InfluenceMap

Big Oil's Real Agenda on Climate Change

How the oil majors have spent $1bn since Paris on narrative capture and lobbying on climate

March 2019

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Executive Summary

- This research finds that the five largest publicly-traded oil and gas majors (ExxonMobil, Royal Dutch Shell, Chevron, BP and Total) have invested over $1Bn of shareholder funds in the three years following the Paris Agreement on misleading climate-related branding and lobbying. These efforts are overwhelmingly in conflict with the goals of this landmark global climate accord, and designed to maintain the social and legal license to operate and expand fossil fuel operations.

- Company disclosures of spending on climate lobbying and branding are very limited. To fill this transparency gap, InfluenceMap has devised a methodology using best-available disclosures and intensive research of corporate messaging to evaluate oil major spending aimed at influencing the climate agenda, both directly and through their key trade groups

- The research reveals a trend of carefully devised campaigns of positive messaging combined with negative policy lobbying on climate change. The aim is to maintain public support on the issue while holding back binding policy. This spending accompanies the expansion of the companies' operations with combined annual sales of over $1Tn and profits of $55Bn 2018, the vast majority of which is oil and gas related. Combined capital investment will increase to $115Bn in 2019 but only about 3% of this will go to low carbon investments, according to company disclosures.

- The most important part of this campaign activity is the nearly $200M per year spent on lobbying designed to control, delay, or block binding climate-motivated policy. This lobbying has hindered governments globally in their efforts to implement such policies post-Paris, which according to the latest IPCC report of 2018 are crucial to meet climate targets and keep warming below 1.5°C.

- All five oil majors continue their efforts to capture the narrative on fossil fuels and climate, driven by coordinated messaging from corporate leadership on the need for increased fossil fuel production to meet global energy demand. Since Paris, Chevron, BP and ExxonMobil have led in direct lobbying activities to oppose a range of progressive climate policy strands. Royal Dutch Shell and to some extent Total have made steps since 2015 to be more positive on a number of climate policy issues. However, both companies continue to support policy supporting a continued role for fossil fuels in the energy mix and remain part of highly climate-oppositional trade associations like the American Petroleum Institute.

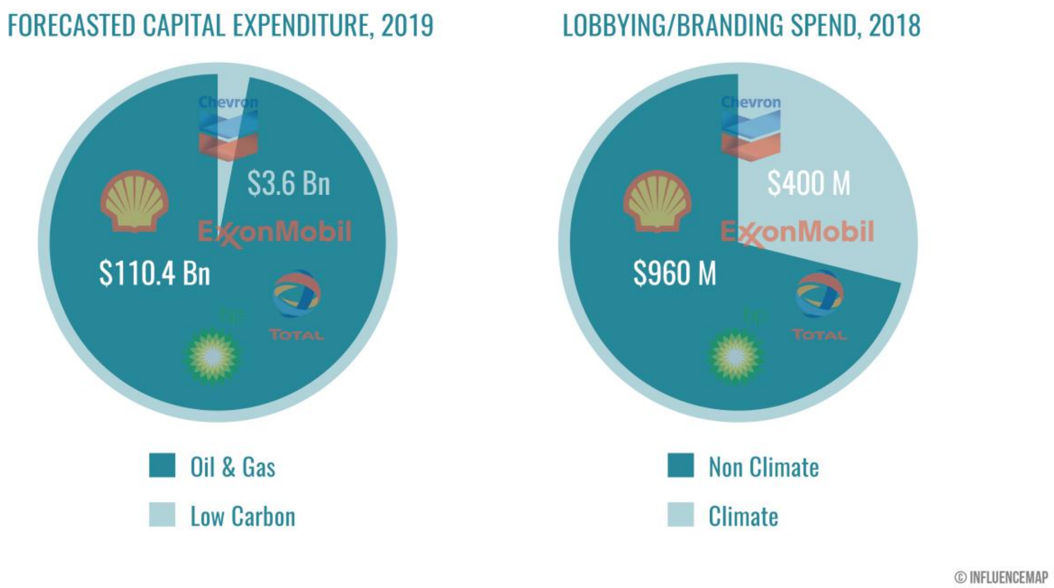
- A key trend is the tactical use of social media. In the four weeks up to the US midterm elections ExxonMobil led the majors and their agents in combined spending of $2M on targeted Facebook and Instagram ads promoting the benefits of increased fossil fuel production and supporting successful opposition to several key climate related ballot initiatives on November 6th, 2018.

- This lobbying strategy is complimented by an annual $195M investment by the five companies in often misleading branding campaigns aimed at convincing stakeholders they are on board with ambitious action on climate. Examples include ExxonMobil's ongoing promotion of its algae-biofuels research and the jointly funded Oil and Gas Climate Initiative, whose messaging de-emphasizes climate regulation while stressing voluntary action and low carbon investments. In fact, company disclosures show such investments will make around 3% of the oil projected capital investments by the oil majors. Exxon's goal of reaching 10,000 barrels of biofuel a day by 2025 would still only equate to 0.2% of its current refinery capacity, essentially a rounding error.

- The research highlights the outsourcing of the most direct, negative and egregious climate lobbying to trade groups such as the American Petroleum Institute which in 2018 successfully campaigned to deregulate oil and gas development, including a rollback of methane standards. Oil and gas funded groups also appear to have coordinated efforts in California, at the US Federal level and in the European Union to oppose policy on the electrification of the transport sector.

- This research will feed into efforts by key stakeholders to bring the oil and gas sector into line with the urgency of action on climate change. These include the global investment community which in 2017 launched the Climate Action 100+ program of engagement with the 100 key corporations on climate. The five oil majors feature prominently in this list. It will also inform various emerging legal cases globally, for example in the United States and the Netherlands to hold oil majors accountable for their past and ongoing climate strategies.

- Despite apparent awareness of these growing pressures from stakeholders, rather than changing course the response from oil major CEOs has been to pledge a ramp up in climate-positive branding, as articulated at this year's World Economic Forum in Davos. This has been accompanied by a surge in fossil fuel exploration capital spend in 2018 as the oil price rebounds.



References and sources used in this report are contained within hyperlinks throughout, including to InfluenceMap's online database of climate lobbying. Registration may be required for some areas. Note: $1M=$1 million, Bn=billion, Tn=trillion

Introduction

Background

The Paris Agreement of 2015 marked a distinct change in the messaging strategies of the large integrated oil and gas companies (the oil majors) on climate change. Realizing public, political and media attention was shifting overwhelmingly in favor of more urgent action, the European oil majors initiated a campaign of top line positivity on climate. This included calling for a price on carbon, supporting the Paris Agreement and the formation of groups like the Oil and Gas Climate Initiative (OGCI) promoting voluntary measures and the investments the companies are making on climate change. Following increased public and legal pressure, ExxonMobil and, to a lesser extent, Chevron, joined the European majors in this communications strategy. The US giants joined the OGCI in September 2018.

InfluenceMap's October 2015 Big Oil and the Obstruction of Climate Regulations confirmed that while Shell, BP and others were nominally asking policy makers for a price on carbon, they and their powerful trade groups were lobbying against strands of policy and regulations designed to create such a meaningful price. InfluenceMap's widely cited analysis of 2016 How Much Big Oil Spends on Climate Lobbying confirmed this numerically, showing ExxonMobil, Shell and three key trade groups were spending over $100M a year on obstructive climate lobbying.

In October 2018, the UN Intergovernmental Panel on Climate Change (IPCC) warned that urgent action is needed to limit climate change to 1.5°C, and that just an extra half degree of global warming (i.e. warming of 2°C) would significantly increase the risks of drought, floods, extreme heat and poverty for hundreds of millions of people. The report implies the need for reductions in the use of fossil fuels and strong policy responses from governments worldwide. At the same time, oil major climate messaging strategies continue to evolve in sophistication whilst their investments remain focused on fossil fuels. In light of this urgency, this work updates and expands upon InfluenceMap's 2016 lobby spend research to assess both the climate lobbying and branding efforts of the five largest oil and gas majors (ExxonMobil, Royal Dutch Shell, Chevron, BP and Total), as well as the activities of the key trade groups globally which lobby on their behalf.

Feeling the Heat on Climate

While campaign groups like Greenpeace and 350.org have long targeted the oil and gas majors on climate change, the last three years have shown a marked uptick and strategic coordination of pressure from several other key stakeholder groups, concerned at the global lack of progress on binding climate policy.

- **Investor pressure**: Certain shareholders, such as faith-based pension funds, have long targeted the oil majors, using their power as owners of the companies. This has now mainstreamed into the largest investor engagement process in history, the Climate Action 100+, in which 300 institutional shareholders representing $33Tn in assets are targeting the 100 or so most climate-critical listed companies. The five oil majors feature prominently in this latter group, and pressure on Royal Dutch Shell resulted in a wide-ranging statement on climate from the company late in 2018, including a pledge to reform its lobbying practices. Rival BP followed suit in early 2019.

- **Legal pressure**: Since the Paris Agreement legal pressure both from individual and government plaintiffs on climate has increased. As well as the high profile and ongoing lawsuits from the New York Attorney General against ExxonMobil and others for past practices on climate change, other US States including Rhode Island have joined the fray with a lawsuit against Exxon, BP and other majors. NGOs have similarly targeted Royal Dutch Shell in European courts. While none of these suits has caused the oil majors any financial stress thus far, this may change should a precedence be set in a future court ruling.

