may champion a proposal providing greater political authority and resources (Mertha 2006).

Therefore, local norm change is a dynamic process filled with uncertainty and idea competition. Norm subsidiarity is possible when the aforementioned conditions—leaders' ambition, transferable local ideas generating satisfying performance, bureaucratic endorsement—are met. However, some local agencies may simply choose to import international norms for ideational and political reasons. In this way, the logic of local norm change described here is not entirely under top leaders' control.

In summary, to explain China's engagement with international norms, our framework adapts the constructivist theories of norm dynamics to the Chinese context, integrating logics of norm localization and subsidiarity with local deliberation. While the framework's emphasis on top leaders and bureaucracies is most suitable for the Chinese context, we believe the general logic of local deliberation has relevance to other contexts.

The empirical study applies the process-tracing method to examine the explanatory power of our framework (Bennett and Checkel 2014). We look for evidence of three observable implications: first, China's embrace of environmental norms in overseas engagement emerged after the announcement of its top leaders' new strategic thinking; second, the creation of new norms is linked to top leaders' ambition and preexisting local norms; and third, functional bureaucracies created specific policies and rules reflecting norms most suitable for their beliefs and interests. Our data consist primarily of the Chinese government's official documents on regulations of IDC and overseas investments, publications in Chinese by researchers affiliated with government agencies, speeches of top Chinese leaders, and interviews with government advisors.

From Bilateral Development Cooperation to the BRI: Partial Adoption of the Eco-sustainability Norm

This section explains why China had been reluctant to set environmental rules for its bilateral IDC and investment activities but later turned to emphasize eco-sustainability in the BRI. By tracing major policy changes, we elaborate on key local dynamics, especially changing development views and the top leaders' ambitions attached to the BRI.

Before the BRI: Weak Environmental Rules for China's IDC

China has a long history of conducting IDC but has, for a long time, been criticized for lack of attention to the environmental risks of its projects. China's bilateral IDC was featured with a focus on infrastructure development like roads, railways, and energy infrastructure (Foster et al. 2009; State Council Information Office 2014). In the meantime, China has been reluctant to design and apply strict environmental safeguards. It was not until 2014 that the MOFCOM—the main regulatory agency of foreign aid—first mentioned environmental issues in a ministry-level document: “Measures for the Administration of Foreign Aid (Trial) (2014).” However, this document contained no specific environmental rules and measures (Ministry of Commerce [MOFCOM] 2014). The records of environmental risk management were better with two Chinese policy banks (i.e., Export-Import Bank and China Development Bank), both adopting guidelines requiring companies to conduct environmental impact assessments (Gellers and Jeffords 2019). Nevertheless, those policies still only emphasized following regulations of recipient countries, potentially creating problems in countries with weak environmental governance systems (Dollar 2016).

China's environmental regulations on overseas commercial investments were summarized by the MOFCOM's (2013) “Guidelines for Environmental Protection in Foreign Investment and Cooperation.” In addition, the China Banking Regulatory Commission upgraded its Green Credit Guidelines in

2012, which sought to strengthen regulations on Chinese banks' overseas lending. However, these documents also mainly required Chinese enterprises to follow recipient countries' regulations (Voituriez et al. 2019). In fact, China's overall attitude toward environmental safeguards was passive. For China, it was the recipient country's government that was responsible for setting safeguard rules (Bräutigam 2011).

China's approach to governing the environmental impacts of IDC and overseas investments was underpinned by both the non-conditionality norm and the passive governance style of the MOFCOM. On IDC, China has strictly followed the non-conditionality principle during the project cycle, which puts recipient countries in the driver's seat even in designing projects (Kopiński and Sun 2014). Meanwhile, Chinese policy makers treated IDC as a purely technical issue. During a project's feasibility study, factors considered seldom go beyond the availability of financial resources and technical expertise (Li et al. 2014). Such a passive governance style has become a habit of the Chinese policy body for IDC (Zhang and Smith 2017). Furthermore, because the project evaluation focused narrowly on individual projects' quality rather than their broader impacts, negative results of projects were often interpreted as caused either by implementation errors or by recipient countries' misuse of Chinese aid (Li et al. 2014; Wei 2011). Consequently, China's strong confidence in its practices constrained transnational diffusion of environmental norms. In the 2000s, both the OECD's Development Assistance Committee (DAC) and the World Bank tried to socialize China through cohosting communication and capacity-building events (e.g., the China-DAC Study Group, the World Bank's training sessions) (Kitano 2014). However, such interactions did not change China's attitude toward Western norms and rules, as environmental safeguards for China's overseas activities remained weak.

