



InfluenceMap

A Review of CA100+ Company Disclosures on Industry Association Lobbying

An InfluenceMap Report

April 2021

A Review of CA100+ Company Disclosures on Industry Association Lobbying

An InfluenceMap report

April 2021

Table of Contents

Executive Summary	2
Background	5
Expectation 1: Paris-Aligned Advocacy	7
Expectation 2: Disclosure	9
Expectation 3: Policy Alignment Process	12
Summary Ranking of Industry Association Reviews.....	15
Appendix A: Methodologies for Assessment.....	17
Appendix B: Company Assessments.....	20

Executive Summary

- Engagement with companies over their lobbying practices is now firmly on the investor agenda on climate change. It is an integral part of the *Climate Action 100+ (CA100+)* investor-engagement process (now 545 investors with a total of \$52 trillion in signatory assets under management) and are the subject of numerous shareholder resolutions at companies such as ExxonMobil, General Motors, and Rio Tinto. InfluenceMap maintains the world's largest database of lobbying on climate by companies and industry associations. Our ranking and scoring of CA100+ companies *can be found here*.
- Investor expectations, formalized by investor-representatives such as the *PRI*, *IIGCC*, and *Ceres* (members of the CA100+ secretariat), require companies to adopt Paris-aligned climate lobbying positions, and also to implement enhanced governance and disclosure processes to ensure industry associations alignment to these positions. Company commitments reflecting this are covered by high-level indicators under the CA100+'s *Net-Zero Company Benchmark*.
- Starting with a release at the end of 2017 from BHP, 24 CA100+ target companies (or 14%) have disclosed on industry association alignment.¹ InfluenceMap's analysis finds that none of these disclosures meet investor expectations in full, although the 2021 release from Royal Dutch Shell leads.
- Mining companies BHP and Rio Tinto were the first to publish industry association lobbying reviews in 2017 and 2018. However, weaknesses in these companies' alignment-review processes have masked limited, real-world improvements in their industry associations' climate lobbying. Similar issues are apparent for nearly all the companies covered in this briefing, including Chevron, ConocoPhillips, and Total. Shell appears to have made steps towards good practice in the clarity and quality of its disclosure and policy alignment-review processes.
- With more CA100+ company disclosures expected in 2021, InfluenceMap will update this analysis on a rolling basis, with updated company assessments available on our *CA100+ platform* as a resource for developing more comprehensive minimum standards of practice on this issue. This will be an ongoing process to feed into active investor engagements, shareholder resolutions and public scrutiny of climate lobbying evolution by the corporate sector.

¹ This excludes companies making more limited disclosures covering corporate participation within industry associations.

Overview of Analysis

The table below shows the 24 CA100+ companies assessed in this report, ranked by InfluenceMap's assessment of their industry association review processes (expressed as a percentage score from 0 to 100). This assessment covers the *clarity, accuracy, and scope of the companies' disclosures*, as well as the robustness of companies' *alignment processes* across a range of criteria. These assessments use benchmarks derived from the investor expectations of investor-representatives such as the *PRI*, *IIGCC*, and *Ceres*. A detailed explanation of the methodology along with overviews of the analysis of each industry association can be found in the appendices of the report. Further details on any of the companies assessed can be provided upon request.

Company and Link to InfluenceMap Profile	CA100+ Sector	Headquarters	Review Score (0-100)
<i>Royal Dutch Shell</i>	Oil & Gas	Europe	64
<i>BASF</i>	Chemicals	Europe	43
<i>BHP</i>	Mining	Australia	43
<i>Rio Tinto</i>	Mining	Europe	43
<i>BP</i>	Oil & Gas	Europe	36
<i>Glencore</i>	Mining	Europe	36
<i>OMV</i>	Oil & Gas	Europe	36
<i>Origin Energy</i>	Oil & Gas	Australia	36
<i>AGL Energy</i>	Electric Utilities	Australia	29
<i>ArcelorMittal</i>	Steel	Europe	29
<i>Equinor</i>	Oil & Gas	Europe	29
<i>Total</i>	Oil & Gas	Europe	29
<i>Woodside</i>	Oil & Gas	Australia	29
<i>Repsol</i>	Oil & Gas	Europe	21
<i>RWE</i>	Electric Utilities	Europe	21
<i>South32</i>	Diversified Mining	Australia	21
<i>Anglo American</i>	Diversified Mining	Europe	14
<i>Chevron</i>	Oil & Gas	US	14
<i>ConocoPhillips</i>	Oil & Gas	US	14
<i>Eni</i>	Oil & Gas	Europe	14
<i>Ford Motor Company</i>	Automobiles	US	14
<i>Santos</i>	Oil & Gas	Australia	14
<i>Duke Energy</i>	Utilities	US	7
<i>Sasol</i>	Oil & Gas	South Africa	0

- With the possible exception of Royal Dutch Shell, companies have not performed consistently across the criteria tested in the analysis. Several companies (e.g. BASF, BHP) have produced reviews that provide examples of strong performance on one or two criteria but fall down in other key areas.
- An area of poor performance across the assessed companies relates to disclosure of industry association climate lobbying activities. Companies are found not to be transparently identifying evidence of detailed and ongoing lobbying from their industry representatives that runs counter to Paris-aligned climate policy. Particularly poor reviews were characterized by a focus only on high-level climate position statements to assess alignment, overlooking detailed lobbying activities entirely. InfluenceMap refers to the *UN's Guide for Responsible Corporate Engagement in Climate Policy* as a guide for what constitutes lobbying. This can include direct engagement with policymakers on specific regulatory or legislative policy streams, as well as public communications by the industry association, including via advertising and social media campaigns which target specific climate-related policy issues.
- Similarly, a lack of disclosure on the case-by-case alignment assessments has resulted in ambiguity over how companies have made specific determinations, creating the impression that non-disclosed factors have shaped these decisions. Several companies provided alignment results only in list format with no additional explanation. In contrast, Royal Dutch Shell and BASF provided a detailed breakdown of their assessments of each industry association within the scope of their reviews.
- Nine companies (AGL Energy, BHP, BP, Equinor, Eni, Origin Energy, Shell, Total, and Woodside) have taken the decisive step of leaving or suspending memberships to certain industry associations misaligned on climate. However, action on misalignments has been inconsistent due to the underlying problems with alignment review processes. Companies committing to internal conversations with their industry associations, without disclosing further on these efforts or their results, exacerbates the perception of a lack of action to address misalignments. BHP and Shell have exhibited better practice in this area, committing to and taking steps to implement frameworks for addressing misalignments, including escalating measures, while also committing to regular reporting on these efforts' results.
- Companies have generally shown more leadership in committing to processes to monitor and review their industry associations going forward, with ten companies (42%) publishing an annual review of their industry association memberships or committing to doing so on at least a yearly basis. Along with the prospect of more CA100+ companies also producing disclosures throughout 2021, this provides a basis for improvements in CA100+ corporate disclosure and alignment processes on industry association climate change lobbying.

Background

Negative climate policy engagement has become a mainstream investor concern, driven by a vanguard group of investors that initiated the engagement processes with companies like Rio Tinto and BHP in 2017, as well as via resolution activity from organizations such as the Australasian Centre for Corporate Responsibility. A consistent approach to what is now business-critical policy is recognized as a key indicator of sound corporate management, whereas oppositional or inconsistent behaviour signals a company might be lobbying to prop up an outdated business model.

Engagement with companies over climate policy advocacy is a strategic element within the framework of the *Climate Action 100+* (CA100+) investor engagement process, which comprises 545 investors with a total of \$52 trillion in signatory assets under management. Several investor-representative groups (e.g. *PRI*, *IIGCC*, and *CERES*) have formalized sets of expectations regarding how companies should manage their climate policy engagement processes. These documents broadly align with the CA100+ requests of companies and can be summarized as follows:

- **Paris-Aligned Advocacy:** Adopt climate policy positions in line with the Paris Agreement and engage accordingly.
- **Disclosure:** Full transparency of climate policy positions, policy engagement, industry association memberships, misalignments on climate policy and remedial plans to address misalignment.
- **Policy Alignment Process:** Adopt good governance of climate policy engagement processes and industry association links such as audits, as well as further actions to ensure consistency between the company's stated climate goals and its policy engagement activities, including the lobbying activities of its industry associations.

In March 2021, the CA100+ released the first edition of its *Net-Zero Company Benchmark*, which assessed the focus companies on key priorities of the initiative. This includes high-level indicators determining whether a company has made a commitment to lobby in line with the goals of the Paris Agreement or to ensuring its industry associations are likewise aligned.

As a research partner to *CA100+*, InfluenceMap's system for tracking, assessing and scoring 300 of the largest industrial companies and around 150 industry associations on their ongoing climate change engagement activities is a key resource for investors. It provides detailed analysis, supplementing the CA100+'s Net-Zero Company benchmark with insight on material and real-world improvements in Paris-aligned corporate and industry association climate lobbying.

With regards to **Paris-Aligned Advocacy** by CA100+ companies, a complete list of analysis and rankings of all CA100+ companies' (currently covered by InfluenceMap) engagement with climate change policy can be found on InfluenceMap's [website here](#), with the details on the methodology for this analysis [here](#). A summary of the **Paris-Aligned Advocacy** for the companies covered in this report is available in the [following section](#). This review then looks at the 'Disclosure' and 'Policy Alignment Process' of the CA100+ companies with the aim of providing insights on the extent to which investor expectations have been met by these disclosures and what currently constitutes best practice.

This report analyzes the 24 CA100+ companies that have produced a review of their industry association memberships up to April 2021. The table below lists these companies, highlighting the early movers along with which companies have gone on to produce follow-up reviews. A clear ramp-up can be seen in 2019-2020. InfluenceMap will update this analysis periodically as further reviews are disclosed in 2021.

Company	2017	2018	2019	2020	2021
AGL Energy				✓	
Anglo American			✓		
ArcelorMittal				✓	
BASF			✓		
BHP	✓	✓	✓	✓	
BP				✓	
Chevron				✓	
ConocoPhillips				✓	
Duke Energy					✓
Eni				✓	
Equinor				✓	✓
Ford Motor					✓
Glencore			✓	✓	
OMV				✓	
Origin Energy			✓	✓	
Repsol				✓	
Rio Tinto		✓	✓	✓	✓
Royal Dutch Shell			✓	✓	✓
RWE				✓	
Santos				✓	
Sasol				✓	
South32			✓	✓	
Total			✓	✓	
Woodside				✓	

✓ = Publication of Review or Review Update

The assessments use methodologies introduced by InfluenceMap in its April 2020 report, "[BHP and Rio Tinto: Their Industry Groups and Climate Lobbying](#)." These methodologies are benchmarked against the formalized sets of expectations on the issue produced by investor-representative groups ([PRI](#), [IIGCC](#), [Ceres](#)). The full methodology can be found in [Appendix A](#) of this report. A detailed company-by-company breakdown of the assessment of the disclosure and alignment processes is summarized in [Appendix B](#).

