



Climate Policy Engagement Review



Unilever Climate Policy
Engagement Review 2023



Unilever

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Introduction

Climate action is one of Unilever's top four sustainability focus areas. Like many businesses, Unilever is aiming to accelerate greenhouse gas emissions reductions within our own operations and our value chain.

However, to tackle climate change at the speed and scale required, we need strong government policy to help create the right enabling environment for businesses to act and drive the wider systems changes needed.

Unilever advocates and lobbies for policies that advance the goal of limiting global warming to no more than 1.5°C, per the Paris Agreement, and help us deliver our Climate Transition Action Plan (CTAP).¹ We do this both directly and indirectly through our memberships with industry groups and trade associations (collectively called industry associations).

In our first Climate Policy Engagement Review, we are setting out our climate policy priorities and highlighting the direct actions Unilever has taken already to ensure we are aligned with them. This includes activity in our top markets², as well as with the European Union institutions.

We also examine the positions and engagement activities of our main

industry associations, to determine whether they are consistent with Unilever's priority policy areas.

This industry association review was independently conducted by Volans, a think-tank and advisory firm; the methodology and process for this work is set out in the industry association review section.

The industry association analysis seeks to identify both commendable practices and areas for improvement, with a view to informing actions that Unilever will take to address any areas of misalignment or opportunities to increase constructive engagement.

In 2024, Unilever will put its updated CTAP to an advisory shareholder vote at the Annual General Meeting. We have committed to reporting progress on our CTAP every year as part of our Annual Report and Accounts, which are usually published in the first quarter of the year. We intend to align the timing of our updated Climate Policy Engagement Review with our CTAP progress report in 2025.

Rebecca Marmot, Chief Sustainability Officer

Paul Matthews, Global Head of Communications and Corporate Affairs

¹Climate Transition Action Plan

²Top twenty markets by turnover

Executive summary

Overall, of the 27 associations assessed, 18 are aligned with Unilever's climate policy positions, while eight are misaligned with Unilever in one or more of our priority policy areas (one has an unclear position).

Of the 18 associations that are aligned with Unilever, eight had no public record of carrying out meaningful engagement on climate policy, and a further four were found to have low engagement.

Where we have found misalignment or low or no meaningful engagement, we have described the actions we have either already taken or will take to address this. These are included in the detailed industry association review section in the Appendix. We will share this report with all 27 industry associations included in the review.

We want to work with industry associations on practical and realistic actions to ensure they improve their policy positions and practices. In our next review we will include updates on the actions taken.

Key findings

Looking at the associations covered in this report, two key trends have emerged.

1. Passive alignment

Twelve associations are classed as being "passively aligned" (see results map on p. 13). This means that their public positions on climate policy are either completely or mostly aligned with our positions and science-based benchmarks, but their public record of actual engagement in support of Paris-aligned climate policies is either minimal or non-existent.

In future, we would like our most influential industry associations to be more actively engaged in promoting outcomes and policies that can help the economy – and Unilever – to decarbonise faster. Our aim is to move most of our associations currently in the bottom right quadrant of the grid p. 13 into the top right quadrant over the next one to three years. The actions we have committed to take in relation to each of these twelve associations are designed to achieve this. In certain cases, it may be that an industry association simply needs to be more proactive with disclosing its engagement activities.

2. Resistance to specific climate policies, despite high-level support for the Paris Agreement

With very few exceptions, the associations reviewed have top-line messaging that is supportive of the Paris Agreement and/or their country's nationally determined contributions. But the eight associations on the left-hand side of the results map do not consistently back this up in their engagement at present.

We recognise there are genuine dilemmas that need to be addressed here. Some climate policies will create near-term costs for the businesses affected by them and this may adversely impact the competitiveness of those businesses as different governments move at different speeds.

As a result, we would like our associations to work constructively with policymakers to implement policies that will deliver real emissions reductions in a way that minimises the potential for a negative impact on competitiveness.

Our approach: direct climate policy engagement

Priority climate policy areas

In 2023, Unilever had a targeted set of priorities. These encompass three cross-cutting policies that support economy-wide transformation, as well as three specific policies that we have identified, through extensive road-mapping exercises, as being of most importance to our Business Groups' ability to hit Unilever's net-zero targets. More information can be found on Unilever.com.

Cross cutting policies

- **Climate ambition / Nationally determined contributions (NDCs):** Encourage policy makers to put forward strengthened, high quality NDCs, in line with a 1.5°C trajectory to halve global emissions by 2030.
- **Renewables / energy transition:** Encourage policy makers to commit to reaching 100% decarbonised power systems by 2035 in advanced economies and by 2040 at the latest for others.
- **Carbon pricing / markets:** Encourage policy makers to put a meaningful price on carbon that reflects the full costs of climate change. Implement Article 6 rules to develop carbon markets that drive ambition and scale investment while ensuring environmental integrity and avoiding double counting.

Business group decarbonisation levers

- **Regenerative agriculture and dairy:** Encourage policy makers to put forward policies that empower farmers and smallholders to protect and regenerate farm environments.³
- **Non-fossil chemical feedstocks and ingredient emissions:** Encourage policy makers to create conditions that facilitate zero emissions ingredients.⁴
- **Deforestation free commodities:** Encourage policy makers to put forward conditions that reflect the ambition of the Glasgow Leaders Declaration on Forests and Land Use to reverse forest loss and land degradation by 2030.⁵

Unilever has also been a vocal supporter of the need for transparent sustainability reporting, including the publication of climate transition plans.

We have long championed the Task Force on Climate-Related Financial Disclosures (TCFD) and advocated for their Recommendations and Recommended Disclosures (now part of the International Sustainability Standards Board's Standards) to be the global standard and adopted by national governments. In 2023, Unilever supported the statement of ISSB Chair, Emmanuel Faber, calling for the establishment of market infrastructure to enable consistent,

comparable climate-related disclosures at a global level. Unilever was a member of the Transition Plan Taskforce, whose outputs we have publicly endorsed.

Engagement on sustainability reporting standards was not included in the industry association review we commissioned, due to insufficient data being available. An initial scan indicated that most of the industry associations covered were not meaningfully engaged on sustainability reporting standards. In instances where an association was found to have an active stance on sustainability reporting standards, this is noted in that association's in-depth profile in Appendix 1.

Internal oversight of climate policy engagement

The management system for Unilever's direct and indirect climate policy engagement is overseen by our Global Sustainability and Global Corporate Affairs teams. For direct lobbying we adhere to the following process:

- Global climate advocacy priorities are defined through an annual planning and review process. In line with our commitment, all direct lobbying priorities are assessed to ensure consistency with our objectives in delivering the 1.5°C ambition of the Paris Agreement. Plans are approved by the Chief Sustainability Officer and the Global Head of Communications and Corporate Affairs.
- Priorities and guidance are then given to Unilever's Business Groups and our in-country Sustainability and Corporate Affairs teams, who apply our global objectives in a local context.
- The Global Head of Sustainability - Environment and the Global Head of Corporate Affairs meet monthly to review this process and manage any flagged issues.

All public policy engagement that Unilever undertakes must adhere to our Code of Business Principles. Colleagues that engage with industry associations must also undertake mandatory compliance training. Our policy engagement has been, and will continue to be, a key driver in helping to deliver the goals set out in our CTAP. Our CEO and Executive Board member, Hein Schumacher, is ultimately responsible for overseeing our climate change agenda. Further details on our internal governance will be included in our updated CTAP, which will be published ahead of our AGM in 2024.

Our approach: Indirect climate policy engagement

Aligning industry associations to Unilever's objectives

Direct engagement is not the only form of policy influence that a business can exert. Unilever is a member of approximately 600 industry associations, many of which work across a range of issues, from nutrition to marketing, and from skills to environmental policy.

Due to the impact industry associations can have on climate policy, we have long championed the importance of aligning indirect climate lobbying to the 1.5°C ambition of the Paris Agreement. This includes advocating within industry associations for them to change positions and increase engagement levels.

³ See more here: [What is regenerative agriculture and why does it matter? | Unilever](#)

⁴ More information here: [Reducing emissions from the use of our products | Unilever](#)

⁵ More information here: [Solutions to deforestation in our supply chain | Unilever](#)

For example, as a member of the European Chemical Industry Council (CEFIC) and part of their working groups, we have actively participated in helping to change their positions to be more aligned with our priorities. This follows Unilever re-joining CEFIC in 2022 after deciding to exit the industry association in 2015 due to misalignment on climate policy. Even though areas of misalignment between Unilever and CEFIC persist, we believe we've had an impact on key issues that are important to us.

Another example is with the Personal Care Products Council (PCPC) in the United States, where we proposed to the Council they create a Sustainability Committee to increase their engagement in our priorities. This Committee was subsequently set up.