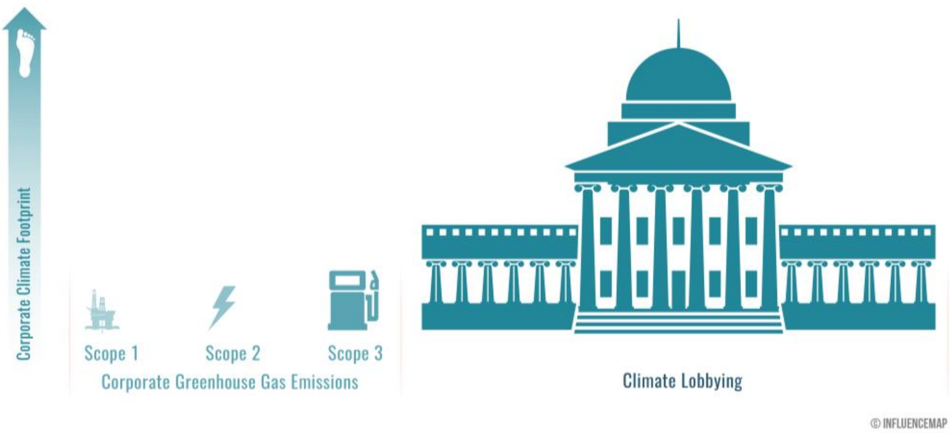
- **Media scrutiny**: The Economist magazine noted in its February 2019 cover "*The truth about big oil and climate change. Even as concerns about global warming grow, energy firms are planning to increase fossil-fuel production. None more than ExxonMobil.*" This likely marked a turning point in the oil majors' ability to convince the world's financial and business media of their commitments to ambitious action on the Paris Agreement and climate change.

InfluenceMap works with all of the stakeholder groups identified above to ensure they remain well informed on the climate related activities of the oil majors and are able to interpret their statements in the context of actual behavior and actions.

The Corporate Climate Policy Footprint

Various criteria are used to measure the impact of individual companies on climate change. Scope 1 and 2 emissions refer to direct operational and supply-chain greenhouse gas emissions respectively, and remain the primary criteria used to assess corporate performance on climate. Increasingly, Scope 3 emissions arising from product use are being assessed. However, Scope 1,2 & 3 measurements fail to account for companies' impact through holding back policy and distorting the wider narrative of climate change. To address this gap, in 2017 InfluenceMap introduced the concept of the Carbon Policy Footprint for corporations.

These footprints are not measured in tons of emissions, but rather rank companies alongside each other according to their support for or opposition to a benchmark of Paris-Aligned regulatory measures around the world. To identify what constitutes influence on climate policy, InfluenceMap refers to a 2013 UN protocol which sets out a range of activities such as advertising, the use of social media, membership in trade associations and direct funding and contact with regulators. Further details of these activities and our methodology are provided in the Appendix.



Lobbying and Carbon Budgets

The IPCC's groundbreaking 2018 report states that limiting warming to 1.5° C would require a "rapid escalation in the scale and pace of transition" of energy systems, "particularly in the next 10-20 years", including in renewable energy and electric transport. It further notes such an unprecedented transition would necessarily require "public sector interventions" – i.e. policy responses around the world.[1] One key implication of these IPCC findings is the probable decline in oil's share of global energy supply should 1.5° C be achieved under most scenarios. The same applies for natural gas without widespread deployment of CCS, and this only if deep reductions in methane emissions can be achieved.

Despite this, and spurred on by deregulation and rising oil prices, the US oil and gas sector achieved record high production and proved reserves in 2018 . Projected forward to 2050, research shows these operations alone will produce greenhouse gas emissions resulting in the 1.5° C global warming targets becoming nearly impossible under most IPCC noted scenarios.[2] Similarly, potential emissions from Western Australian's gas reserves would use Australia's Paris carbon budget three times over[3], whilst lobbying to weaken and delay methane regulations in Canada will lead to an extra 55 million tonnes of GHGs in the atmosphere before 2023.[4]

InfluenceMap's 2017 Carbon Policy Footprint research found the five oil majors have a disproportionate (relative to their economic size) and profoundly negative impact on climate policy

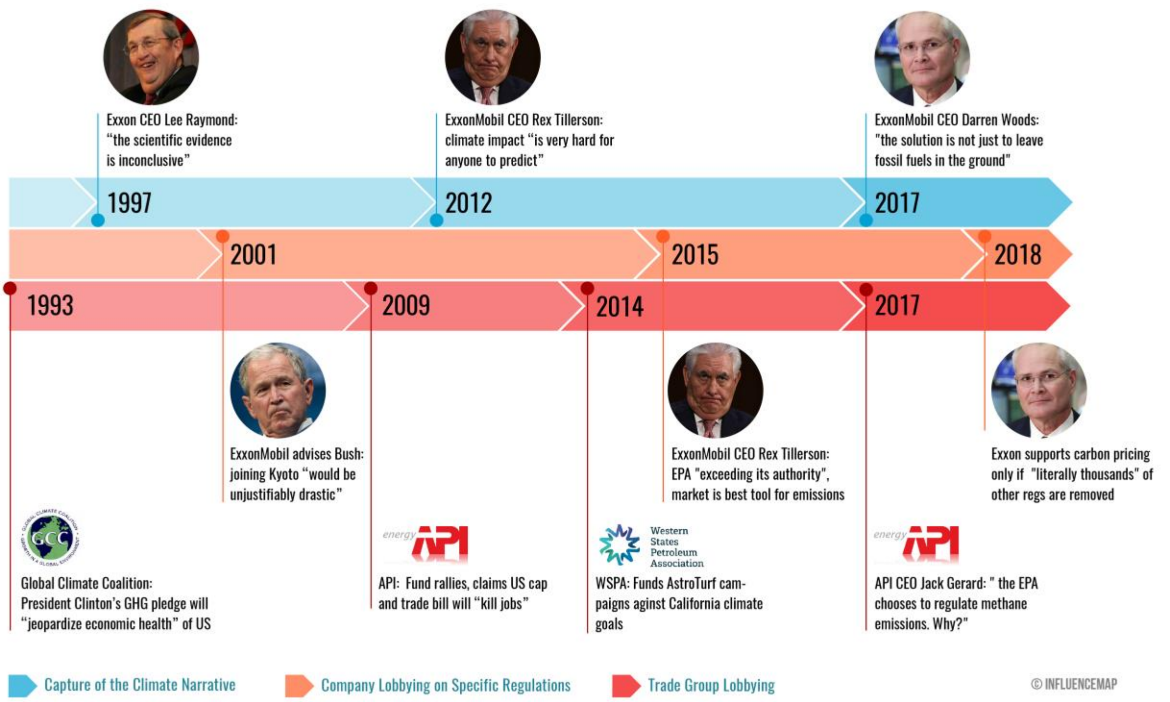
[1] Special Report on Global Warming of 1.5°C, Frequently Asked Questions, IPCC, October 2018
[2] Drilling Towards Disaster, Why U.S Oil and Gas Expansion Is incompatible with Climate Limits, Oil Change International, January 2019
[3] Western Australia's Gas Gamble - Implications of natural gas extraction in WA. Climate Analytics, March 2018
[4] Canada's Oil and Gas Challenge, Environmental Defence & Stand.Earth, December 2018

compared to companies in non-fossil fuel related sectors like tech, finance, healthcare and retail. Thus, despite the escalating warnings from the scientific community on the need for policy and implied reductions in fossil fuel usage, the industry appears to have been successful to date in preventing any policy measures that may materially impact their ongoing business operations.

The Evolution of Climate Lobbying

Oppositional corporate influencing on climate makes use of two increasingly linked strategies. The first involves capturing the political narrative and public understanding of climate change. This has the effect of reducing the likelihood of obtaining robust climate policy even before it makes significant political progress. The second involves more direct efforts to block, oppose or repeal regulations once politicians or policymakers have proposed or implemented them; in other words, what is more traditionally referred to as lobbying. The wider definition of lobbying used in this research covers both of these strategies.

In the past, companies like ExxonMobil and the networks they fund have sowed doubt around scientific consensus on climate science. As these tactics become increasingly unviable, they have moved to more subtle messaging tactics. These range from stressing the potential negative impacts of climate action on jobs and growth, to promoting the need to focus on gradual or incremental climate solutions based on as-of-yet unproven decarbonisation technologies. Another key trend is the increased outsourcing of direct, oppositional lobbying on climate regulations to powerful third-party industry groups such as the American Petroleum Institute. This evolution is illustrated in the timeline of statements from key ExxonMobil executives and those of its key lobbyists from the late 1990s to the present.



Building a Climate Brand

In the wake of pressure from campaigners, the media, and now from investors and legal plaintiffs, the oil majors have found it expedient to invest in individual and coordinated branding campaigns which position them as on board with an ambitious climate agenda post-Paris. To deliver this messaging, they make use of numerous channels. These include sophisticated advertising campaigns, targeting social media and the use of public transport and traditional media spaces to ensure they are widely received. This also includes high-level communications, predominantly delivered by senior management of the oil majors, to build trust with key stakeholders such as investors or politicians. Key tactics and examples of corporate climate branding strategies are noted in the next chapter and are illustrated in the graphic below.

The Oil and Gas Climate Initiative is a joint industry initiative established in 2014 to promote the sector's climate change efforts. Amplifying individual company narratives, the OGCI focuses on technology solutions, operational methane emissions and low carbon investments. This includes a $1Bn low carbon start up fund established by the OGCI as a sector-wide response to climate, in comparison with a total fossil fuel related capital expenditure by the five oil majors of $100Bn in 2018 alone. The OGCI deemphasizes the need for regulatory solutions and any limitations in fossil fuel use, both of which are strongly advocated as necessary to limit to 1.5°C in warming by the latest IPCC report. It can be argued that, given its substantial communications power, the OGCI thus plays a role in distracting from the need for an urgent and binding policy response to climate change.