More Active Environmental Governance, the BRI, and Norm Localization

China's attitude toward eco-sustainability in its international economic activities underwent a major change in 2015. In that year, the MOFCOM, NDRC, and MFA co-issued the aforementioned "Visions and Actions" document, stating the goals to "promote ecological progress in conducting investment and trade, increase cooperation in conserving eco-environment, protecting biodiversity, and tackling climate change" (National Development and Reform Commission [NDRC] et al. 2015). This high-level document reflected Beijing's willingness to take more action in governing its overseas activities' environmental impacts. Additionally, in 2015 and 2016, the MOFCOM published two policy documents seeking to strengthen the environmental regulations of IDC projects during the feasibility study and construction stages (MOFCOM 2015, 2016). To understand this major policy shift, we must examine what contextual factors had changed before 2015. Two factors stand out in our investigation: Beijing's embrace of environmental governance (both domestically and

internationally) and, more importantly, the pressure for policy innovation on China's overseas engagement generated by the top leaders' ambition with the BRI.

Since the 2010s, driven by top leaders' changing views, policy reflections on environmental diplomacy, and the worsening air pollution problem, China has increasingly viewed environmental governance as an essential component of development and played a positive role in multilateral environmental negotiations (Ong 2012; Stokes et al. 2016). Domestically, the twelfth Five Year Plan issued in 2013 set targets of carbon intensity reduction for the first time. Internationally, China showed early support for the Sustainable Development Goals (SDGs) and has actively cooperated with the US in climate negotiations in developing the Paris Agreement since 2013 (Dimitrov 2016; Ministry of Foreign Affairs 2013). Furthermore, in 2015, the Fifth Plenary Session of the eighteenth CCP Central Committee set "green development" as one of the "Five Development Concepts." All these changes have made Chinese policy makers more active in engaging with international environmental norms, creating a favorable political environment for greening the BRI.

Beyond more active engagement in environmental governance, Beijing's strategic ambition with the BRI served as a more powerful trigger for policy innovation and learning. As a comprehensive policy framework, the BRI carries not only specific economic and strategic tasks but an ambition to "perfect the global development model and global governance" (*Xinhua* 2018).⁴ According to the "Vision and Actions" published by Beijing in 2015, the BRI is a "positive endeavor to seek new models of international cooperation and global governance" (NDRC et al. 2015). Attaching these functions to the BRI effectively changed the definition of "success" and "failure" of China's overseas activities. Before the BRI, China's governance of IDC and outward investments was considered successful as long as a large number of projects were built.⁵ Since the BRI, as researchers of the Ministry of Environmental Protection (MEP; predecessor of the MEE) indicated in a policy report, projects are required to generate visible benefits for sustainable development to ensure the BRI's credibility and protect China's international reputation (Dong et al. 2016). This new understanding pushed policy makers to pay greater attention to top-level design, project coordination, and regulation. Such a shift in bureaucratic practice was reflected by the MOFCOM's comprehensive IDC reform in 2014, which for the first time asserted the importance of "macro-policy research, regulation building, optimizing project planning and evaluation" (MOFCOM 2014).

