

BP

Detailed assessment of BP’s corporate climate policy engagement review

This document outlines a detailed breakdown of InfluenceMap's assessment of the company's disclosure on climate policy engagement. Further detail on the assessment methodology is available in the Appendix, and on InfluenceMap’s CA100+ Investor Hub [here](#).

A summary of BP’s disclosures on climate policy engagement is shown below. BP has undertaken four reviews of its climate policy engagement to date. The Review Score represents InfluenceMap’s overall assessment of the quality of the company’s 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
February 2020	36 / 100
May 2021 (Update)	43 / 100
April 2022	50 / 100
April 2023 (Update)	50 / 100

This assessment focuses solely on BP’s disclosure on climate policy engagement, which can be found [here](#). This assessment does not include an analysis of the company's actual climate policy engagement, which can be found on InfluenceMap's online profile of BP [here](#). The table below provides a breakdown of BP’s performance against each of the seven assessment criteria, using the traffic-light assessment framework summarized below.

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.

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

BP's Company Scorecard

The tables below highlight, for each indicator, the criteria for companies to meet investor expectations, BP's 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.

<p>BP</p>	<p>In its 2022 review, BP disclosed seven top-line climate positions including climate science, the Paris Agreement and energy efficiency, but the company provided limited detail of its positions on, and engagement with, specific climate policies beyond a case study on US Environmental Protection Agency's (EPA) methane rule.</p> <p>However, the 2022 review also included clear references to additional resources on BP's corporate website, including advocacy updates on specific government policy consultations and links to public submissions via the EU Transparency Register, US House of Representatives, and US Senate. BP has an additional webpage outlining its advocacy activities in the US including comments and testimony, public statements, and lobbying disclosures at state and federal level.</p> <p>However, BP does not appear to disclose a complete and accurate account of its climate policy engagement on its corporate website. On its advocacy updates page, BP disclosed some bullet points from its response to the UK Government Net Zero Review in <i>October 2022</i>. However, InfluenceMap obtained the full response via a Freedom of Information request, which appears to be considerably longer and includes support for continued investments in fossil fuels.</p> <p>In its 2023 update, BP did not disclose its positions on climate policy beyond the above top line positions, except for one reference to the US EPA methane rule.</p>
<p>Best Practice</p>	<p><i>Rio Tinto</i> appears to have disclosed a complete and accurate account of its climate policy engagement activities - the company's review includes a link to its corporate website, which contains links to government consultation responses on specific climate-related policies from 2020-2023. <i>BP</i> and <i>Shell</i> both have more comprehensive disclosures on their corporate website, with live advocacy updates on specific government policy consultations in multiple regions. However, both companies appear to omit material evidence of negative climate policy engagement and thus have not disclosed a complete and accurate account.</p>

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.

BP	<p>In its 2022 review, BP disclosed top-line climate positions for ten industry associations identified as “partially aligned”, including links to the associations’ websites. However, this is largely limited to top-line climate statements and overlooks evidence of detailed lobbying on specific items of regulation and legislation. Further, there was no disclosure for 40+ industry associations determined to be “aligned”. In its 2023 update, BP provided updates on the 10 industry associations it identified as “partially aligned”, including their engagement with some specific climate policies including the US federal Renewable Fuel Standard, the Inflation Reduction Act, the EPA Methane Emissions Response Program, the South African Carbon Tax, and offshore leasing in California and North Carolina.</p> <p>BP has however omitted key instances of negative engagement with climate-related regulations by its industry associations, including the Canadian Association of Petroleum Producers, Australian Petroleum Production & Exploration Association (APPEA), and BusinessEurope (see Identify & Assess for further details).</p>
Best Practice	<p>No companies have met investor expectations in this area, although BASF and BP 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.</p>

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.

BP	<p>In its 2022 review, BP disclosed a clear and detailed explanation of its alignment assessment methodology based on its seven high-level policy positions, including what constitutes a finding of alignment, partial alignment and misalignment. The company disclosed detailed explanations on how this methodology was applied for the 10 “partially aligned” industry associations, but did not disclose any explanation for the 40+ “aligned” associations. The company reiterated its methodology based on seven high-level policy positions in its 2023 review update.</p>
Best Practice	<p>Shell has disclosed a clear explanation of its alignment assessment method along with a clear and detailed explanation of how it has been applied to each industry association. The company also provided clear criteria which were used to categorize the degree of alignment of Shell’s climate policy positions with the positions of its 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.

BP	In its 2022 review, BP disclosed clear and detailed actions to address misalignment under three categories: misaligned, partially aligned, and aligned. These included active engagement to promote and influence closer alignment, public statements of differences of opinion, formal communication of identified misalignments, setting specific expectations for change, and considering leaving the association. However, there were no timelines attached to this framework for industry associations which do not reform misaligned practices. The company did not provide an update to this framework in its 2023 review update.
Best Practice	<i>Rio Tinto</i> has disclosed clear and detailed steps for addressing potential misalignment, including an escalation strategy and clear timelines attached. The company states that it will clarify its own positions with misaligned industry associations, seek common ground, seek leadership positions to influence associations, and consider suspending membership if differences are not resolved after 12 months.

Policy Alignment Process

Identify & Assess

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 *database* on corporate lobbying.