We have included further examples below of how we have worked within industry associations to drive positive action. In 2019, we asked our associations to confirm whether their policy engagement matched the 1.5°C ambition of the Paris Agreement. Our intervention was positively received, and in several cases, it triggered a discussion about clarifying existing positions.

Then, in 2022, we conducted an internal review of our industry associations to assess what topics and issues they are most engaged with on Unilever's behalf, and which associations are most engaged on climate policy. To gain a better understanding of the positions and activities

Addressing misalignment

Where industry associations have unclear or misaligned positions, we offer guidance and support to help reach an aligned conclusion and agree on a way forward. In some circumstances an industry association may be advocating for policy change that runs counter to Unilever's interests or position. In these circumstances our preference is to engage the industry association to:

1. Make clear how their position is misaligned with ours.
2. Assess why the position is misaligned.
3. Determine if and how their position(s) can change, and over what time periods.
4. Provide and agree on specific recommendations for how the industry association can address misalignment.
5. Review progress on agreed actions.

of our main industry associations, a more detailed analysis was required. This public review provides that analysis.

Internal governance of industry associations

Unilever reviews its membership of industry associations on an annual basis and is committed to conducting a full, global industry association review every three years (the last review took place at the end of 2022).

Furthermore, we are committed to publishing an annual list of principal industry associations and climate specific alliances and advocacy groups. This includes disclosing whether these groups are aligned with the Paris Agreement. Our intention is to publish a full list of our industry associations after our next global review, expected in 2025.

Moreover, our Trade Association Standard, an internal Unilever document approved by the Unilever Leadership Executive, has been updated to give guidance to all our country teams. It sets out that, at the point of joining or renewing membership (typically an annual process) they must seek confirmation from industry associations that their climate policy work is consistent with Unilever's positions and the 1.5°C ambitions of the Paris Agreement.

This process is led by the business lead who manages the day-to-day relationship with the industry association.

We believe that an industry association's continuous improvement is more important and constructive than setting deadlines to reach alignment. If an industry association's position cannot be made consistent with Unilever's, or no improvement is being made to reach alignment over a 12-month period, the issue is escalated to the budget holder, in consultation with the Communications and Corporate Affairs team. At this point, we will determine whether to withdraw our membership and make our withdrawal public.

In some instances, there may be a disagreement regarding positions taken, but Unilever decides that its interests are best served by retaining membership. If this happens, Unilever reserves the right to make a public statement to this effect. We will then continue to work with the industry association to seek to align its climate policy position with Unilever's.

In other instances, associations may be aligned with a Unilever position, but not active in engagement. In these circumstances we will work with the industry association to determine how they can become more proactive in this space.

Climate policy engagement in action

Below are examples of actions we took against our six priority policy areas during 2023.

Climate ambition / Nationally determined contributions

- Unilever attended COP28 in December to call on national governments to raise the ambition of their nationally determined contributions, so to align with the science and safely limit global warming to 1.5°C. Specifically, we asked policy makers to:
 - Triple global renewable electricity capacity by 2030 and phase out fossil fuels
 - Protect and regenerate land, forests and oceans
 - Incentivise a shift to regenerative agriculture
 - Incentivise a shift to renewable carbon feedstocks
- At COP 28, Unilever spoke on panels and attended meetings with officials from Austria, Brazil, Colombia, Finland, Ireland, Luxembourg, Pakistan, Slovenia, UAE, and Vietnam.
- At the United Nations General Assembly (UNGA) in September, Unilever spoke to EU officials responsible for the EU Green Deal, on the need for high-ambition climate targets consistent with the Paris Agreement.
- At EU level, in June, Unilever responded to a Commission consultation where we encouraged the EU to set an emissions reduction target in the range of 90-95% with separate carbon removal targets for nature-based removals and industrial removals.⁶
- In Pakistan in November, at the 2nd Pakistan Climate Conference, Unilever urged attending government officials to act on developing solar energy infrastructure.
- In the USA, throughout 2023, we met federal policy makers to voice our support for government positions on combating climate change. At the state level, we met with legislative staff in New York to support the New York Climate, Jobs and Justice package of bills in the New York State budget.

- In the USA, in June, Unilever signed a joint letter urging the Environmental Protection Agency, to adopt the highest proposed federal GHG emission standards, for light- and medium-duty vehicles.⁷
- In the UK, in July, Unilever signed a joint letter to the Prime Minister, voicing support for faster action in achieving the UK's climate commitments and goals for a net zero transition.⁸ In November, we signed a letter⁹ from the UK Business Group Alliance/Corporate Leaders Group to the UK Chancellor of the Exchequer, calling on him to step up government commitment and investment in net zero.
- In Vietnam, in August, we participated in the Vietnam Corporate Sustainability Forum, which was attended by the deputy prime minister and officials from the Ministry of Natural Resources and Environment. Unilever gave a speech outlining the importance of keeping global temperatures from rising above 1.5°C.¹⁰

Renewables / energy transition

- At the international level, in September, Unilever signed an open letter to support the #3x Renewables campaign. It made a call for world leaders and signatories of the Paris Agreement to commit to tripling renewable energy capacity to a minimum of 11,000 GW by 2030 at COP28. binding zero emission purchase targets for corporate fleets, signing an open letter¹² and attending a Commission meeting.¹³ In March, Unilever signed a joint letter¹⁴ to the President of the European Commission calling on Member States to honor the Regulation on CO₂ emission standards and keep 2035 as the phase out date for petrol, diesel cars and small vans.
- In October, ahead of COP28, Unilever, along with 200+ other companies in the We Mean Business Coalition, wrote a letter¹¹ urging national governments to accelerate the clean energy transition. It called for a commitment to reach 100% decarbonised power systems by 2035 in advanced economies, and by 2040 for other countries, at the latest.
- In Brazil, we participated in meetings with the President of CEBDS (Brazilian Council for Sustainable Development) to voice our support for a fair energy transition.
- In Indonesia, Unilever worked with the government to reform regulations to make it easier for companies to source energy from rooftop solar power plants. This includes lifting the current limits that vendors can set. We also directly engaged with the Director General of Renewable Energy at the national and provincial level. Unilever also met with the Ministers of Energy and Mineral Resources at Davos.
- At EU level, in February we called on the European Commission to set
- In Japan, Unilever supported increasing the ambition of renewable energy legislation in a June 2023 joint letter¹⁵ as part of the Renewable Energy User Network.

⁶Feedback from: Unilever (europa.eu)

⁷<https://lobbymap.org/evidence/ecb8fe96c1ce499c96371db1ecf5481e>

⁸<https://www.aldersgategroup.org.uk/publications/post/over-100-businesses-urge-for-ambitious-action-on-net-zero/>

⁹https://www.corporateleadersgroup.com/files/bga_letter_to_chancellor_v7_final.pdf

¹⁰Unilever's comprehensive green transformation journey towards sustainable development (vietnamnews.vn)

¹¹COP28: Businesses urge governments to phase out fossil fuels - We Mean Business Coalition %

¹²Open letter: Accelerate the electrification of fleets in Europe(1) (influencemap.org)

¹³Transparency Register (europa.eu) – Meetings section

¹⁴Joint-Letter_CO2-Cars-Vans-EU_03-23.pdf (influencemap.org)

¹⁵Joint-letter regarding the use of electricity from natural energy

¹⁶Transparency Register (europa.eu) – Meetings section

Carbon pricing / markets

- In Brazil, we engaged with key associations, in March and July, to present our support for carbon market regulation and for the establishment of a Brazilian climate transition plan that will enable more transparent sustainability public policies.