Expectation 1: Paris-Aligned Advocacy

Investor expectations, as articulated by the [UN PRI](#), [IIGCC](#), and [Ceres](#), clearly state that companies should adopt climate policy positions in line with the Paris Agreement and engage accordingly. The table on the following page shows that all companies within the scope of this analysis have publicly communicated support for the objectives of the Paris Agreement. InfluenceMap's system for tracking, analyzing and scoring these companies demonstrates, however, a consistent disconnect between these top-line communications and the companies' detailed lobbying on climate-related policy and regulation.

InfluenceMap's methodology, available [on our website](#), uses seven publicly available data sources (including corporate websites, legislative consultations, CEO messaging, media, social media and financial disclosures) to gather evidence of company and industry association engagement on a range of climate-related policy streams. Each item of evidence is scored against benchmarks based on the stated intentions of governments looking to implement the Paris Agreement, or the advice of [IPCC science](#). This process can result in hundreds of scored evidence items, providing a robust basis to assess the Paris-alignment of a company's lobbying activities. Two key metrics for understanding the Paris-alignment of corporate climate lobbying are the 'Organization Score' and 'Relationship Score'.

- **Organization Score (0-100)** expresses how supportive or obstructive the company is towards climate policy aligned with the Paris Agreement, with 0 being fully opposed and 100 being fully supportive. Organization Scores under 50 indicate increasingly significant "internal" misalignment between the company's top-line support for the Paris Agreement and the company's detailed climate lobbying positions. Scores above 75 indicate broad alignment.
- **Relationship Score (0-100)** expresses how supportive or obstructive the company's industry associations are towards climate policy aligned with the Paris Agreement, with 0 being fully opposed and 100 being fully supportive (aggregated). Relationship Scores under 50 indicate increasingly significant "external" misalignment between the company's top-line support for the Paris Agreement and the detailed climate lobbying positions of its industry associations. Scores above 75 indicate broad alignment.

A significant difference (a score variation of above 5) in the Organization Score and Relationship Score indicates broad misalignment in the climate policy position of the company and its industry associations.

The table on the following page includes the Organization Score and Relationship Score for all companies covered in this report. The table also includes links to the company profiles on InfluenceMap's website, with a summary of each company's climate position and lobbying activities as well as access to the underlying data which forms the overall company assessment.

Company	Stated support for Paris Agreement?	Organization Score	Relationship Score
<i>Royal Dutch Shell</i>	✓	67	45
<i>AGL Energy</i>	✓	66	64
<i>Equinor</i>	✓	66	46
<i>Origin Energy</i>	✓	63	57
<i>Eni</i>	✓	61	51
<i>Sasol</i>	✓	57	41
<i>RWE</i>	✓	56	60
<i>Total</i>	✓	56	52
<i>ArcelorMittal</i>	✓	55	40
<i>Repsol</i>	✓	54	44
<i>BP</i>	✓	52	45
<i>South32</i>	✓	50	40
<i>Ford Motor Company</i>	✓	50	35
<i>Santos</i>	✓	48	39
<i>BHP</i>	✓	47	45
<i>BASF</i>	✓	46	42
<i>ConocoPhillips</i>	✓	46	35
<i>Duke Energy</i>	✓	44	42
<i>Rio Tinto</i>	✓	41	42
<i>Woodside</i>	✓	41	45
<i>OMV</i>	✓	40	41
<i>Anglo American</i>	✓	38	34
<i>Glencore</i>	✓	36	37
<i>Chevron</i>	✓	30	35



Expectation 2: Disclosure

In its *'Investor Expectations on Corporate Climate Lobbying'* report, the PRI highlights the need for disclosure on the company's positions and activities on climate change policy engagement, as well as the positions and activities of the industry groups it supports. The PRI further requests information on the governance processes and actions taken to ensure alignment between these activities and the company's stated climate goals. Investor-expectation statements from *IIGCC and Ceres* reference similar requirements. Accordingly, InfluenceMap uses the following assessment criteria to test the clarity, accuracy and scope of information provided by companies against four key issues:

- Detailed disclosure of the company's own climate policy positions and influencing activities beyond 'top-line' climate statements;
- Detailed disclosure of their industry associations' climate policy positions and influencing activities beyond 'top-line' climate statements;
- Disclosure of a clear framework to assess alignment with its industry associations on climate policy engagement, including a clear and detailed explanation of how it has been applied to each group;
- Disclosure of a clear framework for addressing misalignments with its industry associations, including escalating steps and clear deadlines attached (the formalized expectations outlined by *PRI, IIGCC* and *Ceres* include several steps a company can take to address misalignment).

InfluenceMap has assessed each company's most recent disclosures against these criteria using the traffic-light assessment framework summarized below². A more detailed explanation of this framework can be found in *Appendix A* of this document.

Key	Explanation
	Has broadly met investor expectations in this area.
	Has made some progress on investor expectations in this area, but with significant deficiencies.
	Has fallen short of investor expectations in this area.

² This focused on each company's most recent industry association review, but also factored in additional corporate website-reporting if clearly referenced in the review.

Company	Corporate climate policy positions and influencing activities	Industry association climate policy positions and influencing activities	Alignment assessment method	Framework for addressing misalignment
BASF				
Royal Dutch Shell				
Rio Tinto				
Woodside				
ArcelorMittal				
OMV				
BHP				
BP				
Glencore				
ConocoPhillips				
Ford Motor				
Origin Energy				
Santos				
RWE				
Repsol				
Eni				
Total				
Chevron				
Anglo American				
Equinor				
South32				
AGL Energy				
Duke Energy				
Sasol				

- The findings show that just 25% of the assessed companies have disclosed a detailed and accurate account of their own climate policy positions and influencing activities, with the better disclosures including policy recommendations and/or engagement history on specific climate regulations, e.g. ConocoPhillips, Royal Dutch Shell. Half of the companies do not make any attempt to disclose their corporate climate policy positions, or limit this disclosure to operational commitments and high-level climate statements which lack specificity. The remaining 25% have made some attempt to disclose specific policy positions but these generally lacked sufficient detail.

- Analysis indicates that to date no companies have met investor expectations on the disclosure of their industry associations' climate policy positions and influencing activities. Only seven companies (29%) have produced a breakdown of the climate policy positions and influencing activities for all the industry associations included in the scope of their reporting. However, these disclosures are generally limited to a high-level description of the associations' climate positions and engagement activities and, even where more detail was provided, did not capture the full scope of the climate-lobbying activities undertaken by the industry associations.
- Only three companies (13%) have outlined a clear framework for assessing alignment with their industry associations on climate and provided a detailed explanation of how this framework has been applied to each industry association. An example of better practice here was BASF's disclosure of specific alignment indicators for engagement with EU policy. Most companies have only partially explained their alignment assessment methodology or have not provided details of its applications to a meaningful number of industry associations. A common source of ambiguity is companies listing the result of the alignment assessment without explaining how these were derived, despite extensive climate lobbying by the industry associations covered.
- BHP is the only company to disclose a clear framework for addressing misalignment, communicating a clear and time-bound escalation process in line with investor expectations in this area. Ten companies (42%) outline steps to address misalignment but with no deadlines attached. The remaining thirteen companies do not disclose any steps, or their process lacks clarity and detail, which leaves ambiguity regarding the circumstances in which they would take action to address misalignment.




A more detailed company-by-company breakdown of the assessment of the disclosure and policy alignment processes is summarized in [Appendix B](#).

Expectation 3: Policy Alignment Process

As well as transparent disclosures on industry group links and lobbying activities, the investor expectations communicated by *PRI*, *IIGCC* and *Ceres* also set out the need for robust processes to ensure alignment between the company's stated policy positions and the positions and lobbying activities of their industry groups. These processes consist of the following three elements:

- **Identify and Assess:** Undertake an initial review process to identify and assess alignment between the company's climate positions and the climate positions of its industry associations. It is clear from the investors' stated principles that companies are expected to identify and assess where their industry associations are lobbying in a way counter to the Paris Agreement. InfluenceMap, with reference to its own database that covers over 150 key industry associations actively lobbying on climate-related policy globally, has scored companies on the quality of these assessments.
- **Monitor and Review:** Companies should have ongoing processes to monitor and review its industry associations' lobbying activities and alignment with its own climate positions. This review process should take place at least once a year and the results should be disclosed publicly.
- **Act:** Companies should demonstrate evidence of action to address all cases of potential misalignment. InfluenceMap has scored companies with reference to its own database on corporate and industry group climate change lobbying, using a benchmark of Paris-aligned climate policy.

InfluenceMap has assessed each company's most recent disclosure of its policy alignment processes against these criteria using the traffic-light assessment framework summarized below³. A more detailed explanation of this framework can be found in *Appendix A* of this document.

Key	Explanation
	Has broadly met investor expectations in this area.
	Has made some progress on investor expectations in this area, but with significant deficiencies.
	Has fallen short of investor expectations in this area.

³ This focused on each company's most recent industry association review, but also factored in additional corporate website-reporting if clearly referenced in the review.

Company	Identify & Assess	Monitor & Review	Act
AGL Energy			
BHP			
Origin Energy			
Royal Dutch Shell			
Total			
Equinor			
BP			
Glencore			
OMV			
Rio Tinto			
South32			
Anglo American			
ArcelorMittal			
Duke Energy			
Repsol			
RWE			
Chevron			
Eni			
Woodside			
BASF			
ConocoPhillips			
Ford Motor			
Santos			
Sasol			

- The 'Identify and Assess' metric is measured against InfluenceMap's database of the climate change position and lobbying activities of each company's industry associations. Although AGL Energy has demonstrated some progress in this area, InfluenceMap analysis indicates that all companies have missed key cases of misalignment with industry associations which are lobbying counter to the goals of the Paris Agreement. There are two main reasons for this:

1. There is a clear lack of consistency regarding what constitutes "alignment". Some companies, such as Repsol, provide ambiguous definitions that focus on top-line statements of support for the Paris Agreement and broad alignment to corporate strategy. Others appear to have made the assessment based purely on alignment with their own positions without making an initial assessment of whether these positions are properly Paris-aligned.

