

# Shell: Climate Policy Engagement Overview

An investor briefing on Shell's climate policy engagement to aid shareholder voting decisions at its 2024 Annual General Meeting (AGM)

April 2024

## Executive Summary

- Context: On the 21<sup>st</sup> May 2024, Shell investors will vote on a [shareholder resolution](#), requesting the company “to align its medium-term emissions reduction targets covering the greenhouse gas (GHG) emissions of the use of its energy products (Scope 3) with the goal of the Paris Climate Agreement: to limit global warming to well below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase to 1.5°C.” [This month](#) Shell has appealed a court case in the Netherlands [ordering](#) the company to reduce its operational and end-use emissions by 45% by 2030. In its appeal, Shell has [claimed](#) it is lobbying in favor of the energy transition. InfluenceMap's database does not support Shell's conclusion. This briefing provides a summary of InfluenceMap's assessment of Shell's climate policy engagement. This analysis can be seen as a forward-looking indicator of corporate strategy on climate change and likely reflects on the company's preparedness for a low carbon transition.
- Direct Climate Policy Engagement: InfluenceMap analysis suggests that Shell's direct climate policy engagement is partially misaligned with science-based pathways for achieving the goal of the Paris Agreement to limit warming to 1.5°C. The analysis finds Shell continues to employ a 'dual' advocacy strategy, whereby it supports high-level climate policies and specific regulatory strands but continues to advocate in favor of a long-term role for oil and gas. For example, Shell supported [renewable energy policy](#) relating to sustainable aviation fuels (SAFs), the [decarbonization of transport](#) and the need for [methane emission regulations](#) in 2023. However, Shell did not support [specific hydrogen regulation](#) and also appeared to [advocate](#) for continued exploration, development and production of oil and gas in the energy mix, which is inconsistent with [IPCC](#) advice on the global use of gas in 1.5°C decarbonization pathways.
- Indirect Climate Policy Engagement via Industry Associations: Shell is a member of multiple industry associations with strategic, negative climate policy engagement globally. InfluenceMap analysis indicates that Shell holds memberships to 24 industry associations with climate policy engagement misaligned with delivering the 1.5°C goal of the Paris Agreement (ranked as a D or below by InfluenceMap's system), and 32 industry associations with partially misaligned climate policy engagement (ranked B- to D+). These include memberships to the [American Petroleum Institute \(API\)](#), [Canadian Association of Petroleum Producers \(CAPP\)](#), [Eurogas](#) and [Australian Energy Producers \(formerly APPEA\)](#), all of which have some negative engagement on key climate policies in their respective regions.

- Accuracy of Climate Policy Engagement Disclosure: InfluenceMap analysis suggests that Shell has published a partial account of its climate policy engagement on specific policies, both [directly](#) and via [industry associations](#). Shell's indirect [disclosure](#) appears to have excluded key examples of both positive and negative engagement with climate policy and memberships to industry associations specifically in the global south including [Business Unity South Africa \(BUSA\)](#), [Instituto Brasileiro de Petróleo e Gás \(IBP\)](#) and [Asociación Mexicana de Empresas de Hidrocarburos \(AMEXHI\)](#). Shell is expected to release a new disclosure of its climate policy engagement this month.
- Climate Policy Engagement Review: Shell has published annual [reviews](#) of its climate policy engagement since 2019. These have included three full reviews and two updates. However, InfluenceMap analysis shows that the quality of Shell's review process falls short of standards put forward by institutional investors as part of the [2022 Global Standard on Responsible Climate Lobbying](#). InfluenceMap's detailed assessment of Shell's review process, including the methodology and best practice guidance, can be found on InfluenceMap's CA100+ Investor Hub [here](#).<sup>1</sup>

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<sup>1</sup> Information correct as of 29th April 2024. InfluenceMap will update this analysis should Shell publish a 2024 iteration of its climate policy engagement review.

