

A new hope for net-zero?

Insights from the new Brazilian Carbon Market framework

Public Report | March 2025





- I. Introduction to today's session
- II. Overview of carbon markets
- III. The Brazilian regulated carbon market
- IV. Impact on the Power Market
- V. Key takeaways
- VI. Appendix

Introducing the Aurora team

AUR 😂 RA



Ana Barillas
Managing Director,
LATAM and Iberia



Matheus Dias Research Product Manager, Brazil



Andersen Müller Research Analyst, Brazil



Julia Breuing
Senior Associate, European
Carbon Markets



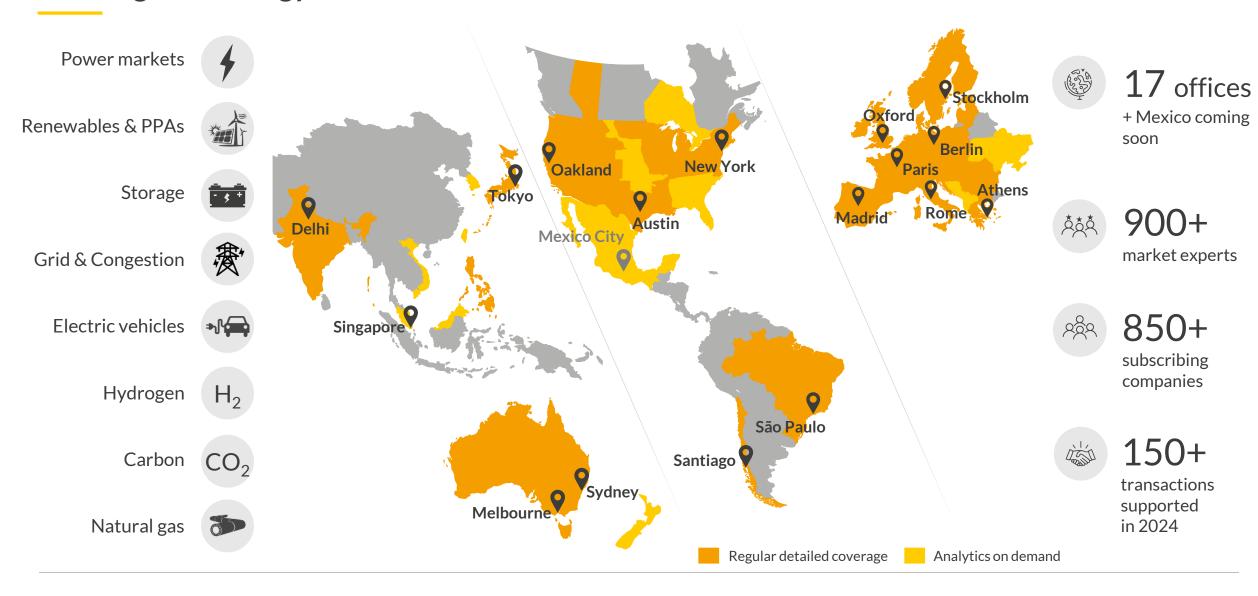
For more information, please contact

Maria Quissini, Commercial Associate

maria.quissini@auroraer.com +55 (11) 91116-5059

Aurora provides market leading forecasts & data-driven intelligence for the global energy transition







- I. Introduction to today's session
- II. Overview of carbon markets
- III. The Brazilian regulated carbon market
- IV. Impact on the Power Market
- V. Key takeaways
- VI. Appendix

With a cap-and-trade system, emission reductions can be targeted better, though leading to lower price security



Following the "polluter pay" principle, a carbon price aims at internalising the costs of emissions and hereby reducing them. There are broadly two different systems 1) a carbon tax and 2) a cap-and-trade system

1

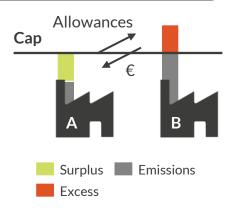
Carbon tax

- Carbon price set by the regulator
- Level of carbon emissions set by emitters in response to carbon price
- Leads to higher certainty of prices and investor security
- However, number of emissions cannot be targeted as directly as under a capand-trade system