As the space for policy reflections and innovation opened, channels were created to bring in international norms and rules for the governance of BRI projects. First, Chinese researchers from universities and government-sponsored think tanks started critically reviewing traditional IDC's pitfalls, including

4. Author's telephone interview with an official of the NDRC, May 2022.

5. Author's telephone interview with a researcher of the MOFCOM, May 2022.

projects' negative environmental impacts. The literature on BRI's environmental risks in Chinese surged in 2015. Many of these works stress that policy makers should pay attention to foreign observers' worries and criticisms (Wang and Ni 2019). This view was accepted by governmental officials and advisors, according to records of more than forty interviews conducted in early 2015 (Beijing Normal University et al. 2015) and meeting records of the BRI Construction Leadership Group of the MEP (2016). Furthermore, studies conducted by researchers affiliated with government agencies introduced to China's policy circle environmental safeguards of international development projects used by developed countries and international organizations (Cao 2016). Second, to fulfill the BRI's policy coordination task, Chinese policy makers actively seek to link the BRI to major international environmental regimes like the Paris Agreement and the SDGs (Yu and Wang 2021). In 2016, China signed a memorandum of understanding (MoU) for building green BRI with the United Nations Environment Programme (UNEP), laying out several areas of cooperation, such as sharing concepts and practices and conducting joint research.⁶ Through these policy coordination efforts, designers of the BRI were further informed of existing international eco-sustainability norms.

To summarize, the norm of environmental stewardship (i.e., taking eco-sustainability as a priority in policy-making) caught the attention of Chinese policy makers, given China's increasing emphasis on environmental protection domestically, its commitment to make BRI a model program for international cooperation, and its active engagement with the international community. Those conditions themselves generated and were also shaped by local deliberation in China's policy circle. However, in the early days of the BRI, no policy document provided concrete rules. Hence, by 2015, Chinese norm entrepreneurs were successful only in making eco-sustainability a priority for the BRI. Chinese policy makers still took caution in adopting operational norms. In this sense, from the very beginning, China's engagement with international environmental norms should be categorized as localization rather than displacement.

Greening the BRI Since 2017: Mixing International and Chinese Norms?

The process of greening the BRI has been further strengthened since 2017 as the term "Green Belt and Road" began to appear in China's official discourse with the emergence of a series of new policies and initiatives. As Table 1 shows, beyond stating broad policy goals (i.e., environmental stewardship) in BRI, Chinese policy makers began to develop more substantial rules and policies. Regarding procedural rules, they have constructed a dialogue-based approach to policy development. On operational rules, policy makers have sought to

6. See the MoU's full text at <https://wedocs.unep.org/bitstream/handle/20.500.11822/25336/MOU%20-%20Belt%20and%20Road%20Strategy%20-Dec%202016.pdf>, last accessed September 21, 2022.

Table 1
Major Policy Guidance and Initiatives for Greening the BRI

<i>Time</i>	<i>Initiative or Policy Plan</i>	<i>Leads</i>	<i>Key Features</i>	<i>Types of Norms</i>
2017.04	Guidance on Promoting Green Belt and Road Initiative	NDRC, MEP, MFA, and MOFCOM	A general plan of green BRI development in line with the SDGs and Paris Agreement, with reference to ecological civilization and the community with a shared future for mankind	Broad policy goals
2017.05	The Belt and Road Ecological and Environmental Cooperation Plan	MEP	Identifying a governance framework for green BRI	Broad policy goals; procedural norms
2017.09	Environmental Risk Management Initiative for China's Overseas Investment	CGFC, major Chinese associations on banking and investment, and MEP	Guidance on green investment in the BRI to Chinese and international financial institutions	Procedural norms (multistakeholder rule-making process); operational rules, standards, and good practices
2018.11	The Green Investment Principles for the Belt and Road	CGFC and City of London Green Finance Initiative		

2019.04	The Belt and Road Initiative International Green Development Coalition (also the BRI Green Development Institute)	MEE (previously MEP), with UNEP, WRI, and other international partners	A platform of policy dialogue and communication, environmental knowledge and information, and green technology exchange and transfer	Procedural norms (i.e., dialogue-based, inclusive platform)
2020–2021	Green Development Guidance for BRI projects	BRIGC	Guides on green financing and transportation infrastructure	Operational rules, standards, and codes of conduct

promote new standards and good practices based on China's experiences, while staying open to international rules (Tao 2020). Hence, since 2017, norm localization and norm subsidiarity coexist in China's efforts to green the BRI.