Regenerative agriculture and dairy

- At the international level, at COP28, Unilever spoke at the Steering Committee meeting of the Action Agenda on Regenerative Landscape. legislation that can enable the uptake of regenerative agriculture practices. This included a meeting in June between our Business Group President of Nutrition and the EU Executive Vice President for the EU Green Deal and the EU Commissioner for Agriculture.¹⁶ As part of promoting our position on the Soil Health Bill, we ran sponsored ads in Politico during December.
- At the international level, in September we took part in a United Nations Industrial Development Office roundtable on food supply chains, where we presented our views on what is needed to scale regenerative agriculture. In September, during the UNGA Food+ forum, Unilever presented on how regenerative agriculture is an investment for the future of a resilient global food supply chain.
- In the USA, we advocated for the Farm Bill to include policies that support the scaling of regenerative agriculture practices, engaging directly with congressional leaders on this. We signed five letters supporting enhanced technical assistance and peer-to-peer learning.
- At EU level, we met government leaders to establish ambitious EU

Non-fossil chemicals / 'net-zero' chemicals

- At the international level, Unilever worked with Oxford University on a research report, detailing the policy interventions needed to accelerate net zero transition in our Home Care value chain. This report was launched at Climate Week NYC in September.¹⁷ meeting, 15 of our partners signed a Climate Pledge, signalling their commitment to creating a decarbonisation plan which includes emissions measurement, and to building capabilities to reduce GHG emissions.
- At EU level, we supported ecodesign regulations that would incentivise the shift to lower/no fossil carbon chemical ingredients. This included direct meetings with members of the Commission as well as the Parliament.
- In the UK, throughout 2023, we advocated that the UK should scale low-emissions chemical technology, to unlock renewable carbon-based ingredients and increase circularity. We did this through our membership of the UK government's Business Innovation Forum, which is chaired by the Science Minister. We also responded to the government's request for submissions on the topic of Boosting UK Innovation.¹⁸
- In India, in August, we hosted the Joint Secretary, Ministry of Environment, Forest & Climate Change and over 100 representatives from our suppliers at our Clean Future India Summit. At the

¹⁷Oxford University and Unilever report identifies actions needed to put cleaning and laundry products on net zero pathway | Smith School of Enterprise and the Environment

¹⁸UK Innovation Strategy: leading the future by creating it - GOV.UK (www.gov.uk)

Deforestation-free

- At the international level, in September, Unilever presented to the G7 Alliance on Nature Positive Economies International Workshop, alongside the Ministry of the Environment of Japan.
- Unilever met and wrote an open letter to the Global Resource Initiative, a UK government established taskforce which advises on sustainably produced commodities, detailing our ambition to zero deforestation in our supply chain (palm oil, paper and board, tea, soy and cocoa) and supporting actions that would help businesses achieve this.
- In the USA, through our work with the Sustainable Food Policy Alliance and the We Mean Business Coalition, we developed a working group to create new legislation to combat deforestation.
- As part of Business for Nature, in 2023 we called on the EU to urgently adopt regulations that promote nature protection, restoration, and sustainable use of natural resources.¹⁹

Industry association review

Selection process

This review covers 27 of Unilever's industry associations. Associations were selected for inclusion in this review based on two criteria:

- The importance of the association for climate policy:** Indicators taken into account include the size of the market where the association is based – both in terms of Unilever's presence and in terms of the country's/region's GHG emissions – and how material the sector/part of the economy represented is for delivery of Unilever's CTAP. We have prioritised associations that represent sectors with high GHG emissions and where achieving Unilever's climate goals is likely to be highly dependent on climate policy.
- Unilever's level of influence within the association:** Indicators taken into account include the amount spent annually on membership and whether Unilever has a position that could give it particular influence (e.g., a board seat).

These criteria were incorporated into the screening and selection process as follows:

- An initial screening was conducted to remove associations a) based outside of Unilever's top 10 markets by turnover, and b) operating outside of the top 10 highest GHG emitting countries. This generated a longlist of associations. Those that operate globally or regionally (e.g., at EU level) were also included in this longlist.

- Longlisted associations were then subjected to a selection process, where they were assigned a score out of five for each of the following:

- Geography:** The size of the market / region where the association operates.
- Sector:** Importance of the sector or industry the association represents for climate policy. This includes a 'sub-national' categorisation for trade associations that represent industry at a state or city level.
- Fees:** The amount Unilever spends on annual membership.

The table below indicates how scores were assigned

SCORE	1	2	3	4	5
Amount spent on membership (annual)	Under €20,000	Between €20,000 and €49,999	Between €50,000 and €99,999	Between €100,000 and €299,999	Above €300,000
Geography	Canada, United Kingdom, France, Mexico, Philippines, Germany	Indonesia, Brazil	US, India, China	Regional	Global
Sector	Sub-national ²²	Personal Care	Consumer goods, Home Care	Food & drink, Transport & logistics	Cross-industry, Chemicals, Energy

- The scores for each of the three categories were added to obtain a total score out of 15. All associations scoring 10 or above were automatically included, unless they do not engage on climate policy and there is no reason to believe they should (i.e., because they are specifically set up to focus on other issues).
- In addition, the following associations that scored eight or nine were included on the grounds that they are active in one of Unilever's top five markets *and* represent at least one of its five Business Groups.

- American Cleaning Institute (ACI)
- Associated Chamber of Commerce & Industry India (ASSOCHAM)
- Brazilian Food Industry Association (ABIA)
- China National Food Industry Association (CNFIA)
- Confederation of Indian Industry (CII)
- European Union Chamber of Commerce in China (EUCCC)
- Federation of Indian Chambers of Commerce (FICCI)
- Indonesia Chamber of Commerce & Industry (KADIN)

²⁰This measure involved prioritisation of Unilever's top 10 markets by turnover.

²¹This is a composite measure that seeks to reflect a) the size of the sector/segment's GHG footprint today, b) its materiality to Unilever's Climate Transition Plan and c) the degree to which the sector's decarbonisation pathway is dependent on policy change.

²²Sub-national was used to describe associations that represent a sector at a state (e.g., US) or city level – such as the Tennessee Chamber of Commerce & Industry.

Finally, the following associations were included, despite not meeting the selection criteria / thresholds described above, on the grounds that they are already covered by InfluenceMap whose data was used in this exercise (see further information below):

1. Asociación Nacional de Empresarios de Colombia (ANDI)
2. Business Leadership South Africa
3. Dutch Employers' Federation (VNO-NCW)
4. German Chemical Industry Association (VCI)*
5. National Business Initiative (South Africa)
6. Tennessee Chamber of Commerce & Industry (TCCI)

* Unilever is an indirect member of VCI via its membership of the German Cosmetic, Toiletry, Perfumery and Detergent Association.

We acknowledge that this selection process may not have captured every association that is engaged, or should be engaged, on climate policy. We will aim to refine the selection methodology and expand the list of associations covered over time.

Assessment methodology

Alignment to what?

Unilever commissioned Volans, a think-tank and advisory firm, to conduct an independent review of our industry associations' climate policy engagement. As part of this review, each industry association's climate-related policy stances were compared with Unilever's stated climate policy positions (see p. 3). This was to assess whether the association's positions were aligned with ours or not. Key areas of divergence are highlighted in the individual association assessments in Appendix 1.

In addition, industry associations' overall climate lobbying was assessed in relation to what the Intergovernmental Panel on Climate Change (IPCC) has said is needed to keep global warming below 1.5°C. For this part of the assessment, the research looked at all aspects of the association's climate lobbying for which data was available – not just those aspects that correspond directly to Unilever's policy priorities. Again, notable areas of divergence from a science-based policy agenda are highlighted in the individual assessments.

This review took place between October 6th and November 24th, 2023. Associations' policy positions and engagement that occurred after this time were, therefore, not included in this review.

²³<https://climateactiontracker.org/countries/>

What counts as alignment / misalignment?

Judging whether an association's policy engagement is aligned with what is required to meet the goals of the Paris Agreement is not always straightforward. There is no single policy playbook for achieving 1.5°C. There can and will be legitimate differences of opinion on what the most effective policies are in any given region or sector.

According to Climate Action Tracker, the current reality is that no government's policies are yet compatible with a 1.5°C pathway.²³ Therefore, if an association is pushing to weaken policy ambition and delay timelines, this is likely to indicate misalignment with "science-based policy". This doesn't mean associations can be expected to provide support for every proposed climate law that affects their members.

However, it does mean that when an association opposes a specific climate policy proposal (e.g., because it believes the proposed policy will adversely impact the competitiveness of the businesses it represents), it is incumbent on the association to engage constructively with policymakers to help find alternative policy options that would be (at least) equally effective at reducing emissions. Importantly, the alternative proposals need to be viable too: refusing to support a climate policy that isn't "perfect" can constitute obstructive lobbying if there is no realistic possibility of the "perfect" option being implemented given prevailing political conditions.

Detailed advocacy vs top-line statements

The research focused, wherever possible, on associations' actual engagement on specific policies – for example, responses to government consultations and statements given to the media commenting on policy proposals – rather than top-line statements. Additionally, the research concentrated on public evidence of policy engagement, rather than calls for voluntary action.

As a result, some associations are categorised as misaligned or partially misaligned despite having made public statements in support of the Paris Agreement and net zero targets. If an association opposes specific policies designed to help bend the emissions curve without offering credible, viable alternatives, this is counted as misalignment, regardless of whether the association nominally endorses the goals of the Paris Agreement.

Active vs passive alignment

As well as assessing alignment, the research looked at how active and engaged each association is on climate policy overall. This informed an assessment of whether an association's alignment was passive (i.e., not seeking to obstruct policies that are in line with Unilever's policy positions and a science-based policy agenda) or active (i.e., taking concrete steps to promote such policies).

The principle adopted here is that passive alignment is a minimum threshold, but Unilever is looking for more than a "do no harm" stance on climate policy from its industry associations.