2

Cap-and-trade

- Level of carbon emissions set by regulator in the form of the cap, which defines the number of tradable certificates issued per year
- Carbon price set by market balance of demand and supply
- While a cap-and-trade can lead to higher economic efficiency, it can risk investor security if not designed appropriately



Price vs. emission quantity under carbon tax & cap-and-trade

	1 Carbon tax	2 Cap-and-trade
\$ Carbon price	Fixed	Variable
E missions quantity	Variable	Fixed

Strengths and weaknesses of carbon tax & cap-and-trade

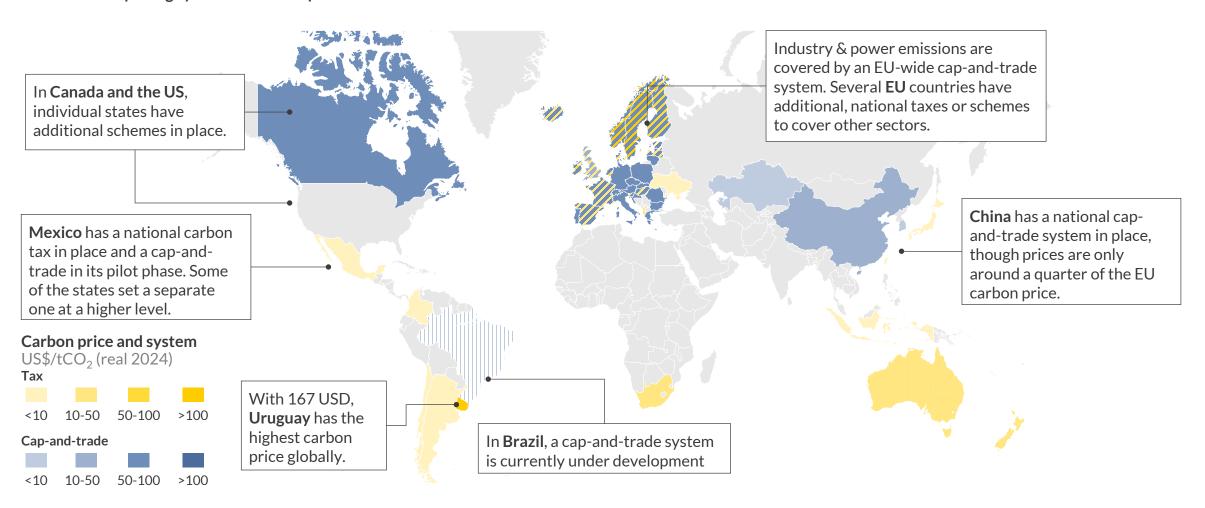
	1 Carbon tax	2 Cap-and-trade
Targeted emission reductions		+
Economic efficiency		+
Investor security	+	
Bureaucratic simplicity	+	

Sources: Aurora Energy Research

Several countries have a carbon tax or cap-and-trade system in place, but price levels vary significantly



Global carbon pricing systems and 2024 price levels





The EU-ETS 1 only led to meaningful carbon prices and emission reductions after several changes to the market design





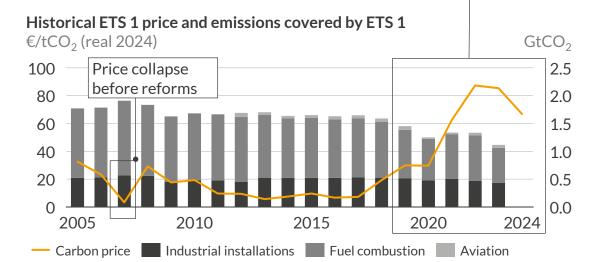
2021: More ambitious climate **policy** reflected in tighter cap and allocations leads to

2026: CBAM gradually becomes main measure against carbon leakage, replacing free allocations

2026

2027: **EU-ETS 2** comes into force. The market will be separate from ETS 1 initially but potentially merged in the 2030s

2027



 All importers to the EU will be subject to the same carbon **price** as domestic producers

Importer

Domestic producer











- ETS 1 mainly targeted large industrials & energy producers
- From 2027, a separate carbon market covering transport & buildings will be introduced