2. All companies appear to overlook evidence of detailed, negative lobbying on climate policy while “cherry-picking” positive positions and top-line statements to suggest alignment.
- Based on disclosures so far, companies demonstrate better performance under the ‘Monitor and Review’ metric, with ten companies (42%) publishing an annual review of its industry association memberships or committing to do so on at least an annual basis. BHP, Origin Energy and Royal Dutch Shell have made significant progress in this area, publishing updated disclosures to reflect changes in their assessment of the position of their key industry associations. BHP has also committed to disclose assessments of misalignment in ‘real-time’ on its corporate website. However, eight companies (33%) have not committed to update their reviews, while a further six companies (25%) have committed to update the review but not on an annual basis, or with no timeline specified.
 - Companies have demonstrated only limited action to address potential misalignment with their industry associations under the ‘Act’ metric, with no companies showing evidence of addressing all cases of misalignment identified by InfluenceMap’s database on corporate lobbying. Action to address misalignment, such as terminating memberships, appears to be taken in an ad hoc manner with companies failing to take consistent action on misaligned associations. Poor performance in this area is likely heightened due to limited disclosure on internal engagements to reform misaligned industry associations. Furthermore, for companies to be taking action on all misalignments, it holds that they first need to have identified areas of misalignment and have processes in place to monitor and review developments. Therefore, poor performance across the other policy alignment process indicators has contributed to limited action being taken by the companies.
 - The ‘Act’ metric was measured against the steps outlined in the investor expectations formalized by *PRI*, *IIGCC* and *Ceres*, which range from constructive engagement to discontinuing membership. Nine companies (38%) in this analysis have suspended or terminated its membership with at least one industry association. Of these, a smaller number of companies have also demonstrated further evidence of action to reform misaligned groups of which they are still a member. For example, BHP requested that the American Petroleum Institute refrain from policy advocacy in relation to emissions reduction targets. Royal Dutch Shell also disclosed its detailed engagement activity with misaligned groups on specific policies in the EU and the US. However, most companies have shown limited or no evidence of action to reform the detailed and material lobbying activities undertaken by misaligned organizations.
 - A more detailed company-by-company breakdown of the assessment of the disclosure and policy alignment processes is summarized in *Appendix B*.

Summary Ranking of Industry Association Reviews

Overview

The table below shows a ranking of the 24 CA100+ companies in this report by the quality of their industry association review processes, expressed as a percentage score from 0 to 100. This score comprises both the 'Disclosure' and 'Policy Alignment Process' assessments in this report, where 100 would indicate that a company has met investor expectations for every assessment criteria related to the review process.




With the exception of Royal Dutch Shell, it is clear that corporate governance of industry association memberships and climate alignment currently falls significantly short of meeting investor expectations. It should be noted, however, that even Shell's review fell short of full alignment to investor expectations in key areas, with evidence that the company's overlooking of industry association climate-negative data points contributed to inaccurate alignment assessments and inconsistent action to address misaligned groups.

Company and Link to InfluenceMap Profile	CA100+ Sector	Headquarters	Review Score (0-100)
<i>Royal Dutch Shell</i>	Oil & Gas	Europe	64
<i>BASF</i>	Chemicals	Europe	43
<i>BHP</i>	Mining	Australia	43
<i>Rio Tinto</i>	Mining	Europe	43
<i>BP</i>	Oil & Gas	Europe	36
<i>Glencore</i>	Mining	Europe	36
<i>OMV</i>	Oil & Gas	Europe	36
<i>Origin Energy</i>	Oil & Gas	Australia	36
<i>AGL Energy</i>	Electric Utilities	Australia	29
<i>ArcelorMittal</i>	Steel	Europe	29
<i>Equinor</i>	Oil & Gas	Europe	29
<i>Total</i>	Oil & Gas	Europe	29
<i>Woodside</i>	Oil & Gas	Australia	29
<i>Repsol</i>	Oil & Gas	Europe	21
<i>RWE</i>	Electric Utilities	Europe	21
<i>South32</i>	Diversified Mining	Australia	21
<i>Anglo American</i>	Diversified Mining	Europe	14
<i>Chevron</i>	Oil & Gas	US	14
<i>ConocoPhillips</i>	Oil & Gas	US	14
<i>Eni</i>	Oil & Gas	Europe	14
<i>Ford Motor Company</i>	Automobile	US	14
<i>Santos</i>	Oil & Gas	Australia	14
<i>Duke Energy</i>	Utilities	US	7
<i>Sasol</i>	Oil & Gas	South Africa	0

Examples of Better Practice

While InfluenceMap did not find an example of best practice across the entire industry association review process, some companies have demonstrated better practice under specific metrics under the 'Disclosure' and 'Policy Alignment Process' assessments. Examples of best practice are highlighted below:

Disclosure




Corporate climate policy positions and influencing activities	
	<i>Shell</i> has disclosed six detailed climate policy positions in its 2021 review including net-zero emissions and carbon pricing. Shell's 2020 update also outlined the company's position on specific climate policies including the EU Green Deal and methane regulation in the EU and US. The 2021 review also includes a clear reference to a list of climate policy positions and examples of Shell's advocacy on its website.
Industry association climate policy positions and influencing activities	
N/A	No companies have met investor expectations in this area, although <i>BASF</i> and <i>Shell</i> exhibit current leading practice. Both companies have disclosed a detailed account of all key industry associations' climate policy positions, and a summary of their influencing activities. However, they appear to overlook detailed negative lobbying by a number of industry associations identified by InfluenceMap's database.
Alignment assessment method	
	<i>BASF</i> has disclosed a clear explanation of its alignment assessment method along with a clear and detailed explanation of how it has been applied to each industry association. The company also provided specific alignment indicators for EU climate policy such as the EU ETS to assess the alignment of key European industry associations.
Framework for addressing misalignment	
	<i>BHP</i> has disclosed clear and detailed steps for addressing potential misalignment, including an escalation strategy and clear timelines attached. The company states it will communicate material differences, request that the industry association develop a position or refrain from advocacy in certain areas, and review the membership if there has been no action within 12 months.

Policy Alignment Process

Identify & Assess	
N/A	Although <i>AGL Energy</i> has demonstrated some progress in this area, no companies have met investor expectations. InfluenceMap analysis indicates that all companies have missed key cases of misalignment with industry associations lobbying counter to the goals of the Paris Agreement.
Monitor & Review	
	<i>Shell</i> has published full industry association reviews in 2019 and 2021. In April 2020, Shell also published an update on the nine associations with some misalignment found in 2019 including actions taken within each association, key changes to the associations' climate positions and detailed next steps. Shell has committed to publish its next update in 2022.
Act	
N/A	No companies have met investor expectations in this area by showing evidence of action to address all cases of misalignment identified by InfluenceMap's database, although some companies have made more progress. <i>Total</i> announced in January 2021 that it had decided not to renew its membership to the American Petroleum Institute due to divergences on climate positions. <i>BHP</i> suspended its membership to Queensland Resources Council in 2020 following its 'Vote Greens Last' advertising campaign and also outlined detailed actions to be taken at four "partly aligned" industry associations. <i>Chevron</i> has not left any industry associations but has disclosed its engagement on specific climate change policy issues with seven industry associations, including details of the results of this engagement.

Appendix A: Methodologies for Assessment



Scoring Disclosures and Policy-Alignment

Key	Explanation
	Has broadly met investor expectations in this area.
	Has made some progress on investor expectations in this area, but with significant deficiencies.
	Has fallen short of investor expectations in this area.

Assessing Disclosures

Since BHP's 2017 industry association review, over 20 major global corporates have delivered similar, specific disclosures on their industry association links in response to investor pressure. This positive momentum is undermined, however, if the resulting disclosures are of poor quality.










In its *'Investor Expectations on Corporate Climate Lobbying'* report, the PRI highlights the need for disclosure on the company's positions and activities on climate change policy engagement, as well as the positions and activities of the industry groups it supports. The PRI further requests information on the governance processes and actions taken to ensure alignment between these activities and the company's stated climate goals. *IIGCC* and *Ceres* articulate similar expectations, also requiring companies to disclose a material impact assessment of lobbying by an organization that opposes their public position. InfluenceMap uses the following assessment criteria to test the clarity, accuracy and scope of information provided by companies against four key issues.

Disclosure Item	Score	InfluenceMap's Assessment Criteria
Corporate climate policy positions and influencing activities		The company has disclosed a detailed and clearly referenced breakdown of its own climate policy positions and influencing activities beyond 'top-line' climate statements. This includes descriptions of the company's positions and policy engagement activities on specific items of regulation and legislation which are material to the company's operations, business sector, and/or the region(s) in which it operates.
		The company has disclosed a breakdown of its own climate policy positions and influencing activities. However, the company's description of its positions and policy engagement activities on specific items of regulation and legislation lacks detail, and/or the company has not disclosed its position and engagement activities on key items of regulation and legislation which are material to its operations, business sector, and/or the region(s) in which it operates.

		The company has made no attempt to disclose its climate policy positions and influencing activities, or the company's disclosure is limited to a brief overview of its 'top-line' climate statements and operational commitments without reference to specific items of regulation and legislation.
Industry association climate policy positions and influencing activities		The company has disclosed a detailed and accurate account of the climate policy positions and influencing activities of each industry association actively engaged on climate change policy, including descriptions of positions and policy engagement activities on specific items of regulation and legislation beyond 'top-line' statements.
		The company has disclosed an account of the climate policy positions and influencing activities of each industry association actively engaged on climate change policy, beyond 'top-line' statements. However, the disclosure lacks detail on positions and policy engagement activities on specific items of regulation and legislation, and/or does not disclose evidence of negative climate lobbying by one or more of its industry associations.
		The company has not disclosed the climate policy positions and influencing activities of each industry association actively engaged on climate change policy, and/or the company's disclosure is limited to a brief overview of 'top-line' climate statements without reference to specific items of regulation and legislation.
Alignment assessment method		The company has: (1) disclosed a clear and detailed framework for assessing alignment with its industry associations across all relevant areas of policy engagement; (2) consistently applied this framework across <i>all</i> industry associations; and (3) provided a clear and detailed explanation behind each evaluation.
		The company has disclosed a framework for assessing alignment with its industry associations but the disclosure lacks detail regarding <i>one</i> of the above steps (1-3).
		The company has not disclosed a framework for assessing alignment with industry associations, or it has disclosed a framework but the disclosure lacks detail regarding <i>more than one</i> of the above steps (1-3).
Framework for addressing misalignment		The company has disclosed a clear and detailed framework for addressing misalignments with its industry associations including escalation steps and clear deadlines for industry associations which do not amend misaligned practices.
		The company has disclosed a clear and detailed framework for addressing misalignments with its industry associations including escalation steps, but there is no clear deadlines for industry associations which do not amend misaligned practices
		The company has not disclosed a framework for addressing misalignments with its industry associations, or the company has disclosed a framework but the steps are ambiguous and lack sufficient detail.