Ultimately, Unilever views climate policy engagement as a tool to help the company deliver on its net-zero targets. Therefore, each association's policy positions were examined through the lens of whether, if implemented, they would help or hinder delivery of Unilever's current Climate

²⁴<https://lobbymap.org/index.html>

Transition Action Plan (published in 2021).

A note on data sources

All evidence used for these assessments comes from publicly available sources. The primary source of information used was the LobbyMap platform, created by InfluenceMap, an independent think-tank that tracks corporate and industry association climate policy engagement.²⁴ Using this publicly available data, Volans reviewed the detail of each association's engagement on specific policies, to assess whether its detailed positions were aligned or not.

As this is Unilever's first Climate Policy Engagement Review, we decided it was appropriate to cover both 2022 and 2023, so we can build a sufficiently detailed and robust picture of how our associations engage on climate policy. In future years, we will only cover the period since our previous review.

Inevitably, this publicly available information provides an incomplete snapshot of associations' climate policy engagement. In some cases, associations are therefore likely to be doing more than is captured in this review. Where we believe this to be the case, Unilever intends to work with the associations in question to increase the visibility of their climate policy work.

Rating system

Unilever's climate policy engagement focuses on issues that materially impact its ability to deliver its Climate Transition Action Plan. Unilever's climate policy priorities are aligned with science-based policy. Therefore, if an association was assessed as aligned with Unilever in one or more priority areas, the association was also assessed as aligned with science-based policy. Likewise, if an association was assessed as misaligned with Unilever in one or more priority areas, the association was also assessed to be at least partially misaligned with science-based policy.

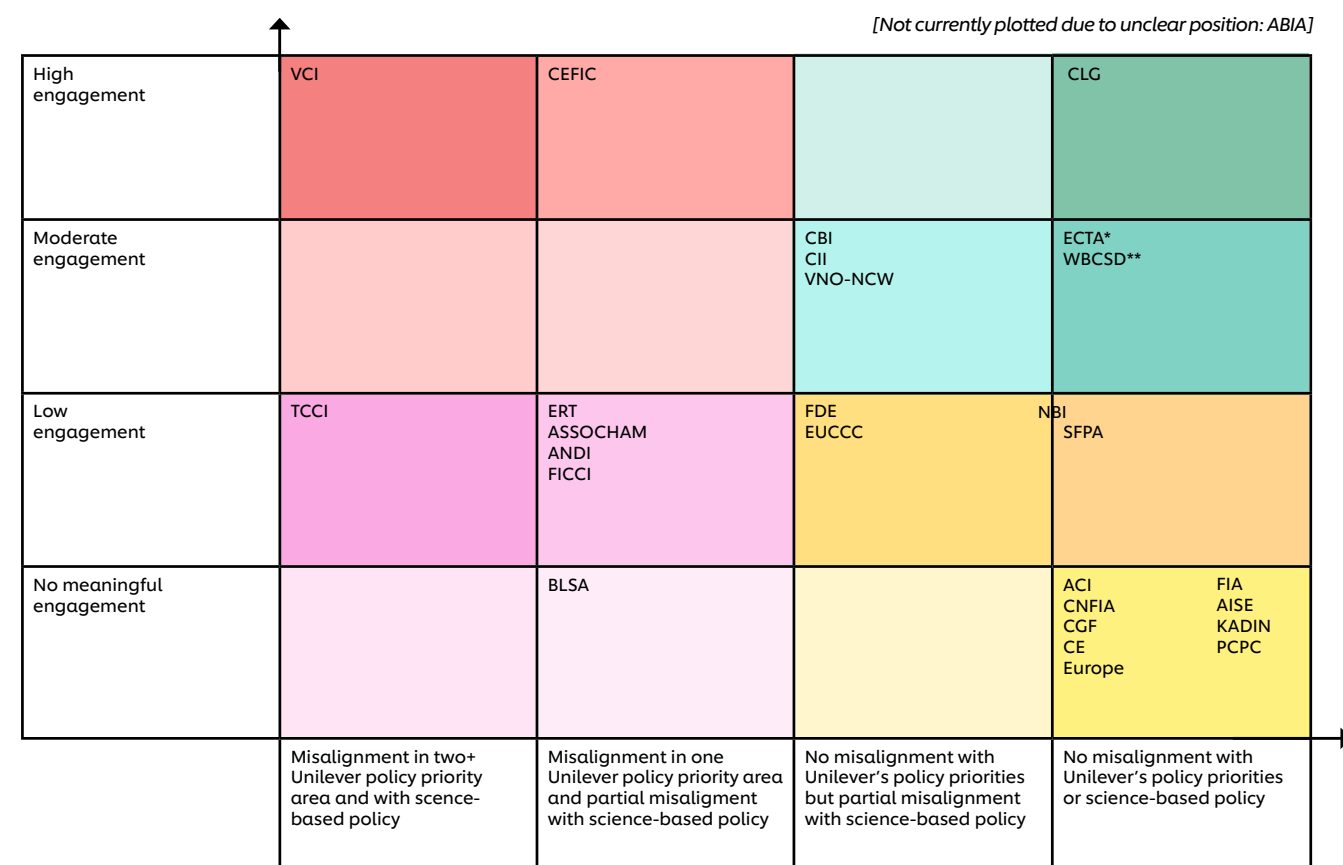
There are some aspects of climate policy that Unilever does not engage with. When an industry association was found to be active on a climate policy issue that Unilever does not have a clear public position on, the association’s positions were assessed relative to science-based policy benchmarks – specifically the IPCC’s 2018 Special Report on 1.5°C and its 6th Assessment Report, published in 2023²⁵. For more information on individual cases, see Appendix 2.

The intensity of associations’ engagement is categorised based on InfluenceMap’s intensity scores as follows:

- No meaningful engagement: 0-11%
- Low engagement: 12-24%
- Moderate engagement: 25-49%
- High engagement: > 50%

Results

The grid below and accompanying summary table give an overview of the results. The full industry association analysis can be found in the appendix.



ACI: American Cleaning Institute
ANDI: Asociación Nacional de Empresarios de Colombia
ABIA: Associação Brasileira da Indústria de Alimentos
ASSOCHAM: Associated Chamber of Commerce & Industry
BLSA: Business Leadership South Africa
CEFIC: European Chemical Industry Council
CNFIA: China National Food Industry Association
CBI: Confederation of British Industry
CII: Confederation of Indian Industry
CGF: Consumer Goods Forum

CLG: Corporate Leaders Group
CE: Cosmetics Europe
VNO-NCW: Dutch Employers’ Federation
EUCCC: EU Chamber of Commerce in China
ECTA: European Clean Trucking Alliance
ERT: European Round Table for Industry
FICCI: Federation of Indian Chambers of Commerce & Industry
FDE: FoodDrinkEurope
FIA: Food Industry Asia
VCI: German Chemical Industry Association

KADIN: Indonesian Chamber of Commerce and Industry
AISE: International Association for Soaps, Detergents and Maintenance Products
NBI: National Business Initiative
PCPC: Personal Care Products Council
SFPA: Sustainable Food Policy Alliance
TCCI: Tennessee Chamber of Commerce & Industry
WBCSD: World Business Council for Sustainable development

The grid on p.13 summarises each of the 27 associations’ engagement intensity and alignment. The vertical axis categorises each association’s engagement intensity based on InfluenceMap’s scores, ranging from no meaningful engagement through to high engagement. The horizontal axis depicts each association’s alignment with Unilever’s policy priorities and science-based benchmarks. The goal over time is to move all associations towards the top right-hand corner, either through encouraging more active public engagement on climate policy, or by encouraging them to take steps to align with Unilever’s policy priorities and science-based policies.

Summary table

This table shows details of how each of the 27 industry associations assessed were engaging on Unilever’s policy priorities during the in scope time period (2022-2023). For each priority, associations were assigned one of the following ratings:

1. Constructive (i.e., the association is actively engaged on this topic and its position is aligned with Unilever’s).
2. Obstructive (i.e., the association is actively engaged on this topic but its position is misaligned with Unilever’s).
3. Mixed (i.e., the association is actively engaged on this topic; some but not all of what it advocates for aligns with Unilever’s position).
4. Inactive (i.e., the association is not actively engaged on this topic).
5. Unclear (i.e., the association is actively engaged on this topic but insufficient information was available to assess whether its position is aligned or not).

Associations were not rated on whether they advocated for strengthened NDCs since this was not a “live” issue during the period of the review. The last NDC submission deadline was in 2020 and the next submissions will be due in 2025.

*ECTA’s engagement intensity has been rated as moderate despite only receiving a 15% engagement intensity score from InfluenceMap (which would normally cause it to be assessed as having low engagement). This adjustment reflects the fact that ECTA’s narrow focus limits how highly it can score under InfluenceMap’s engagement intensity scoring methodology. Essentially, because ECTA only engages on policies related to the trucking industry, it is inactive on other aspects of climate policy which are not part of its remit. InfluenceMap counts this inactivity towards its overall engagement intensity score, which brings that score down.