EU ETS 1













PUBLIC VERSION 8 Sources: Aurora Energy Research

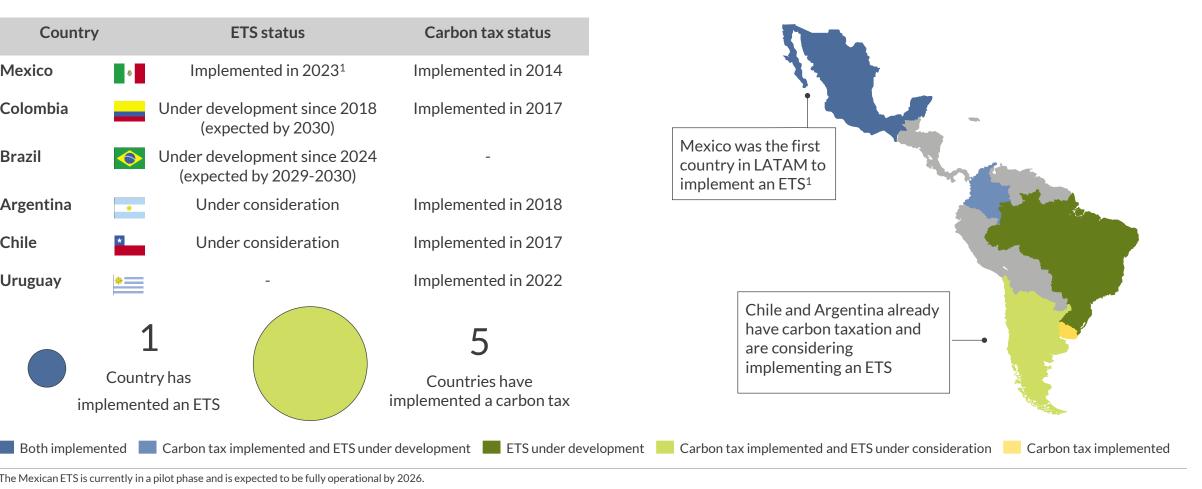
Brazil became the third country in LATAM to implement an emissions trading AUR RA system (ETS), after Mexico and Colombia

Five countries in LATAM have implemented carbon taxes, but Mexico is the only one to successfully implement an emissions trading system as well¹. Brazil now joins Colombia as the two countries currently developing an ETS.

Status of ETS and carbon tax implementation by country in LATAM

Country	ETS status	Carbon tax status	
Mexico	Implemented in 2023 ¹	Implemented in 2014	
Colombia	Under development since 201 (expected by 2030)	.8 Implemented in 2017	
Brazil	Under development since 202 (expected by 2029-2030)	-	
Argentina	Under consideration	Implemented in 2018	
Chile	▼ Under consideration	Implemented in 2017	
Uruguay	-	Implemented in 2022	
imp	Country has emented an ETS	5 Countries have implemented a carbon tax	

Status of carbon compliance implementation by country in LATAM



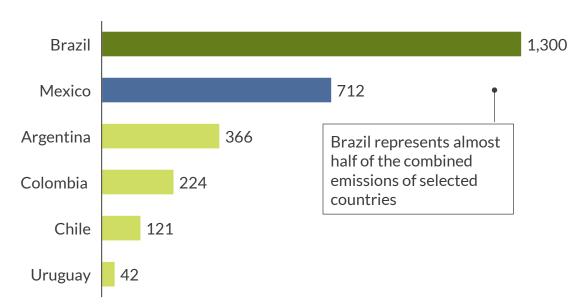
¹⁾ The Mexican ETS is currently in a pilot phase and is expected to be fully operational by 2026.



With 47% of total emissions from the selected countries in the region, Brazil holds the greatest potential

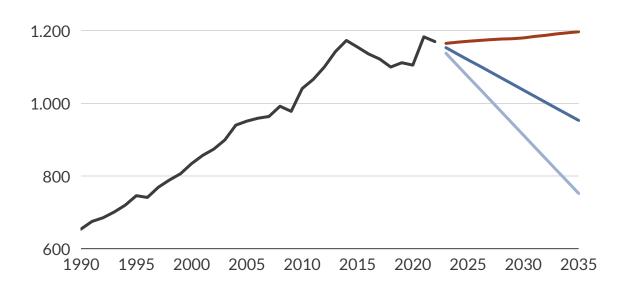






- Brazil has the highest number of emissions in the region and could therefore become the biggest carbon market. With the right framework, the Brazilian carbon market has the potential to cover almost half of the region's emissions.
- Brazil will be the first country in Latin America to implement a carbon market without implementing a carbon tax first.





