Appendix A – Summary of association advocacy continued

Canadian Chamber of Commerce

We have found there to be some, non-material, misalignment between the climate policy advocacy of the Canadian Chamber of Commerce (CCC) and BHP’s August 2020 Global Climate Policy Standards. While we welcome the CCC’s focus on achieving net zero emissions by 2050, we believe there is room for the CCC to strengthen its position on mandatory Scope 3 reporting and low to zero GHG emissions hydrogen production, and ensure it provides appropriate context on the future role of fossil fuels.

On the whole, we believe we sufficiently benefit from our membership of the CCC to continue our membership at this point in time. In particular, we value the opportunities for sharing of best practice and supporting policy development presented through our involvement in the Net Zero Council established by the CCC.

Background

Overview

A national and multi-sector industry association. It has over 200,000 members.

2022 membership fee

Less than US$100,000

Governance role

None

Policy outcomes

Global agreements

CCC has advocated for greater international cooperation on climate policy and commended the Canadian Government on its participation in COP26.

Paris Agreement goals

CCC has described Canada’s net zero by 2050 goal as a ‘necessity’ and established a Net Zero Council to support ‘research and advocacy designed to advance Canada’s pathway to net-zero’.

Emissions reduction targets

CCC has recognised the important role governments play in setting targets and welcomed both the Canadian Net Zero Emissions Accountability Act and the 2030 Emissions Reduction Plan.

Least cost abatement

CCC has advocated for an ‘efficient and cost-effective approach to climate change’. This has included carbon pricing (and associated arrangements, such as border carbon adjustments) and a range of other fiscal and regulatory measures.

Pre-commercial technology

CCC has advocated for the Canadian Government to ‘accelerate Canada’s net zero transformation through supporting innovation, propelling clean tech projects, and growing zero emission technology manufacturing’.

Enabling the broader transition

CCC has advocated on the link between labour and decarbonisation, the economic potential presented by the circular economy, the need for a national adaptation strategy, measures to accelerate the electrification of the Canadian economy and the opportunity to expand Canada’s critical mineral-related industries.

In January 2022, CCC advocated that the Canadian Securities Administrators should not integrate Scope 3 emissions ‘into disclosure requirements at this time’, on the basis that mandatory Scope 3 reporting is currently not practical for issuers. However, BHP is supportive of the concept of mandatory reporting of Scope 3 emissions, subject to any such requirement reflecting the inherent data limitations associated with calculating Scope 3 emissions.
### Guiding principles

<table>
<thead>
<tr>
<th>Balanced</th>
<th>CCC’s advocacy generally appears to be balanced between maintaining the competitiveness of Canadian businesses and highlighting the upside presented by the energy transition.</th>
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</thead>
<tbody>
<tr>
<td>Fact-based</td>
<td>CCC generally appears to be fact-based in its advocacy. However, at times, the association has used language on the future role of fossil fuels that lacks important context. For instance, in December 2020, CCC noted that ‘The demand for Canadian energy, including fossil fuels, remains high for the foreseeable future. The Canada Energy Regulator suggests that while coal and oil will decline in use while natural gas and renewable use rises, crude oil production still has the potential to see a 49% increase from 2018 levels to 2040’. The association, does not, however, provide information on how this forecast could be affected if governments around the world adopted more ambitious climate policies (such as by noting the outputs of other comparable scenarios) or the technologies that would be required to help align the expected strong demand for fossil fuels with the aims of the Paris Agreement.</td>
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<tr>
<td>Focused</td>
<td>CCC generally appears to avoid advocacy on issues that may be seen to unduly exacerbate policy tensions.</td>
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<tr>
<td>Technology neutral</td>
<td>CCC generally appears to advocate in favour of technology neutral policy frameworks.</td>
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