## Context: Scrutiny on Shell's Climate Strategy

In 2021, the Hague District Court [ordered](#) Shell to reduce its emissions by 45% by 2030, relative to 2019, across all activities including both its own emissions and end-use emissions, finding the company had a 'standard of care' to prevent dangerous climate change through its policies. In [April 2024](#), Shell began its appeal case against the ruling, with a decision expected in the second half of the year. During its appeal, Shell claimed that it "[lobbies for, not against, the energy transition](#)." InfluenceMap's database does not support Shell's conclusion.

The Hague District Court [ruled](#) Scope 3 emissions were included in Shell's 'standard of care', concluding that companies needed to take responsibility for Scope 3, especially "where these emissions form the majority of a company's CO2 emissions, as is the case for companies that produce and sell fossil fuels." Scope 3 accounts for around [95%](#) of Shell's emissions. InfluenceMap's recent Carbon Majors [report](#) has found that Shell is responsible for 2.1% of global CO2 emissions since 1854, making it the 9<sup>th</sup> highest carbon-producing entity in the Carbon Majors database.

This briefing provides an overview of Shell's indirect and direct climate policy engagement, along with its related disclosure and review processes. It is released in advance of the [shareholder resolution](#) being filed by [Follow This](#), a Dutch shareholder activist group, at Shell's Annual General Meeting (AGM) on 21st May 2024. The proposal urges Shell to align its medium-term Scope 3 emissions reduction targets with the goals of the Paris Agreement. The proposal is summarized in Table 1 below.

Analysis of corporate climate policy engagement can be considered an indicator of corporate governance and management-level thinking on the transition to a net-zero economy. If a company's climate policy engagement is inconsistent with the Paris Agreement's 1.5°C goal, this suggests that the company's business model is not prepared for a low-carbon transition.

**Table 1: Key information for shareholder resolution at Shell's 2024 AGM**

Resolution: Align medium-term Scope 3 emissions reduction targets with the 1.5°C goal of the Paris Agreement.			
Lead Filer:	Follow This	AGM Date:	21 <sup>st</sup> May 2024
Proposal Summary: The full resolution text is available <a href="#">here</a> .	"to align its medium-term emissions reduction targets covering the greenhouse gas (GHG) emissions of the use of its energy products (Scope 3) with the goal of the Paris Climate Agreement: to limit global warming to well below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase to 1.5°C."		

## Summary of Shell's Climate Policy Engagement

Engagement with companies over their climate policy engagement is now firmly on the investor agenda on climate change. It is an integral part of the [Climate Action 100+](#) (CA100+) investor-engagement process, which now has over 700 investor signatories with a total of \$68 trillion in assets under management.

As a research partner to CA100+, InfluenceMap maintains a global system for tracking, assessing, and scoring companies on their engagement with climate change policy against Paris-aligned benchmarks. This system currently covers around 500 companies along with 250 of their key industry associations.

InfluenceMap refers to the UN's [Guide for Responsible Corporate Engagement in Climate Policy](#) as a guide for what constitutes engagement. This can include advertising, social media, public relations, sponsoring research, direct contact with regulators and elected officials, funding of campaigns and political parties, and participation in policy advisory committees.

InfluenceMap's methodology, available [on our website](#), uses seven publicly available data sources 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 advice of [IPCC science](#) or the stated intentions of governments looking to implement the Paris Agreement. This process can result in hundreds of scored evidence items, providing a robust basis to assess the extent to which a company's climate policy engagement, and that of its industry associations, is Paris-aligned.

InfluenceMap's online profile of Shell, including access to the underlying data which forms this assessment, can be found [here](#). The analysis of Shell's industry association relationships, including detailed profiles for each association, can be explored via the "Details of Relationship Score" tab. An overview of this assessment is provided in Table 2 below. Shell is expected to release a new disclosure of its climate policy engagement this month.