Enhanced Top-Level Push for Green BRI and Norm Innovation

In April 2017, the term "Green BRI" appeared for the first time in the document "Guidance on Promoting Green Belt and Road" co-published by four ministries—MEP, MFA, NDRC, and MOFCOM (MEP et al. 2017). This guidance presents a general plan for promoting eco-sustainability and green development in the BRI, with the requirement to "incorporate eco-environment protection into all aspects and whole process of the BRI building" (MEP et al. 2017). This high-level document not only states China's intention to participate in global environmental governance more actively but also highlights two strategic ambitions driving green BRI endeavor: one is promoting "the ecological civilization philosophy"—a concept treated as Beijing's major normative invention in the environment realm (Hansen et al. 2018);⁷ another is forging "the community with a shared future for mankind"—a key foreign policy concept proposed by Xi Jinping. These two rationales indicate the presence of strategic ambition to construct subsidiary norms in greening the BRI.

Soon after the publication of this guidance, in the opening ceremony of the first Belt and Road Forum for International Cooperation (BRF) in 2017, Xi Jinping stated that the BRI "should pursue the new vision of green development" and "strengthen cooperation in ecological and environmental protection and build a sound ecosystem so as to realize the goals set by the 2030 Agenda for Sustainable Development" (Xi 2017). Echoing the guidance published a month earlier, Xi's speech sent a clear message of double objectives of the green BRI—supporting global environmental governance while providing new visions and solutions for green development led by China.

These high-level statements were a natural extension of Chinese leaders' strategic ambition in foreign activities that was to provide more "Chinese intellects" and "Chinese solutions" to global governance: in February 2017, Xi delivered a speech at the National Security Work Conference stating for the first time that China needs to lead the international community to perfect and reform the current international system.⁸ Under the enhanced push from top leaders, a new trend in building green BRI started to emerge: while in 2015, they stressed simply the need to pay attention to environmental impacts of the BRI, in 2017, policy makers began not only to conduct more systemic policy development

7. On the official articulation of ecological civilization, China's State Council published a central document that emphasizes fostering system innovations (especially technological innovations) but also incorporating social change and governance reform (Geall and Ely 2018).

8. See the text of the speech (in Chinese) at <https://politics.people.com.cn/n1/2017/0220/c1001-29094518.html>, last accessed September 21, 2022.

on green BRI but also to promote methods of environmental governance with Chinese characteristics.

Inclusive Governance Innovation and Diverse Rule-Making Efforts

Once the direction to greening the BRI was set, bureaucracies' policy development work accelerated. As usual, broad instructions from the top left plenty of room for policy innovation and experimentation. When crafting specific procedural and operational rules and policies, functional ministries and other high-level regulatory agencies played a central role. Owing to their varied beliefs, interests, and prior connections to international norm entrepreneurs, their choices have differed. Because the policy package for green BRI remains incomplete and changing, we illustrate two types of norm dynamics to show the diverse logics of norm change in recent policy developments.

We start with the development of procedural rules. As different ministries began to develop substantial policies in 2017, they quickly drew on a preexisting local norm that had been guiding the BRI development since 2014: the so-called Silk Road spirit, which advocates "openness and inclusiveness" and "mutual learning" (Xi 2017).⁹ The idea that China needs to guarantee an inclusive and balanced policy-making process, one that simultaneously considers host countries' conditions, guidelines of the Chinese government, multilateral regimes, and rules of Western-led international organizations, was shared by high-level policy bodies like the State Council and NDRC (Tao 2020; Zhang et al. 2018). This rule-making methodology differs from Western-led organizations' (e.g., OECD and the World Bank) emphasis on enforcing predesigned environmental safeguards. In fact, roots of this emerging subsidiary norm can be found in China's long-standing foreign policy principle of nonintervention and mutual respect as shown by China's strong emphasis on South–South solidarity and host countries' needs in its IDC practices (Bräutigam 2011; Yu 2021).