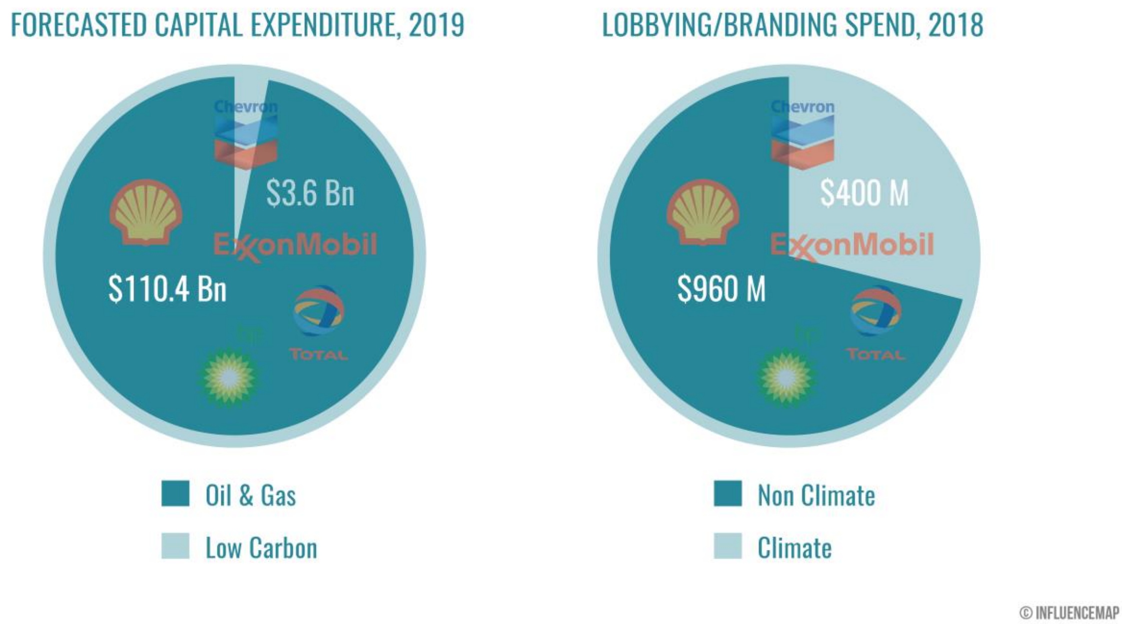
This research highlights the increasing disconnect between the oil majors' efforts towards positive climate branding and their lobbying and actual business decisions. As the urgency of action on climate change grows, the line between this lobbying and that of the sector's branding on climate becomes ever blurred, with the ultimate effect of stalling meaningful action by policy makers.

Detailed Results

Background

Company disclosures on climate lobbying and branding activities are very limited. To fill this transparency gap, InfluenceMap has devised a methodology to calculate corporate spending on climate. This uses best-available disclosures to isolate line-item spending for each company across a range of activities (e.g. communications, government relations, advertising, etc.). Through an intensive research process, the organization's external output related to these activities is thoroughly assessed to give the proportion of these activities, and their associated costs, focused on climate-related issues. Details of this methodology can be found in the Appendix. Using this system, the research finds that the five largest publicly-traded oil and gas majors (ExxonMobil, Royal Dutch Shell, Chevron, BP and Total) are investing around $400M annually of shareholder's money on climate-related lobbying and branding activities between them. This constitutes well over $1Bn since the Paris Agreement was signed in December 2015.

Climate-related spending constitutes over a quarter of the oil majors' expenses on lobbying and branding, the total of which includes the marketing of their fuel and chemical products. However, company disclosures show low carbon investments will comprise only about 3% of the oil majors' expected investments, with the rest of their combined annual capital expenditure ($115Bn for 2019) focused on fossil fuel related businesses.[5]



[5] Total expected capital expenditure for 2019 has been used where disclosed. Otherwise total capital expenditure for 2018 is used. Low carbon expenditure is based on company announcements of their expected yearly investment in low carbon businesses, taken from the 2018 CDP disclosures where available, and other best-available disclosures (e.g. company websites, reports).

While the five oil majors all display similar strategies and most fund the same advocacy and industry groups, they display individually different traits based on their geographic base, spread of operations, and business portfolios and strategies. The remainder of this section provides deep-dives into:

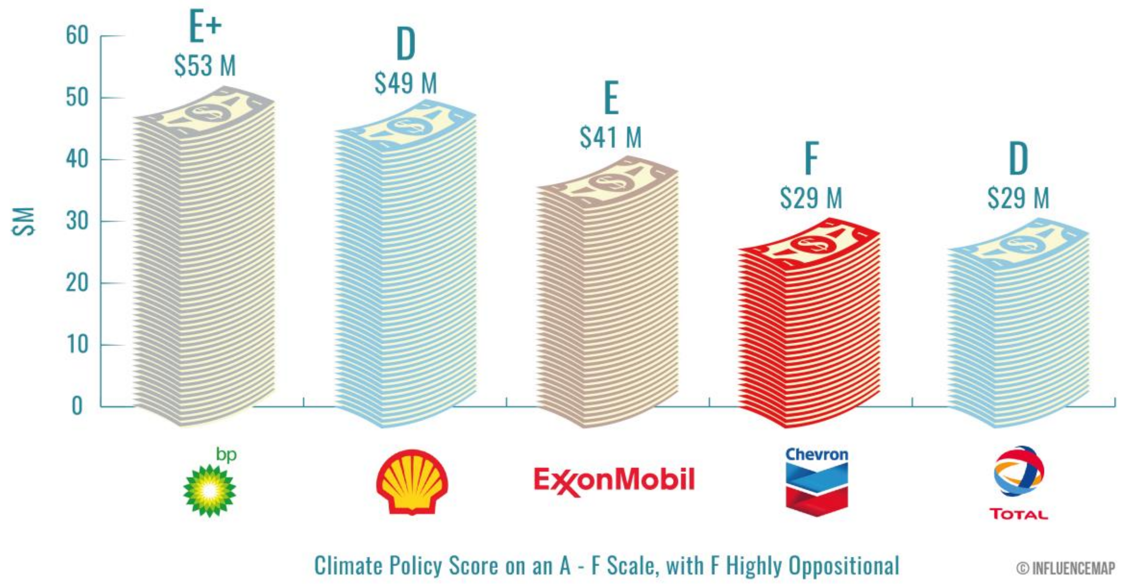
- Direct spending on **climate lobbying** by the five oil majors;
- Direct spending on **climate branding** by the five oil majors;
- The role of **trade associations** as powerful lobbying vehicles for the entire sector.

Full details of the methodology and scoring details can be found in the Appendix.

Spending on Climate Lobbying

To define what constitutes 'lobbying' on climate policy, InfluenceMap refers to a UN protocol from 2014: the Guide for Responsible Engagement in Climate Policy. Areas noted in this include direct interactions with policy makers, comments on specific regulations or policy areas, marketing and advertising, financial contributions to campaigns and the use of external groups like trade associations. The research finds that five oil majors are spending around $200M annually on these activities to influence on climate change policy, both directly and via funding of trade associations.

The climate lobbying spend for each oil major is quantified in the chart below, accompanied by InfluenceMap grades. These company grades indicate the level of support or opposition to climate-related policy. Under this scoring system, grades between B- and an A+ can be considered broadly supportive of meaningful climate policy, with a D to an F indicating increasing opposition. Full summaries of each company score can be found in the Appendix.



Part of this lobby spend goes toward sophisticated efforts to capture the public and political narrative on climate change and the energy transition and is designed to deter policies which will impact fossil fuel usage. For example, BP has recently coordinated messages across its social media and advertising to reframe the climate crisis as a “dual” energy challenge, emphasizing the task of meeting rising energy demand as well as addressing climate change. At the same time, BP senior management has promoted “gradual” climate policy pathways with increased consumption of natural gas and “advantaged” oil. Powerful oil major CEOs play a key role in delivering pro-fossil fuel narratives. For example, Total CEO Patrick Pouyanné has argued against “the unrealistic idea of an abrupt transition”, stating that fossil fuels are “essential” due to their contribution to growth.

This top line narrative capture of the energy transition supports direct lobbying on specific climate and energy regulations. Since Paris, Chevron, BP and ExxonMobil have led in opposition to a range of climate-motivated policy stands. For example, in 2018 both BP and Chevron have directly lobbied US policymakers for a rollback on US methane requirements. One recent trend is that Royal Dutch Shell and to some extent Total have made steps since 2015 to be more positive on a number of climate policy issues. However, both companies continue to support policy that will extend the role for fossil fuels in the energy mix and remain part of highly climate-oppositional trade associations.