- Historical data from Climate Action Tracker indicates that Brazil's GHG emissions have nearly doubled since 1990.
- According to the Climate Action Tracker, the country's emissions are projected to continue rising. However, to align with Brazil's NDC commitments, emissions should be on a downward trajectory, with a target of 750-950 MtCO2e by 2035^{1,3}.



Brazil Countries with ETS Countries with carbon tax



- I. Introduction to today's session
- II. Overview of carbon markets
- III. The Brazilian regulated carbon market
- IV. Impact on the Power Market
- V. Key takeaways
- VI. Appendix



For more information, please contact

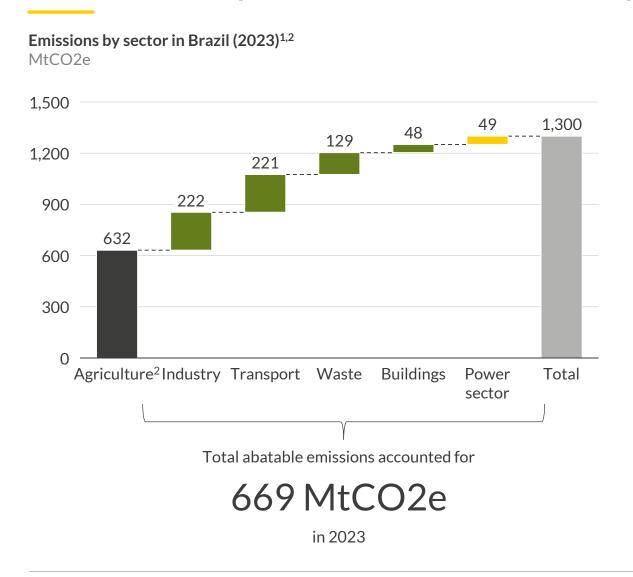
Maria Quissini, Commercial Associate

maria.quissini@auroraer.com +55 (11) 91116-5059

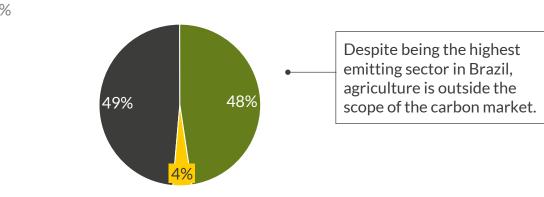


In 2023, the Brazilian carbon market would have had the potential to abate 669 MtCO2e, equivalent to 51% of the country's CO2e emissions

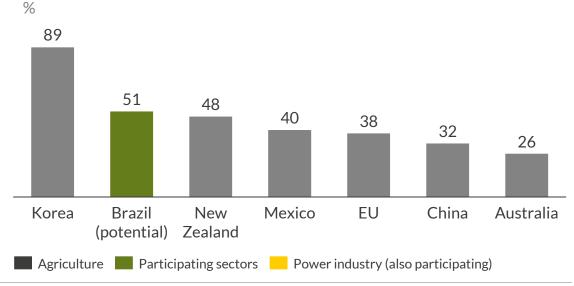












¹⁾ Excluding Land Use, Land Use Change and Forestry (LULUCF). 2) Despite being the highest emitting sector in Brazil, agriculture is outside the scope of the carbon market.



The implementation of the SBCE¹ is divided into 5 phases and is expected to be fully completed by the end of 2029

AUR 😂 RA

The system will be progressively implemented in five phases, each one starting after the previous one has completed and with Phase 1 beginning in December 2024. The implementation of the assets (CBE and CRVE) will be completed during Phase 4.

Phase 1 Phase 3 Phase 5 **Duration: Duration:** Operators will only be Edition by the governing Full implementation of the one commitment period³ 1 year subject to submitting a body of the specific SBCE, at the end of the first **Expected start: Expected start:** monitoring plan and a report regulations of this Law, National Allocation Plan. of emissions and removals Dec/2028 Dec/2025 Phase 2 **Duration:** Valid for **Duration:** Phase 4 Operationalization, by 12 months² 2 years undetermined time operators, of the instruments **Expected start:** Start date: for reporting emissions. Dec/2026 Dez/2024

Phase 4

Validity of the first National Allocation Plan⁴, with non-onerous distribution of CBEs and implementation of the SBCE asset market.