Assessing Policy Alignment Process

As well as transparent disclosures on industry group links and lobbying activities, the investor expectations communicated by IIGCC, CERES and the UN PRI also set out the need for robust processes to ensure alignment between the company's stated policy positions and the positions and lobbying activities of their industry groups. These processes consist of the following three elements:

Alignment Process	Score	InfluenceMap's Assessment Criteria
Identify & Assess		The company has identified all cases of misalignment with its industry associations and the Paris Agreement in line with InfluenceMap's <i>database</i> on corporate lobbying.
		The company has not identified key cases of misalignment with the Paris Agreement in line with InfluenceMap's <i>database</i> on corporate lobbying. Companies are scored in this category if they miss up to three cases of "potential" misalignment (industry associations with Organization Scores 34-66 in InfluenceMap's database).
		The company has not identified key cases of misalignment with the Paris Agreement in line with InfluenceMap's <i>database</i> on corporate lobbying. Companies are scored in this category if they miss one case of "material" misalignment (industry associations with Organization Scores 0-33) or more than three cases of "potential" misalignment (industry associations with Organization Scores 34-66 in InfluenceMap's database).
Monitor & Review		The company has published a review of industry associations on an annual basis, has committed to do so at least once a year, or is/has committed to disclose regular updates on its review and alignment process. Updates should accurately report on relevant material and on-going lobbying activities of potentially misaligned industry associations, as well as the company's alignment and engagement with the industry association concerning these activities.
		The company has committed to publish an update to its review of industry associations but not an annual basis or not specified a timeframe.
		The company has not committed to any follow-up processes as part of its review of industry associations.
Act		The company has shown evidence of action to address all cases of misalignment with its industry associations and the Paris Agreement, in line with InfluenceMap's <i>database</i> on corporate lobbying. The investor expectations outlined by <i>PRI</i> , <i>IIGCC</i> and <i>Ceres</i> include several steps companies can take to address misalignment. Steps should include terminating memberships or taking specific action to reform the detailed and material lobbying activities undertaken by misaligned organizations.
		The company has shown some evidence of action to address cases of misalignment with its industry associations and the Paris Agreement, but has not addressed key cases of "material" or "potential" misalignment identified by InfluenceMap's <i>database</i> on corporate lobbying, i.e. industry associations with Organization Scores 0-66 in InfluenceMap's database. The investor expectations outlined by <i>PRI</i> , <i>IIGCC</i> and <i>Ceres</i> include several steps companies can take to address misalignment. Steps should include terminating memberships or taking specific action to reform the detailed and material lobbying activities undertaken by misaligned organizations.
		The company has shown no or limited evidence of action to address cases of misalignment with its industry associations and the Paris Agreement, missing key cases of "material" or "potential" misalignment identified in InfluenceMap's <i>database</i> on corporate lobbying, i.e. industry associations with Organization Scores 0-66. The investor expectations outlined by <i>PRI</i> , <i>IIGCC</i> and <i>Ceres</i> include several steps companies can take to address misalignment. Action will be scored under this category if it does not include terminating memberships or taking specific action to reform the detailed and material lobbying activities undertaken by misaligned organizations.

To assist this assessment, InfluenceMap will be applying its database on corporate and industry group climate change lobbying. This tracks in real-time the detailed climate policy lobbying of around 300 companies and 100 industry associations globally, allowing like-for-like comparisons of organizations' positions on climate policy that are compared to a benchmark of Paris-aligned climate policy. This system can track the evolution of corporate and industry group climate lobbying positions over time.

Appendix B: Company Assessments

This section outlines a more detailed breakdown of each company's assessment on disclosure and policy alignment process by metric, using the traffic-light assessment framework summarized below⁴. Scores of 'Green' reflect areas of better practice by companies, while scores of 'Yellow' and 'Red' highlight key areas for improvement. Detailed assessments of each company can be made available on request.

Key	Explanation
	Has broadly met investor expectations in this area.
	Has made some progress on investor expectations in this area, but with significant deficiencies.
	Has fallen short of investor expectations in this area.

AGL Energy

A copy of AGL Energy's latest disclosure on industry associations and climate lobbying can be [found here](#). InfluenceMap's online profile of AGL Energy, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of AGL Energy's industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	AGL Energy does not disclose its climate policy positions and influencing activities. The review includes a link to the climate position on its corporate website but this is limited to the company's operational commitments and high-level statements on climate change.
Industry group climate positions	AGL Energy does not disclose its industry associations' climate policy positions and influencing activities in its review.
Alignment assessment method	AGL Energy does not disclose a framework for assessing alignment with its industry groups on climate change policy engagement.
Framework for misalignment	AGL Energy does not disclose a framework for addressing potential misalignment with its industry associations on climate change policy engagement.
Identify & Assess	AGL Energy has identified some misalignment with the Queensland Resources Council. InfluenceMap analysis indicates that AGL Energy likely has memberships to one industry association materially misaligned with the Paris Agreement (Queensland Resources Council) and three industry associations potentially misaligned with the Paris Agreement (Australian Energy Council, Australian Industry Group, Business Council of Australia).
Monitor & Review	AGL Energy discloses a commitment to annually review the policy positioning of its industry associations and to disclose material policy differences.
Act	AGL Energy has shown evidence of action to address misalignment by terminating its membership with Queensland Resources Council in 2020. The company has not disclosed steps to address cases of potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).

⁴ This focused on each company's most recent industry association review but factored in additional corporate website-reporting if clearly referenced in the review.

Anglo American

A copy of Anglo American's latest disclosure on industry associations and climate lobbying can be [found here](#).

InfluenceMap's online profile of Anglo American, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of Anglo American's industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	Anglo American discloses some examples of its climate policy positions but this is largely limited to operational commitments and high-level statements on climate change.
Industry group climate positions	Anglo American discloses an overview of the climate policy positions and influencing activities of five industry associations identified as having "material differences" on climate policy, but it does not disclose any information for the other groups.
Alignment assessment method	Anglo American's alignment assessment method is disclosed in the external audit undertaken by a third party. The company has disclosed a detailed explanation of its application to five "misaligned" associations, but no detail provided for the other groups.
Framework for misalignment	Anglo American states that "all potential actions would be considered" in the finding of misalignment, from engagement to suspension/termination of membership. The disclosure lacks detail regarding what other steps would be taken and there is no clear timeline attached.
Identify & Assess	Anglo American accepted some degree of misalignment with Minerals Council of Australia and World Coal Association found by an external third-party audit, but did not appear to find a material misalignment. InfluenceMap analysis indicates that Anglo American likely has memberships to three industry associations materially misaligned with the Paris Agreement (Minerals Council of South Africa, Queensland Resources Council, World Coal Association) and three industry associations potentially misaligned with the Paris Agreement (Eurometaux, Minerals Council of Australia and Mining Association of Canada).
Monitor & Review	Anglo American has committed to publish a disclosure every two years that "outlines an analysis of policy alignment and how the governance process has been applied during the reporting period".
Act	Anglo American has shown no evidence of action to address misalignments beyond a brief overview of its engagement with Minerals Council of Australia and World Coal Association. The company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).

ArcelorMittal

A copy of ArcelorMittal's latest disclosure on industry associations and climate lobbying can be [found here](#).

InfluenceMap's online profile of ArcelorMittal, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of ArcelorMittal's industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	ArcelorMittal disclosed a detailed summary of the company's climate positions covering five policy areas, with direction to the company's Climate Action Report for further detail. The Climate Action Report contains a set of global policy recommendations as well as specific recommendations for specific EU climate policy such as the EU ETS.
Industry group climate positions	ArcelorMittal's disclosure on its industry associations' climate policy positions is limited to a brief explanation of alignment, contained to top-line climate positions.
Alignment assessment method	ArcelorMittal discloses a detailed explanation of its alignment assessment method. The company discloses a brief explanation of how the framework has been applied to each association but a lack of detail leaves ambiguity regarding how the evaluations have been made.
Framework for misalignment	ArcelorMittal has outlined a different framework for addressing misalignment for different categories of industry association, depending on their value. However, steps within each category lack clarity and involve a single action without an escalation strategy or timelines.
Identify & Assess	ArcelorMittal has disclosed one case of misalignment with the American Petroleum Institute. InfluenceMap analysis indicates that the company likely has memberships to two industry associations materially misaligned with the Paris Agreement (American Petroleum Institute, National Association of Manufacturers) and six memberships to industry associations potentially misaligned with the Paris Agreement (BusinessEurope, Canadian Chamber of Commerce, Eurofer, European Roundtable of Industrialists, MEDEF, Mining Association of Canada).
Monitor & Review	ArcelorMittal has stated that it will update its industry association review "periodically" but does not disclose how frequently this will be.
Act	ArcelorMittal has shown no evidence of action to address misalignments beyond brief action steps for each association, which is limited to high-level commitments to seek further alignment, clarity and/or disclosure on policy positions. The company retained membership to the American Petroleum Institute because it's role is limited to a technical working group. The company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).

BASF

A copy of BASF's latest disclosure on industry associations and climate lobbying can be [found here](#).

InfluenceMap's online profile of BASF, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of BASF's industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	BASF has disclosed a detailed position on four key policy areas including policy recommendations, as well as a disclosure of the company's influencing activities. The audit is also on the same landing page as more complete disclosures on global climate policy, emissions trading and energy efficiency.
Industry group climate positions	BASF has disclosed a breakdown of the climate policy positions and influencing activities of its industry associations in the Annex of the audit. However, this disclosure appears to overlook detailed examples of negative climate lobbying for some industry associations such as the National Association of Manufacturers.
Alignment assessment method	BASF has disclosed a detailed explanation of its alignment assessment method along with a clear and detailed explanation of how it has been applied to each industry association. The company also provided specific alignment indicators for EU climate policy.
Framework for misalignment	BASF has disclosed clear and detailed steps to address misalignment including increased engagement to improve alignment, demanding that the association stops advocating against the company's interests, an overarching assessment of performance and termination of membership. However, there are no timelines attached to the framework.
Identify & Assess	BASF has not identified any cases of misalignment with its industry associations. InfluenceMap analysis indicates that the company likely has memberships to one industry association materially misaligned with the Paris Agreement (National Association of Manufacturers) and six industry associations potentially misaligned with the Paris Agreement (American Chemistry Council, BusinessEurope, CEFIC, European Roundtable of Industrialists, Federation of German Industries (BDI), German Chemicals Industry Association (VCI)).
Monitor & Review	BASF has not committed to "regularly review the positions and activities on climate and energy policies of the major associations listed in this report" but it is unclear whether the company will publicly disclose the results of this process.
Act	BASF has shown no evidence of action to address misalignments. The company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).