This procedural norm certainly shaped the MEP's policy development practices. Before the launch of the BRI, the MEP had predominantly focused on environmental protection within China and had a very limited role in governing China's overseas activities. However, once greening the BRI had been identified by top leaders as a policy goal, it quickly took up the agenda and published "The Belt and Road Ecological and Environmental Cooperation Plan" in May 2017. Concerning the governance methodology for greening the BRI, the plan clearly endorsed the Silk Road spirit, vowing to conduct inclusive dialogue and consultation to make sure that relevant rules and policies fully "respect the development needs of countries along the BRI" (MEP 2017).

9. The content of the "Silk Road spirit" was first summarized by Xi in 2014. Xi later stressed that, based on the Silk Road spirit, the BRI should follow the principle of "extensive consultation, joint contribution and shared benefits" (*gongshang, gongjian, gongxiang*). Those phrases were also mentioned in the "Guidance on Promoting Green Belt and Road."

Following this plan, the MEP, together with UNEP, established the BRIGC during the first BRF in 2017. Since then, the MEP began to work with international partners to build an “open, inclusive and voluntary international network” to ensure that “the BRI brings long-term green and sustainable development to all concerned countries” (United Nations Environment Programme 2019). As of 2022, BRIGC’s partners include environmental ministries of twenty-six host countries, nine intergovernmental organizations, eighty-five nongovernmental organizations and research institutes, and thirty-two enterprises.¹⁰ Reflecting the dialogue-based policy development methodology, actors in the BRIGC have shown a strong preference for a bottom-up approach to policy development: collecting cases of workable rules and best practices from a variety of countries and sectors, summarizing replicable lessons, and then promoting them throughout BRIGC.¹¹

Moving to operational rules and standards, we can observe both innovation attempts and learning activities due to relatively flexible methodologies for policy development. For example, the MEE, as a key promoter of the “ecological civilization philosophy,” is certainly more prone to innovation. The ministry’s “Belt and Road Ecological and Environmental Cooperation Plan” identifies key areas of cooperation. While some are similar to Western practices (e.g., green finance, capacity building, safeguards), there are areas in line with China’s long-lasting preferences in IDC (e.g., eco-friendly infrastructure, green demonstration parks, and province-led capacity-building and technology-transfer activities) (MEP 2017).

More notably, in 2019, the BRIGC launched a research program to develop green development guidance for BRI projects. The program produced a baseline study report in 2020 that proposed a “traffic light system” classifying the positive and negative lists. The classification of projects is not just based on a project’s environmental impacts through its life cycle but also considers local developmental needs and measures to compensate for the project’s negative impacts (BRI International Green Development Coalition [BRIGC] 2020). It therefore embodies a novel governance approach to support green development in developing countries. More recently, the program also developed a sector-specific guide, which proposes an environmental evaluation index system—drawing on existing best practices while also experimenting with new rules—for railway and highway projects in the BRI (BRIGC 2021). In developing these guides, the MEE has been open to learning other actors’ (e.g., the EU and World Bank) safeguard policies but, at the same time, has expressed strong intentions to make innovations through new standards and good practices.¹²

10. See partner’s information at https://en.brigc.net/About_us/Partners/202011/t20201124_102810.html, last accessed September 21, 2022.

11. Author’s telephone interviews with a researcher of the NDRC, May 2022, and a researcher of the MEE, June 2022. See also policy reports of BRIGC at https://en.brigc.net/Reports/Report_Download/, last accessed September 21, 2022.

12. Author’s telephone interview with a researcher of the MEE, June 2022.

Some recommendations made by the BRIGC, such as managing environmental risks in projects' whole life cycles, have been taken up in the recent Green Development Guidelines for Foreign Investments issued by MEE and MOFCOM, which also for the first time encouraged companies to follow higher international or Chinese standards if host countries' environmental rules are deemed insufficient (Wang and Tang 2021). Hence, the MEE's efforts follow not only the logic of norm localization but also that of norm subsidiarity.

