

Teck Resources

Detailed assessment of Teck Resources’ corporate industry association review

September 2022

This document outlines a detailed breakdown of InfluenceMap’s assessment of the company’s corporate disclosure on industry association climate policy engagement, using the traffic-light assessment framework summarized below. Further detail on the assessment methodology is available in the Appendix, and on our CA100+ Investor Hub [here](#).

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

A summary of Teck Resources’ disclosures on industry associations is shown below. Teck Resources has undertaken one review of its industry associations to date. The Review Score represents InfluenceMap’s overall assessment of the quality of the company’s industry association review process, where 100 would indicate that a company has met investor expectations for all criteria related to the review process.

Date of Review	Review Score
2022 (No Date)	21 / 100

This assessment focuses solely on Teck Resources’ disclosure on industry associations and climate policy engagement, which can be [found here](#). This assessment does not include an analysis of the company’s direct climate policy engagement, which can be found on InfluenceMap’s online profile of Teck Resources [here](#).

Applying the traffic-light framework outlined above, the table below summarizes the company’s performance under the seven indicators which form InfluenceMap’s assessment. A more detailed breakdown, along with examples of best practice evidenced by other companies to date, can be found on the following page.

Disclosure & Transparency	Policy Alignment Process
Corporate climate positions	Identify & Assess
Industry group climate positions	Monitor & Review
Alignment assessment method	Act
Framework for misalignment	

Teck Resources' Company Scorecard

The tables below highlight, for each indicator, the criteria for companies to meet investor expectations, Teck Resources' assessment, and examples of better practice by companies to date. While InfluenceMap did not find an example of best practice across the entire industry association review process, some companies have demonstrated better practice under specific metrics under the 'Disclosure & Transparency' and 'Policy Alignment Process' assessments.

Disclosure & Transparency

Corporate climate policy positions and influencing activities

To meet investor expectations under this indicator: The company has to disclose a detailed and clearly referenced breakdown of its own climate policy positions and influencing activities beyond 'top-line' climate statements. This includes descriptions of the company's positions and policy engagement activities on specific items of regulation and legislation which are material to the company's operations, business sector, and/or the region(s) in which it operates.

Teck Resources

Teck has limited its disclosure on its own climate policy positions and influencing activities to top-line statements. While Teck states in its industry association review that it works with governments and provides transparent disclosure on its climate-related policy positions, the company has not expanded on these in its industry association review. Teck also provided links to its *Climate Change Outlook Report 2021* and its *Climate Change Policy* statement in its review, however both of these disclosures are also limited to top-line statements on carbon pricing and support for the goals of the Paris Agreement.

As a result, Teck has missed key instances of climate policy engagement. For example, in its 2021 CDP response, Teck engaged on the British Columbia carbon tax with mixed positions, *caveating its support* by advocating for carbon leakage protection and maintaining the competitiveness of emissions intensive, trade-exposed sectors.

Best Practice

Shell has disclosed case studies of its direct climate policy engagement in the EU and US. These case studies include Shell's positions on, and engagement with, specific items of EU and US regulation and legislation. The 2022 review also includes clear references to additional resources on Shell's corporate website, including advocacy updates on specific government policy consultations and links to public submissions via the EU Transparency Register and the US Lobbying Disclosure Act.

Industry association climate policy positions and influencing activities

To meet investor expectations under this indicator: The company has to disclose a detailed and accurate account of the climate policy positions and influencing activities of each industry association actively engaged on climate change policy, including descriptions of positions and policy engagement activities on specific items of regulation and legislation beyond 'top-line' statements.

Teck Resources

Teck's disclosure on its industry associations' climate policy positions and influencing activities is limited to top-line statements on the Paris Agreement, carbon pricing, carbon tax, and greenhouse gas emissions legislation, without reference to specific items of regulation and legislation. The company does reference the Business Council of British Columbia's position on a British Columbia carbon tax, however beyond this its disclosure is limited to top-line statements.

Best Practice

No companies have met investor expectations in this area, although *BASF* and *Shell* exhibit current leading practice. Both companies have disclosed a detailed account of all key industry associations' climate policy positions, and a summary of their influencing activities. However, they appear to overlook detailed negative lobbying by a number of industry associations identified by InfluenceMap's database.