BHP

A copy of BHP's latest disclosure on industry associations and climate lobbying can be [found here](#). InfluenceMap's online profile of BHP, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of BHP's industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	BHP has disclosed a top-line summary of ten climate positions but the audit lacks detail on specific policy positions, instead focusing on commitments that are largely high-level, operations-focused, and sometimes unclear as to its practical meaning such as the energy trilemma.
Industry group climate positions	BHP has disclosed the climate positions of the four industry associations identified as potentially misaligned, as well as Coal21 and Minerals Council of Australia. However, this disclosure lacks detail on specific policy positions and there is limited or no disclosure for the other groups.
Alignment assessment method	BHP has disclosed a detailed explanation of its alignment assessment method based on its ten climate positions. However, there is ambiguity regarding how some company evaluations have been made as a full breakdown of its application has only been provided for four groups identified as 'partially aligned', with a one-line statement for the 12 groups identified as 'mostly aligned', and no details for the remaining industry associations.
Framework for misalignment	BHP has disclosed clear and detailed steps for addressing potential misalignment including an escalation strategy and clear timeline attached. The company states it will communicate material differences, request that the industry association develop a position or refrain from advocacy, and review the membership if there has been no action within 12 months.
Identify & Assess	BHP has not disclosed any cases of misalignment, but has identified four "partly aligned" industry associations: American Petroleum Institute (API), Mining Association of Canada (MAC), NSW Minerals Council (NSWMC) and US Chamber of Commerce (USCC). InfluenceMap analysis indicates that the company likely has memberships to five industry associations materially misaligned with the Paris Agreement (API, MAC, NSWMC, USCC and Chamber of Minerals and Energy of Western Australia) and nine industry associations potentially misaligned with the Paris Agreement (APPEA, Australian Industry Greenhouse Network, Business Council of Australia, Canadian Chamber of Commerce, International Association of Oil and Gas Producers, International Chamber of Commerce, Minerals Council of Australia, Mining Association of Canada, South Australian Chamber of Mines and Energy).
Monitor & Review	BHP has published several reviews of its industry association memberships since the first in 2017, as well as specific updates on potentially misaligned groups. Following its 2019 review, BHP has published an update on American Petroleum Institute, Mining Association of Canada, NSW Minerals Council and US Chamber of Commerce on its corporate website. In 2020, BHP stated it will conduct a formal industry association review process on a three-year cycle, rather than annually. The company has also stated that it will disclose any cases of material misalignment in 'real-time' on its website. InfluenceMap will closely track BHP's related disclosures to ensure it is reporting in line with this commitment.
Act	BHP has shown evidence of action to address misalignment by terminating its membership to World Coal Association in 2018, and suspending its membership to Queensland Resources Council in 2020 following its 'Vote Greens Last' advertising campaign. BHP has also outlined detailed actions to be taken at the four partly aligned industry associations, e.g. "BHP will review its membership of the API if it has not refrained from advocacy in relation to Emissions Reduction Targets and fostered a consensus on the Paris Agreement within a reasonable period (no later than 31 August 2020)". However, the company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).

BP

A copy of BP's latest disclosure on industry associations and climate lobbying can be [found here](#).

InfluenceMap's online profile of BP, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of BP's industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	BP has disclosed seven top-line climate positions covering climate science, the Paris Agreement and energy efficiency. However, the company provides limited detail of its positions and engagement on specific climate policies beyond two selective case studies on US methane regulations and carbon pricing in Washington.
Industry group climate positions	BP has disclosed the top-line climate positions for eight industry associations identified as "partially aligned" or "not aligned". However, this overview largely overlooks evidence of detailed lobbying related to these groups, and there is no disclosure for industry associations determined to be "aligned".
Alignment assessment method	BP has disclosed a broad explanation of its alignment assessment methodology based on the seven high-level policy positions. The company has disclosed detailed explanations of its application for the eight "partially aligned" and "not aligned" industry associations, but has not disclosed any details of its application to the remaining "aligned" associations.
Framework for misalignment	BP has disclosed clear and detailed steps for addressing misalignment including setting expectations, active engagement, formally communicating misalignments, publicly dissenting from a position and leaving. However, there are no timelines attached to this framework.
Identify & Assess	BP has identified three cases of misalignment with American Fuel & Petrochemical Manufacturers (AFPM), Western Energy Alliance and Western States Petroleum Association (WSPA). BP has also identified five cases of partial misalignment with American Petroleum Institute (API), Australian Institute of Petroleum (AIP), Canadian Association of Petroleum Producers (CAPP), National Association of Manufacturers (NAM) and US Chamber of Commerce (USCC). InfluenceMap analysis indicates that the company likely has memberships to seven industry associations materially misaligned with the Paris Agreement (AFPM, WSPA, API, CAPP, NAM, USCC and Oil & Gas UK) and ten industry associations potentially misaligned with the Paris Agreement (APPEA, AIP, Australian Industry Greenhouse Network, Business Council of Australia, BusinessEurope, CEFIC, European Roundtable of Industrialists, FuelsEurope, International Air Transport Association, International Association of Oil and Gas Producers).
Monitor & Review	BP has committed to provide periodic updates of its industry associations internally to its board and stakeholders, and undertake another review in two years' time.
Act	BP has shown evidence of action to address misalignment by terminating its membership to the AFPM, WEA and WSPA in 2020. BP has also outlined its ongoing engagement with the five industry associations identified as "partially aligned" (API, AIP, CAPP, NAM, USCC). However, the company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).

Chevron

A copy of Chevron's latest disclosure on industry associations and climate lobbying can be [found here](#). InfluenceMap's online profile of Chevron, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of Chevron's industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	Chevron has disclosed its climate policy framework which focuses on high-level concepts such as carbon pricing, incentives for new technology and targeted policies such as building efficiency standards. The disclosure lacks detail on specific climate policies or the company's influencing activities on climate policy.
Industry group climate positions	Chevron has disclosed an account of the climate-related positions and influencing activities of each industry association, including examples of engagement on specific climate policies. However, the account appears to overlook the detailed negative lobbying of a number of organizations including American Petroleum Institute and Consumer Energy Alliance.
Alignment assessment method	Chevron has not disclosed its alignment assessment methodology as the review does not assess the company's alignment with its industry associations on climate change.
Framework for misalignment	Chevron has not disclosed a framework for addressing misalignment with its industry associations, beyond a statement that it believes open engagement and continuous participation is the best way to advance its own opinions and shape positions.
Identify & Assess	Chevron has not assessed alignment with its industry associations. InfluenceMap analysis indicates that Chevron likely has seven memberships to industry associations materially misaligned with the Paris Agreement (American Fuel & Petrochemical Manufacturers, American Petroleum Institute, California Chamber of Commerce, Consumer Energy Alliance, National Association of Manufacturers, US Chamber of Commerce, Western States Petroleum Association) and three industry associations potentially misaligned with the Paris Agreement (American Chemistry Council, Business Roundtable, Natural Gas Supply Association). InfluenceMap analysis indicates that there are likely a further three cases of material misalignment (Chamber of Minerals and Energy WA, Japan Chemical Industry Association, Oil & Gas UK) and six cases of potential misalignment (APPEA, Australian Industry Greenhouse Network, Australian Institute of Petroleum, Business Council of Australia, International Air Transport Association, International Association of Oil and Gas Producers) with industry associations not included in the audit.
Monitor & Review	Chevron has stated that the company reviews its industry association memberships on an annual basis to ensure alignment, but does not appear to publicly disclose this information.
Act	Chevron has shown some evidence of action to address instances where its industry associations are taking positions that differ from its own, although this is not expressed in terms of misalignment. Although the company has not left any industry associations, it has disclosed its engagement on specific climate change policy issues with seven industry associations including details of the results of this engagement. For example, Chevron discloses that its continued engagement with AFPM has helped to create a Carbon Steering Committee and shift the organization from historic opposition to carbon pricing to evaluating proposals on a case-by-case basis. However, the company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).

ConocoPhillips

A copy of ConocoPhillips' latest disclosure on industry associations and climate lobbying can be [found here](#).

InfluenceMap's online profile of ConocoPhillips, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of ConocoPhillips' industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	ConocoPhillips has disclosed its position on carbon pricing policy and carbon taxation, as well as a detailed overview of the company's historical and recent engagement on specific climate policies.
Industry group climate positions	ConocoPhillips' disclosure is limited to a statement of the top-line climate positions of its industry associations, overlooking evidence of detailed lobbying (except for an isolated discussion of the American Petroleum Institute's position on US methane regulation).
Alignment assessment method	ConocoPhillips has not disclosed its alignment assessment methodology, nor has it explained how individual industry associations have been assessed.
Framework for misalignment	ConocoPhillips has not disclosed a clear and detailed framework for addressing misalignment, stating that it will offer its viewpoint and work with the company to align positions. The company does not disclose an escalation strategy or timelines.
Identify & Assess	ConocoPhillips does not explicitly disclose any cases of misalignment with its industry associations, although the company does state that it disagrees with American Petroleum Institute on the direct federal regulation of methane. The company states that it has "decided not to renew some memberships in 2020 because of misalignment on a number of policy topics, one of which is climate change". However, it does not disclose which associations it is referring to or the specific rationale behind this decision. InfluenceMap analysis indicates that the company likely has memberships to four industry associations materially misaligned with the Paris Agreement (American Petroleum Institute, National Association of Manufacturers, US Chamber of Commerce, Western States Petroleum Institute) and three industry associations potentially misaligned with the Paris Agreement (Business Roundtable, Natural Gas Supply Association, IOGP). InfluenceMap analysis indicates that there are likely a further two cases of material misalignment (Canadian Association of Petroleum Producers, Queensland Resources Council) and two cases of potential misalignment (APPEA, Australian Institute of Petroleum) with industry associations not included in the audit.
Monitor & Review	ConocoPhillips has not disclosed any process to monitor or review its alignment with industry associations on climate change.
Act	ConocoPhillips has stated that it has "decided not to renew some memberships in 2020 because of misalignment on a number of policy topics, one of which is climate change". However, it does not disclose which associations it is referring to or the rationale behind these decisions. The company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).

Duke Energy

A copy of Duke Energy's latest disclosure on industry associations and climate lobbying can be [found here](#).

InfluenceMap's online profile of Duke Energy, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of Duke Energy's industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	Duke Energy has disclosed its position on climate change policy, but this is limited to operational commitments and high-level statements on climate change, including the type of climate policy the company supports. The disclosure also includes links to Duke Energy's ESG Website, 2020 Climate Report, Sustainability Report and Investor Relations webpage. However, Duke Energy does not appear to disclose its position on, or engagement with, specific items of regulation and legislation.
Industry group climate positions	Duke Energy has disclosed a brief overview of each industry association's climate policy or "mission", including a link to its corporate website. However, this overview is limited to top-line climate positions and does not include the associations' position on, or engagement with, specific items of regulation and legislation.
Alignment assessment method	Duke Energy does not appear to disclose its framework for assessing alignment with industry associations. The company just states whether a company is aligned or not.
Framework for misalignment	Duke Energy has not disclosed a clear framework for addressing misalignments with its industry associations. The company states that it prefers to stay engaged in dialogue with associations which hold positions counter to its own so that it can "test assumptions, clarify views and challenge differences". However, it does not outline clear, escalating steps for addressing misalignment, and/or deadlines for industry associations which do not amend misaligned practices.
Identify & Assess	Duke Energy has not identified any cases of misalignment with its industry associations. InfluenceMap analysis indicates that the company likely has memberships to one industry association materially misaligned with the Paris Agreement (US Chamber of Commerce) and three industry associations potentially misaligned with the Paris Agreement (American Gas Association, Business Roundtable, Edison Electric Institute).
Monitor & Review	Duke Energy states that it anticipates reporting on new trade associations in its "next report" and will work to ensure the climate policies and positions of these groups aligns with those of Duke Energy. However, it does not disclose when this next report will be published.
Act	Duke Energy has shown no evidence of action to address cases of misalignment. The company states that "if a trade association's positions on climate policy [are] conflicted with Duke Energy's, the report discusses actions the company has taken to bring the association's position into alignment with ours". However, the review did not find any cases of misalignment, and thus did not disclose any actions taken. The company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).

Eni

A copy of Eni's latest disclosure on industry associations and climate lobbying can be [found here](#).