**WBCSD is not currently assessed by InfluenceMap, therefore Volans made an independent assessment of engagement intensity. Its direct engagement with specific policies is very limited. This is due to the nature of WBCSD’s remit, which is primarily about coordinating and driving voluntary private sector action. However, as a founder member of the We Mean Business Coalition, WBCSD is indirectly engaged in climate policy engagement at the global level. Its positioning on the grid reflects this indirect engagement via We Mean Business, not just WBCSD’s direct policy work.

²⁵ <https://www.ipcc.ch/sr15/>

	Geography	Sector	Annual financial payment (€)	Climate ambition / NDCs	Renewables / energy transition	Carbon pricing / markets	Regenerative agriculture and dairy	Non-fossil / net zero chemicals	Deforestation free	Other
American Cleaning Institute (ACI)	USA	Home care	50,000-99,999	N/A	Constructive	Inactive	Inactive	Inactive	Inactive	N/A
Asociación Nacional de Empresarios de Colombia (ANDI)	Colombia	Cross-industry	20,000-49,999	N/A	Mixed	Mixed	Inactive	Inactive	Inactive	Supports new oil and gas, as well as renewables
Associação Brasileira da Indústria de Alimentos (ABIA)	Brazil	Food & Drink	50,000-99,999	N/A	Inactive	Inactive	Inactive	Inactive	Unclear	Opposes measures to incentivise dietary change
Associated Chamber of Commerce & Industry (ASSOCHAM)	India	Cross-industry	<20,000	N/A	Mixed	Inactive	Inactive	Inactive	Inactive	Supports new coal and gas, as well as renewables
Business leadership South Africa (BLSA)	South Africa	Cross-industry	<50,00	N/A	Constructive	Obstructive	Inactive	Inactive	Inactive	N/A
European Chemical Industry Council (CEFIC)	EU	Chemicals	100,000-299,999	N/A	Unclear	Obstructive	Inactive	Unclear	Inactive	N/A
China National Food Industry Association (CNFIA)	Asia	Food & drink	<20,000	N/A	Inactive	Inactive	Inactive	Inactive	Inactive	N/A
Confederation of British Industry (CBI)	UK	Cross-industry	20,000-49,999	N/A	Mixed	Constructive	Inactive	Inactive	Inactive	Supports new fossil gas, as well as renewables
Confederation of Indian Industry (CII)	India	Cross-industry	<20,000	N/A	Mixed	Inactive	Inactive	Inactive	Inactive	Supports new fossil gas, as well as renewables
Consumer Goods Forum (CGF)	Global	Food & drink	50,000-99,999	N/A	Inactive	Inactive	Inactive	Inactive	Inactive	N/A
Corporate Leaders Group (CLG)	EU / UK	Cross-industry	20,000-49,999	N/A	Constructive	Inactive	Inactive	Inactive	Inactive	N/A
Cosmetics Europe (CE)	EU	Personal care	100,000- 299,999	N/A	Inactive	Inactive	Inactive	Inactive	Inactive	N/A
Dutch Employers' Federation (VNO-NCW)	Netherlands	Cross-industry	<100,000	N/A	Mixed	Inactive	Inactive	Inactive	Inactive	Supports new fossil gas, as well as renewables

	Geography	Sector	Annual financial payment (€)	Climate ambition / NDCs	Renewables / energy transition	Carbon pricing / markets	Regenerative agriculture and dairy	Non-fossil / net zero chemicals	Deforestation free	Other
EU Chamber of Commerce in China (EUCCC)	China	Cross-industry	<20,000	N/A	Mixed	Constructive	Inactive	Inactive	Inactive	Supports new fossil gas, as well as renewables
European Clean Trucking Alliance (ECTA)	EU	Transport & logistics	No membership fees	N/A	Inactive	Inactive	Inactive	Inactive	Inactive	Pushing for clean transportation policies
European Round Table for Industry (ERT)	EU	Cross-industry	20,000-49,999	N/A	Constructive	Obstructive	Inactive	Inactive	Inactive	N/A
Federation of Indian Chambers of Commerce & Industry (FICCI)	India	Cross-industry	<20,000	N/A	Mixed	Constructive	Inactive	Inactive	Inactive	Supports new coal and gas, as well as renewables
FoodDrinkEurope (FDE)	EU	Food & Drink	50,000-99,999	N/A	Inactive	Inactive	Constructive	Inactive	Constructive	Opposes measures to incentivise dietary change
Food Industry Asia (FIA)	Asia	Food & Drink	20,000-49,999	N/A	Inactive	Inactive	Inactive	Inactive	Inactive	N/A
German Chemical Industry Association (VCI)²⁶	Germany / EU	Chemicals	20,000-49,999	N/A	Mixed	Obstructive	Inactive	Constructive	Inactive	Supports new fossil gas, as well as renewables
Indonesian Chamber of Commerce and Industry (KADIN)	Indonesia	Cross-industry	<20,000	N/A	Constructive	Constructive	Inactive	Inactive	Inactive	N/A
International Association for Soaps, Detergents and Maintenance Products (AISE)	Global	Home Care	100,000 – 299,999	N/A	Inactive	Inactive	Inactive	Inactive	Inactive	N/A
National Business Initiative (NBI)	South Africa	Cross-industry	<20,000	N/A	Constructive/ Mixed	Inactive	Inactive	Inactive	Inactive	Supports new fossil gas (with extensive caveats), as well as renewables
Personal Care Products Council (PCPC)	USA	Personal Care	>300,000	N/A	Inactive	Inactive	Inactive	Inactive	Inactive	N/A
Sustainable Food Policy Alliance (SFPA)	USA	Food & Drink	100,000- 299,999	N/A	Constructive	Inactive	Constructive	Inactive	Constructive	N/A
Tennessee Chamber of Commerce & Industry (TCCI)	USA	Cross-industry	<20,000	N/A	Obstructive	Inactive	Inactive	Inactive	Inactive	Opposed to climate / net zero policies
World Business Council for Sustainable Development (WBCSD)	Global	Cross-industry	50,000-99,999	N/A	Constructive	Constructive	Constructive	Inactive	Constructive	Supports sustainability reporting and disclosure standards

²⁶ Indirect member via membership of IKW, The German Cosmetic, Toiletry, Perfumery and Detergent Association.

Appendix 1: Detailed industry association review, including actions to take

American Cleaning Institute (ACI)

Unilever role(s)	Member
Top line positions	High-level support for 1.5°C and net zero by 2050 ACI's top line messaging is supportive of the goal of limiting global warming to 1.5°C above pre-industrial levels. It states that it expects companies in the cleaning products industry and associated supply chain to "align their corporate climate strategy and targets with the 1.5°C ambition, which strives to reach net-zero global emissions by 2050." ²⁷ ACI expressed support for the US's re-entry into the Paris Agreement and has endorsed the Biden Administration's goal of achieving a 100% renewable/clean US electricity grid by 2035.
Detailed advocacy positions	ACI appears not to be actively engaged on climate policy beyond top line statements in support of the Paris Agreement and 1.5°C.
Alignment assessment	No misalignment with Unilever policy priorities or science-based policy
Engagement intensity	No meaningful engagement
Explanation	ACI's messaging on the need to limit global warming to 1.5°C is aligned with Unilever's, but its engagement on climate policy appears to be limited to top line statements.
More Information	View ACI's LobbyMap profile
Actions (to be) taken	Encourage ACI to increase its engagement on climate policy.