In addition to the MEE and BRIGC, Chinese regulators in the financial and banking sectors, especially the Green Finance Committee of China Society for Banking and Finance (CGFC), have been promoters of green BRI.¹³ Historically, China's financial policy makers have been keen to adopt international financial rules and norms (Yu 2019). This long-standing preference for transnational learning is reflected in their practices to make green BRI rules. In partnership with the City of London Green Finance Initiative, the CGFC developed in November 2018 the Green Investment Principles for the Belt and Road (GIP), which are "embedding sustainability into corporate governance"; "understanding environmental, social and governance risks"; "disclosing environmental information"; "enhancing communication with stakeholders"; "utilizing green financial instruments"; "adopting green supply chain management"; and "building capacity through collective action" (Green Investment Principles for the Belt and Road 2018). In addition to the CGFC and the UK's Green Finance Institute, the drafting members of the GIP include major Western-led transnational initiatives and organizations working on green investment, such as the UN-supported Principles for Responsible Investment, International Finance Corporation, and World Economic Forum.

Aiming at aligning with the Paris Agreement and the SDGs, the GIP developed specific guidance for implementation based on existing international principles and standards on green investment (City of London Green Finance Initiative and Green Finance Committee of China Society for Banking and Finance 2019). The initiative also established three working groups to share knowledge and best practices on green investment in the BRI.¹⁴ As of June 2022, forty-two financial institutions from China and beyond—including investors in both the Global North and South—have pledged to implement the GIP and report annually on their activities.¹⁵ That said, the governance of this initiative remains dominated by Chinese and Western actors, and the content of the GIP draws heavily on relevant Western-led principles and standards (e.g., incorporating environmental, social, and governance issues in investment

13. CGFC comprises economists and officials in China's financial and banking regulators (e.g., People's Bank of China [PBOC] and China Securities Regulatory Commission) and those in major state-owned banks.
14. The three working groups focus respectively on environmental and climate risk assessment, environmental and climate information disclosure, and green financial product innovation; see more details at <https://gipbr.net/List.aspx?type=54&m=6>, last accessed September 21, 2022.
15. See the full list of the GIP's signatories at <https://gipbr.net/Membership.aspx?type=12&m=2>, last accessed September 21, 2022.

Table 2
Summary of the Empirical Findings

<i>Type of Norms</i>	<i>Logic Behind Green BRI Policies</i>	<i>Examples</i>
Broad concepts of environmental stewardship and green development	Mostly norm localization, with discursive call for norm subsidiarity	<p>Directions set by the “Guidance on Promoting Green Belt and Road Initiative” (MEP, MOFCOM, MFA, and NDRC 2017):</p> <ul style="list-style-type: none"> • Emphasizing cooperation in environmental protection and climate change in the BRI • Establishing strong links between the BRI and the SDGs and the global climate targets • Identifying green development as a main goal of the BRI • Using the concept of ecological civilization to guide the green BRI to pursue a new vision of green development
Procedural norms on how to pursue environmental stewardship and green development	Mostly norm subsidiarity	<ul style="list-style-type: none"> • Building multilateral, multistakeholder platforms to share information and build capacity (e.g., BRIGC led by MEP/MEE)
Specific standards, codes of conduct, and good practices for project design and implementation	Coexistence of norm localization and norm subsidiarity based on actors’ preferences	<ul style="list-style-type: none"> • Identifying rules or codes established by Western-led institutions to develop good practices for the BRI (e.g., the GIP, stopping of new coal projects) • Developing new governance tools for greening the BRI (e.g., traffic light system and environmental impact evaluation index system proposed by the MEE through the BRIGC)

decisions and promoting financial instruments like green bonds). Therefore, the GIP's development has mainly followed a norm localization logic.

