- Collective transport
- Labour flexibility
- Training
- Videoconferences
- Promoting cycling
- Parking management
- Carpooling, which allows employees to publish their journeys and offer their vehicle to share the trips

# C12.3

(C12.3) Do you engage in activities that could either directly or indirectly influence public policy on climaterelated issues through any of the following?

Direct engagement with policy makers Trade associations Funding research organizations Other

## C12.3a

## (C12.3a) On what issues have you been engaging directly with policy makers?

Focus of legislation	Corporate position	Details of engagement	Proposed legislative solution
Mandatory carbon reporting	Support	ISO 14064 external verification since 2010. Participation in European Com- mission pilot project.	Carbon reporting should be compulsory for big companies.
Cap and trade	Support	Iberdrola participates in the EU ETS. As a stakeholder, Iberdrola plays an active role in the EU regulatory dialogue re- garding cap and trade structural design and rules, specifically in the review of the Directive of the EU-ETS and in the Effort Sharing Decision. Iberdrola is also member of the Carbon Pricing Leadership Coalition, a multilateral partnership, that promotes robust car- bon pricing mechanisms as a climate action tool.	Recognition of the important role of cap™ to tackle the de- carbonisation of EU energy model. In the context of EU ETS, long term goals are essential to provide a CO2 price which consolid- ates as a signal to the investment in low carbon technologies. A strong carbon price signal able to encourage investments in decarbonisation. To reinforced this signal, through a carbon price floor should be explored to bring visibility and stability to investors.

		where there are carbon price instru- ments equivalent to a carbon tax (EU ETS, carbon price floor in UK). Iber- drola is also member of the Carbon Pri- cing Leadership Coalition, a multilateral partnership, that promotes robust car- bon pricing mechanisms as a climate action tool.	Reform, which would cover all sectors, including transport and heating; cooling. Part of the Transport sector (road transport, diesel rail and inland waterway, which cover 33% of the non ETS emissions) is not so far covered by EU ETS. This sector currently contributes to a quarter of the total EU GHG emissions and its share its growing since this is the only EU sector where the emis- sions have risen since 1990. At the same time, some of the en- ergy sources of heating; cooling are not covered by the EU ETS, despite of the fact that it represents the highest share final en- ergy consumption in EU (over 50%).
Energy efficiency	Support	Iberdrola has created its own Energy Services Company (ESCO) ,to deploy specific actions in the field of efficiency, together with other suppliers in Iberdrola Group who plays and active role in the regulatory dialogue at inter- national and national level.	Energy efficiency (EE) is one of the main targets to tackle energy model challenges. Electrification of economy is the most import- ant element for the improvement of energy efficiency, due to competitive and technical advantages of the electricity sector to introduce EE measures. Energy price signal (e.g. taxation), information, and standards are proved to be the most efficient and effective tools to mitigate barriers and market failures that prevent market to provide the optimal level of energy efficiency investments.
Clean energy generation	Support	Iberdrola was founded at the beginning of the past century based on hydroelec- tric power and 17 years ago pre-empted the rest of the sector with a focus on renewables that has made it world leader in wind power and pioneer in measures to combat climate change.	Iberdrola is one of the largest electricity companies in the world and a global leader in wind power. We have achieved this position by strengthening our commitment to sustainable development and care for the environment using cleaner technologies with the lowest CO2 emission levels. The Company proposes an efficient energy mix, based on efficient renewable energy, combined cycle gas turbines, and nuclear. Iberdrola current energy mix is 68% free of carbon emissions and plans to reduce by 50% emissions in 2030 vs. 2007 and become carbon neutral in 2050.
Adaptation or resilience	Support	Iberdrola plays and active role in the regulatory dialogue at international and national level. Building on previous en- gagements like the collaboration with the United States Department of Energy's (DOE) Partnership for Energy Sector Climate Resilience program, or in the UK the Adaptation Reporting Power, Iberdrola is following the EU reg- ulatory dialogue regarding the review of the EU adaptation strategy, as well as contributing with its views to the devel- opment of the new Spanish National Adaptation Plan.	Governments should set global strategies to promote adaptation resilience across all economy sectors. Iberdrola's contribution to the new Spanish National Adaptation Plan and the EU adaptation strategy has highlighted the relevance of providing accessible and user friendly tools in order to get homogeneous information on climate scenarios and common metrics that allow a compar- ison between regions as well as risks priorization. In addition, for better addressing extreme events, an area of analysis shall be global (systemic) action plans versus individual action at asset level to understand effectiveness and efficiencies achieved. Furthermore, the need of specific financial instruments that en- courage investment, especially in the private sector, where meas- ures such as direct subsidies or favourable taxation has been also included. The relevance of the energy sector in the new ener- getic context and its contribution to socio-economic resilience has been strongly highlighted.