InfluenceMap's online profile of Eni, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of Eni's industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	Eni has disclosed six high-level climate positions, including policy recommendations (e.g. carbon pricing, energy efficiency, natural gas). However, the company has not disclosed detailed explanations of its positions and influencing activities related to specific climate policies.
Industry group climate positions	Eni has not disclosed the climate policy positions and influencing activities of its industry associations.
Alignment assessment method	Eni has disclosed a broad explanation of its alignment assessment methodology, assessed on six policy areas. However, there is ambiguity regarding how alignment evaluations have been made, as explanations of these evaluations are only provided for three associations judged to be misaligned to some extent.
Framework for misalignment	Eni has disclosed steps for addressing potential misalignment, but this is limited to one specific action depending on the context. The company states that it will disassociate itself from views that contradict its climate strategy, and consider withdrawing from an association if its views contract the main principles of its climate strategy. The framework lacks detail and clarity; it does not include escalating action steps, and there are no timelines attached.
Identify & Assess	Eni has disclosed one case of misalignment with the American Fuel & Petrochemical Manufacturers, and two cases of partial misalignment with the Methanol Institute and the National Biodiesel Board. However, InfluenceMap analysis indicates that the company likely has memberships to one industry association materially misaligned with the Paris Agreement (Oil & Gas UK) and five industry associations potentially misaligned with the Paris Agreement (APPEA, BusinessEurope, CEFIC, Eurogas, International Association of Oil and Gas Producers). InfluenceMap analysis indicates that there are likely a further three cases of potential misalignment with industry associations not included in the audit (Australian Institute of Petroleum, European Roundtable of Industrialists, FuelsEurope).
Monitor & Review	Eni has not committed to publicly update its industry association review. The company states that it will "undertake a periodic assessment" of the consistency between Eni's climate position and its associations, and assess the alignment status of the partially aligned associations. It is not specified how often this will be, the extent of the review, or if the findings of the review will be publicly disclosed.
Act	Eni has shown evidence of action to address misalignment by terminating its membership to the AFPM. Eni has also stated that it will engage with Methanol Institute and the National Biodiesel Board to promote its climate-related positions and subsequently reassess alignment. However, the company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).

Equinor

A copy of Equinor's latest disclosure on industry associations and climate lobbying can be [found here](#).

InfluenceMap's online profile of Equinor, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of Equinor's industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	Equinor has disclosed top-line statements describing its top-line policy priorities (e.g. adopt carbon pricing, promote research and development, phase out fossil fuel subsidies). However, the company does not disclose its position on or engagement with specific climate policies.
Industry group climate positions	Equinor has disclosed the climate policy positions and influencing activities of three industry associations with "some" or "material" misalignment, but the company does not disclose any details of the climate positions of the 90 remaining "aligned" industry associations.
Alignment assessment method	Equinor has disclosed a limited explanation of its alignment assessment methodology, stating it is based on four high-level policy positions but with no explanation of what constitutes alignment. A discussion of its application to specific industry associations was only provided for three industry associations, leaving ambiguity regarding as to how other evaluations have been made.
Framework for misalignment	Equinor has disclosed clear steps for addressing misalignment including escalation steps where necessary. The company states it will advocate to change the associations' position, publicly state disagreement, notify the association that their membership is under review then exit. However, there is no timelines attached to the framework.
Identify & Assess	In its 2020 review, Equinor disclosed one case of material misalignment with the Independent Petroleum Association of America, as well as two cases of partial misalignment with American Petroleum Institute (API) and APPEA. In its 2021 update, Equinor disclosed progress made by API on climate but did not specify whether it is still partially misaligned. However, InfluenceMap analysis indicates that the company likely has memberships to five industry associations materially misaligned with the Paris Agreement (API, Canadian Association of Petroleum Producers, Consumer Energy Alliance, National Association of Manufacturers, Oil & Gas UK) and eight memberships to industry associations potentially misaligned with the Paris Agreement (APPEA, BusinessEurope, CEFIC, Eurogas, FuelsEurope, International Association of Oil and Gas Producers, Natural Gas Supply Association and South Australian Chamber of Mines and Energy).
Monitor & Review	Equinor has committed to "regularly review and provide information about memberships". The company published a full review in 2020 and provided an update to this review in 2021, including details of engagement and progress made with the American Petroleum Institute.
Act	Equinor has shown evidence of action to address misalignment by leaving the Independent Petroleum Association of America in 2020 and APPEA in 2021. Equinor also provided details of its engagement with API on its climate position through its representation on its board and climate committee. However, the company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).

Ford Motor Company

A copy of Ford's latest disclosure on industry associations and climate lobbying can be [found here](#).

InfluenceMap's online profile of Ford, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of Ford's industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	Ford has disclosed an overview of its top-line climate position and policy principles, as well as examples of its climate policy positions and influencing activities on specific items of regulation including the California Settlement Agreement, the Clean Air Act, SAFE Vehicle rules and tax credits for electric vehicles.
Industry group climate positions	Ford has disclosed an overview of each industry associations' mission and climate change position. However, this disclosure is largely limited to top-line climate statements without reference to specific items of regulation and legislation.
Alignment assessment method	Ford has disclosed a limited explanation of its alignment assessment methodology, outlining five metrics but with no discussion of what constitutes alignment with reference to these. Although there is a brief overview of where each association is aligned, there is ambiguity regarding how these evaluations have been made.
Framework for misalignment	Ford has stated that it would "respond appropriately" if an association's position did not align and advocate for its position independently, but the steps are ambiguous and lack sufficient detail and there are no timelines attached.
Identify & Assess	Ford has not identified any cases of misalignment with its industry associations. InfluenceMap analysis indicates that the company likely has two memberships to industry associations materially misaligned with the Paris Agreement (National Association of Manufacturers, US Chamber of Commerce). InfluenceMap analysis indicates that there are likely a further five cases of potential misalignment with industry associations not included in the audit (Alliance of Automobile Manufacturers, Business Roundtable, European Automobile Manufacturers Association, German Automotive Association (VDA), Society of Motor Manufacturers and Traders).
Monitor & Review	Ford has not committed to publicly update its industry association review. The company states that it will conduct an internal review annually and share this report with management, but it is not clear if this will be publicly disclosed.
Act	Ford has shown no evidence of action to address misalignments, beyond outlining where it has taken independent action from the Alliance for Automotive Innovation. The company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).

Glencore

A copy of Glencore's latest disclosure on industry associations and climate lobbying can be [found here](#).

InfluenceMap's online profile of Glencore, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of Glencore's industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	Glencore has disclosed its top-line positions on climate science, the Paris Agreement and the energy mix in the Annex as well as some detail of the company's direct lobbying activities in Australia, Europe and South Africa. However, there are limited details on Glencore's preferred positions on specific climate policies.
Industry group climate positions	Glencore has disclosed the top-line climate positions and influencing activities of ten key industry associations. However, detail on specific policies is limited and the overview does not capture the detailed, negative lobbying by industry associations such as the Minerals Council of Australia.
Alignment assessment method	Glencore has disclosed a limited explanation of its alignment assessment methodology, stating it is based on three climate metrics but with no discussion of what constitutes alignment with reference to these. There is ambiguity regarding how some evaluations have been made as it is not made clear how the methodology has been applied to individual industry associations.
Framework for misalignment	Glencore has disclosed clear steps for addressing misalignment including engagement, taking a leadership role to influence positions, terminating membership and establishing independent advocacy. However, there are no timelines attached to the framework.
Identify & Assess	Glencore has not identified any cases of 'serious misalignment' with its industry associations. The company's 2019 review suggested potential misalignment with Minerals Council of Australia (MCA) and World Coal Association (WCA), but these differences appear to have been resolved in the 2020 update following the publication of both associations' climate position statements. InfluenceMap analysis indicates that the company likely has five memberships to industry associations materially misaligned with the Paris Agreement (Chamber of Minerals and Energy of Western Australia, Minerals Council of South Africa, NSW Minerals Council, Queensland Resources Council, WCA) and five industry associations potentially misaligned with the Paris Agreement (Canadian Chamber of Commerce, Eurometaux, German Chemicals Industry Association (VCI), MCA, Mining Association of Canada). InfluenceMap analysis indicates that there are likely a further two cases of potential misalignment with industry associations not included in the audit (Australian Industry Greenhouse Network, CEFIC).
Monitor & Review	Glencore published an update to its 2019 industry association audit in December 2020, although InfluenceMap has found no evidence of a commitment to annual reviews.
Act	Glencore has shown limited evidence of action to address misalignment. The company stated that they engaged with organizations to encourage them to formalize their positions on climate change, which led to updated climate position statements by MCA and WCA, but the company does not disclose the actions taken nor the specific outcomes sought. The company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).

OMV

A copy of OMV's latest disclosure on industry associations and climate lobbying can be [found here](#).

InfluenceMap's online profile of OMV, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of OMV's industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	OMV's disclosure on its climate positions and influencing activities is limited to a statement of top-line climate positions and details concerning operational commitments. The company states support for the Paris Agreement and EU ETS but there is no detailed disclosure on specific policy positions or influencing activities related to these.
Industry group climate positions	OMV's disclosure of its industry associations' climate positions and influencing activities is limited to a description of each group's top-line position on climate change and the Paris Agreement, not including evidence on detailed lobbying on specific climate policies.
Alignment assessment method	OMV has clearly disclosed its alignment assessment methodology as well as an explanation of how it has been applied to each industry association under review. Associations are judged to be aligned if they have stated support for the Paris Agreement.
Framework for misalignment	OMV has disclosed steps for addressing alignment including an escalation strategy, although no timeline is attached to the framework. The company will advocate for changes in position, reassess membership and consider leaving if unable to influence the association to adopt a more aligned position on climate change.
Identify & Assess	OMV has not disclosed any cases of misalignment, stating that all associations are fully aligned on climate change based on their support for the Paris Agreement. InfluenceMap analysis indicates that the company likely has memberships to three industry associations potentially misaligned with the Paris Agreement (BusinessEurope, FuelsEurope, International Association of Oil and Gas Producers). InfluenceMap analysis indicates that there are likely a further two cases of potential misalignment with industry associations not included in the audit (APPEA, International Air Transport Association).
Monitor & Review	OMV has stated that it is continuously monitoring its alignment with industry associations and will report on this annually, with the next report to be published in 2021.
Act	OMV has not indicated action to address misalignment. The company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).

Origin Energy

A copy of Origin Energy's latest disclosure on industry associations and climate lobbying can be [found here](#).