**Table 2: Overview of InfluenceMap's assessment of Shell**

Shell		
Performance Band	C	Performance Band (A+ to F) is a full measure of a company's climate policy engagement, accounting for both its own engagement and that of its industry associations. A+ indicates full support for Paris-aligned climate policy, with grades from D to F indicating increasingly obstructive climate policy engagement.
Organization Score	65%	Organization Score (0 to 100) expresses how supportive or obstructive the company is towards climate policy aligned with the Paris Agreement is, with scores under 50 indicating misalignment with the Paris Agreement
Relationship Score	55%	Relationship Score (0 to 100) expresses how supportive or obstructive the company's industry associations are towards climate policy aligned with the Paris Agreement, with scores under 50 indicating misalignment with the Paris Agreement.
Engagement Intensity	66%	Engagement Intensity (0 to 100) is a measure of the level of policy engagement by the company, with scores above 12 indicating active engagement, and scores above 25 indicating highly active or strategic engagement.

## Summary of Shell's Direct Climate Policy Engagement

InfluenceMap's analysis of Shell's direct climate policy engagement is based on 924 independent data points, with 232 logged since 2022. Under InfluenceMap's system, recent evidence is heavily weighted in the calculation of metrics, as explained in the [methodology](#).

The analysis indicates that Shell continues to employ a 'dual' advocacy strategy with its climate policy engagement. Shell has engaged positively on high level climate policy as well as a range of specific climate-related policies. However, the company also advocates a continued role for oil and fossil gas in the energy mix and has advocated for new exploration, production and infrastructure to support this.

Shell has communicated high-level support for climate policy action:

- Shell supported GHG emissions reductions in line with the 1.5°C target of the Paris Agreement and the need for government [regulation](#) to respond to climate change in its 2022 [Sustainability](#) and [Lobbying](#) Reports, published in March 2023.

Shell supported the electrification of transport and policies promoting sustainable aviation fuels (SAFs), however the company also advocated to weaken SAF sustainability criteria in 2023:

- In a [consultation response](#) to the EU Commission in June 2023, Shell supported the need for specific regulatory measures towards the electrification/decarbonization of road transportation and shipping and also supported a Zero Emission Vehicle (ZEV) sales mandate target and date in Canada in a [submission](#) of comments on a policy proposal in March 2023.
- Through the 'SAF BTC Coalition' Shell appeared supportive of the SAF blenders tax credit in February 2023 [regulatory comments](#). However, in the same regulatory comments by the 'SAF BTC Coalition', Shell appeared to advocate for weaker sustainability criteria for SAFs, which increase the likelihood that crop-based SAFs are eligible under the [SAF blenders tax credit](#), and as a result, risks land-based carbon stores. Advocacy on the SAF sustainability criteria is misaligned with scientific advice from the [Intergovernmental Panel on Climate Change \(IPCC\)](#) which emphasizes that large-scale production of biofuel crops risks the destruction of natural lands, increasing the lifecycle emissions of biofuels, and urges safeguards to limit such impacts.

Shell supported the need for methane regulations in 2023 and 2024 but had a more varied position on other GHG emissions regulations in 2022 and 2023:

- Shell supported the need for regulations on methane emissions in its Policy Positions [publication](#) published March 2024 and in [comments](#) on the proposal in February 2023, Shell supported the Environmental Protection Agency's (EPA) Methane Regulation Supplementary Proposal stating support for EPA policy to regulate existing onshore oil and natural gas sources, supporting robust

monitoring, reporting and verification (MRV) requirements and stressing the need for equivalence between methane regulations in the European Union and the United States.

- In 2022, Shell supported the introduction of ambitious Australian CO<sub>2</sub> emission standards for light-duty vehicles and advocated for heavy-duty vehicle CO<sub>2</sub> standards in [comments](#) submitted on the National EV Strategy, however, in the same year the company opposed Canada's proposed cap on GHG emissions in a [testimony](#) to the Standing Committee on Natural Resources.

Shell appears to advocate a long-term role for fossil fuels in the energy mix in its global advocacy, contrary to IPCC pathways on oil and gas to limit global warming to 1.5°C:

- In its 2022 [Lobbying Report](#), published in March 2023, Shell advocated for new liquified natural gas (LNG) supply in the EU, the approval of backlogged fossil fuel permits in the U.S., and the development of North Sea fossil fuels in the UK.
- Shell advocated for policy to support deeper gas markets and for consumption of unabated fossil gas to be promoted in a [submission](#) of comments on a draft policy in India in April 2023.
- In a [submission](#) to the Parliament of Western Australia in August 2023, Shell supported new exploration & production, infrastructure and investments for fossil gas supply in Western Australia.
- The CEO of Shell, Wael Sawan, told [BBC News](#) in July 2023, that cutting oil and gas production would be 'dangerous and irresponsible' and that the world still "desperately needs oil and gas".