Alignment assessment method

To meet investor expectations under this indicator: The company has to: (1) disclose a clear and detailed framework for assessing alignment with its industry associations across all relevant areas of policy engagement; (2) consistently apply this framework across *all* industry associations; and (3) provide a clear and detailed explanation behind each evaluation.

<p>Teck Resources</p>	<p>Teck has disclosed a clear and detailed framework for assessing alignment with its industry associations. Teck assessed 16 industry associations against its 'Climate Change Guiding Principles'. This included four criteria categories:</p> <ul style="list-style-type: none"> ■ Positions and actions: Associations must align with Teck's climate change positions and actions, outlined in its Climate Change Outlook reports. ■ Governance: Industry associations should have senior management responsible for overseeing the association's climate advocacy approach. Associations must engage with stakeholders on climate-related issues. ■ Action: Associations should encourage members to set greenhouse gas emissions reduction targets; support carbon pricing; and support carbon credits and offsets. ■ Reporting: Associations should publish their climate-related positions and actions in a report and publish detailed descriptions of their climate advocacy activities. <p>Teck has also disclosed the criteria its industry associations must meet to be considered "Generally Aligned", "Partially Aligned", and "Not Aligned". The company has also provided a clear and detailed explanation behind each evaluation.</p>
<p>Best Practice</p>	<p><i>BASF</i> has also disclosed a clear explanation of its alignment assessment method along with a clear and detailed explanation of how it has been applied to each industry association. The company also provided specific alignment indicators for EU climate policy such as the EU ETS to assess the alignment of key European industry associations.</p>

Framework for addressing misalignment

To meet investor expectations under this indicator: The company must disclose a clear and detailed framework for addressing misalignments with its industry associations including escalation steps and clear deadlines for industry associations which do not amend misaligned practices.

<p>Teck Resources</p>	<p>Teck has disclosed a framework to address potential cases of misalignment. The company stated that, in cases of misalignment with its Climate Change Guiding Principles, Teck will engage with the association to better understand their positions and actions, and then advocate for improved alignment with Teck's own positions and actions. Specifically, the company will advocate for alignment with Teck's climate change positions within appropriate working groups and membership leadership; directly engage with other member companies that may hold different positions; and educate and offer capacity-building on the risks and opportunities of climate change. The company also stated that when misalignment cannot be resolved and differences of opinion are too substantial, Teck may choose to withdraw from the association.</p> <p>However, Teck does not disclose clear deadlines for industry associations which do not amend misaligned practices.</p>
<p>Best Practice</p>	<p><i>BHP</i> has disclosed clear and detailed steps for addressing potential misalignment, including an escalation strategy and clear timelines attached. The company states it will communicate material differences, request that the industry association develop a position or refrain from advocacy in certain areas, and review the membership if there has been no action within 12 months.</p>