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Other, please specify (Climate Action Summit)	Support	cient tool to achieve this goal is putting a price on carbon, as it provides technology-neutral incentives and pro- motes the cheapest clean production sources. Leadership in the Climate Action Sum- mit organized by the UN Secretary Gen- eral in September 2019	lberdrola's was selected by UN climate action team to lead private sector participation at the plenary event of the mitigation stream at the Climate Action Summit. Iberdrola's leadership at this summit was also supported by its endorsement of the main pledges (e.g. Business Ambition 1,5 C) and its engagement with the main organizations and campaigns (We Mean Business, Cor- porate Leaders Group, UN Global Compact activities – e.g. LEAD recognition).
Other, please specify (Carbon Pricing)	Support	Iberdrola is member of Carbon Pricing Leadership Coalition - CPLC (World Bank) and participated in the Carbon Pricing Corridors project (promoted by CDP, We Mean Business and the Carbon Pricing Leadership Coalition) that, provided market insights into the future impact of carbon pricing and explored the carbon-related price signals that would decarbonize electricity genera- tion and heavy industry. We believe that is necessary to put in place the right incentives, in electricity and in all other sectors, to invest and consume in low carbon technologies. This will move from the current model that rewards polluters to a new system based on the principle "polluter pays". The most effi-	A strong carbon price signal based on the "polluter pays principle" and faced by the whole economy should be the main tool for driving cost-effective decarbonisation and low carbon investment. Carbon pricing will not be fully effective unless all agents are in a level playing field, removing subsidies to carbon- intensive producers because in the energy sector, subsidies to fossil fuels are five times more costlier than subsidies to renewables. Additionally, technological development is making energies compete with each other in energy uses (eg electric vehicles vs internal combustion, heatpumps vs fossil fuel based boilers), so implementing the polluter pays principle is even more critical. Additionally carbon pricing can generate revenues to fund the energy transition and compensate unwanted impacts on vulnerable communities.
Other, please specify (Assumption Environm. costs internally)	Support	Some of these principles have not been fully adopted in some of the countries in which it operates and are the subject of a social debate, in which Iberdrola participates, for their possible inclusion in regulations.	Active participation in national and international forums. For instance, WEF Summit in Davos, Climate Summit organized by the UN Secretary General in New York in September 2019, COP 25 in Madrid. Our Chairman and CEO joined high level panels in all of them supporting ambitious approaches in climate action (e.g. cli- mate neutrality goal).
finance		regulatory dialogue at international and national level.	climate change. Iberdrola is fully involved in the main policy con- versations to promote sustainable finance. It is especially re- markable the participation of Iberdrola in the Technical Expert Group on Sustainable Finance at EU, that has been deeply in- volved in the developing on the EU taxonomy for climate change mitigation and climate change adaptation. Additionally, Iberdrola has been really involved in working groups that support ambi- tious approaches on sustainable finance within its activities in organizations such as OECD, UN Global Compact or Corporate Leaders Group. Within climate advocacy activities, it was espe- cially remarkable the leadership of the company in the Climate Summit of the Secretary General of the United Nations in New York in September 2019, engaging at the highest level with the main action streams (mitigation, energy transition, just transition) and joining some of the most relevant pledges such as the Business Ambition 1,5°C declaration, aimed at aligning business activities with limiting global temperature rise to 1.5°C above pre-industrial levels, and the Just Transition and Decent Jobs Pledge, encouraging companies to following ILO core la- bour standards with respect to our own employees, and use con- tractors who also comply with these standards.

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please	presentation by the European Commis-	dorsed the European Green Deal and the EU climate neutrality
specify	sion in December 2019.	target by 2050, co-organizing a high level event at COP 25 in
(European		Madrid with European Commission and CLG Europe, with the par-
Green Deal)		ticipation of Vice-president Timmermans and Iberdrola's, Chair-
		man and CEO . Within the roadmap towards climate neutrality,
		Iberdrola has advocated for an ambitious approach to fully decar-
		bonize the energy sector at EU level by 2050 as a source of
		opportunities. In collaboration with the Afry consulting group, it
		has been developed (during 2019 & 2020) a thorough assess-
		ment of this transition towards a decarbonized energy sector at
		EU level. This report was launched at a high level webinar with
		the participation of the European Commission, co-organized with
		Euractiv in June 2020.