InfluenceMap's online profile of Origin Energy, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of Origin Energy's industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	Origin Energy has not disclosed its corporate climate policy positions and influencing activities.
Industry group climate positions	Origin Energy has disclosed an overview of its industry associations' climate positions and influencing activities, covering each group included in the report. However, this disclosure is broadly focused on top-line climate positions with only a limited discussion of specific policy positions.
Alignment assessment method	Origin Energy has not clearly explained its alignment assessment methodology, stating that it is based on a comparison with the company's climate position, despite not disclosing the latter. However, the company has disclosed a clear explanation of how the methodology has been applied to all six industry associations in the scope of the review.
Framework for misalignment	Origin Energy has not disclosed clear or detailed steps to address misalignment, only stating that it will seek to influence the industry associations through constructive dialogue. The framework does not include an escalation strategy or timelines.
Identify & Assess	Despite not framing in terms of misalignment, Origin Energy has identified "areas of difference" with three industry associations: APPEA, Business Council of Australia (BCA), Queensland Resources Council (QRC). InfluenceMap analysis indicates that the company likely has memberships to one industry association materially misaligned with the Paris Agreement (QRC) and four memberships to industry associations potentially misaligned with the Paris Agreement (APPEA, Australian Energy Council, BCA, Gas Energy Australia). InfluenceMap analysis indicates that there are likely a further two cases of potential misalignment with industry associations not included in the audit (Australian Industry Greenhouse Network, Australian Pipelines and Gas Association).
Monitor & Review	Origin Energy published an update to its industry association audit in August 2020, which assessed the same six industry associations using the same assessment criteria. The update identified changes in the associations' climate positions, for example BCA's more progressive position on the use of Kyoto carry-over credits.
Act	Origin Energy has shown evidence of action to address misalignment by suspending its membership to QRC in 2020 following its 'Vote Greens Last' advertising campaign. The company also outlined its engagement efforts with APPEA, BCA and QRC. For example, Origin Energy has advocated to APPEA to support national targets aligned to the Paris goals and for more tangible action from the Australian gas industry to achieve climate targets. However, the company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).

Repsol

A copy of Repsol's latest disclosure on industry associations and climate lobbying can be [found here](#).

InfluenceMap's online profile of Repsol, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of Repsol's industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	Repsol has disclosed its position on the Paris Agreement, methane regulation and five "strategic lines" including carbon pricing and energy efficiency, but the disclosure lacks detail regarding the company's position on and engagement with specific climate policies.
Industry group climate positions	Repsol has not disclosed the climate policy positions and influencing activities of its industry associations.
Alignment assessment method	Repsol has disclosed a broad explanation of its alignment assessment methodology, assessed on the basis of support for the Paris Agreement and Repsol's climate strategy. However, there is significant ambiguity regarding how individual evaluations have been with reference to this method. It is difficult, for example, to understand why organizations such as the American Petroleum Institute have been deemed to be "partially aligned" rather than "misaligned" based on the explanation of the methodology provided. Repsol has not provided details of its evaluation of industry associations judged to be aligned, and misaligned associations are accompanied only by limited details.
Framework for misalignment	Repsol has disclosed clear and escalating steps for addressing misalignment. The company states that it will make public statements, constructively engage, require organization to stop lobbying on issues, discontinue membership or form proactive coalitions to counter organization's lobbying. However, there are no timelines attached to this framework.
Identify & Assess	Repsol has disclosed no cases of misalignment but has identified two cases of partial alignment with the American Petroleum Institute (API) and the Canadian Society for Unconventional Resources. InfluenceMap analysis indicates that the company likely has memberships to two industry associations materially misaligned with the Paris Agreement (API and Canadian Association of Petroleum Producers) and five memberships to industry associations potentially misaligned with the Paris Agreement (BusinessEurope, Canadian Chamber of Commerce, CEFIC, FuelsEurope and International Association of Oil and Gas Producers). InfluenceMap analysis indicates that there is likely one further case of material misalignment (Oil and Gas UK) and one further case of potential misalignment (International Chamber of Commerce) with industry associations not included in the audit.
Monitor & Review	Repsol has committed to review the developments of its industry associations on climate issues on an annual basis to identify potential deviations promptly, and to publish an update report every two years (unless changes warrant earlier publication).
Act	Repsol has not indicated specific actions to address misalignments beyond a general commitment to maintain an open and constructive dialogue with partially aligned associations and "take the necessary measures to bring the diverging climate positions and strategies closer together". The company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).

Rio Tinto

A copy of Rio Tinto's latest disclosure on industry associations and climate lobbying can be [found here](#). InfluenceMap's online profile of Rio Tinto, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of Rio Tinto's industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	Rio Tinto's disclosure of its corporate climate positions and influencing activities in its review is limited to top-line positions covering six broad policy areas, including climate science and the Paris Agreement. However, the review includes a clear reference and link to Rio Tinto's 2020 Climate Change Report, which discloses the company's engagement on four legislative consultations in Australia and New Zealand in 2020, including a link to its submissions.
Industry group climate positions	Rio Tinto has disclosed the detailed climate positions and influencing activities of just one industry association, the US National Mining Association (NMA). There is some limited information on Minerals Council of Australia (MCA) and Queensland Resources Council (QRC), but this lacks detail on specific policy positions. The other 30+ industry associations only have a brief overview of their purpose, without a description of their climate policy positions or influencing activities.
Alignment assessment method	Rio Tinto has disclosed a clear explanation of its alignment assessment methodology, stating that an association will be misaligned if there is a significant policy or advocacy difference with one or more of its six top-line climate positions. However, a limited explanation of its application has been provided only for one industry association (NMA), with no details of how the majority of evaluations have been made. Rio Tinto provides some context for its assessment of MCA and QRC, but this is limited.
Framework for misalignment	Rio Tinto has disclosed clear and escalating steps for addressing misalignment. The company states that it will clarify its own positions, seek common ground, seek leadership positions to influence associations and consider reviewing membership if differences are not resolved. However, there are no timelines attached to this framework.
Identify & Assess	Rio Tinto has identified one industry association with "significant differences in stated policy positions or advocacy" - the US National Mining Association (NMA). Rio Tinto's 2021 review appears to state that it has resolved previous misalignment with the Minerals Council of Australia (MCA) due to a "positive shift" in its position and commentary. Rio Tinto also said that Queensland Resources Council had "scope for improvement". InfluenceMap analysis indicates that Rio Tinto likely has five memberships to industry associations materially misaligned with the Paris Agreement (Chamber of Minerals and Energy of Western Australia, Minerals Council of South Africa, National Mining Association, Queensland Resources Council, US Chamber of Commerce) and eight memberships to industry associations potentially misaligned with the Paris Agreement (Australian Industry Greenhouse Network, Business Council of Australia, Canadian Chamber of Commerce, Eurometaux, European Roundtable of Industrialists, International Chamber of Commerce, Minerals Council of Australia, Mining Association of Canada).
Monitor & Review	Rio Tinto has published annual reviews of its industry association memberships since 2018. In its 2021 review, Rio Tinto provided updates of its engagement with Minerals Council of Australia and Queensland Resources Council.
Act	Rio Tinto has indicated limited evidence of action to address misalignments. The company has provided some details of its engagement with NMA, MCA and QRC, but this is limited. Rio Tinto has not committed to escalate actions to address misalignments and, in the case of the MCA, suggests that previous misalignments have been resolved. The company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).

Royal Dutch Shell

A copy of Royal Dutch Shell's latest disclosure on industry associations and climate lobbying can be [found here](#).

InfluenceMap's online profile of Royal Dutch Shell, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of Royal Dutch Shell's industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	Shell has disclosed six detailed climate policy positions in its 2021 review including net-zero emissions and carbon pricing. Shell's 2020 update also outlined the company's position on specific climate policies including the EU Green Deal and methane regulation in the EU and US. The 2021 review also includes a clear reference to a list of climate policy positions and examples of Shell's advocacy on its website.
Industry group climate positions	Shell has disclosed a detailed account of all key industry associations' climate policy positions under the six key policy areas, including details of their influencing activities. However, this account appears to overlook detailed negative lobbying by a number of industry associations including APPEA.
Alignment assessment method	Shell has disclosed a clear explanation of its alignment assessment methodology, assessed on the six key policy areas. The company has also disclosed a clear and detailed explanation of how the methodology has been applied to each industry association.
Framework for misalignment	Shell's 2021 review refers to the guiding principles outlined in its 2019 review. These principles outline clear escalating steps to address potential cases of misalignment, stating that Shell will increase engagement, pursue advocacy independently through other coalitions and reassess membership including ending board and committee memberships or leaving the industry association. However, there are no timelines attached.
Identify & Assess	Shell has identified one case of "material misalignment" with the Queensland Resources Council (QRC). Shell has also identified seven cases of "some misalignment" with American Petroleum Institute (API), Chamber of Minerals and Energy of Western Australia (CMEWA), Electric Power Supply Association, National Association of Manufacturers (NAM), Texas Oil & Gas Association, US Chamber of Commerce (USCC) and Wind Europe. InfluenceMap analysis indicates that Shell likely has eight memberships to industry associations materially misaligned with the Paris Agreement (API, Canadian Association of Petroleum Producers, CMEWA, Oil & Gas UK, NAM, QRC, USCC, Western States Petroleum Association) and thirteen memberships to industry associations potentially misaligned with the Paris Agreement (American Chemistry Council, Australian Industry Greenhouse Network, Ai Group, APPEA, Business Council of Australia, BusinessEurope, European Roundtable of Industrialists, FuelsEurope, International Air Transport Association, International Association of Oil and Gas Producers, Natural Gas Supply Association). InfluenceMap analysis also indicates a further one case of material misalignment (Consumer Energy Alliance) and four cases of potential misalignment (Australian Institute of Petroleum, Australian Pipelines and Gas Association, Eurogas, German Chemical Industry Association (VCI)) with associations excluded from the review.
Monitor & Review	Shell has published full reviews in 2019 and 2021. In April 2020, Shell also published an update on the nine associations with some misalignment found in 2019 including actions taken within each association, key changes to the associations' climate positions and detailed next steps. Shell has committed to publish its next update in 2022.
Act	Shell has shown evidence of action to address misalignment by terminating its membership to the American Fuel & Petrochemical Manufacturers, and outlining its ongoing engagement with the nine partially aligned associations with reference to specific climate policies. In its 2021 review, Shell also provides a case study of addressing misalignment with the American Petroleum Institute and the US Chamber of Commerce, including actions taken and progress made. However, the company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).

RWE

A copy of RWE's latest disclosure on industry associations and climate lobbying can be [found here](#).

InfluenceMap's online profile of RWE, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of RWE's industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	RWE has disclosed its position on the Paris Agreement and its support for three key EU climate policies (EU ETS, EU Green Deal and EU 2030 GHG target). However, this disclosure lacks detail and does not include influencing activities. The company has also stated that further positions are "articulated in internal and external documents" but these are not referenced.
Industry group climate positions	RWE has not disclosed the climate policy positions and influencing activities of its industry associations.
Alignment assessment method	RWE has disclosed a clear explanation of its alignment assessment methodology based on explicit or implicit support for the Paris Agreement. The company has disclosed a brief explanation of how the method has been applied to seven of the 18 associations reviewed.
Framework for misalignment	RWE has not disclosed a framework for addressing misalignment.
Identify & Assess	RWE has not identified any cases of misalignment with its industry associations. InfluenceMap analysis indicates that the company likely has four memberships to industry associations potentially misaligned with the Paris Agreement (BusinessEurope, Euracoal, Eurogas, Federation of German Industries (BDI)).
Monitor & Review	RWE has committed to publish an updated report on its industry association memberships "on a regular basis" but does not specify how frequent these will be.
Act	RWE has not shown any evidence of action to address misalignments with its industry associations. The company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).