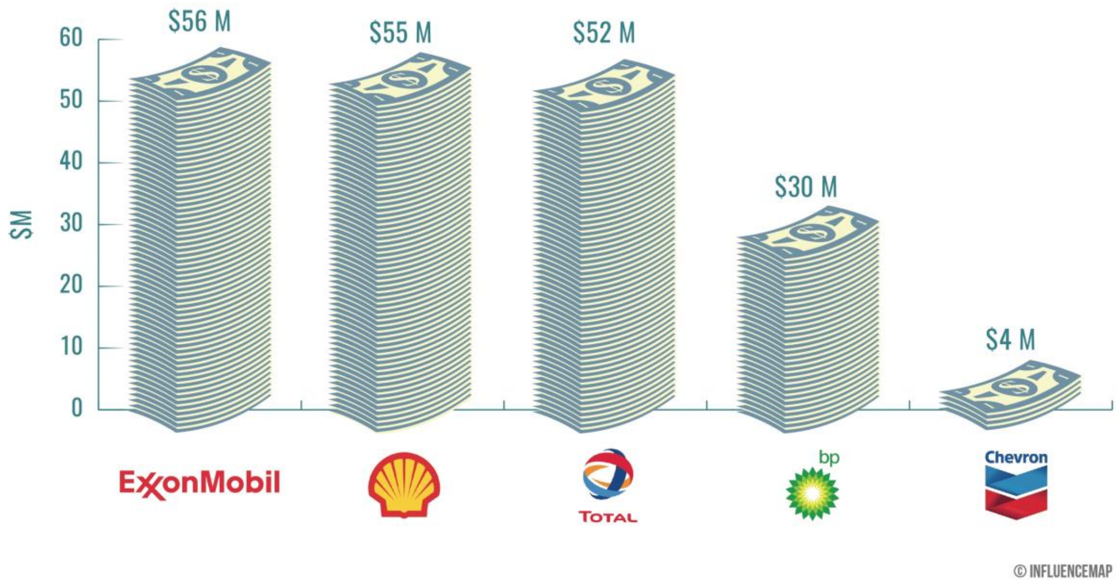
A key part of the oil majors’ lobbying strategy is apparent support for concepts like carbon pricing, while attaching numerous conditions to this support. For example, ExxonMobil made a highly publicized $1M donation to a campaign for a US federal carbon tax that also proposes the repeal of greenhouse gas emission standards under the US Clean Power Plan and the removal of company legal liability for climate change. Similar tactics are illustrated in the examples below.

- *Claiming to share government concern for tackling climate yet opposing binding regulations*. Chevron’s 2019 Climate Resilience Report Update sets out its opposition to regulation directly associated with the use of its products based on emissions. BP CEO Bob Dudley thanked the Trump administration in 2018 for rolling back the “avalanche of regulation” on the sector, and ExxonMobil’s apparent support for a federal carbon tax is conditioned on the removal of “literally thousands of regulations, laws and mandates” on greenhouse gas emissions.

- *Claiming support for a carbon price but opposing specific policies to implement this price*. In 2018, BP donated $13M to a campaign that successfully blocked a carbon tax policy in Washington State, also supported by Chevron. In other cases, companies are supporting cap and trade policies while attempting to control the policy details in order to weaken their impact by securing special exemptions in the form of free emission permits for their businesses.

Spending on Climate Branding

This research finds that the oil majors' lobbying expenditures are supported by extensive climate-focused branding activities, totaling $195M annually. This spend compares with branding on other activities such as fuel and chemical product marketing and promoting non climate-related corporate sustainability initiatives of around $965M a year. The climate branding spend for each oil major is quantified in the chart below.



Analysis of the Spending

- Each oil major's spending on climate branding its largely in line with respective economic size, with ExxonMobil and Shell leading the pack. For example, Shell maintains 800 internal communications staff globally and has a reported advertising spend of over $200M.
- The research suggests that Total maintains the highest proportion of its branding activities on climate (29%). Following this, ExxonMobil, which has faced significant negative media attention in 2018, allocates 19%. Shell and BP followed with 16% and 14% respectively. Chevron appears far less concerned, using approximately 2% of its branding budget on climate issues in 2018.
- With oil major CEOs looking to ramp up their climate-positive branding, as articulated at this year's World Economic Forum in Davos, these figures can be expected to rise in 2019. BP, for example, has already launched a substantial new global TV, digital, and print media advertising campaign, "Possibilities Everywhere", in 2019 to promote their low carbon initiatives.

Climate Branding Tactics

Three significant trends in climate branding tactics are increasingly evident from the oil majors.

- **Draw attention to low carbon (and away from fossil fuels):** This is the most commonly used and best recognized advertising theme. For example, ExxonMobil's promotion of its biofuels from algae technology in its 'Tiny Organism' campaign.

- **Position the company as a climate expert:** Framing the company as an authority on climate change and integral to a solution. Themes include emphasizing the companies' knowledge monopoly on the global energy system or know-how on clean technologies. Shell's promotion of its "energy ideas" through its Make the Future campaign is a key example, so too is BP's extensive promotion of its Statistical Review, Technology Review and Energy Outlook.

- **Acknowledge climate concern while ignoring key parts of the solution:** Enhanced efforts to assimilate the messaging tone and style of the global climate movement and convince stakeholders of the company's concern for climate change. In general, the campaigns largely ignore the need for binding policy, which is increasingly counter to what the IPCC's recommendations imply to meet climate targets.

Misalignment Issues

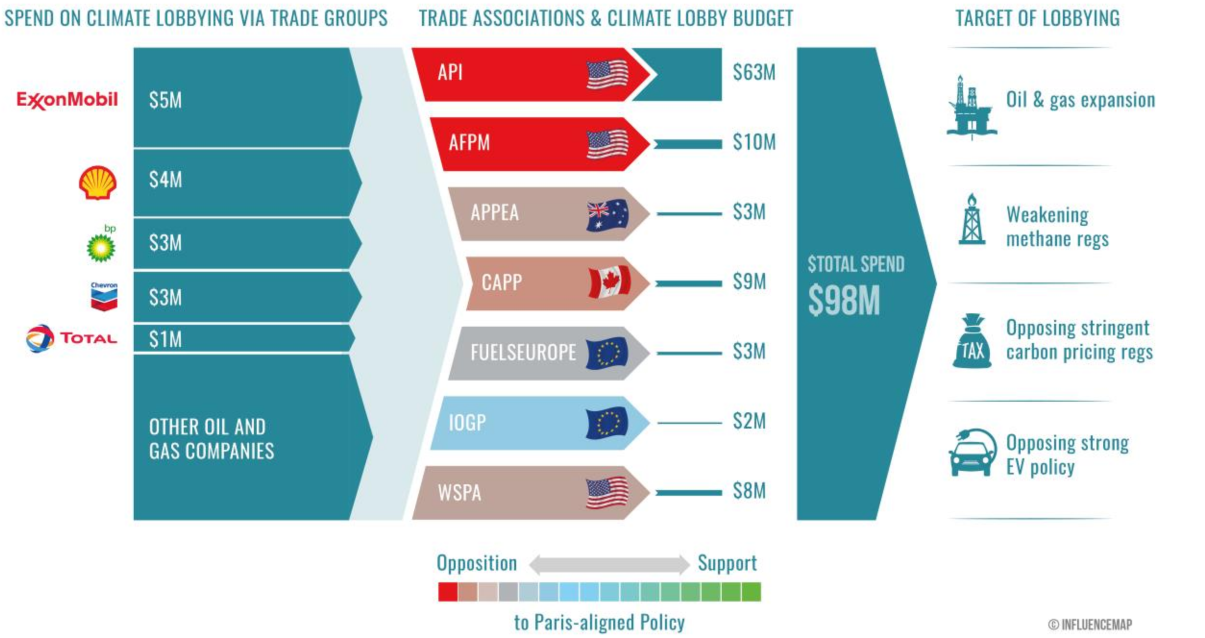
The research demonstrates how the companies have used branding to counter increasing societal pressure on climate rather than decisive efforts to change their business and lobbying practices. Two core disconnects are emerging.

- **Gap between spin and reality in low carbon investment**: Despite efforts to draw attention to low carbon activities, the overwhelming business focus remains on oil and gas related business, ($110Bn vs $3Bn among for the five oil majors for 2019 projections). Exxon's high-profile advertising of its biofuels from algae research contrasts with the relatively tiny role it currently plays or will play in its overall business. Exxon's goal of reaching 10,000 barrels of biofuel a day by 2025 would still equate to just 0.2% of its current refinery capacity – in other words, a rounding error relative its global business.

- **Gap between top line climate statements and actual lobbying**: The oil major's lobbying practices remain clearly misaligned from the positivity of their top-level communications. For example, at the same time as making high-profile commitments on the importance of reducing methane from oil and gas facilities through the Oil and Gas Climate Initiative (OGCI), Chevron and BP have actively lobbied US policymakers to roll back US efforts to regulate such methane emissions.

The Role of Trade Associations

While the five oil majors may need to have their individual voices heard on climate policy, given their diverse geographic and business portfolio mixes the use of jointly funded trade associations plays a crucial role in lobbying against binding regulations. The importance of this is two-fold. Firstly, as direct opposition by the companies to climate policy becomes increasingly untenable, the use of trade associations to do this work becomes increasingly desirable, as these groups are easier to hide behind and defend. Secondly, a trade group with a mandate to represent the entire sector and the jobs/growth narrative it deploys may be more powerful than a single-company approach. This study looks at the most powerful oil & gas sector trade groups operating in the US, Canada, Europe and Australia. The chart below tracks the money each of the five oil majors contributes towards climate lobbying by their trade groups and how it contributes to these groups' overall climate lobbying budgets. The American Petroleum Institute clearly dominates in this spending. Detailed summaries of each trade association's climate lobbying can be found in the Appendix.



Trade associations structure their membership and fees depending on the size of a company's operations in the region they represent. The five oil majors, owing to their economic size, appear likely to dominate the agendas of most if not all groups highlighted above. Their presence represents a global strategic lobbying asset to combat binding regulations deemed a risk to the expansion of fossil fuels. All five oil majors, as truly global firms, have close links to all the trade associations in the flow chart above, with a few exceptions (e.g. Chevron remains outside of FuelsEurope, Total remains outside the WSPA).