National Allocation Plan



Brazilian Emissions Quota (CBE)



Certificate of Verified Emissions Reduction or Removal (CRVE)

Definition

National Plan, where the limit for emissions of the system and the number of distributed CBEs are defined.

Owning this asset means that the agent has the right to emit 1 tCO2e.

Owning this asset means that the agent has reduced or removed emissions of 1 tCO2e. This asset can be acquired in **exchange for carbon credits**⁵.

Main goals

To set targets for the reduction in GHG emissions and action plan for achieving them.

This asset will be **granted by the government** either free of charge or through auctions, giving more control in the pursuit of targets.

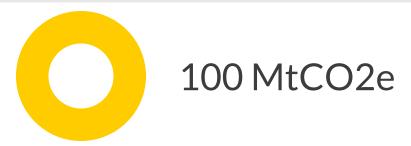
Allows for carbon credits to be converted into CRVE, if they are verified with an approved methodology.



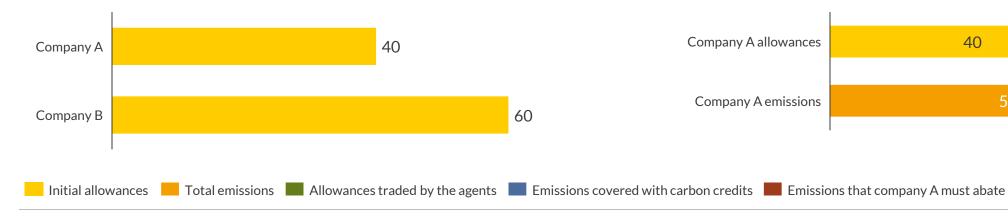
The carbon market will work as a cap-and-trade system, with allowances and carbon credits being issued to players in applicable sectors



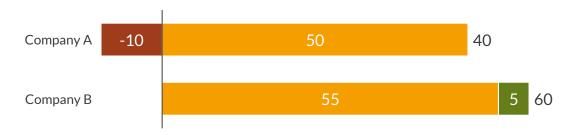




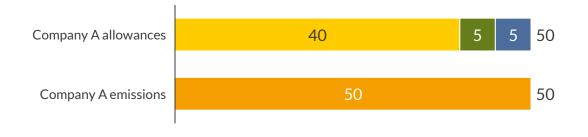
2 Market players buy allowances, based on their expectations for the year.



At the end of the period, players reconcile emissions: those emitting less than purchased can sell the surplus, while those emitting more must buy the shortfall.



Carbon credits serve as a certificate of emissions reductions and are equivalent of one allowance and can be freely negotiated as well.



Sources: Aurora Energy Research PUBLIC VERSION 14



- I. Introduction to today's session
- II. Overview of carbon markets
- III. The Brazilian regulated carbon market
- IV. Impact on the Power Market
- V. Key takeaways
- VI. Appendix



For more information, please contact

Maria Quissini, Commercial Associate

maria.quissini@auroraer.com +55 (11) 91116-5059



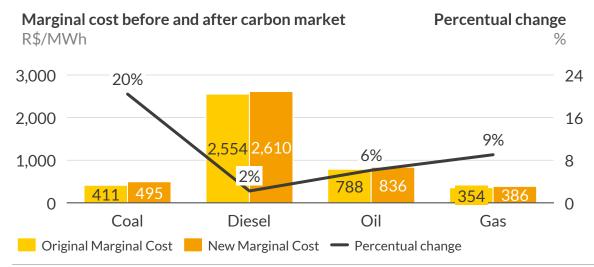
In the power sector, fossil-fuel based power plants will have an extra cost due to the price of carbon

AUR 🚇 RA

The carbon market can generate an extra cost for thermal plants that depends on specific emissions and efficiency of each plants