# C12.3b

(C12.3b) Are you on the board of any trade associations or do you provide funding beyond membership? Yes

# C12.3c

(C12.3c) Enter the details of those trade associations that are likely to take a position on climate change legislation.

Trade association Eurelectric

Is your position on climate change consistent with theirs? Mixed

## Please explain the trade association's position

Eurelectric in Europe, decarbornisation in 2050.

#### How have you influenced, or are you attempting to influence their position?

We are participating focused on clean energy promotion instead of the general rule of coal generation in Europe. Members of Groups relating Climate Change are committed to design the energy roadmap in order to decarbonise European utilities.

#### **Trade association**

Transparency Register

Is your position on climate change consistent with theirs? Consistent

Please explain the trade association's position

## How have you influenced, or are you attempting to influence their position?

In February 2012, Iberdrola registered within the Transparency Register. Existence of government and regulatory support mechanisms to facilitate the implementation of these programmes and help achieve the global targets. The company is also engaged by the input from expert stakeholders to the sustainability report.

### **Trade association**

Club de Excelencia en Sostenibilidad

#### Is your position on climate change consistent with theirs?

Consistent

#### Please explain the trade association's position

Created by leading corporations in order to point out the public authorities best practices regarding sustainability issues: GHG emissions, mobility, biodiversity and energy efficiency projects...

#### How have you influenced, or are you attempting to influence their position?

We have participated in all the publications and we have coordinated within the institutions several Working Groups. The most recent is the Biodiversity Catalogue.

### **Trade association**

Call of eight leading energy companies to EU leaders for a revitalized energy policy

#### Is your position on climate change consistent with theirs?

Consistent

#### Please explain the trade association's position

The eight energy companies agreed on a joint statement to underline the seriousness of the current challenges facing European carbon market able to support climate-friendly technologies and in which a reliable perspective is provided, notably, by establishing ambitious but realistic and stable post-2020 greenhouse gas emissions targets.

#### How have you influenced, or are you attempting to influence their position?

Iberdrola has supported the event. Information published in Iberdrola's webpage.

### **Trade association**

Grupo español de Crecimiento Verde

#### Is your position on climate change consistent with theirs?

Consistent

#### Please explain the trade association's position

The aim of this Group is increasing participation of companies, sharing information, identifying opportunities and supporting Spanish presence in international forums. Main spanish companies belong to this Group which was created by the Spanish Ministry for Agriculture, Alimentation and Environment.

#### How have you influenced, or are you attempting to influence their position?

Iberdrola is present in this Group since its creation on September 2014. It is one of the few utilities present. Iberdolaholds the vice-presidency of the Group and coordinates the climate plicty working

#### Trade association CDP Roadmap to Paris

## Is your position on climate change consistent with theirs?

Consistent

## Please explain the trade association's position

Iberdrola reaffirmed its unwavering commitment to combating climate change at the Climate Change Summit organised by the United Nations in New York in September 2014. In this regard, the company endorsed the goals set by CDP via its Road to Paris 2015 initiative, which aims to ensure that more ambitious and binding measures will be taken by States at the Climate Summit scheduled for the French capital.

## How have you influenced, or are you attempting to influence their position?

Iberdrola, when attending the New York Climate week in September 2014, signed the basic purposes of this initiative and has joined the effort in order to go on bringing down greenhouse gas emissions, limit global warming to less than 2° Celsius and promoting transparency in the reporting.

Trade association Global Compact Lead

## Is your position on climate change consistent with theirs?

Consistent

### Please explain the trade association's position

By bringing companies together with relevant experts and stakeholders, Global Compact LEAD provides a collaborative space to generate and implement advanced corporate sustainability practice. As an integral part of the United Nations and the UN Global Compact, LEAD is uniquely positioned to inspire widespread uptake of sustainability solutions among businesses around the world.

## How have you influenced, or are you attempting to influence their position?

Iberdrola takes an active part in this Group.

## C12.3d

## (C12.3d) Do you publicly disclose a list of all research organizations that you fund? Yes

## C12.3e

(C12.3e) Provide details of the other engagement activities that you undertake.