

Volkswagen

Detailed assessment of Volkswagen’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 Volkswagen’s disclosures on climate policy engagement is shown below. Volkswagen has undertaken one review 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
April 2023	50 / 100

This assessment focuses solely on Volkswagen’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 Volkswagen [here](#).

The table below provides a breakdown of Volkswagen’s performance, 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	

Volkswagen’s Company Scorecard

The tables below highlight, for each indicator, the criteria for companies to meet investor expectations, Volkswagen’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>Volkswagen</p>	<p>Volkswagen’s review is mostly limited to top-line climate positions under six areas, without reference to specific climate-related policies: Paris Agreement, Decarbonization and Carbon Neutrality, Charging Infrastructure, Renewable Energy, Carbon Pricing, and Greenhouse Gas & Fuel Economy Fleet Regulations.</p> <p>The company appears to state broad support for the tightening of the EU’s 2035 emissions regulation in the review. The company also includes a link to its 2022 Sustainability Report for further details, but this does not include any positions on specific climate-related policies.</p> <p>However, this disclosure omits key evidence of engagement on specific climate-related policies by Volkswagen and its subsidiaries in 2022-23. In the US, in a May 2022 California consultation response, Volkswagen appeared to take an <i>unclear position</i> on California’s proposed Advanced Clean Cars II regulation, which would require an increasing percentage of new light-duty EV sales each year until a 100% ZEV mandate in 2035, while proposing several flexibilities to reduce the stringency of the policy. In an <i>April 2022</i> Colorado consultation response signed by Volkswagen subsidiary, Navistar, the company opposed the state’s adoption of the Advanced Clean Truck rule. Volkswagen also does not appear to disclose its positions on other key policies to decarbonize the automotive sector, such as zero-emission vehicle mandates and ICE-phase out policies.</p> <p>In its review, Volkswagen excludes “companies within the Group which are not fully controlled by Volkswagen AG (e.g., Porsche AG, TRATON SE and joint ventures)”. <i>The Global Standard on Responsible Climate Lobbying</i> states that companies should include all of its subsidiaries and business areas, and all operational jurisdictions. In addition Volkswagen’s CEO, Oliver Blume, is also the CEO of subsidiary Porsche.</p>
<p>Best Practice</p>	<p>In its review, <i>BP</i> provides a link to a dedicated webpage titled ‘Advocacy activities’ which includes clear and detailed advocacy updates on specific government policy consultations in Europe, Australia and the US. These include specific consultations with climate-related policies under 6 topics, and a link to <i>another webpage</i> which discloses further details on the company’s advocacy activities in the US. BP also includes links to public submissions via the EU Transparency Register, the Scottish Lobbying Register, and the US Lobbying Disclosure Act.</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.

<p>Volkswagen</p>	<p>Volkswagen has disclosed some details of each industry association’s climate policy positions and influencing activities, with clear links to position papers. For example, it has disclosed engagement by the European Automobile Manufacturers Association (ACEA) on EU 2025 and 2030 CO2 reduction targets, the EU Renewable Energy Directive, and the EU Emissions Trading System.</p> <p>However, Volkswagen has omitted key instances of negative engagement with climate-related regulations by its industry associations, including European Automobile Manufacturers Association (ACEA). For example, Volkswagen has not disclosed ACEA’s active advocacy against a zero-emissions 2035 CO2 target for light duty vehicles in the EU, such as in a <i>November 2021</i> consultation response. In March 2022, ACEA also publicly urged policymakers to <i>delay setting</i> the EU's zero-emission 2035 CO2 emissions target until "2040 at the earliest".</p> <p>Full profiles for each industry association can be accessed via the links in 'Identify & Assess' below or on Volkswagen’s <i>company profile</i> under the “Details of Relationship Score” tab.</p>
<p>Best Practice</p>	<p>No companies have met investor expectations in this area, although <i>BASF</i> and <i>Shell</i> exhibit current leading practice. Both companies have disclosed a detailed account of all key industry associations’ climate policy positions, and a summary of their influencing activities. However, they appear to overlook detailed negative lobbying by a number of industry associations identified by InfluenceMap’s database.</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.