²⁷https://content.influencemap.org/site/data/001/328/ACI_Oct2023_NetZeroEmissions_Oct2023.pdf

Asociación Nacional de Empresarios de Colombia (ANDI)

Unilever role(s)	Member of the food industry, cosmetics & toiletries, and logistics chambers.
Top line positions	High-level support for 1.5°C and Colombia's NDC ANDI has voiced support for limiting warming to 1.5°C above pre-industrial levels, emphasising urgent action to limit GHG emissions reductions. ²⁸ It acknowledges that decarbonisation is a global priority and indicates support for Colombia's NDC of achieving a 51% emissions reduction by 2030 (relative to a business -as-usual scenario) and carbon neutrality by 2050. ²⁹
Detailed advocacy positions	Mixed position on the energy transition ANDI has highlighted Colombia's potential for renewable energy generation ³⁰ and signalled broad support for the energy transition. ³¹ It has also promoted legislation to support both green and blue hydrogen production. ³² However, ANDI has also opposed efforts to end new fossil fuel exploration and production. ³³ It actively promotes fossil gas as a key part of the energy mix going forward. ³⁴ Opposed the inclusion of natural gas in the carbon tax ANDI has called for natural gas to be excluded from Colombia's carbon tax and stressed the importance of Colombia having "a reliable and competitive supply of natural gas in the long term." ³⁵ It has previously also opposed applying a carbon tax to coal. Supports legislation to ensure quality carbon markets ANDI supports the regulation of carbon markets, emphasising the significance of carbon markets in Colombia due to the size of its AFOLU (Agriculture, Forestry and Other Land Use) sector. ANDI calls for political uncertainties to be addressed to ensure carbon markets are developed and aligned regionally and globally. ³⁶

²⁸<https://www.andi.com.co/Uploads/Present-CAA-1-2023-marzo-24-F.pdf>

²⁹https://issuu.com/andicolombia/docs/01_cartilla_co2_andi_espan_ol_bmm

³⁰<https://www.andi.com.co/Home/Noticia/17362-el-camino-hacia-la-transicion-energetica>

³¹[https://one.oecd.org/document/DAF/COMP/WP2/WD\(2022\)15/en/pdf](https://one.oecd.org/document/DAF/COMP/WP2/WD(2022)15/en/pdf)

³²<https://mascolombia.com/hidrogeno-clave-para-la-transicion-energetica-de-colombia/>

³³<https://www.infobae.com/colombia/2023/03/01/gremios-del-sector-energetico-hicieron-10-propuestas-a-gustavo-petro-para-regular-servicios-publicos/>

³⁴<https://www.andi.com.co/Uploads/INFORME%20PERSPECTIVAS%20ANDI%202023.pdf>

³⁵[https://www.andi.com.co/Uploads/2021-LaC%C3%A1mara-%20\(1\).pdf](https://www.andi.com.co/Uploads/2021-LaC%C3%A1mara-%20(1).pdf)

³⁶<https://www.andi.com.co/Uploads/Present-CAA-1-2023-marzo-24-F.pdf>

Alignment assessment	Misalignment in one Unilever policy priority area; partial misalignment with science-based policy
Engagement intensity	Low engagement
Explanation	<p>ANDI's top line messaging is generally supportive of climate policies and the Colombian Government's NDC. However, its detailed policy positions are more mixed.</p> <p>Its efforts to get gas and coal excluded from Colombia's carbon tax are not consistent with Unilever's advocacy for a meaningful price on carbon that reflects the full costs of climate change. However, its position on the need for regulation to support the development of high-quality carbon markets is consistent with Unilever's position on the need to implement Article 6 rules to develop carbon markets that drive ambition and scale investment while ensuring environmental integrity and avoiding double counting.</p> <p>Its support for new oil and gas means that ANDI is partially misaligned with science-based policy, though it does also support increasing renewable energy generation capacity.</p> <p>ANDI's overall engagement intensity on climate policy is relatively low. Very little evidence of ANDI actively engaging with government or media to promote policies aligned to Unilever's climate agenda during 2022-23 was found.</p>
More Information	View ANDI's LobbyMap profile
Actions (to be) taken	Encourage ANDI to be more active in promoting higher policy ambition and how Colombia can meet its net-zero target.

Associação Brasileira da Indústria de Alimentos* (ABIA)

* Brazilian Food Industry Association

Unilever role(s)	Board member
Top line positions	<p>Minimal mention of climate change in top-level messaging</p> <p>ABIA has expressed high-level commitment to reducing the food industry's environmental impact and acknowledged the need to shift from fossil fuels to renewables.³⁷ However, it makes very few explicit references to climate change and/or net zero in its public communications and has not taken a clear position on support for Paris-aligned decarbonisation policies.</p>
Detailed advocacy positions	<p>Unclear position on deforestation</p> <p>In its 2023 Annual Report, ABIA mentions that it responded to public consultations on deforestation policy in both the UK and US.³⁸ However, no detail of the positions taken in these consultation responses is available. ABIA has also spoken out in favour of biofuels production, arguing that this can be done alongside food production in a way that is mutually beneficial.³⁹ It does not appear to have a position on the potential deforestation risk associated with producing biofuels at scale.</p> <p>Opposition to dietary change</p> <p>ABIA strongly supports meat and dairy and opposes measures designed to incentivise a shift to a more plant-based diet.⁴⁰</p>
Alignment assessment	Unclear whether ABIA is aligned or not
Engagement intensity	No meaningful engagement
Explanation	<p>ABIA appears to be relatively inactive on climate policy. Its top-line messaging does not indicate misalignment, but equally it does not include clear backing for science-based policies to achieve the goals of the Paris Agreement.</p> <p>The only one of Unilever's climate policy priorities that ABIA appears to be active on is Deforestation.</p>

³⁷https://content.influencemap.org/site/data/001/322/ABIA_news_tetra_22.9.22_oct2023.pdf

³⁸https://content.influencemap.org/site/data/001/322/ABIA_annualreport2023_oct2023.pdf

³⁹https://content.influencemap.org/site/data/001/322/ABIA_president_taxreform_24.3.23_oct2023.pdf

⁴⁰https://content.influencemap.org/site/data/001/322/ABIA_C%C3%A2maradosDeputados_taxreform_11.05.23_oct2023.pdf

It discloses that it has responded to public consultations on proposed deforestation laws in the UK and US, but it has not disclosed the detail of its position, so no assessment can be made of whether it is aligned or not at this stage. Its opposition to policies that would incentivise dietary change and increased recycling rates indicate at least partial misalignment with science-based policy benchmarks.

More Information

View ABIA's [LobbyMap](#) profile

Actions (to be) taken

- Encourage ABIA to create a roadmap for decarbonisation.
- Request greater transparency regarding ABIA's position on deforestation policies.
- Encourage ABIA to create a Climate Committee.

Associated Chamber of Commerce & Industry (ASSOCHAM)

Unilever role(s)

Member

Top line positions

Support for India's Net Zero by 2070 target

ASSOCHAM has publicly backed the Paris Agreement and the Indian Government's Net Zero by 2070 target, though it does not appear to have lobbied for such a target prior to its adoption and has not called for ambition to be further increased.

Mixed position on energy transition

ASSOCHAM has made clear its support for increasing renewable energy capacity, electrifying mobility and green hydrogen production. However, it has also called for coal mining and natural gas infrastructure to be expanded.

Detailed advocacy positions

Support for new natural gas infrastructure

In a September 2022 memo to the Petroleum and Natural Gas Regulatory Board, ASSOCHAM expressed opposition to a clause that would exclude new fossil gas from the common carrier pipeline, pointing out that this conflicts with the Indian Government's promotion of gas infrastructure development and gas consumption.⁴¹

Alignment assessment

Misalignment in one Unilever policy priority area

Engagement intensity

Low engagement

Explanation

ASSOCHAM's top line messaging is generally supportive of climate policies and the Indian Government's Net Zero by 2070 target. However, its position on the role of gas and coal in the energy mix is not consistent with Unilever's goal of 100% decarbonised power systems for all countries by 2040 at the latest, despite the fact it also supports an expansion of renewable power generation.

ASSOCHAM appears not to have actively engaged with government or media on any of Unilever's other climate policy priorities during 2022-23.

More Information

View ASSOCHAM's [LobbyMap](#) profile

Actions (to be) taken

Encourage ASSOCHAM to be more active in promoting higher policy ambition.

Business Leadership South Africa (BLSA)

Unilever role(s)

Council member

Top line positions

Support for South Africa's NDC and a just transition

BLSA has expressed strong support for South Africa's commitment to achieve net zero by 2050 and has recognised both the scientific and moral imperative to reduce emissions. It supports a focus on social justice and inclusion in the way the transition is delivered – for example ensuring low-income households and small businesses benefit from incentives to install rooftop solar panels.⁴²

Detailed advocacy positions

Support for policy to accelerate deployment of renewables

BLSA has consistently spoken out in favour of policies to incentivise faster deployment of renewables throughout 2022-23. In particular, it supports the Renewable Energy Independent Power Producers Programme (REIPPP) and has called for reforms to speed up the process of adding new renewable capacity to the grid.⁴³ It also supports enhanced incentives for rooftop solar and the introduction of a feed-in tariff or renewables.⁴⁴

⁴²https://content.influencemap.org/site/data/001/215/BLSA_CEO_Newsletter_Feb20th_2023_AccessedMay23.pdf

⁴³https://content.influencemap.org/site/data/000/960/BLSA_CEO_Post_Feb22_AccessedApr22.pdf

⁴⁴https://content.influencemap.org/site/data/001/215/BLSA_CEO_Newsletter_Feb23_AccessedMay23.pdf

⁴¹https://content.influencemap.org/site/data/001/326/ASSOCHAM_PNGRB_Letter_Sep22.pdf

Calling for carbon prices to be kept lower for longer
While BLSA expresses overall support for South Africa's carbon tax, it issued a joint statement alongside other South African industry associations in September 2022 calling on the Government to slow down proposed increases in the carbon tax rate until after 2035 and, to retain free allowances for businesses in hard-to-abate sectors until 2030.⁴⁵

Alignment assessment

Misalignment in one Unilever policy priority area

Engagement intensity

No meaningful engagement

Explanation

BLSA's top line messaging is generally supportive of climate policies and the South African Government's Net Zero by 2050 target. Its consistent support for policies that would incentivise faster deployment of renewables is aligned with Unilever's position.