Policy Alignment Process




Identify & Assess	
<p>To meet investor expectations under this indicator: The company has to identify all cases of misalignment with its industry associations and the Paris Agreement in line with InfluenceMap’s <i>database</i> on corporate lobbying.</p>	
<p>Teck Resources</p>	<p>Teck’s industry association review assessed sixteen industry associations, and identified three associations that were “Not Aligned” with its Climate Change Guiding Principles: the Alaska Chamber, the Alaska Miners Association, and the <i>National Mining Association</i>. Teck also identified two associations as “Partially Aligned” with its Climate Change Guiding Principles: the <i>U.S. Chamber of Commerce</i>, and Sociedad Nacional de Minería (SONAMI). InfluenceMap’s database does not currently cover the Alaska Chamber, Alaska Miners Association, or SONAMI.</p> <p>InfluenceMap analysis indicates that the company likely has at least two memberships to industry associations with climate policy engagement misaligned with the Paris Agreement (<i>National Mining Association (NMA)</i>, <i>U.S. Chamber of Commerce</i>). Teck also has at least two memberships to industry associations with climate policy engagement potentially misaligned with the Paris Agreement (<i>Mining Association of Canada (MAC)</i>, <i>Canadian Chamber of Commerce</i>).</p> <p>Teck identified <i>NMA</i> as misaligned, and the U.S. Chamber as “Partially Aligned”. However, Teck’s rationale for assessing the U.S. Chamber as partially aligned only referenced a lack of senior oversight on its climate-related positions, without reference to the association’s negative engagement on climate-related policies. Teck has therefore missed key instances of misalignment by the U.S. Chamber. The company did not identify key instances of misalignment and potential misalignment from the <i>U.S. Chamber</i>, <i>Canadian Chamber</i>, and <i>MAC</i>. InfluenceMap analysis finds that these associations have engaged negatively on climate-related policies, for example:</p> <ul style="list-style-type: none"> ■ <i>U.S. Chamber of Commerce</i>: In a March 2022 letter to Members of the Senate Committee on Energy and Natural Resources, the U.S. Chamber <i>supported</i> the revocation of the Federal Energy Regulatory Commission’s new rule on considering the greenhouse gas emission impacts of fossil gas pipelines. Furthermore, the Chamber <i>submitted</i> a March 2022 amicus brief in support of the Line 5 oil and gas pipeline to the District Court for the Western District of Michigan Southern Division. The Chamber has also <i>opposed</i> the 2022 reconciliation bill throughout 2022. ■ <i>Canadian Chamber of Commerce</i>: The Canadian Chamber has consistently supported Line 5, an oil and gas pipeline in Michigan, US. In a March 2022 press release, the Chamber <i>opposed</i> the shutdown of Line 5, and <i>stated</i> in a June 2022 tweet that the pipeline was critical for safe, secure cross-border energy. On its corporate website, the Chamber also <i>supported</i> the exemption of gaseous and solid fuels from the Canadian Clean Fuel Standard regulations.
<p>Best Practice</p>	<p><i>Enel</i> is the only company to meet investor expectations in this area, identifying all cases of misalignment with its industry associations and the Paris Agreement in line with InfluenceMap’s database, although the company does not disclose additional details of why they are not fully aligned. InfluenceMap analysis indicates that most companies have missed key cases of misalignment with industry associations lobbying counter to the goals of the Paris Agreement.</p>

Monitor & Review	
<p>To meet investor expectations under this indicator: The company has to publish a review of industry associations on an annual basis, commit to do so at least once a year, or commit to disclose regular updates on its review and alignment process. Updates should accurately report on relevant material and on-going lobbying activities of potentially misaligned industry associations, as well as the company’s alignment and engagement with the industry association concerning these activities.</p>	
Teck Resources	<p>Teck states that its industry association review establishes a robust framework for ongoing and future association reviews. However, the company has not explicitly committed to publish follow-up reviews on an annual basis in line with investor expectations.</p>
Best Practice	<p><i>Shell</i> publishes detailed assessments of its industry association memberships at two-year intervals, with detailed updates on misaligned industry associations each year. Shell has published two full reviews of its industry associations (2019, 2021) and two review updates (2020, 2022). The review updates include actions taken within each industry association, key changes to the associations’ climate positions, and detailed next steps. Shell has committed to publish its next update in 2023.</p>

Act	
<p>To meet investor expectations under this indicator: The company has to show evidence of action to address all cases of misalignment with its industry associations and the Paris Agreement, in line with InfluenceMap’s <i>database</i> on corporate lobbying. The investor expectations outlined by <i>PRI</i>, <i>IIGCC</i> and <i>Ceres</i> include several steps companies can take to address misalignment. Steps should include terminating memberships or taking specific action to reform the detailed and material lobbying activities undertaken by misaligned organizations.</p>	
Teck Resources	<p>Teck outlined its “Next Steps and Actions” towards the associations it found to be misaligned in its review, however these were broad actions and not specific to each industry association. For example, Teck stated that for the three “Not Aligned” industry associations it would actively advocate for alignment, directly engage with other member companies and offer capacity-building. However, there is no evidence of action to address specific misalignments, including engagement and outcomes.</p> <p>However, the company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap’s database (see Identify & Assess).</p>
Best Practice	<p>No companies have met investor expectations in this area by showing evidence of action to address all cases of misalignment identified by InfluenceMap’s database, although some companies have made more progress. <i>Total</i> announced in January 2021 that it had decided not to renew its membership to the American Petroleum Institute due to divergences on climate positions. <i>BHP</i> suspended its membership to Queensland Resources Council in 2020 following its ‘Vote Greens Last’ advertising campaign and outlined detailed actions to be taken at four “partly aligned” industry associations. <i>Chevron</i> has not left any industry associations but has disclosed its engagement on specific climate change policy issues with seven industry associations, including details of the results of this engagement. Similarly, <i>General Motors</i> has disclosed that it has not financially contributed to advocacy campaigns against the Build Back Better Act by the Business Roundtable and US Chamber, and has publicly advocated a supportive position to ensure its stance is differentiated from them.</p>