In summary, driven by varied interests and beliefs, different Chinese bureaucracies have made various efforts to promote green BRI since 2017 (see Table 2). In the process of building these initiatives, Chinese actors have explicitly linked the BRI to existing global norms on sustainable development (e.g., the SDGs and the Paris climate targets). Hence, China's efforts in identifying the broad goals of green development in the BRI largely follow a localization logic. At the same time, high-level policy bodies (e.g., MEP/MEE), encouraged by top leaders' ambition and preexisting norms of non-conditionality and South-South solidarity, constructed an inclusive, dialogue-based methodology to policy development, which can be seen as a subsidiary norm. Furthermore, regarding operational rules and policies, MEE, financial regulators, and other actors have followed their preferences and beliefs to either localize existing international rules or develop novel Chinese rules. This is an ongoing process where localization and subsidiarity logics coexist.

In fact, in the document on the joint implementation of green development in the BRI issued in March 2022 by the four ministries responsible for the BRI (NDRC, MEE, MFA, and MOFCOM), the government not only strengthens environmental regulations for overseas projects (e.g., encouraging companies to follow higher international or Chinese environmental standards and to stop building new coal-fired power plants) but also highlights the importance of innovation (e.g., encouraging Chinese companies and industry associations to develop and promote new standards, codes, guidelines, and best practices) (NDRC et al. 2022). This latest high-level document shows once again the mixed logic of norm localization and subsidiarity for making operational rules and policies.

Conclusions

The BRI holds promise to advance global sustainable development if it can successfully manage its environmental risks. Since 2015, the Chinese government has continued to strengthen its efforts to promote green development in the BRI. China's efforts have evolved from a process of localizing international environmental norms into a dual process of incorporating global norms while seeking to create subsidiary norms on green development based on Chinese experiences and knowledge. We examined the forces shaping Chinese policy makers' choices. We find that Chinese leaders' ambitions to make the BRI a novel, inclusive platform of international cooperation have provided bureaucracies with opportunities to collaborate with international stakeholders in aligning the BRI with international norms, but that ambition has also encouraged policy makers to develop new governance models, rules, and standards. In this process, Chinese policy makers, building on preexisting local norms, have developed a dialogue-based, inclusive rule-making methodology with an emphasis

on host countries' inputs. But when it comes to operational rules, both norm localization and subsidiarity can happen, depending on specific policy bodies' preferences. Therefore, greening the BRI is not just a discursive move for China to protect its reputation but dynamic processes of policy evolution and innovation.

Our investigation of Chinese policy makers' motive for greening the BRI contributes to the debate on the environmental governance of the BRI. By examining different types of norms, the article provides a more nuanced picture of China's engagement with international environmental norms. Our finding echoes the argument that China does not always challenge the Western-dominated liberal international order (Johnston 2019; Weiss and Wallace 2021). Meanwhile, we reveal that Chinese government agencies can choose different strategies regarding Western-led international norms based on their own beliefs, knowledge, and interests. In such cases, China's attempts to develop new international norms are driven not only by their motivations to challenge the liberal international order but also by preexisting local norms based on their past experiences. As localization and subsidiarity logics are likely to coexist in the future development of China's green BRI policy, researchers of global environmental politics need to better theorize and empirically assess the conditions under which Chinese actors follow existing international norms or develop new norms. Addressing these questions will allow us to identify pathways to better engage China in reforming global environmental governance.

Last, as the on-the-ground impacts of different China-led governance initiatives remain to be seen, more research is urgently needed to examine the causal effects of rules and norms proposed by Chinese actors on the policies and practices of different stakeholders. More importantly, given China's intention and efforts to develop and promote new procedural and operational norms under the green BRI agenda, and also Western countries' initiatives (such as the US-led Build Back Better World) that promote sustainable infrastructure in the Global South to counterbalance the BRI, it is crucial to study how those different norms and rules interact and compete and how such interactions may affect global governance of the environment and development. For the sake of global sustainable development, it would be necessary to explore the mechanisms through which host countries and their people can benefit from a more diverse set of norms.

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