The one area where BLSA's lobbying during 2022-23 appears to be misaligned is on carbon pricing. Its opposition to raising carbon prices in the near term is not consistent with the goal of ensuring a meaningful price on carbon that reflects the full costs of climate change. Implementation of its recommendations would lead to lower carbon prices for companies covered by South Africa's carbon tax than if its proposals were not adopted.

More information

View BLSA's [LobbyMap](#) profile

Actions (to be) taken

Climate policy has to date not been a focus of Unilever's relationship with BLSA. In 2024, we will look for appropriate opportunities to partner more closely with BLSA on climate policy.

European Chemical Industry Council (CEFIC)**Unilever role(s)**

Member of climate change and energy programme council

Top line positions**Support for EU Green Deal (with a preference for an Inflation reduction act-style approach that makes Europe attractive for industry investment)**

CEFIC has consistently expressed top-line support for the EU Green Deal and the goal of achieving climate neutrality by 2050. Its July 2023 Manifesto for the 2024-2029 EU legislative term calls on the European Commission to develop the business case for private sector investments in Europe's industrial transformation and to avoid 'overly-detailed regulation'.⁴⁶ It has criticised the European Commission's Net Zero Industry Act proposals for focusing too narrowly on net zero technologies and advocated for a "technology neutral" approach.⁴⁷ It also advocates scaling up supply of renewable and circular carbon feedstocks.⁴⁸

Detailed advocacy positions**Negative position on EU Emissions trading system (ETS) reform and the phase-in of a carbon border adjustment mechanism (CBAM)**

CEFIC has pushed for an extension of free allowances under the EU ETS and a slower phase-in of CBAM. It has opposed proposals to a) increase the ETS's Linear Reduction Factor (the rate at which the cap on GHG emissions decreases annually) and b) reduce the cap on total GHG emissions to zero by 2039.⁴⁹

Mixed positions on natural gas and chemical industry feedstocks

CEFIC has opposed regulation that would mandate the blending of hydrogen and natural gas on the grounds that this would make adaptations to industrial installations in the chemicals sector necessary, which, it argues, would undercut the industry's competitiveness. It has expressed support for a gradual phase-out of fossil gas, but argues that this phase-out should be "market-driven".⁵⁰ Its response to the EU's Public Consultation on Certification of Carbon Removals in May 2022 advocated for CCU and CCS to be deployed as soon as possible and emphasised the role of bio-based feedstocks in reducing the chemical industry's GHG emissions.⁵¹ However, Cefic's position on how avoided emissions from CCU and CCS should be treated is ambiguous: it seems to argue that they should receive the same recognition as carbon removed from the atmosphere through bioenergy with carbon capture and storage (BECCS) or Direct Air Capture and Storage (DACCS). Treating avoided emissions as equivalent to carbon removed from the atmosphere is not consistent with the IPCC's guidance on what is required to achieve a 1.5°C trajectory.

⁴⁶https://content.influencemap.org/site/data/001/046/JointCarbonTaxPressRelease_Sept22_AccessedSept22.pdf

⁴⁷https://content.influencemap.org/site/data/001/304/Cefic_Manifesto_07.2023_Aug2023.pdf

⁴⁸https://content.influencemap.org/site/data/001/218/Cefic_PositionPaper_NZIA_25.05.2023_Jun2023.pdf

⁴⁹https://content.influencemap.org/site/data/001/304/Cefic_Manifesto_07.2023_Aug2023.pdf

⁵⁰<https://lobbymap.org/evidence/aa1a3b704e5ea1cf16ca3414542d0a76>

⁵¹https://content.influencemap.org/site/data/000/980/cefic_comment-ECadoption_gaspackage_1.4.22_jun2022.pdf

⁴⁵https://content.influencemap.org/site/data/001/046/JointCarbonTaxPressRelease_Sept22_AccessedSept22.pdf

Alignment assessment	Misalignment in one Unilever policy priority area; potential misalignment in two others
Engagement intensity	High engagement
Explanation	<p>CEFIC's top line messaging is generally supportive of Paris-aligned policy action and the EU Green Deal. However, its detailed advocacy is not always consistent with this. Very little evidence of CEFIC actively pushing recommendations that would increase the ambition and effectiveness of EU climate policies was found.</p> <p>CEFIC's lobbying on the EU ETS and CBAM is judged to be misaligned with Unilever's goal of ensuring a meaningful price on carbon that reflects the full costs of climate change. This is because adoption of its proposals would lead to the carbon price paid by industries covered by the EU ETS remaining lower for longer compared with a scenario in which its proposals were not implemented.</p> <p>CEFIC's preference for a "market-driven" approach to electricity grid decarbonisation and transitioning away from natural gas is likely to be insufficient for achieving the goals of reaching 100% decarbonised power systems by 2035 and eliminating fossil fuel feedstocks used in certain products by 2030. However, in the absence of clarity about what "market-driven" means for the pace of the energy transition and chemical industry decarbonisation, the assessment of whether this position constitutes misalignment is inconclusive.</p>
More information	View CEFIC's LobbyMap profile
Actions (to be) taken	As a member of CEFIC, we have actively participated, as part of their working groups, to change their positions to be more aligned with our priorities. We will continue to encourage CEFIC – directly and within working groups – to play a constructive role in offering solutions that will accelerate the reduction of GHG emissions from the chemical sector. We will encourage CEFIC – directly and within working groups – to further develop policy proposals that will help increase the uptake of renewable and recycled carbon feedstocks through working groups and direct conversations.

China National Food Industry Association (CNFIA)

Unilever role(s)	Member of sustainability committee
Top line positions	<p>High-level support for China's climate goals</p> <p>CNFIA has expressed support for China's "double carbon goal": ensuring emissions peak by 2030 and reach carbon neutrality by 2060.⁵² It does not appear to have a position on what policy or regulatory measures are required to enable the food industry to meet these goals.</p>
Detailed advocacy positions	No evidence of specific climate-related lobbying by CNFIA was found.
Alignment assessment	No misalignment with Unilever policy priorities or science-based policy
Engagement intensity	No meaningful engagement
Explanation	CNFIA appears not to be engaged on climate policy beyond top line support of the Paris Agreement.
More information	CNFIA's LobbyMap profile
Actions (to be) taken	We will engage CNFIA to explore the possibility of setting up a project to develop a policy roadmap to help the food sector contribute to China's double carbon goal.

⁵²https://content.influencemap.org/site/data/001/323/Food_Industry_Corporate_Social_Responsibility_Report_Feb_2022.pdf

Confederation of British Industry (CBI)

Unilever role(s)	General member
Top line positions	<p>Demands clearer policies for implementing net zero by 2050</p> <p>Over the last two years, CBI has consistently called on the UK Government to set out clear short- and long-term plans for achieving net zero. This is the case both in direct consultation responses to government (for example its contribution to the Net Zero Review in October 2022⁵³) and in public messaging. It has emphasised the need for Government to respond to the Inflation Reduction Act and EU Green Deal to make the UK attractive for private investment in the net zero transition.⁵⁴</p>
Detailed advocacy positions	<p>Support for policies that would accelerate expansion of UK renewable energy capacity</p> <p>CBI supports decarbonisation of the energy sector, with particular emphasis on the need for regulatory and planning reform to support grid decarbonisation. For example, in its response to the Net Zero Review it argued for Ofgem (the UK's energy market regulator) to be given a statutory duty to achieve the UK's net zero target, which would encourage it to take a more proactive approach to incentivising upgrades to the network to enable renewable capacity to be added faster.⁵⁵</p> <p>Supports both carbon pricing and incentives for investment in clean technologies</p> <p>CBI has called on the UK Government to use the tax system to discourage environmentally harmful activities and help internalise externalities. Concretely, it has called for a review of the tax system to ensure alignment with net zero ambitions to take place within the first year after the next election, with changes to start being implemented no later than April 2027.⁵⁶ It is broadly supportive of the UK's Emissions Trading Scheme (ETS) and a "carefully designed" Carbon Border Adjustment Mechanism (CBAM) to address carbon leakage.⁵⁷ It has also called for Contracts for Difference (CfDs) to be introduced for hydrogen, carbon capture and sustainable aviation fuel.⁵⁸</p>

⁵³https://content.influencemap.org/site/data/001/297/CBI_corporate_website_net_zero_review_22.10.22_August_2023.pdf

⁵⁴https://content.influencemap.org/site/data/001/260/CBI_Mar2023_paper-unlocking-net-zero-investment_Aug2023.pdf

⁵⁵https://content.influencemap.org/site/data/001/297/CBI_corporate_website_net_zero_review_22.10.22_August_2023.pdf

⁵⁶https://www.cbi.org.uk/media/pplbtdca/12820_green_growth_report.pdf

⁵⁷Ibid.