Misalignment Issues – Investors Take Notice

The disconnect between the top line climate positions of the oil majors and their policy lobbying stances is noted in the section above. When considering the gap between this top line climate branding and the lobbying positions of their key trade associations, the disconnect is extreme. Moreover, it only continues to widen as the oil majors' branding becomes more positive while trade group lobbying against climate policy holds firm. This disconnect in combination with the huge power wielded by trade groups wield through their lobbying has attracted growing investor concern. Key institutional investors like pension funds are anxious to eliminate the lobbying blocking climate policy and to drive better corporate governance on climate (i.e. ensuring there is no disconnect between the "walk and the talk" on climate change).

A key theme of a shareholder engagement launched by institutional investors with $2Tn in assets in 2018 was the misalignment by European oil majors with their trade associations over climate change (see Financial Times, Investors challenge 55 companies on climate, Oct 2018). Royal Dutch Shell, facing a potential shareholder resolution on the matter, announced in December it would comprehensively assess its lobbying and trade association links. These pressures are likely to increase on all five oil majors, especially as the Climate Action 100+ engagement process proceeds. The following table outlines some glaring recent disconnects between the corporate top line stance and trade group lobbying on climate change.

Company	Top Line Climate Statements by Company	Contradictory Lobbying by its Trade Group
Shell	"The next step should be for governments to put in place the right policies [...] they should include regulations that speed up investment in low carbon technologies and — at the same time — move consumer demand" - Shell CEO, Ben Van Beurden, CERAWeek, March 2017 "We need battery electric vehicles" – Shell CEO, Ben Van Beurden, July 2018	"American Petroleum Institute (API) opposes mandates and subsidies [...] the level of market penetration achieved by electric vehicles should not rely on government interference" - API Testimony before the US House of Representatives, May 2018
ExxonMobil	"We've been vocal in our support of a carbon tax, and recently joined the pro-carbon-tax Climate Leadership Council." - Energy and Carbon Report, February 2018	"[a carbon tax would be] bad public policy [...] We currently do not support, as a trade association, a carbon tax." American Fuel and Petrochemical Manufacturers (AFPM) CEO Chet Thompson, March 2019

bp	"BP and seven peers have agreed to five principles for reducing methane emissions across the gas value chain. […] They are: […] Advance strong policies and regulations on methane emissions" - BP Website	"[…] the EPA chooses to regulate methane emissions. Why? Good question" - American Petroleum Institute CEO Jack Gerard, January 2017
TOTAL	"Currently, the most pressing issue is simply to promote the idea of carbon pricing in any form." - Climate Report, September 2018	"Current climate policies in Canada are prompting companies to move to countries" – Canadian Association of Petroleum Producers (CAPP) twitter post, June 2018
Chevron	"Chevron shares the concerns of governments and the public about climate change." - Chevron, Climate Change Resilience Report, 2018	"Markets, not government interventions, should determine energy sources for power generation." – American Petroleum Institute 2019 State of American Energy Report

Big Oil and the US Elections

Background

With the exception of France's Total, the oil majors' climate lobbying expenditures are geographically weighted towards the United States. One explanation is that the United States, in particular its shale fields, have become of increasing strategic importance in corporate investment plans. A further explanation is that the legal framework structuring the way companies spend on lobbying and politics in the US enables far greater levels of effective spending than the other regions included in the survey (Europe, Canada, Australia). US corporate political spending has received increasing political and media attention in 2019. In light of this concern, the US political contributions from the five oil majors since 1990 are listed below, with data from opensecrets.org.

Organization	Aggregated US Political Donations since 1990
Chevron	$28,436,617
ExxonMobil	$20,980,168
bp	$8,583,322
	$3,310,304
TOTAL	$380,285 (since 2000)

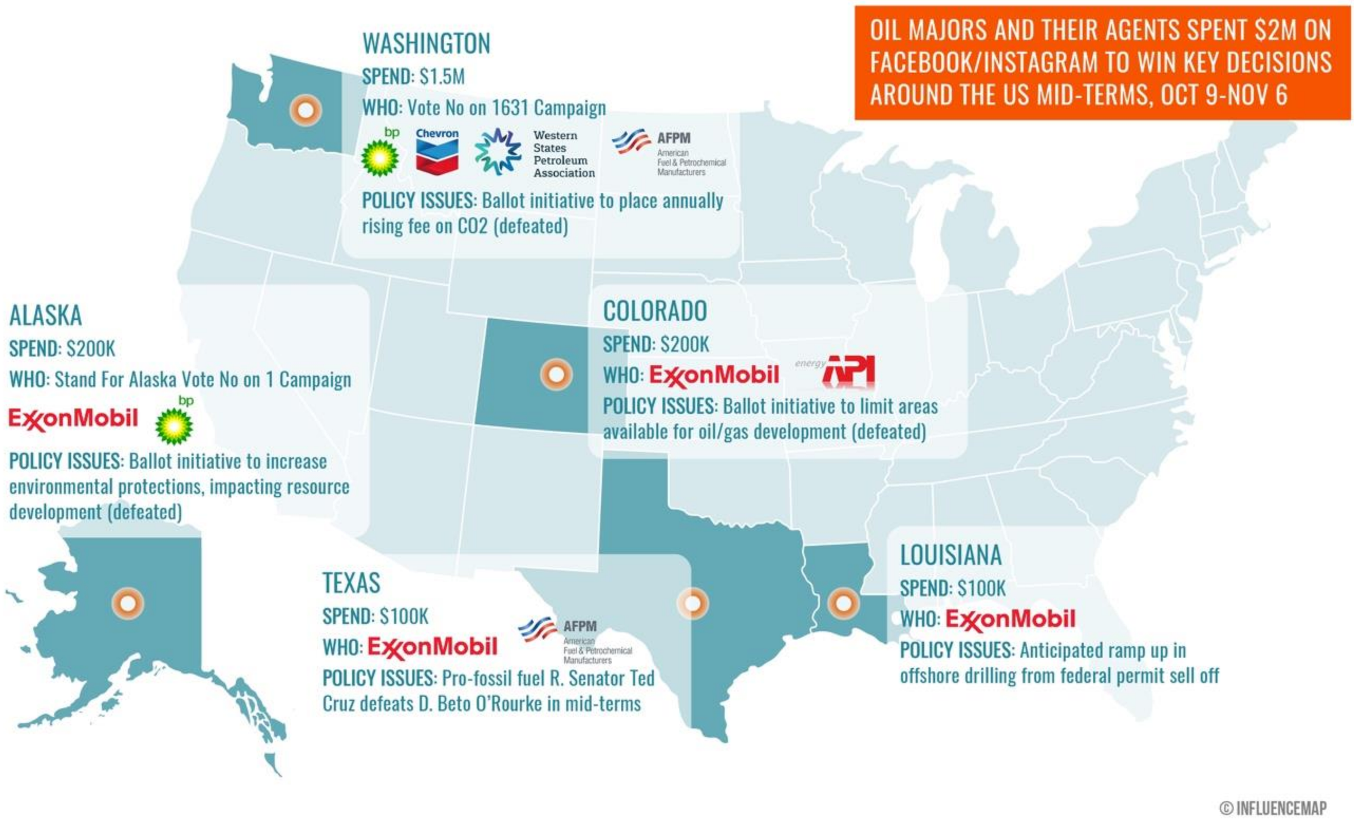
Under the 1995 Lobbying Disclosure Act, lobbying disclosures require the linkage of money spent to a particular policy agenda such as climate change (although the positions taken do not need to be disclosed). However, disclosure of this targeted policy agenda is not generally required under US Federal campaign finance laws pertaining to political contributions. Furthermore, research by US watchdog the Centre of Responsive Politics reveals significant amounts of US political contributions do not even fully disclosure their ultimate donors.[6] Political contributions that were made without full disclosure of their ultimate source totaled $539M in the 2018 election cycle according to opensecrets.org. *Given these limitations in ascertaining targeted policy agenda and ultimate donors, this research does take into account such political donations. InfluenceMap does recognize that this influencing and spending could be highly significant to the overall climate-influencing strategies of the oil majors and their agents.*

[6] Center for Responsive Politics, State of Money in Politics: Billion-dollar 'dark money' spending is just the tip of the iceberg, February 2019

The Mid-Term Elections, Big Oil and Social Media

Aside from political donations to support particular campaigns which, as noted above, are extremely difficult to track, much attention in recent years has been paid to the role of sophisticated, targeted social media campaigns aimed at influencing elections around the world. Following a number of related controversies surrounding the 2016 US Presidential Election and the UK's Brexit vote, platforms like Facebook and Twitter have implemented systems for public searching and tracking of political ads on their platforms. Using Facebook's disclosure facility (covering both Facebook and Instagram) InfluenceMap has identified significant investment in political social media advertising by the oil majors and their agents. Such data for 2018 indicates concentrated ad purchasing around the US midterm elections, when $2M was spent on Facebook and Instagram ads in just four weeks.

During the midterm elections, "ballot initatives" and other referendum-like mechanisms are used for key decisions of interest in certain states. As with all other elections, these also represent an opportunity for interest groups to lobby. The infographic below details the five states most targeted by the oil majors' political advertising in the four weeks leading up to the November 6th elections. It demonstrates how the companies have used sophisticated social media advertising techniques to help swing key climate and energy decisions in their favour.



During this time ExxonMobil was by far the most prolific spender, racking up over $400K in four weeks on over 360 individual political ads. The ads urge rejecting specific ballot initaitves whilst promoting the benefits of increased fossil fuel production. Facebook's data indicates that ExxonMobil's ads made over 10 million "impressions" in this time with users in Colorado, Texas and Louisiana.