This advocacy appears inconsistent with the [IPCC's 2022 Mitigation of Climate Change report](#), which states that in pathways that limit warming to 1.5°C with no or limited overshoot, the global use of oil and gas in 2050 is projected to decline by 60% and 45% respectively compared to 2019. Shell's position on oil and gas also appears to be inconsistent with IPCC's less ambitious mitigation pathways, including scenarios for 1.5°C warming by 2100 with overshoot (50% reduction in oil and 45% reduction in gas) and 2°C warming (30% reduction in oil and 15% reduction in gas), all compared to 2019 levels.

## Summary of Shell's Indirect Climate Policy Engagement via Industry Associations

InfluenceMap's LobbyMap platform tracks and analyzes the climate policy engagement of over 250 industry associations, using the same benchmarks and scoring process applied to companies. This assesses each association's engagement against Paris-aligned benchmarks.

This section details InfluenceMap's analysis of some of Shell's key industry associations. A full ranking table of Shell's industry associations, including links to each association's online profile, is available in Appendix A.

Shell's 'dual' advocacy strategy appears to extend into the companies' indirect climate policy engagement, whereby the company itself has engaged positively on climate-related policy but maintains a vast network of highly oppositional industry associations, which have successfully opposed and weakened numerous climate policies globally.

- InfluenceMap analysis indicates that Shell holds memberships to 9 industry associations with climate policy engagement aligned with delivering the 1.5°C goal of the Paris Agreement (ranked as A+ to B by InfluenceMap's system), 32 industry associations with climate policy engagement partially aligned (ranked B- to D+) and 24 industry associations with climate policy engagement misaligned with delivering the 1.5°C goal of the Paris Agreement (ranked as a D or below).
- Shell retains memberships to the [American Petroleum Institute \(API\)](#) which opposed the EPA's tailpipe emissions standards for light and medium-duty vehicles in a [joint letter](#) to policymakers in December 2023, the [Canadian Association of Petroleum Producers \(CAPP\)](#) which opposed amendments to Canada's methane regulation for the oil and gas sector in a [submission](#) to Minister of Environment and Climate Change in February 2024 and [Eurogas](#) which advocated to weaken significant elements of the EU Methane Regulation for the energy sector in a [letter](#) to policymakers in September 2023. Shell is also a member of [Australian Energy Producers \(formerly APPEA\)](#) which advocated for the "crucial role" of fossil gas to be recognized in the Future Gas Strategy in a [submission](#) to government in February 2024.

Table 3 gives an overview of 10 of Shell's key industry associations with examples of recent climate policy engagement. The associations listed appear to be the most engaged entities that Shell holds board membership to. These entities also appear to have climate policy engagement misaligned or partially misaligned with delivering the 1.5°C goal of the Paris Agreement. Detailed profiles for all of Shell's industry associations can be explored via the links in the table, Appendix A, or the "Details of Relationship Score" tab on Shell's online profile ([here](#)).

*Table 3: Evidence of recent climate policy engagement by Shell's key industry associations.*