Santos

A copy of Santos' latest disclosure on industry associations and climate lobbying can be [found here](#).

InfluenceMap's online profile of Santos, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of Santos' industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	Santos has disclosed its climate change policy but this is limited to operational commitments and top-line climate positions including climate science and the role of natural gas in the energy mix. The company does not disclose its position on or engagement with specific climate policies. The review refers to the company's climate change report but this also lacks detail.
Industry group climate positions	Santos has disclosed an overview of its industry associations' climate positions and influencing activities, covering each group included in the report. However, this disclosure is broadly focused on top-line climate positions, overlooking evidence of detailed lobbying on specific climate policy.
Alignment assessment method	Santos has disclosed a broad explanation of its alignment assessment methodology, based on its three key climate positions, although it lacks detail regarding what constitutes alignment. A brief explanation of its application has been provided for all industry associations, but lacks detail.
Framework for misalignment	Santos has not disclosed a clear framework for addressing potential cases of misalignment, stating that it will use its position to drive change in positions and continue to review ongoing alignment, but with no escalation strategy or timelines attached.
Identify & Assess	Santos has not identified any cases of misalignment with its industry associations, classifying three as "aligned", three as "mostly aligned" and two as "neutral". InfluenceMap analysis indicates that the company likely has two memberships to industry associations materially misaligned with the Paris Agreement (Chamber of Minerals and Energy of Western Australia, Queensland Resources Council) and four memberships to industry associations potentially misaligned with the Paris Agreement (APPEA, Australian Pipelines and Gas Association, Australian Industry Greenhouse Network, South Australia Chamber of Minerals and Energy). InfluenceMap analysis also indicates a further two cases of potential misalignment with associations excluded from the review (Australian Institute of Petroleum, Business Council of Australia).
Monitor & Review	Santos has not committed to publicly disclose an update to its industry association review.
Act	Santos has shown limited evidence of action to address misalignments with its industry associations. The company has identified opportunities to improve each associations' climate and energy policy alignment, but has not disclosed concrete steps for engaging on these issues, the specific outcomes sought or evidence of previous engagement. The company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).

Sasol

A copy of Sasol's latest disclosure on industry associations and climate lobbying can be [found here](#).

InfluenceMap's online profile of Sasol, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of Sasol's industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	Sasol has disclosed an overview of climate policy in South Africa, Europe and the US but has not disclosed the company's position on, or engagement with, specific policies. Sasol's disclosure of its own policy positions is limited to a brief overview of its top-line climate positions including the Paris Agreement and carbon pricing.
Industry group climate positions	Sasol has not disclosed its industry associations' climate policy positions and influencing activities in its review.
Alignment assessment method	Sasol has disclosed a clear explanation of its alignment assessment methodology based on four high-level policy positions, including what constitutes alignment, partial alignment and misalignment. However, the company has not provided any breakdown of how this has been applied to any of the industry associations included in the audit. It is therefore unclear whether the framework has been applied consistently.
Framework for misalignment	Sasol has not disclosed a framework for addressing misalignment beyond stating that it would engage with the industry association to obtain clearer positions if unclear.
Identify & Assess	Sasol has not identified any cases of misalignment with its industry associations. InfluenceMap analysis indicates that the company likely has one membership to industry associations materially misaligned with the Paris Agreement (Minerals Council of South Africa) and seven memberships to industry associations potentially misaligned with the Paris Agreement (American Chemistry Council, Business Unity South Africa, CEFIC, German Chemical Industry Association (VCI), Industry Task Team on Climate Change, International Chamber of Commerce, International Council of Chemical Associations).
Monitor & Review	Sasol has not committed to any follow-up processes as part of its review of industry associations beyond a commitment to "maintain and monitor" memberships.
Act	Sasol has shown no evidence of action to address misalignments. The company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).

South32

A copy of South 32's latest disclosure on industry associations and climate lobbying can be [found here](#).

InfluenceMap's online profile of South32, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of South32's industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	South32 has disclosed its top-line position on the Paris Agreement and carbon pricing in its Sustainability Report, in which the review is located, but the company does not disclose its climate positions and influencing activities on specific climate policies.
Industry group climate positions	South32 has not disclosed the climate policy positions and influencing activities of its industry associations beyond a brief explanation limited to top-line climate positions.
Alignment assessment method	South32 has disclosed a limited explanation of its alignment assessment methodology, stating that evaluations are based on 12 policy areas but without disclosing South32's own position in these areas or what constitutes alignment. The company has disclosed a brief explanation regarding how each association is assessed but this lacks detail and is broadly limited to top-line statements rather than a discussion of the 12 policy areas.
Framework for misalignment	South32 has disclosed clear steps for addressing misalignment, including an escalation strategy. The company has stated that it will inform the association's leadership, explore opportunities for alignment, advocate an internal view and terminate membership if the misalignment is material and outweighs benefits of membership. However, there are no deadlines attached to the framework.
Identify & Assess	South32's 2019 review did not identify any cases of material misalignments with its industry associations, while the 2020 update identified one case of "potential misalignment" with the Queensland Resources Council (QRC). InfluenceMap analysis indicates that the company likely has four memberships to industry associations materially misaligned with the Paris Agreement (Chamber of Minerals and Energy of Western Australia, Minerals Council of South Africa, NSW Minerals Council and QRC) and one membership to industry associations potentially misaligned with the Paris Agreement (Business Council of Australia).
Monitor & Review	South32 published an update to its 2019 industry association audit in September 2020, which identified one case of potential misalignment and three cases which needed further information from the associations. The company has stated that it will continue to engage with these associations in 2021 but has not committed to publishing another review.
Act	South32 has made a brief statement explaining it will seek clarity on QRC and three other organizations' climate positions and identify opportunities for alignment, but with no further details on this. The company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).

Total

A copy of Total's latest disclosure on industry associations and climate lobbying can be [found here](#). InfluenceMap's online profile of Total, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of Total's industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	Total has disclosed its position on carbon pricing policy, US methane regulations and financial transparency policies as well as a statement of top-line climate positions across six broad areas. However, the company provides limited detail on its position on and engagement with these specific climate policies.
Industry group climate positions	Total's disclosure of its industry associations' climate positions and influencing activities is limited to very brief statements on the position of the four industry associations identified as having some degree of misalignment, with no disclosure for the remaining industry associations.
Alignment assessment method	Total has disclosed a broad explanation of its alignment assessment methodology, based on six top-line policy areas. However, there is significant ambiguity regarding how company evaluations have been made. Total has not provided an explanation of its evaluation of groups found to be aligned, and the three partially aligned associations are accompanied by very limited explanation. This makes it difficult to understand why groups such as American Petroleum and Texas Oil & Gas Association were judged to be "partially aligned" rather than "misaligned" despite contradictory positions on US methane regulations.
Framework for misalignment	Total has disclosed only a high-level overview of potential actions it might take to address misalignment. The company does not clearly set out an explicit strategy to escalate action if required, or place these potential actions within a specified timeframe.
Identify & Assess	In its 2019 review, Total identified one case of misalignment (American Fuel & Petrochemical Manufacturers) and three cases of partial alignment (American Chemistry Council (ACC), American Petroleum Institute (API), Canadian Association of Petroleum Producers (CAPP)). Total's 2020 update found ACC to be aligned due to progress in its climate policy positions, and found API and Texas Oil and Gas Association to be partially aligned. Total further elaborated on its differences in position with API in January 2021, in a statement confirming that the company had terminated its membership with the association. In 2020, the company left CAPP due to its exit from oil sands. InfluenceMap analysis indicates that the company likely has three memberships to industry associations materially misaligned with the Paris Agreement (API, CAPP, Oil & Gas UK) and ten memberships to industry associations potentially misaligned with the Paris Agreement (ACC, APPEA, CEFIC, BusinessEurope, Eurogas, European Roundtable of Industrialists, FuelsEurope, International Association of Oil and Gas Producers, International Air Transport Association, MEDEF).
Monitor & Review	Total published an update to its industry association audit in September 2020, which provided a brief update on the three partially aligned associations from the 2019 review, including details of changes in their climate policy positions.
Act	Total has shown evidence of action to address misalignment with its industry associations by terminating its membership to the American Fuel & Petrochemical Manufacturers in 2019 and to the Canadian Association of Petroleum Producers in 2020, although the latter appears to be due to the company's exit from oil sands. Total also announced in January 2020 that it had decided not to renew its membership to the American Petroleum Institute due to divergences on climate positions. Total has also stated it will advocate internally for changes with its partially aligned associations, although has not disclosed details of this engagement. However, the company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).

Woodside

A copy of Woodside's latest disclosure on industry associations and climate lobbying can be [found here](#).

InfluenceMap's online profile of Woodside, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of Woodside's industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab.

Item	Comment
Corporate climate positions	Woodside's disclosure of its corporate climate position is limited to a statement of three top-line positions (Paris Agreement and net zero by 2050, socio-economic costs of the energy transition, support for low-emissions technology), with limited details on the company's position on or engagement specific climate policies.
Industry group climate positions	Woodside has disclosed an overview of each industry associations' climate policy positions and influencing activities. However, it appears to overlook detailed negative lobbying from a number of industry associations including Australian Industry Greenhouse Network and APPEA.
Alignment assessment method	Woodside has disclosed a broad explanation of its alignment assessment methodology based on three climate positions. The company has also disclosed an explanation of how each evaluation has been made, but this disclosure lacks clarity in areas and appears to be disclosed in an ad hoc manner.
Framework for misalignment	Woodside has disclosed several steps to address potential cases of misalignment, including measuring alignment against value of membership, constructive engagement and assessing whether to continue membership. However, no timelines have been attached to the framework.
Identify & Assess	Woodside has not identified any cases of misalignment, but the company has identified "some misalignment" with the Canadian Association of Petroleum Producers (CAPP). InfluenceMap analysis indicates that the company likely has two memberships to industry associations materially misaligned with the Paris Agreement (CAPP, Chamber of Minerals and Energy of Western Australia) and four industry associations potentially misaligned with the Paris Agreement (Australian Industry Greenhouse Network, APPEA, Business Council of Australia, International Association of Oil and Gas Producers). InfluenceMap analysis indicates a further two cases of potential misalignment with industry associations excluded from the review (Australian Institute of Petroleum, Australian Pipelines and Gas Association).
Monitor & Review	Woodside has stated that it will continue to monitor the climate positions of its industry associations, with the Executive Steering Group and Executive Committee conducting biannual and annual reviews respectively. However, the company does not state whether these reviews will be publicly available.
Act	Woodside has shown evidence of action to address misalignment with its industry associations by terminating its membership to the Canadian Association of Petroleum Producers. The company also outlines its ongoing engagement with APPEA and Business Council of Australia. However, the company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap's database (see Identify & Assess).