Oil industry trade groups were also active with campaigns. The Western States Petroleum Association (WSPA)'s 'Vote NO on 1631' campaign group was established to oppose a ballot initiatve proposing the implementation of a carbon tax in Washington State. The group received over $13M in funding from BP alone and spent more than $1M of this on political social media ads in the four weeks running up to the vote. Similar ads were evident in the state of Alaska prior to the midterms.

A selection of stills from these adverts are shown above, indicating the use of highly political, negative and seemingly targeted messages by the companies to swing critical energy and climate decisions in their favour. For example, the WSPA Vote No on 1631 campaign ran adverts stressing the negative impact of an 'unfair tax' on Washington state families and small businesses. The industry-backed campaign 'Stand for Alaska' against new environmental standards appealed to Alaskans to oppose 'ousiders' and 'billionaire activitists from Washington DC and California' telling them what to do.

Social media disclosures suggest neither Shell nor Total appear directly involved in funding these Facebook/Instagram ads relating to climate and energy policy leading up to the midterm elections, although indirectly, key trade groups they are members of (like the AFPM) were involved in such activities.

Conclusions

The five global oil majors have invested over $1Bn since the Paris Agreement on misleading climate lobbying and branding activities. The overriding intention and net result of these efforts has been to stall binding and increasingly crucial policy designed to implement the Agreement by national governments. Clearly the companies deem such spending necessary to preserve their business models.

In a speech to an industry-wide conference in March 2018, Shell's CEO Ben van Beurden noted the challenges of climate change, stating there is "*no other issue with the potential to disrupt our industry on such a deep and fundamental level*". Yet in November 2018, at another oil industry conference, he acknowledged that recent headlines generated around Shell's investments in low carbon energy were misleading and that it was wrong to think they had gone "soft on oil and gas".

The issue for Shell and its oil major peers is one of credibility and increasing disconnect on climate. Most glaring is the gap between their seemingly positive statements on climate change and the often directly oppositional actions of their lobbying, both directly and through highly effective trade associations. Second is the disconnect between these seemingly positive statements, the companies' actual low carbon investments, and the growing consensus of the scientific community, non-fossil-fuel business sectors, shareholders and civil society more broadly on the urgency of action needed on climate. The oil sector's climate branding is increasingly sounding hollow and disingenuous.

It is likely that the IPCC's groundbreaking 2018 report on limiting warming to 1.5^{o}C will be a watershed moment for the fossil fuel industry. The IPCC notes limiting warming to 1.5^{o}C will require a "rapid escalation in the scale and pace of transition" of energy systems, "particularly in the next 10-20 years" including renewable energy and electric transport. It further notes such an unprecedented transition would necessarily require "public sector interventions". It appears almost inevitable that these changes would be accompanied by limitations on oil and gas usage in this time frame.

Oil major messaging on climate with its focus on market-driven solutions (often involving commercially unproven technology), low carbon investments dwarfed by fossil fuel capex budgets and incremental operational improvements are increasing seen as attempts to distract from science-based reality and stall real progress. It is highly probable they will find it increasingly hard to pursue this manner of lobbying and branding strategy into the future without significant push back from emerging pressures – shareholders, the media, the public and potential court plaintiffs.

These pressures could feasibly catalyze what the sector has been fearing and suppressing for decades: meaningful and binding regulations on their operations in line with what is needed to address one of the most important challenges faced by humanity.

Appendix: Methodology

InfluenceMap's methodology for this research is based on a four-stage process.

Stage One - Defining Scope of Activities: Areas of corporate activity that might be used for climate lobbying or for climate branding are identified. To assist in this process, InfluenceMap refers to a UN protocol from 2014, the Guide for Responsible Engagement in Climate Policy. Areas noted in this include direct interactions with policy makers and comments on specific regulations or policy areas, marketing and advertising, financial contributions to campaigns and the use of external groups like trade associations. The scope of what constitutes "climate-motivated policy" (e.g. global treaties, carbon taxes, renewables, emissions limits etc.) follows InfluenceMap's recognized platform for measuring climate lobbying and is noted at this FAQ landing page.

Stage Two - Estimating Spending: Spending associated with these activities is then estimated. Some of these costs can be assessed from organizational disclosures such as lobbying registers, regulatory financial filings and annual reports. Where these are not available, (e.g. the maintenance of corporate departments involved (Regulatory Affairs, PR/Communications) and external advertising/PR spend) InfluenceMap has made best-attempt efforts to estimate budgets based on industry norms and external sources.

Stage Three – Estimating Climate Relevance: InfluenceMap then estimates the proportion of this spending directed at climate change related issues. This is done by assessing the content of the outputs of these activities. For example, if the activity is PR/communications, every press release, publication or social media post over the time period is assessed. Similarly, for advertising, all ads released across all platforms (such as YouTube) are assessed. This provides hundreds of data points for evaluation. Each is then scored for climate relevance (0.0 for no relevance to 1.0 for full relevance).

Stage Four – Computing Total Climate Lobbying/Branding Spend: Each spend item is then categorized as lobbying or branding based on whether the activity pertains to a policy agenda (e.g. commentary on the energy mix) or is related purely to corporate activity. Total spending is computed by multiplying the climate relevance for each spending item and aggregating for both branding and lobbying. Where a company is member of a trade association engaged in climate lobbying, InfluenceMap's methodology incorporates estimation of each companies' contribution to that trade group's climate related spend and this is included in the company totals.

Lobbying activities are graded using InfluenceMap's well established process devised in 2015 and updated continuously. These grades are evident on page 10 of the report where the nature of each oil majors' lobbying is noted. Chevron proves the most oppositional to climate with a "F" grade on the A+ to F scale. Full profiles of each of the oil majors and the main trade groups are provided in the next Appendix. Examples of their lobbying are included throughout the main report.

Appendix: Climate Scoring Profiles

The following is also available on InfluenceMap's online climate lobbying database.

The Oil Majors

bp	Climate Policy Score: E+

Improvements in BP's top line statements on climate change since 2015 appear increasingly disconnected from the companies' lobbying on a range of climate and energy policy. Responding to the IPCC's special report on 1.5C warming in October 2018, BP CEO Bob Dudley stated publicly - "Clearly it's a call to action." In the same month, however, responding to an an EU consultation, BP appears not to have supported increasing the region's GHG emission reduction contribution by 2050. In 2016, BP's Chairman Carl-Henric Svanberg and CEO Bob Dudley told shareholders that the company supported "strengthening" climate policy frameworks. However, this does not appear consistent with the company's support for the US Administration's rollback of regulations impacting their operations since this time. In 2017, former BP America CEO John Minge sent then US EPA Administrator Scott Pruitt a document with a handwritten note thanking him for his "vision" on regulatory reform. BP also lobbied the US Administration on reducing "regulatory burdens" impacting its operations. In 2018 BP CEO Bob Dudley thanked the Trump administration for the "avalanche of regulations" that have been reduced or removed. BP also actively lobbied the US Administration between 2016-2018 for the repeal or rollback of various methane emission requirements. Bob Dudley has separately explained that the company supports a "carbon price" as it is "by far a better way to go than regulation." The company's website states that the company supports either emissions trading or carbon taxes. Despite this, BP spent $13m in 2018 to oppose carbon pricing regulation in the US state of Washington which would have placed a $15 fee on every ton of CO2 produced. BP has also engaged through multiple channels, including direct consultations with consultations and along with EU trade body FuelsEurope, to weaken the impact of the EU ETS by pushing for greater immunity for industry installations through the allocation of free emission permits. BP's high-level framing of a global energy transition, promoted through various messaging channels, suggests the need for a "gradual" approach, with increased short-term investment in "advantaged" oil and gas. The company has advocated with both EU and US policymakers for policy to support investment in CCS technologies in 2018. BP's support for a transition from coal to gas in the power sector is premised on the notion that gas represents a permanent solution rather than a transition fuel. BP has also lobbied for measures to facilitate increased oil and gas development in the US in 2017-2018..

Climate Policy Score: F

Chevron appears to continue opposing almost all forms of climate-motivated regulation whilst actively pushing a US energy policy agenda that accelerates oil and gas production. Chevron's 2019 climate policy position states support only for a "market-based" route to "lower-carbon outcomes", whilst opposing a regulatory approach that establishes GHG emission targets on the use of its products. Between 2015-2018, successive Chevron CEOs have questioned the desirability and feasibility of action on climate in line with the recommendations of the IPCC, for example by suggesting that the challenge of meeting growing energy demand in developing countries should be prioritized over urgent climate policy action. Throughout 2016-2017 former Chevron CEO John Watson also advocated against emissions trading and carbon taxes, suggesting they constitute an unnecessary cost to "the consumer and ... business". In 2018, Chevron appeared to shift from opposing carbon taxes, to suggesting it would support a carbon tax but only with several poorly specified conditions. Despite this, the company still donated $500K to a successful campaign to defeat a carbon tax policy proposal in Washington State in 2018. Chevron has disclosed that it supports the repeal or significant revision of US methane regulations and has directly lobbied the US EPA on the rollback of a number of methane emission measurement requirements in 2018 including, seemingly, through direct meetings with Trump Administration officials. In 2017, Chevron CEO called renewable and low carbon fuel policies in the US and Canada 'failures' and in 2015-2018, Chevron has repeatedly lobbied for the repeal of Renewable Fuel Standards at the federal level. Between 2016 and 2018, Chevron directly lobbied US policymakers to open US federal land to oil/gas exploration, demanding that all offshore areas from the lower 48 states and Alaska should be considered for their "hydrocarbon potential". Chevron is represented on the boards of various trade associations that are opposing climate policy. For example, CEO Michael Wirth is on the board of directors of the American Petroleum Institute which, like Chevron, has lobbied for the rollback on US methane regulation throughout 2017-2018. The company further appears to retain membership to ALEC, a US group renowned for disseminating climate misinformation and for using legal tactics to block a range of US state-level and federal climate polices.