Industry Association	Performance Band	Type of Membership	Recent examples of climate policy engagement
<i>American Petroleum Institute (API)</i>	E-	Member of the board and executive committee	<ul style="list-style-type: none"> <li>December 2023: <i>Opposed</i> the EPA's tailpipe emissions standards for light and medium-duty vehicles.</li> <li>January 2023: <i>Advocated</i> for several exceptions to the Inflation Reduction Act's methane fee: advocated for the exclusion of certain types of methane emissions related to combustion in the calculation of the fee. Further, API advocated that operators engaged in voluntary emission reduction should be excluded from the methane fee.</li> <li>June 2023: Directly <i>advocated</i> to US Senators in support of the Revitalizing the Economy by Simplifying Timelines and Assuring Regulatory Transparency Act, which contains provisions to expedite the approval process for fossil gas projects.</li> </ul>
<i>U.S. Chamber of Commerce</i>	E	Board Member	<ul style="list-style-type: none"> <li>July 2023: <i>Advocated</i> to reduce the ambition of Environmental Protection Agency's (EPA) proposed GHG emissions standards for light- and medium-duty vehicles MY 2027+.</li> <li>May 2023: <i>Supported</i> provisions for permitting reforms in the Fiscal Responsibility Act of 2023 and its potential outcomes, specifically referencing the approval of the Mountain Valley Pipeline.</li> </ul>
<i>Canadian Association of Petroleum Producers (CAPP)</i>	E	Board Member	<ul style="list-style-type: none"> <li>February 2024: <i>Opposed</i> amendments to Canada's methane regulation for the oil and gas sector: stated that regulations are incompatible with the oil and gas operations and advocated that the 75% methane reduction target should focus on limited sources, instead of total upstream oil sands mining emissions. In addition, advocated for the government to create an industry-government working group to devise alternatives to achieve the 75% target and advocated for provincial regulation of methane over federal regulations.</li> <li>June 2023: <i>Advocated</i> for increasing the role of oil and gas in the energy mix; appeared to advocate for expanded</li> </ul>



			<p>financial incentives and government investment through the federal Carbon Capture, Utilization and Storage (CCUS) Investment Tax Credit for the oil sector as a justification to continue to fossil fuel production.</p> <ul style="list-style-type: none"> <li>■ April 2024: Disclosed in the Alberta Lobbying Register that they had <i>advocated</i> for the expansion of the Trans Mountain Pipeline.</li> </ul>
Western States Petroleum Association (WSPA)	E+	Board Member	<ul style="list-style-type: none"> <li>■ January 2024: <i>Opposed</i> specific measures toward clean hydrogen production: opposing the hourly matching and additionality requirements around hydrogen produced from renewables, as proposed in California Assembly Bill 1550.</li> <li>■ April 2023: Strongly <i>opposed</i> the Advanced Clean Fleets regulation proposed by the California Air Resources Board (CARB) that includes a 100% Zero Emissions Vehicle (ZEV) sales mandate for medium and heavy-duty vehicles in 2040. The entity emphasized numerous challenges and opposed a 2036 100% ZEV mandate.</li> </ul>
Australian Energy Producers (formerly APPEA)	E+	Board Member	<ul style="list-style-type: none"> <li>■ February 2024: <i>Advocated</i> for the "crucial role" of fossil gas to be recognized in the Future Gas Strategy.</li> <li>■ March 2023: <i>Opposed</i> the final design of the Safeguard Mechanism, stating that it will increase costs across the economy.</li> <li>■ October 2023: <i>Supported</i> an expansion of fossil fuel as part of the Middle Arm Precinct development in Darwin, Australian, alongside supporting the inclusion of low carbon hydrogen and carbon capture projects.</li> </ul>
Federation of German Industries (BDI)	D	Board Member	<ul style="list-style-type: none"> <li>■ February 2024: <i>Opposed</i> government-mandated coal phaseout in Germany to be replaced by nuclear and renewables.</li> <li>■ June 2022: <i>Opposed</i> including GHG emissions in the EU's Industrial Emissions Directive (IED) review.</li> </ul>