BP	<p>In its 2022 review, BP did not identify any cases of misalignment. However, the company identified 10 cases of partial misalignment with Advanced Biofuels Association, American Petroleum Institute, Business Leadership South Africa, Electric Power Supply Association, Louisiana Mid-Continent Oil & Gas Association, National Association of Manufacturers, National Ocean Industries Association, Oil Companies International Marine Forum, Texas Oil and Gas Association, and US Chamber of Commerce. BP’s 2023 update provides an update on these 10 partially misaligned associations, including changes in their climate policy positions. All are still considered partially misaligned by BP.</p> <p>InfluenceMap analysis indicates that BP has at least 17 memberships to industry associations misaligned with the Paris Agreement (<i>International Association of Oil and Gas Producers (IOGP), Australian Petroleum Production & Exploration Association (APPEA), California Chamber of Commerce (CalChamber), American Petroleum Institute (API), German Chemical Industry Association (VCI), Natural Gas Supply Association (NGSA), US Chamber of Commerce, BusinessEurope, Australian Institute of Petroleum, National Association of Manufacturers (NAM), FuelsEurope, Canadian Association of Petroleum Producers (CAPP), Asociación Mexicana de Empresas de Hidrocarburos (AMEXH), International Air Transport Association (IATA), Japan Chemical Industry Association (JCIA), Illinois Chamber of Commerce, Texas Oil & Gas Association (TXOGA)</i>).</p> <p>InfluenceMap analysis also indicates that BP has at least 18 memberships to industry associations potentially misaligned with the Paris Agreement (<i>Federation of Indian Petroleum Industry (FIPI), Confederation of British Industry (CBI), South African Petroleum Industry Association (SAPIA), Instituto Brasileiro de Petróleo e Gás (IBP), Offshore Energies UK (OEUK) (Formerly OGUK), European Round Table for Industry (ERT), Dutch Employers’ Federation (VNO-NCW), Business Leadership South Africa, Gas Energy Australia, Australian Industry Greenhouse Network, European Chemical Industry Council (Cefic), Business Roundtable, American Chemistry Council (ACC)</i>).</p>
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	<p><i>Business Council of Australia, Hydrogen Council, Australian Hydrogen Council, Hydrogen Europe, International Gas Union</i>).</p> <p>InfluenceMap analysis finds that these industry associations have engaged negatively on climate-related policies. For example:</p> <ul style="list-style-type: none"> ■ <i>Canadian Association of Petroleum Producers (CAPP)</i>: CAPP <i>opposed</i> the Canadian government’s proposed greenhouse gas emissions cap for the Canadian oil and gas industry in a March 2022 letter to the Minister for Environment and Climate Change and Minister of Natural Resources. ■ <i>BusinessEurope</i>: BusinessEurope has consistently advocated to policymakers to oppose ambitious reforms to the EU Emissions Trading System (EU ETS) since 2018. In a <i>July 2022</i> newsletter and a <i>December 2022</i> press release, the association supported weaker reforms to the EU ETS, including advocating for a staggered rebasing of the emissions cap. ■ <i>Australian Petroleum Production & Exploration Association (APPEA)</i>: APPEA <i>appeared to oppose</i> reforms to the Australian Safeguard Mechanism, including opposing the removal of headroom, supporting differentiated baselines, and supporting the direct provision of Safeguard Credits for emissions intensive facilities in a September 2022 consultation.
Best Practice	<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>	
BP	<p>BP has published two full industry association reviews in 2020 and 2022, and also published two update reviews in 2021 and 2023 on misaligned industry associations which include details of engagement, changes in position, and next steps. BP has committed to publish another full assessment in 2024.</p>
Best Practice	<p><i>Rio Tinto</i> has published detailed assessments of its industry association memberships every year, with detailed updates on misaligned industry associations each year. Rio Tinto has published six full reviews of its industry associations, annually from 2018 to 2023. The company has committed to continue reviewing its memberships on an annual basis.</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>	
BP	<p>BP has shown evidence of action to address misalignment by terminating its membership to the AFPM, WEA and WSPA in 2020. In its 2022 review, BP provided a detailed update on its engagement with the American Petroleum Institute (API), and a case study on how it directly advocated with its industry associations to support the US EPA's methane rule. In its 2023 update, BP also outlined its ongoing engagement with the 10 industry associations identified as “partially aligned” in 2022, including actions taken within each association. These included, for example, continued work with the API on addressing its opposition to policies to accelerate the adoption of electric vehicles, working with the National Association of Manufacturers to advocated for policy stances in line with the US reaching net zero greenhouse gas emissions, and gaining an executive committee seat with the Advanced Biofuels Association to support them in developing a broader set of climate policy positions.</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>Rio Tinto</i> terminated its membership to Queensland Resources Council in 2022 following findings of misalignment in past reviews, and also outlined detailed actions to be taken at two "partially aligned" industry associations. <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>Fortum</i> has not left any industry associations but has disclosed its engagement on specific climate change policy issues with four industry associations, including details of the results of this engagement in 2022. 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: InfluenceMap’s Methodology for Assessing Corporate Climate Policy Engagement Disclosures

Scoring Disclosures and Policy Alignment Process



InfluenceMap assesses corporate performance against seven assessment criteria, using the traffic-light framework summarized below. A ‘Green’ scores 2 points, a ‘Yellow’ scores 1 point, and a ‘Red’ scores 0 points. This total is converted into a percentage from 0 to 100, calculated using the total number of points available (14). As such, only certain scores within the 0 to 100 range are possible under this methodology.

Key	Score 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 500 companies and 250 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.