Climate Policy Score: E

ExxonMobil continues to oppose most forms of climate regulation whilst promoting an energy policy agenda to accelerate fossil fuel development. Despite claiming in 2008 that it would cease its funding of climate denial, it has continued to fund organizations like the American Legislative Exchange Council (ALEC) until 2018. ExxonMobil continues to question the desirability or feasibility of urgent action towards a global low-carbon energy transition. ExxonMobil claims to support a carbon tax as long as its revenue-neutral. However, when questioned on its lobbying activities around US carbon tax bills in 2015-2018, the company has failed to disclose the specific messaging conveyed to policymakers through this lobbying. This includes not clarifying the company's detailed position on Republican Carlo Curbelo's proposal to place a $24 per ton tax on carbon emissions and dedicate 70% of the revenue to rebuilding US infrastructure. In 2016, the company opposed a revenue-neutral carbon tax bill in the state of Massachusetts. ExxonMobil's support for a carbon tax further appears to come with a number of conditions, including the rollback of other regulations such as the US Clean Power Plan. In 2018, an ExxonMobil representative explained that they would support carbon pricing only if the policy replaced the "patchwork of literally thousands of regulations, laws and mandates" currently regulating carbon emissions. Despite advocating in late 2018 for the maintenance of "key elements" of Obama-era methane regulations, ExxonMobil appears to have supported a rollback of certain technical detection requirements. ExxonMobil sits on the board of the API, which actively sought the rollback on methane regulations in 2016-2018, and company representatives accompanied the API to meetings with Trump Administration officials throughout 2017 and 2018. In 2017, ExxonMobil lobbyists actively opposed renewable energy and energy efficiency standards in Ohio and the company has criticized renewable subsidy programs in Europe. ExxonMobil is on the board of directors for the American Fuel and Petrochemical Manufacturers, which appears to have played a significant role in pushing for a rollback of the Corporate Average Fuel Economy (CAFE) standards in the United States in 2018. In Canada, ExxonMobil's affiliate Imperial Oil appears to have successfully persuaded the government to delay a clean fuel standard. ExxonMobil has also opposed US renewable fuel standards. In 2018, CEO Darren Woods argued that oil and natural gas "will play a huge role in all scenarios". ExxonMobil appears to make extensive use of social media advertising to communicate its position on the energy mix. In the run-up to the US mid-terms in 2018, ExxonMobil ran an extensive social media advertising campaign promoting increased oil and gas production and opposing a number of state-level policy initiatives that would have placed restrictions on such activities.

Climate Policy Score: D

Between 2015-2018, Shell has become more positive across different areas of climate policy while continuing to simultaneously lobby for policy to advance fossil fuel production and consumption. It also retains membership to various trade groups that directly contradict Shell's own positions. In consultation with EU policymakers in 2017, Shell supported a transition to a net zero economy in Europe 'before 2070' based on its '2C aligned' Sky Scenario. However, Shell CEO Ben Van Beurden has suggested that ambition beyond a 2C scenario should not be explored to avoid disappointment. In 2017, Shell supported EU emission standards for power facilities in EU capacity markets. Throughout 2018 the company has also advocated for carbon pricing policy including international carbon markets, further reforms to raise the ambition of the EU Emissions Trading Scheme, and appears to support a US federal-level carbon tax. Despite this, in 2018, US subsidiary Shell Oil lobbied against measures to strengthen the ambition of the Cap and Trade scheme in California. Furthermore, despite choosing not to fund a joint industry effort to block a carbon tax policy in Washington state in 2018, Shell's CEO publicly criticized the policy prior to a public vote. In 2019, Shell has called on the US EPA to tighten rather than weaken methane regulations. However, the company previously attended meetings with Trump Administration officials along with the American Petroleum Institute in 2017-2018 to discuss methane, disclosing in 2018 that it supported "fixing" the EPA's Obama-era methane rule to make it "workable". In 2018, Shell opposed the rollback of US Fuel Economy Standards despite being on the board of the American Fuel & Petrochemical Manufacturers, which appears to have played a significant role in pushing for their weakening in 2018. In 2017 Shell advocated to EU policymakers for "well-targeted regulation" to support particular low-carbon technological innovation investments the company is making. However, Shell also communicates that they see oil and gas "playing a major role throughout the decades of transition and beyond." In 2018, the company lobbied the EU commission to embed natural gas in the EU's future energy mix. In the US, Shell Oil also lobbied the EPA for regulatory approaches that avoid "significantly encumbering" natural gas-fired generation, despite recognizing that CCS "may be too costly to constitute the best system of emission reduction". Between 2017-18, the company also lobbied US policymakers in support of opening new areas of US federal land for oil and gas exploration and production. Whilst Shell has used advertising to promote its EV business and the electrification of transport, the company is a member of the API, the AFPM and FuelsEurope, all of which lobbied against progressive policy to promote electric vehicles in the US and EU in 2017-2018.

TOTAL	Climate Policy Score: D

Total has communicated a more positive position on certain climate-motivated policies since 2015, although continues to advocate an energy policy agenda focused around fossil fuels. Furthermore, the company retains memberships to a number of powerful trade associations engaged in active opposition of climate regulations. In line with its efforts to project itself as a "responsible energy major", Total has stated support for an energy mix "in line with the IEA's 2°C scenario and whose carbon intensity declines steadily." In 2017, Total supported emission standards to ensure the phase-out of coal in EU capacity markets. Total also supports the implementation of a carbon price between 30-40 USD and has stated support for policies including the emission trading system (EU ETS) and a carbon price floor in Europe, as well as a carbon tax & dividend plan in the US. However, the carbon tax policy supported by the company in the US appears to come with the caveat that other regulations, including the US Clean Power Plan, are rolled back. In its 2018 CDP disclosure Total stated that it supports "one single EU-wide GHG emissions reduction target", although this suggests the company has not supported increasing separate targets for energy efficiency, for example. Total is supporting measures to transition from coal to gas power but rejects the notion of gas as a transition fuel, instead promoting it as a long-term energy solution. The company does not appear to support urgency on decarbonizing the global energy mix and Total CEO Patrick Pouyanne has opposed the "unrealistic idea of an abrupt transition." Total retains membership of trade associations including Canadian Association of Petroleum Producers (CAPP), the American Petroleum Institute (API) and the Australian Petroleum Production & Exploration Association (APPEA), all of which have actively lobbied for the expansion of oil and gas production globally. Patrick Pouyanne does not appear to support a significant shift to electricity in the transport sector and Total retains membership of trade associations including the API, the AFPM and FuelsEurope that lobbied against progressive policy to promote electric vehicles in the US and EU in 2017-2018.

The Trade Associations

energy API	Climate Policy Score: F

The API has consistently advocated against the role of the US government in tackling climate change. In 2015 API President Jack Gerald argued that President Obama's support of the Paris climate change summit was driven by "narrow political ideology" and, since the 2016 US election, the group has heavily promoted a deregulatory agenda in the country, suggesting it is more important than further action on climate change. In 2018, the API continued to lobby the US EPA for a broad a reconsideration of its approach to increasing emission limits and regulation and in 2019 maintains its position of opposition to the role of government policy in defining the US energy mix. In 2019, the API has refrained from taking a position on a US carbon tax despite it being backed by some of API's largest members, and instead, President Mike Sommers has emphasised the importance of voluntary emission reductions in press briefings. In 2017, former API President Jack Gerard stated that the API doesn't have a position on a US carbon tax because he didn't believe it would be given "serious consideration" in the House or Senate. The organisation has, however, opposed carbon pricing regulation in the past; in 2016, an API spokesperson claimed that the organisation "had a long history opposing carbon taxes." The API appears to oppose direct regulation of methane. Since 2016, the organisation has relentlessly pursued the removal or weakening of Bureau of Land Management's regulation of methane as well as the EPA's New Source Performance Standards for oil and gas sector emissions. In 2017, API lobbied in favour of reconsidering previously agreed US vehicle emission standards for 2021-2025, which the Trump administration has since moved to roll back. The API has also funded research that calls into question the link between air pollution and health impacts that was subsequently used in 2018 by the automotive sector to support the case for weaker vehicle emission rules. In 2018, the API remained actively opposed to tax credits, mandates or subsidies to help incentivize electric vehicles. This includes directly lobbying the US House, the US Senate and a number of US State Governors calling on them to reject such policies. The API has also continually lobbied for the repeal or reform of US renewable fuel standards and has lobbied heavily in favour of measures that will help maintain a high GHG energy mix, for example, the removal of restrictions on unconventional oil and gas production, including in the Arctic.