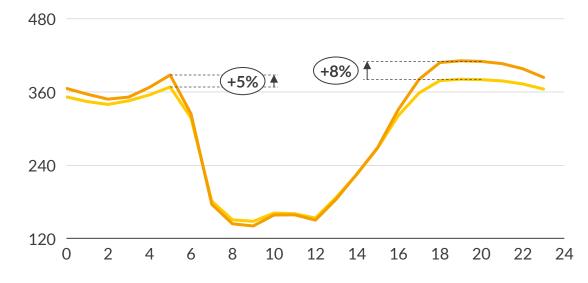
	Carbon Price R\$/tCO2e	Emissions tCO2e/MWh _{fuel}	Efficiency MWh _{elet} /MWh _{fuel}	Carbon Cost R\$/MWh _{elet}
Coal	80	0.34	0.33	83.94
Diesel	80	0.27	• 0.37	56.83
Oil	80	0.25	0.42	48.24
Gas	80	0.18	0.46	31.95

This cost would raise marginal costs; for coal, an R\$80 carbon price could mean up to 20% increase in marginal cost¹



With the increase in marginal cost for thermal plants, prices are expected to rise during peak load hours²

Average hourly wholesale price (PLD) in 2060 before and after carbon market R\$/MWh



- Due to higher marginal cost from thermal plants, prices increase during peak demand hours.
- During hours of high renewable penetration, when solar generation is at its peak, no significant difference is expected.

Before carbon market — After carbon market

¹⁾ These costs refer to the 2030 costs. 2) Prices refer to the average of 2060.

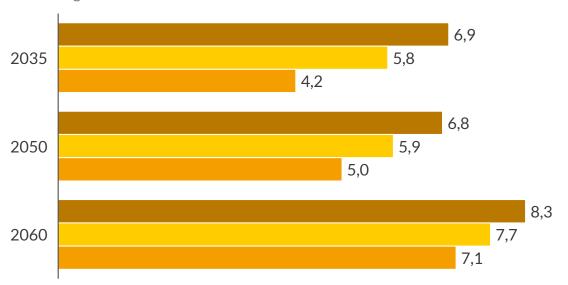


The change in thermal marginal costs can reshape Brazil's capacity matrix and generation mix through 2060

AUR 👄 RA

Fossil-fuel based generation in multiple carbon price scenarios

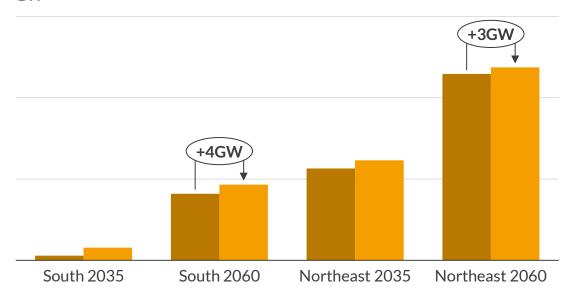
% of total generation



- In general, the higher the carbon price, the lower the thermal generation, as marginal cost increases and these plants are placed further in the merit order.
- This effect is more evident in the short term, as other resources, such as hydro and wind, are sufficient to meet demand, significantly reducing thermal generation. In the long term, as demand grows, thermal generation becomes more necessary, regardless of carbon prices—unless prices rise significantly enough to limit their dispatch.



Onshore wind capacity by subsystem and year in two carbon price scenarios GW



- The introduction of the carbon market raises wholesale prices during peak hours, improving the business case for technologies generating when demand is higher and thermal plants need to be dispatched, such as onshore wind.
- However, since load factors vary significantly across subsystems, this effect is more pronounced in the South, where the generation profile aligns more closely with the demand pattern, and where 52% of the coal capacity is located (most impacted by the carbon price).

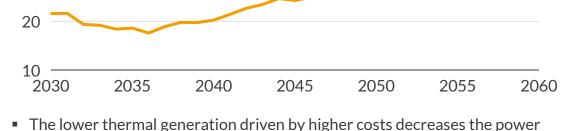
Sources: Aurora Energy Research PUBLIC VERSION 17



Growing thermal reliance will increase emissions in the long term, making carbon cost quantification crucial for pricing signals and reinvestment



Total emissions in the power sector for different carbon pricing scenarios MtCO2e 60 50 40



- sector emissions. Therefore, the higher the carbon pricing and the lower the thermal generation - the lower the emissions as well.
- While carbon pricing reduces emissions by limiting thermal generation, total emissions still rise as demand grows. In Brazil, gas plants remain the main firm capacity source in reserve auctions, driving higher thermal generation and emissions.