<i>FuelsEurope</i>	D	Board Member	<ul style="list-style-type: none"> <li>March 2023: <i>Advocated</i> for weaker criteria for heating systems that are considered fossil fuels under the Energy Performance of Buildings Directive (EPBD).</li> <li>March 2023: <i>Advocated</i> for a technology-neutral approach towards the decarbonization of heavy-duty vehicles (HDVs) and promoted a long-term role for Internal Combustion Engine (ICE) HDVs powered by carbon-neutral fuels.</li> </ul>
<i>Eurogas</i>	D+	Board Member	<ul style="list-style-type: none"> <li>September 2023: <i>Advocated</i> to weaken significant elements of the EU Methane Regulation for the energy sector, and also advocated against the inclusion of imported fossil fuels.</li> <li>April 2023: Directly <i>advocated</i> to EU and US policymakers for new Liquefied Natural Gas (LNG) infrastructure investments.</li> </ul>
<i>European Chemical Industry Council (Cefic)</i>	C-	Board Member	<ul style="list-style-type: none"> <li>May 2023: Cefic Director General Marco Mensink <i>did not support</i> key elements of the EU Emissions Trading System (ETS) reform, including increasing the Linear Reduction Factor and reducing the cap on total GHG emissions to zero by 2039.</li> <li>May 2023: <i>Advocated</i> for a 'technology neutral' approach to net-zero technologies in the EU's Net Zero Industry Act (NZIA).</li> </ul>
<i>Business Unity South Africa (BUSA)</i>	C+	Board Member	<ul style="list-style-type: none"> <li>October 2022: <i>Opposed</i> the implementation of penalties for emitters that do not comply with proposed carbon budgets under the South African Climate Change Act. Emphasizing the economic impacts of the bill and stating that there are other ways to "deal with emissions"</li> <li>September 2022: <i>Called</i> for provisions that would weaken the overall climate ambition of the South African carbon tax. Supported the extension of phase 1 of the carbon tax and recognized the need to increase the rate of the carbon tax, but opposed the Tax Administration Laws Amendment Bill's (TLAB) amendments to increase the carbon tax rate, stating that it is too high too soon and emphasizing the impacts of a higher rate on business. Also supported more incentives alongside the tax, including free allocations, compensation, and subsidies.</li> </ul>

## Disclosure and Review of Climate Policy Engagement

The [Global Standard on Responsible Climate Lobbying](#) - instigated by investors and launched in March 2022 - is the leading best practice framework for climate policy engagement disclosure. The Global Standard sets out 14 indicators covering disclosure, governance and oversight processes to ensure alignment between a company's climate policy engagement and delivering the 1.5°C goal of the Paris Agreement.

In September 2023, InfluenceMap's methodology to assess corporate disclosures on climate policy engagement was formally updated in line with the Global Standard and stakeholder input. InfluenceMap has two distinct assessments of disclosures:

Accuracy of Climate Policy Engagement Disclosure (See Shell's detailed disclosure scorecard [here](#)): An assessment of the accuracy of a company's reporting on its direct and indirect (via industry associations) climate policy engagement activities made in July 2023. Shell is expected to release a new disclosure of its climate policy engagement this month.

InfluenceMap analysis suggests that Shell has [published](#) a partial account of its own climate policy engagement on specific policies.

- InfluenceMap analysis has identified several key examples of climate policy engagement that Shell has either failed to disclose, provided limited details on or provided a misleading account of. For example, in a February 2023 [consultation response](#), Shell supported electrification through the Australian National Energy Performance Strategy and in an April 2022 [testimony](#) to the U.S. House of Representatives advocated for permits for new projects to be accelerated and for an end of the pause on oil and gas leasing. Shell also supported the RGGI in [comments](#) on the policy in November 2021, however, appeared to directly advocate for policymakers to raise the CO2 offset allowance. These engagements are not included in Shell's disclosure.

InfluenceMap analysis suggests that Shell has [published](#) a partial account of its industry associations' climate policy engagement on specific policies.

- On its [website](#) Shell discloses its membership to 111 business associations, sector-specific industry associations and issue-specific organizations, however, it does not appear to disclose all memberships that are in InfluenceMap's database. For example, Shell's disclosure is limited to associations in the global north and therefore does not appear to disclose its membership to associations including [Business Unity South Africa \(BUSA\)](#), [Instituto Brasileiro de Petróleo e Gás \(IBP\)](#) and [Asociación Mexicana de Empresas de Hidrocarburos \(AMEXH\)](#).