AFPM American Fuel & Petrochemical Manufacturers

Climate Policy Score: F

The American Fuel & Petrochemical Manufacturers (AFPM) is negatively lobbying on a wide range of US climate policies. In 2015 AFPM criticized the 'heavy burden' emission reductions the Paris Agreement had placed on the U.S. public, and called into question their financial value. In 2018 AFPM argued that removing regulations on gas and oil production could lead to over a million new jobs and contribute billions of dollars to the US economy. In 2019, AFPM President and CEO Chet Thompson has stated: "We currently do not support, as a trade association, a carbon tax." In 2018 the group strongly supported the Scalise-McKinley anti-carbon tax resolution introduced in Congress and has funded campaigns to oppose carbon tax policies in Washington State in both 2016 and 2018. AFPM appears strongly opposed to regulations to decarbonize the mobility sector, and has repeatedly criticized the Renewable Fuel Standard (RFS), describing it as "unworkable", and a "broken program". In December 2018, CEO Chet Thompson stated the organization "adamantly opposes EV subsidies and mandates". In June 2018, AFPM called on the governors of eight states to reject subsidies for electric vehicles and zero emission vehicles. Similarly, AFPM has supported the repeal of California's Zero Emission Vehicle mandate, and made the case in October 2018 that other states should not be allowed to adopt similar mandates. AFPM also appears to have run an extensive public campaign in 2018 to support the rollback of Corporate Average Fuel Economy (CAFE) standards, and CEO Chet Thompson previously applauded the US federal government's October 2018 decision to freeze the standards at 2020 levels until 2026.

appea the voice of australia's oil and gas industry

Climate Policy Score: E+

APPEA appears to recognize IPCC science, but has emphasized the need to balance climate action with competitiveness and growing energy demand. Shortly before COP24 in December 2018, APPEA stressed the need for policies which reduce emissions at "least cost." APPEA has promoted the role of gas Australia's energy mix, including as an alternative to coal. Whilst the group appears to support some energy regulation, APPEA Chief Executive, Dr. Malcolm Roberts, stated in December 2018 that an energy policy framework would work best by facilitating market innovation and investment. The organization has further qualified support for regulations by stating they should not affect national or regional competitiveness. In June 2018, APPEA stated its opposition to a recommendation to impose a financial penalty for non-compliance with the National Energy Guarantee (NEG). In February 2018 the organization attempted to have LNG manufactured for export made exempt from emissions requirements. APPEA has voiced its opposition to individual renewable energy targets at the State level in Australia, and in June 2018 proposed replacing these and lessening the role of the Renewable Energy Target with a "low-cost" NEG. The organization has lobbied against various state-level bans and moratoriums on unconventional gas production threatened the NEG's success, and advocated for their removal. APPEA has expressed support for climate policy consistent with an international price on carbon and in December 2018 Malcolm Roberts called for the finalization of UNFCCC rules on trading emissions permits and credits. However, the organization in the meantime appears opposed to more achievable policy ambitions at the national level.

CAPP CANADIAN ASSOCIATION OF PETROLEUM PRODUCERS Canada's Oil and Natural Gas Producers

Climate Policy Score: E-

Whilst CAPP has acknowledged climate change and the need for action, its lobbying clearly favours the Canadian oil and gas sector's global competitiveness in opposition to climate change policy. The group has, for example, continuously warned of the threat posed by carbon leakage to counter ambitions in Canada to reduce emissions. Since 2016, the group appeared to have become more outwardly supportive of the concept of carbon pricing policy. However this support has been based on the condition that a federal policy "not only preserve, but enhance" the sector by recycling revenues from the scheme back to the oil and gas companies. In 2018, CAPP argued for the federal government to provide the oil and gas sector with increased subsidies to compensate for the costs of the federal carbon tax scheme as a "trade-exposed industry". A December 2018 report indicated that oil and gas companies will have on average 80% of their emissions exempt from federal carbon pricing. At the same time, CAPP has lobbied to weaken carbon pricing regulation already implemented in several Canadian provinces, whilst opposing it in provinces without such regulation. For example, in Alberta, CAPP directly lobbied policymakers in 2018 to ensure exemptions for the sector until 2023 and in 2017 lobbied for a weaker carbon tax in British Columbia. In Ontario, CAPP appears to have funded a social media campaign attacking carbon pricing in the lead up to elections in June 2018. In 2016-17, CAPP directly lobbied the Canadian government to weaken proposed methane emission standards, advocating instead for voluntary standards and a delay in their introduction. It also opposed a "prescriptive" enforcement of methane rules in Alberta. In 2018, CAPP argued that the Clean Fuels Standard is duplicative and called on the Canadian government to limit its scope by exempting the upstream oil and natural gas sector. CAPP promotes policy to enable a "strong growth scenario" for oil and gas in Alberta and used its 'Energy Platform' to influence voters on this issue prior to elections in the state in June 2018. In a September 2018 submission to Alberta policymakers, the group pushed for measures including streamlined regulatory timelines and a range of 'financial levers' to incentivise the expansion of oil sands exploitation

FuelsEurope REFINING PRODUCTS FOR OUR EVERYDAY LIFE

Climate Policy Score: E+

FuelsEurope is negatively lobbying EU climate change policy. Despite stating support for the Paris Agreement in 2015, FuelsEurope has stressed carbon leakage concerns to warn against EU climate ambition. In a 2018 consultation with the European Commission on increasing the EU's contribution to global GHG emission reductions, FuelsEurope argued that Europe should not focus on "ever-higher unilateral targets". While appearing to support the EU ETS as an alternative to other climate policies, FuelsEurope has not supported reforms to raise its carbon price. In 2016-17, FuelsEurope communicated opposition to an import inclusion mechanism and free allowance reductions related to the scheme. Throughout 2018 the organisation engaged EU policymakers to secure continued compensation for the refinery sector for costs related to the scheme. FuelsEurope has communicated opposition to binding environmental targets, including EU energy efficiency targets and has supported a transport exemption from the EU energy efficiency obligation scheme. FuelsEurope has previously opposed renewable energy legislation, advocating against both the binding 27% EU 2030 renewable energy target and renewable subsidies in 2014-16 consultation responses. Since then, the organisation has supported a closer alignment between EU renewable energy policy and transport policy. In 2017, the group appears to have been more accepting of a EU-wide renewable energy target of 27%, focusing on promoting the role that renewable fuels can play in achieving it, although not specifying a position on proposals to raise this target and arguing that any target should be realistic and flexible. Between 2016-2018, FuelsEurope has been critical of increasing EU vehicle GHG emission standards arguing that this "risks misleading the car industry into premature electrification " and neglects the "potential for further efficiency improvements in conventional vehicles". In 2018, the organisation has proposed changes to the policy to give vehicle producers extra compliance credits to count towards CO2 reduction targets if renewable fuels are used. FuelsEurope opposes policy promoting the electrification of transportation and its CEO, John Cooper, has criticized electric vehicles as "a route to much more expensive fuels in transport." FuelsEurope directly engaged the EU Commission in 2017 to oppose a proposal for zero-carbon vehicle sales mandates, as well as EV subsidies.

International Association of Oil & Gas Producers	Climate Policy Score: D

The International Association of Oil and Gas Producers (IOGP) is supporting some high-level GHG emission reduction targets in Europe and appears to support the Paris Agreement. However, the organisation's detailed lobbying is negative on European climate policy and promotes increased fossil fuel production. In a consultation response to the European Commission's 2050 Climate Strategy, IOGP stated support for GHG reductions within the range of 80% to 95% by 2050, although the organisation seemingly does not support an increase in ambition to net-zero by 2050 as suggested by European policymakaers. IOGP states support for the EU ETS as the "core instrument" for reducing CO2 in Europe but has criticised the policy for the negative impact it will have on natural gas production due to the reduction of free emission permits for the sector in its next phase. IOGP has opposed binding energy efficiency and renewable energy targets under the EU 2030 Climate and Energy Framework, calling instead for a single GHG emissions target in 2016. In a 2016 consultation response to the European Commission, IOGP also opposed renewable energy support schemes, instead favoring a phase out of subsidies, and maintained such a position in 2017. IOGP promotes a long-term role for natural gas in the energy mix, as well as its role as a 'low carbon' solution. In 2018 IOGP also advocated in favour of European policy to support increased investment in CCS. At the same time, as a founding member of GasNaturally, IOGP has been involved in lobbying efforts to secure the place of natural gas in Europe's energy mix for an extended period through supporting infrastructure projects. IOGP further supports increased fossil fuel development including in the Arctic and European shale gas. In 2018, IOGP also lobbied the EU Commission to make sure that support for "exploration & production of untapped domestic oil and gas resources" was included in the EU's long-term strategy on GHG emissions.

Western States Petroleum Association	Climate Policy Score: E+

Western States Petroleum Association (WSPA) has an extensive record of lobbying against climate-motivated policy designed to regulate or increase the cost of releasing GHG emissions or support alternatives to fossil fuels in transportation or electricity production. On transportation, in 2018 WSPA responded to a new proposal to achieve 100% zero-emission vehicles in California by 2040 (AB 1745) with clear opposition, arguing that ZEV standards will undermine peoples' lifestyles and finances. It similarly opposed the Oregon Clean Fuels Program from 2015 to 2018, when it argued for its complete removal. This follows a campaign against a provision in California's bill SB 350 to reduce California's petroleum usage by 50% by 2030 - a campaign which in 2015 involved fake-citizen-lead methods. WSPA applauded the policy's eventual removal. In 2015, the group advocated against SB 350's 50% renewable energy and energy efficiency targets. WSPA also actively opposed GHG emissions reduction targets in SB 32 and has consistently rejected GHG emissions standards for hydrocarbon refining facilities in California, taking legal action against local measures in 2016. WSPA opposed California's cap and trade scheme throughout 2014-16; however, by 2017 its position had switched to supporting an extension of the emissions trading program with the exception that provisions be included to prevent California from regulating GHG emissions at refineries through other measures, with evidence suggesting a successful amendment introduced in the final bill was at WSPA's behest. Throughout 2018, WSPA has heavily engaged with Californian policymakers to oppose measures that would increase the cap and trade system's stringency going forward. The WSPA rebranded in June 2018 as an "inclusive" supporter of "common goals" and "socially, economically, and environmentally responsible" policies. However, they do not appear to have changed their lobbying behaviour to date. In 2018, WSPA ran a successful campaign 'No on 1631' against the introduction of a carbon tax in Washington State. The proposal was voted down in November 2018.