Appendix A: Methodologies for Assessment



Scoring Disclosures and Policy-Alignment

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

Assessing Disclosures

Since BHP’s 2017 industry association review, around 60 major global corporates have delivered similar, specific disclosures on their industry association links in response to investor pressure. This positive momentum is undermined, however, if the resulting disclosures are of poor quality.

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

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

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

Assessing Policy Alignment Process

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

Alignment Process	Score	InfluenceMap's Assessment Criteria
Identify & Assess	Green	The company has identified all cases of misalignment with its industry associations and the Paris Agreement in line with InfluenceMap's <i>database</i> on corporate lobbying.
	Yellow	The company has not identified key cases of misalignment with the Paris Agreement in line with InfluenceMap's <i>database</i> on corporate lobbying. Companies are scored in this category if they miss up to three cases of "potential" misalignment (industry associations with Organization Scores 51-75 in InfluenceMap's database).
	Red	The company has not identified key cases of misalignment with the Paris Agreement in line with InfluenceMap's <i>database</i> on corporate lobbying. Companies are scored in this category if they miss one case of misalignment (industry associations with Organization Scores 0-50) or more than three cases of "potential" misalignment (industry associations with Organization Scores 51-75 in InfluenceMap's database).
Monitor & Review	Green	The company has published a review of industry associations on an annual basis, has committed to do so at least once a year, or is/has committed to disclose regular updates on its review and alignment process. Updates should accurately report on relevant material and on-going lobbying activities of potentially misaligned industry associations, as well as the company's alignment and engagement with the industry association concerning these activities.
	Yellow	The company has committed to publish an update to its review of industry associations but not an annual basis or not specified a timeframe.
	Red	The company has not committed to any follow-up processes as part of its review of industry associations.
Act	Green	The company has shown evidence of action to address all cases of misalignment with its industry associations and the Paris Agreement, in line with InfluenceMap's <i>database</i> on corporate lobbying. The investor expectations outlined by <i>PRI</i> , <i>IIGCC</i> and <i>Ceres</i> include several steps companies can take to address misalignment. Steps should include terminating memberships or taking specific action to reform the detailed and material lobbying activities undertaken by misaligned organizations.
	Yellow	The company has shown some evidence of action to address cases of misalignment with its industry associations and the Paris Agreement, but has not addressed key cases of misalignment or "potential" misalignment identified by InfluenceMap's <i>database</i> on corporate lobbying, i.e. industry associations with Organization Scores 0-75 in InfluenceMap's database. The investor expectations outlined by <i>PRI</i> , <i>IIGCC</i> and <i>Ceres</i> include several steps companies can take to address misalignment. Steps should include terminating memberships or taking specific action to reform the detailed and material lobbying activities undertaken by misaligned organizations.
	Red	The company has shown no or limited evidence of action to address cases of misalignment with its industry associations and the Paris Agreement, missing key cases of misalignment or potential misalignment identified in InfluenceMap's <i>database</i> on corporate lobbying, i.e. industry associations with Organization Scores 0-75. The investor expectations outlined by <i>PRI</i> , <i>IIGCC</i> and <i>Ceres</i> include several steps companies can take to address misalignment. Action will be scored under this category if it does not include terminating memberships or taking specific action to reform the detailed and material lobbying activities undertaken by misaligned organizations.

To assist this assessment, InfluenceMap will be applying its database on corporate and industry group climate change lobbying. This tracks in real-time the detailed climate policy lobbying of around 400 companies and 200 industry associations globally, allowing like-for-like comparisons of organizations' positions on climate policy that are compared to a benchmark of Paris-aligned climate policy. This system can track the evolution of corporate and industry group climate lobbying positions over time.