Corporate Climate Policy Engagement Review: An assessment of the quality and robustness of a company's process to identify, report on, and address specific cases of misalignment between its climate policy engagement activities and delivering the 1.5°C goal of the Paris Agreement made in August 2023. Shell is expected to release a new disclosure of its climate policy engagement this month.<sup>2</sup>

- Shell has published five reviews of its climate policy engagement since 2019, three full reviews and two updates in intervening years. However, InfluenceMap analysis shows that the quality of Shell's review process falls short of standards put forward by institutional investors as part of the 2022 [Global Standard on Responsible Climate Lobbying](#), scoring 36/100 for its [review](#) published in March 2023 under InfluenceMap's assessment criteria.
- Shell has not assessed the alignment of its own climate policy engagement activities with the 1.5°C goal of the Paris Agreement as part of its latest review, nor has it identified key cases of misalignment and partial misalignment between its industry associations and delivering the 1.5°C goal of the Paris Agreement. Although the company has disclosed a detailed framework for addressing potential misalignments, including escalation strategies, it has not included clear deadlines for associations which do not amend misaligned practices.
- The company appears to miss key examples of both positive and negative engagement with climate policy by its industry associations. For example, Shell failed to identify the American Petroleum Institute (API) advocating against the Inflation Reduction Act's methane fee in [comments](#) submitted to the US EPA in January 2023, Eurogas advocating for weaker EU methane rules in a [letter](#) submitted to EU policymakers in September 2023 and WindEurope supporting subsidies/funding for specific technologies to respond to the U.S. Inflation Reduction Act in the EU Green Deal Industrial Plan in a [letter](#) to ambassadors in October 2023.

InfluenceMap's assessment of Shell's disclosure and review process can be accessed [here](#).

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<sup>2</sup> Information correct as of 29 April 2024. InfluenceMap will update this analysis should Shell publish a 2024 iteration of its climate policy engagement review.

## Appendix A: Ranking of Shell's Industry Association Memberships

The table below provides a ranking of Shell's industry associations currently covered by InfluenceMap's database by Performance Band, i.e. a full measure of a company's climate policy engagement, accounting for both its own engagement and that of its industry associations. Detailed profiles for all industry associations can be explored via the links in the table.

Industry associations are categorized by InfluenceMap as having climate policy engagement that is aligned, partially misaligned or misaligned with delivering the 1.5°C goal of the Paris Agreement by Performance Band:

- Aligned = Performance Band A+ to B
- Partially Misaligned = Performance Band B- to D+
- Misaligned = Performance Band D to F
- Low Engagement = Performance Band N/A

Industry Association	Region	IM Performance Band	IM Assessment
<a href="#">Advanced Energy United (AEU)</a>	United States	A+	Aligned
<a href="#">Solar Energy Industries Association (SEIA)</a>	United States	A	Aligned
<a href="#">American Clean Power Association (formerly AWEA)</a>	United States	A-	Aligned
<a href="#">WindEurope</a>	Belgium	A-	Aligned
<a href="#">Energy Efficiency Council</a>	Australia	B+	Aligned
<a href="#">Clean Energy Council</a>	Australia	B+	Aligned
<a href="#">National Business Initiative</a>	South Africa	B+	Aligned
<a href="#">Clean Energy Buyers Alliance (CEBA)</a>	United States	B+	Aligned
<a href="#">Carbon Market Institute</a>	Australia	B	Aligned
<a href="#">Confederation of British Industry (CBI)</a>	UK	B-	Partially Misaligned
<a href="#">European Round Table for Industry (ERT)</a>	Belgium	B-	Partially Misaligned