— Carbon Price at R\$80/tCO2e — Carbon Price at R\$160/tCO2e — No Carbon Market

Key outcomes from the Carbon Market for the power sector (at a R\$160/tCO2e carbon price)



■ In the R\$160/MWh carbon price scenario, power sector **emissions fell by** 31% over the period. In this scenario, the carbon market generated almost R\$60 billion reais from quota emissions and trade.

Next steps

• This analysis reflects a case where firm capacity is met primarily by thermal plants, with a limited role of batteries. However, greater battery penetration could further reduce emissions, bringing Brazil closer to its NDC targets, as we are exploring in Aurora analyses for subscribers.



- I. Introduction to today's session
- II. Overview of carbon markets
- III. The Brazilian regulated carbon market
- IV. Impact on the Power Market
- V. Key takeaways
- VI. Appendix



For more information, please contact

Maria Quissini, Commercial Associate

maria.quissini@auroraer.com +55 (11) 91116-5059



Brazil's new carbon market will impact all applicable sectors; in the power sector, it will raise thermal costs while reducing emissions

AUR 😂 RA

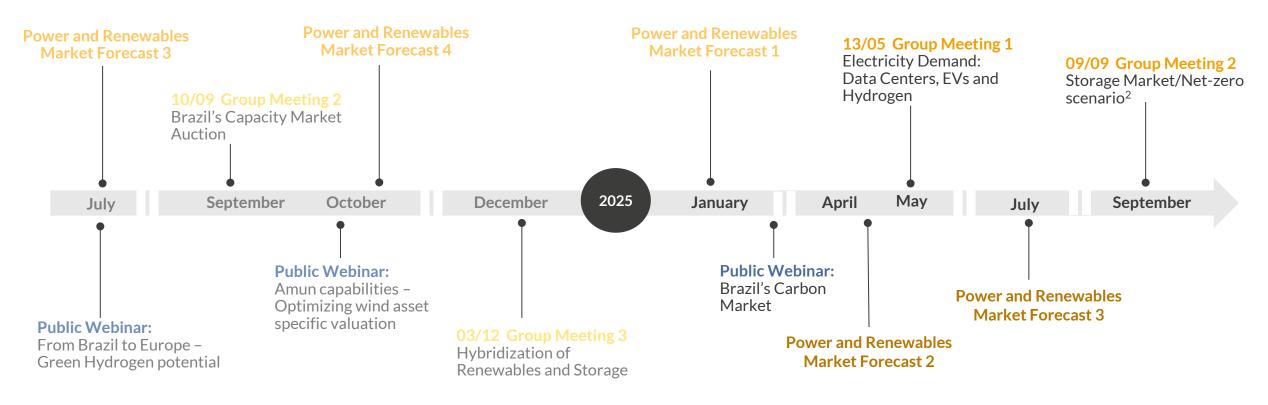
- With Law 15.042, Brazil introduced the regulated carbon market in 2024, becoming the third country in Latin America to establish an Emissions Trading System. This legislation creates a cap-and-trade system, aligning with previous international experiences, especially with the European carbon markets.
- Brazil's carbon market is set to launch by 2029 under a cap-and-trade system, covering all sectors except agriculture. The scheme will apply to entities emitting over 10,000 megatons of CO_2 annually, targeting sectors responsible for 51% of the country's emissions.

- In the power sector, the introduction of a carbon market will increase thermal generation costs, making the wholesale market more volatile. During peak hours, when thermal plants are dispatched, prices are expected to rise by 8%, strengthening the business case for technologies that generate in these hours, such as onshore wind.
- A carbon price of R160/MtCO_2$ led to a 31% reduction in emissions. In this scenario, the carbon market generated nearly R\$60 billion from quota allocations and trading which can be directed toward government initiatives.