<p>Volkswagen</p>	<p>Volkswagen has disclosed a clear and detailed methodology to assess alignment. The company stated that it assesses alignment against its six top-line climate policy positions, and provides details on the requirements for companies to be assessed as 'Aligned', 'Partly aligned' and 'Misaligned'.</p> <p>Volkswagen has also provided an explanation behind the assessment of each industry association.</p>
<p>Best Practice</p>	<p><i>Shell</i> has disclosed a clear explanation of its alignment assessment method along with a clear and detailed explanation of how it has been applied to each industry association. The company also provided 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.

Volkswagen	<p>Volkswagen has disclosed a framework for addressing misalignment with its industry associations, including escalation strategies. In the case of a misalignment or partial misalignment, the case will be referred to a panel, which will engage in a dialogue with the industry association. If the misalignment cannot be remedied after several steps, withdrawal from the association will be considered by the company.</p> <p>However, Volkswagen does not include clear deadlines for industry associations which do not amend misaligned practices.</p>
Best Practice	<p><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.</p>

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.

Volkswagen	<p>Volkswagen assessed 6 industry associations in its review – the company found 3 to be aligned and 3 to be partly aligned.</p> <p>InfluenceMap analysis indicates that Volkswagen has at least 8 memberships to industry associations with climate policy engagement misaligned with the Paris Agreement (<i>Federation of German Industries, German Association of the Automotive Industry (VDA), BusinessEurope, Truck and Engine Manufacturers Association, International Federation of Industrial Energy Consumers, Society of Indian Automobile Manufacturers, Tennessee Chamber of Commerce & Industry, Federal Chamber of Automotive Industries</i>) and at least 5 membership to industry associations potentially misaligned with the Paris Agreement (<i>European Automobile Manufacturers Association (ACEA), Alliance for Automotive Innovation (Auto Innovators), Society of Motor Manufacturers and Traders (SMMT), Confederation of British Industry, Hydrogen Europe</i>).</p> <p>Volkswagen found ACEA and VDA to be ‘Aligned’, and SMMT and Auto Innovators to be ‘Partly Aligned’. The company stated that it found no clear opposition by any associations, and the main reason for classifying associations as partly aligned was the absence of specific public statements on the Paris Agreement.</p> <p>The remaining companies listed above were not included within the scope of Volkswagen’s review. Full profiles for each industry association can be accessed via the links above or on Volkswagen’s <i>company profile</i> under the “Details of Relationship Score” tab.</p> <p>Two companies included in Volkswagen’s review – Automotive Industry Association and Spanish Association of Automobile and Truck Manufacturers – are not currently covered by InfluenceMap’s database.</p>
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Best Practice	<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.
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Monitor & Review

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.

Volkswagen	Volkswagen states that the Review Report will be published at "regular intervals", but the company does not specify whether it will publish an update on an annual basis.
Best Practice	<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.

Act




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 *database* on corporate lobbying. The investor expectations outlined by *PRI*, *IIGCC* and *Ceres* 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.

Volkswagen	<p>Volkswagen has shown some evidence of action to address misalignment, stating that it will engage with ANFAC, SMMT and Auto Innovators to push for a clear commitment to the Paris Agreement. The company also stated that it would strengthen dialogue to ensure alignment with all six industry associations. However, there were no details on reforming the detailed climate policy engagement of industry associations on specific climate-related policies. For example, a <i>Politico article from 2021</i> suggests that Volkswagen previously pushed ACEA internally for a more positive position on automotive climate regulations in Europe.</p> <p>The company does not appear to have shown evidence of action to address specific cases of material and potential misalignment with industry associations identified by InfluenceMap's database (see Identify & Assess).</p>
Best Practice	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.

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.