<i>European Union Chamber of Commerce in China</i>	China	C+	Partially Misaligned
<i>Japan Association of Corporate Executives (Keizai Doyukai)</i>	Japan	C+	Partially Misaligned
<i>Hydrogen Europe</i>	Belgium	C+	Partially Misaligned
<i>Business Unity South Africa (BUSA)</i>	South Africa	C+	Partially Misaligned
<i>Offshore Energies UK (OEUK) (Formerly OGUK)</i>	UK	C	Partially Misaligned
<i>Australian Industry Group (Ai Group)</i>	Australia	C	Partially Misaligned
<i>International Emissions Trading Association (IETA)</i>	UK	C	Partially Misaligned
<i>Hydrogen Council</i>	Belgium	C	Partially Misaligned
<i>Federation of Indian Petroleum Industry (FIPI)</i>	India	C	Partially Misaligned
<i>Australian Energy Council</i>	Australia	C	Partially Misaligned
<i>Dutch Employers' Federation (VNO-NCW)</i>	Netherlands	C	Partially Misaligned
<i>Indonesian Petroleum Association</i>	Indonesia	C	Partially Misaligned
<i>Business Council of Canada</i>	Canada	C	Partially Misaligned
<i>PlasticsEurope</i>	Belgium	C	Partially Misaligned
<i>Business Council of Australia</i>	Australia	C	Partially Misaligned
<i>International Gas Union</i>	UK	C-	Partially Misaligned
<i>European Chemical Industry Council (Cefic)</i>	Belgium	C-	Partially Misaligned
<i>American Chemistry Council (ACC)</i>	United States	C-	Partially Misaligned
<i>South African Petroleum Industry Association (SAPIA)</i>	South Africa	C-	Partially Misaligned
<i>French Association of Large Companies (AFEP)</i>	France	C-	Partially Misaligned
<i>China Petroleum and Chemical Industry Federation</i>	China	C-	Partially Misaligned
<i>Australian Pipelines and Gas Association</i>	Australia	D+	Partially Misaligned
<i>Eurogas</i>	Belgium	D+	Partially Misaligned

<i>Canadian Fuels Association</i>	Canada	D+	Partially Misaligned
<i>Korea Business Council for Sustainable Development (KBCSD)</i>	South Korea	D+	Partially Misaligned
<i>Asociación Mexicana de Empresas de Hidrocarburos (AMEXHI)</i>	Mexico	D+	Partially Misaligned
<i>International Association of Oil and Gas Producers (IOGP)</i>	Belgium	D+	Partially Misaligned
<i>Energy Users Association of Australia</i>	Australia	D+	Partially Misaligned
<i>Instituto Brasileiro de Petróleo e Gás (IBP)</i>	Brazil	D+	Partially Misaligned
<i>German Chemical Industry Association (VCI)</i>	Germany	D+	Partially Misaligned
<i>FuelsEurope</i>	Belgium	D	Misaligned
<i>International Air Transport Association (IATA)</i>	Canada	D	Misaligned
<i>Australian Industry Greenhouse Network</i>	Australia	D	Misaligned
<i>KazEnergy</i>	Kazakhstan	D	Misaligned
<i>Federation of German Industries (BDI)</i>	Germany	D	Misaligned
<i>German Association of the Automotive Industry (VDA)</i>	Germany	D	Misaligned
<i>Malaysian Gas Association</i>	Malaysia	D	Misaligned
<i>Chamber of Minerals and Energy of Western Australia (CME)</i>	Australia	D	Misaligned
<i>Asociación Colombiana del Petróleo y Gas (ACP)</i>	Colombia	D	Misaligned
<i>Natural &amp; bio Gas Vehicle Association (NGVA Europe)</i>	Belgium	D-	Misaligned
<i>BusinessEurope</i>	Belgium	D-	Misaligned
<i>Natural Gas Supply Association (NGSA)</i>	United States	D-	Misaligned
<i>Nigerian Gas Association</i>	Nigeria	E+	Misaligned
<i>Australian Energy Producers (Formerly APPEA)</i>	Australia	E+	Misaligned
<i>Energy Chamber of Trinidad &amp; Tobago</i>	Trinidad and Tobago	E+	Misaligned
<i>Western States Petroleum Association (WSPA)</i>	United States	E+	Misaligned

<i>Australian Institute of Petroleum</i>	Australia	E+	Misaligned
<i>Canadian Association of Petroleum Producers (CAPP)</i>	Canada	E	Misaligned
<i>US Chamber of Commerce</i>	United States	E	Misaligned
<i>National Association of Manufacturers (NAM)</i>	United States	E	Misaligned
<i>American Petroleum Institute (API)</i>	United States	E-	Misaligned
<i>Consumer Energy Alliance</i>	United States	E-	Misaligned
<i>American Gas Association</i>	United States	F	Misaligned
<i>Texas Oil &amp; Gas Association (TXOGA)</i>	United States	F	Misaligned