Appendix A – Summary of association advocacy continued

United States Chamber of Commerce

We have found there to be some, non-material, misalignment between the climate policy advocacy of the United States Chamber of Commerce (US Chamber) and BHP’s August 2020 Global Climate Policy Standards.

We welcome the US Chamber’s commitment to climate action and embrace of carbon pricing. However, we believe there is room for the US Chamber to strengthen its position on fuel efficiency standards and mandatory Scope 3 reporting, 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 US Chamber to continue with membership at this point in time. In particular, we value the deep expertise and advocacy of the US Chamber on matters relating to fiscal policies, trade and geopolitics.

Background

Overview

A national and multi-sector industry association. It has around 3 million members.

2022 membership fee

USS100,000 – USS500,000

Governance role

None

Policy outcomes

Global agreements

US Chamber has recognised the importance of international action and cooperation. In line with this position, US Chamber welcomed ‘President Biden’s action to re-join the Paris Climate Agreement’.

Paris Agreement goals

US Chamber has expressed support for ‘US participation in the Paris Agreement’ and welcomed the Biden Administration’s decision to re-join the Paris Agreement. In line with this position, US Chamber has: engaged on climate policy debates; supported efforts to improve access to critical minerals supply; and provided guidance to businesses on how they can accelerate their decarbonisation progress.

Emissions reduction targets

US Chamber has advocated for ‘reducing emissions as low as we can and fast as we can, while ensuring that any national targets and timetables are realistic, achievable, appropriately account for U.S. economic interests and work to address impacts to trade-exposed, hard-to-adapt and energy intensive sectors’. In line with this position, US Chamber noted the Biden administration’s new 2030 target, and expressed its support for the Global Methane Pledge.

Least cost abatement

US Chamber’s position statement highlights the importance of ‘acknowledging the costs of action and inaction and the competitiveness of the US economy’, and market-based approaches to emissions reduction. US Chamber has separately indicated that it supports an ‘economy-wide carbon price’. In line with these positions, US Chamber has engaged on various climate policies.

In March 2020, US Chamber stated that it welcomed the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule issued by the Trump Administration, on the basis that it appeared to provide ‘a workable path forward on a unified national program that provides regulatory certainty while strengthening fuel economy standards and continuing emissions reductions’. It is not clear, however, that the SAFE Vehicles Rule would have resulted in more cost-effective abatement in the transport sector relative to the more stringent fuel efficiency standards that it replaced – particularly given the reported concerns about the quality of the cost-benefit analysis that underpinned the regulatory change process.

Pre-commercial technology

US Chamber has advocated (in principle and in practice) for policy measures that help accelerate the development and deployment of new technologies.

Enabling the broader transition

US Chamber has advocated (in principle and in practice) for policy measures that support climate resilient infrastructure. US Chamber has also been a strong proponent of expanding the domestic production and processing of the minerals required to enable the energy transition, with a particular focus on permitting reform.

In June 2022, US Chamber advocated that the Securities and Exchange Commission (SEC) should make Scope 3 reporting voluntary, rather than mandatory, given the difficulties associated with calculating Scope 3 emissions. However, BHP supports 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

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<tr>
<th>Guiding principle</th>
<th>Description</th>
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<td>Balanced</td>
<td>US Chamber’s advocacy generally appears to be balanced between upholding the competitiveness of the US business community highlighting the opportunities presented by decarbonisation. Notably, US Chamber’s position statement is underpinned by the recognition that ‘inaction is not an option’.</td>
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<td>Fact-based</td>
<td>US Chamber generally appears to be fact-based in its advocacy. However, at times, the association used language on the future role of fossil fuels that lacks important context. For instance, in March 2022, the US Chamber noted that ‘Oil and natural gas are the primary sources of [reliable] energy, and the Department of Energy forecasts they will remain the most-consumed sources of energy in the U.S. through at least 2050’. 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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<td>Focused</td>
<td>US Chamber 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>US Chamber generally appears to advocate in favour of technology neutral policy frameworks.</td>
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