Source: Aurora Energy Research

Upcoming developments for subscribers of Aurora's Brazilian services







For more information, please contact

Maria Quissini, Commercial Associate

maria.quissini@auroraer.com +55 (11) 91116-5059

Source: Aurora Energy Research

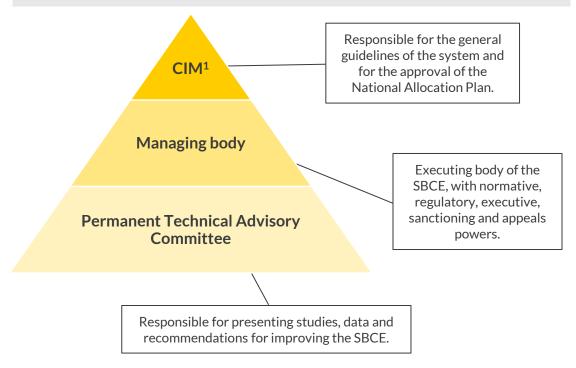


- I. Introduction to today's session
- II. Overview of carbon markets
- III. The Brazilian regulated carbon market
- IV. Impact on the Power Market
- V. Key takeaways
- VI. Appendix

The regulated carbon market will have a governing body and a set of rules that AUR RA participants will follow

The governing body will have participation of both the government and the civil society and will be responsible for establishing the missing regulation.

The governing body will be responsible for the functioning of the system and for setting specific regulation



Every activity that emits or has potential to emit greenhouse gasses will take part in the regulated market, except for the agriculture sector

Regulated agents will have to follow a set of rules, according to their yearly emissions

		Rule	To whom it is applied
1	Monitoring plan	Submit monitoring plan for consideration by the SBCE management body.	All agents with yearly emissions of at least 10.000 tCO2e.
II	Emissions and removals report	Submit a report on GHG emissions and removals, according to the approved monitoring plan.	All agents with yearly emissions of at least 10.000 tCO2e.
III	Periodic report of obligations reconciliation	Send a periodic reconciliation report of obligations, proving that emissions and removals are equal to owned assets.	All agents with yearly emissions of at least 25.000 tCO2e.
IV	Other	Meet other obligations provided in decrees or other specific acts of the managing body.	All agents with yearly emissions of at least 10.000 tCO2e.

Sources: Aurora Energy Research, Brazilian Congress

PUBLIC VERSION 23

¹⁾ Comitê Internacional sobre Mudança do Clima - Interministerial Committee on Climate Change. This authority was created by the government via Decree 11.550 in 2023.



Details and disclaimer

Publication

A new hope for net-zero? Insights from the new Brazilian Carbon Market framework

Date 19/03/2025

Prepared by Andersen Müller (Andersen.Muller@auroraer.com) Matheus Dias (Matheus.Dias@auroraer.com) Julia Breuing (Julia.Breuing@auroraer.com)

Approved by Inês Gaspar (Ines.Gaspar@auroraer.com) Ana Barillas (Ana.Barillas@auroraer.com)

General Disclaimer

This document is provided "as is" for your information only and no representation or warranty, express or implied, is given by Aurora Energy Research Limited and its subsidiaries Aurora Energy Research GmbH and Aurora Energy Research Pty Ltd (together, "Aurora"), their directors, employees agents or affiliates (together, Aurora's "Associates") as to its accuracy, reliability or completeness. Aurora and its Associates assume no responsibility, and accept no liability for, any loss arising out of your use of this document. This document is not to be relied upon for any purpose or used in substitution for your own independent investigations and sound judgment. The information contained in this document reflects our beliefs, assumptions, intentions and expectations as of the date of this document and is subject to change. Aurora assumes no obligation, and does not intend, to update this information.

Forward-looking statements

This document contains forward-looking statements and information, which reflect Aurora's current view with respect to future events and financial performance. When used in this document, the words "believes", "expects", "plans", "may", "will", "would", "could", "should", "anticipates", "estimates", "project", "intend" or "outlook" or other variations of these words or other similar expressions are intended to identify forward-looking statements and information. Actual results may differ materially from the expectations expressed or implied in the forward-looking statements as a result of known and unknown risks and uncertainties. Known risks and uncertainties include but are not limited to: risks associated with political events in Europe and elsewhere, contractual risks, creditworthiness of customers, performance of suppliers and management of plant and personnel; risk associated with financial factors such as volatility in exchange rates, increases in interest rates, restrictions on access to capital, and swings in global financial markets; risks associated with domestic and foreign government regulation, including export controls and economic sanctions; and other risks, including litigation. The foregoing list of important factors is not exhaustive.

Copyright

This document and its content (including, but not limited to, the text, images, graphics and illustrations) is the copyright material of Aurora, unless otherwise stated.

This document is confidential and it may not be copied, reproduced, distributed or in any way used for commercial purposes without the prior written consent of Aurora.