⁵⁸https://content.influencemap.org/site/data/001/261/CBI_Jan2023_sporting-cfds-hydrogen-mixed_Aug2023.pdf

	<p>Support for expansion of fossil gas</p> <p>In April 2023, CBI, as a member of the B7, was party to a joint recommendation to G7 policymakers that included a call for governments to 'continue to enable investment in natural gas production and delivery to the global markets.'⁵⁹ BusinessEurope, of which CBI is a member, has repeatedly called for the EU to invest in deployment of additional natural gas capacity (as well as renewables).⁶⁰</p>
Alignment assessment	No misalignment on Unilever's policy priorities but partial misalignment with science-based policy
Engagement intensity	Moderate engagement
Explanation	<p>CBI's top line messaging is consistently supportive of the UK's net zero by 2050 target and it is relatively engaged on climate policy. It has repeatedly called on the UK Government to set out clear delivery plans for sectors and develop near-term policies to shift financial flows towards net zero, as well as providing long-term policy certainty to give businesses the confidence to invest in green technologies. Despite this, CBI's support for investment in new fossil gas production and infrastructure means that it is partially misaligned with science-based policy.</p> <p>Taken as a whole, if CBI's climate-related policy recommendations were to be implemented in full, this would positively impact Unilever's ability to deliver its Climate Transition Action Plan (CTAP).</p>
More information	View CBI's LobbyMap profile
Actions (to be) taken	Encourage CBI to double down on its pro-climate agenda and increase its engagement intensity on net zero policy both before and after the next UK General Election.

⁵⁹https://content.influencemap.org/site/data/001/199/b7tokyosummit_jointrecommendation_2023-04-20_apr2023.pdf

⁶⁰https://content.influencemap.org/site/data/001/084/businessseurope_stockholmdeclaration_councilpresidents_2022-11-25_nov2022.pdf

Confederation of Indian Industry (CII)

Unilever role(s)	Member of national committee on environment
Top line positions	<p>Support for India's net zero by 2070 target CII has publicly backed the Indian Government's Net Zero by 2070 target and has called for 'swift action in implementing low carbon technologies' and the establishment of 'an effective and predictable policy environment that acts as a catalyst in meeting respective NDC targets.'⁶¹</p> <p>Support for renewables – but also gas CII's view on the energy transition was set out in a detailed policy briefing in April 2022, in which it promotes policies to accelerate deployment of renewables, but also advocates for an enhanced role for gas in India's energy transition.⁶² CII has also advocated for enabling regulation and policy to promote resource efficiency and voiced a need for affordable, scalable renewable energy options through a 2023 B20 India Communique.⁶³</p> <p>In a report setting out an Indian industry perspective on priorities for COP28, CII highlighted the need for clean electrification and lower-carbon fuel adoption for India to meet its climate goals.⁶⁴</p>
Detailed advocacy positions	<p>Recommendations for incentivising green hydrogen production During 2023, green hydrogen has been a focus for CII. For example, in a January 2023 OpEd, the CII's Director General called for a production-linked incentive scheme for electrolysers and a focus on making India a hub for green hydrogen.⁶⁵ CII published a detailed policy briefing on turning India into a global leader on green hydrogen in August 2023.⁶⁶</p>
Alignment assessment	No misalignment on Unilever's policy priorities but partial misalignment with science-based policy
Engagement intensity	Moderate engagement

⁶¹https://content.influencemap.org/site/data/001/346/CII_Blog_March2023_AccessedDec2023.pdf

⁶²<https://content.influencemap.org/site/data/000/964/77954.CIIPolicyWatchApril2022.pdf>

⁶³https://content.influencemap.org/site/data/001/347/CII_B20Communique_PolicyRecommendationstotheG20_2023_AccessedDec2023p54-60.pdf

⁶⁴https://content.influencemap.org/site/data/001/346/CII-COP-28-Report_Dec2023p8-13.pdf

⁶⁵https://content.influencemap.org/site/data/001/111/CII_Investment_and_consumption_need_special_attention- The New Indian Express_Jan2023.pdf

⁶⁶https://content.influencemap.org/site/data/001/313/CII_Policy_GreenHydrogen_Aug2023_Sep2023.pdf

Explanation

CII's top line messaging is generally supportive of climate policies and the Indian Government's Net Zero by 2070 target. It has advocated for specific measures to promote green hydrogen production and increase renewable energy installed capacity.⁶⁷

CII has expressed support for gas as a necessary transition fuel for India.⁶⁸ This means it is not fully aligned with the IPCC's assessment of what is required to achieve a 1.5°C trajectory.

CII appears not to have actively engaged with government or media on any of Unilever's other climate policy priorities during 2022-23.

More information

View CII's [LobbyMap](#) profile

Actions (to be) taken

CII has made a number of positive policy positions and is active on the ground. We will recommend to CII that it improves on how it discloses its engagement, for example on its website, so that its positive influence can be properly recognised.

Consumer Goods Forum (CGF)

Unilever role(s)	Member of all workstreams
Top line positions	<p>High-level support for 1.5°C CGF's messaging on climate change is consistently supportive of the Paris Agreement and the goal of limiting warming to 1.5°C. Its Net Zero Playbook for Consumer Industries, published in 2022, promotes a wide range of climate solutions, including regenerative agriculture, deforestation-free production, circular economy models and fleet electrification.⁶⁹ Through its Forest Positive Coalition (of which Unilever is a member), CGF has taken a strong and detailed position on tackling commodity-driven deforestation and has pushed upstream businesses to increase the ambition of their plans in this area.⁷⁰</p>
Detailed advocacy positions	No evidence of specific climate-related policy engagement by CGF was found.

⁶⁷<https://lobbymax.org/score/Confederation-of-Indian-Industry-CII-O9-D6>

⁶⁸<https://content.influencemap.org/site/data/000/964/77954.CIIPolicyWatchApril2022.pdf>

⁶⁹https://content.influencemap.org/site/data/001/325/ConsumerGoodsForum_Nov2022_NetZeroPlaybook_Oct2023.pdf

⁷⁰https://www.theconsumergoodsforum.com/press_releases/forest-positive-coalition-of-action-responds-to-cop27-agriculture-sector-roadmap-to-1-5c/

Alignment assessment	No misalignment with Unilever policy priorities or science-based policy
Engagement intensity	No meaningful engagement ⁷¹
Explanation	CGF's headline messaging on the need for urgent, ambitious climate action is fully aligned with both Unilever and the international scientific consensus. However, climate-related activities appear to focus exclusively on enabling voluntary action rather than driving policy change.
More information	View CGF's LobbyMap profile
Actions (to be) taken	CGF has played a vital role in advocating for climate action within the private sector, for example, CGF has led an effort to increase the number of CGF members to join the UNFCCC Race to Zero, which has seen a 40% increase since COP26. CGF is also creating a Net Zero Coalition of Action to further increase industry action. We will explore with CGF how we can better leverage the network to continue advancing the goals of the Paris Agreement, respecting the fact that CGF's role to date has not been explicitly to engage governments and policy makers on climate issues.

Corporate Leaders Group (CLG)

Unilever role(s)	Member
Top line positions	<p>Support for UK net zero policy</p> <p>Throughout 2022 and 2023, CLG has issued statements encouraging the UK Government to stick to its commitment to Net Zero by 2050 and to develop more concrete short-and-long-term plans to deliver on that commitment. In a March 2023 briefing it provided concrete recommendations for doing so.⁷² It has pushed back against net zero "sceptics" and criticised the UK Government's announcement in September 2023 that the Government was weakening or delaying policies that had previously been agreed as part of the UK's Net Zero Roadmap.</p>

⁷¹CGF's messaging highlights the need for ambitious climate action. However, CGF focuses on voluntary action within the business sector rather than driving direct policy change

⁷²https://content.influencemap.org/site/data/001/134/CLG_briefing_UK_net_zero_03.03.2023_March_2023.pdf

Top line positions	<p>Support for greater investment in renewables</p> <p>CLG has consistently called on the European Commission to accelerate investment in renewables and endorsed an ambitious and effective Fit for 55 package (the EU's flagship climate legislation during this period). In May 2022, the CLG called on the EU to take concrete measures to speed up the transition away from fossil fuel dependence arguing that investment in renewable energy infrastructure is the best way of addressing the twin challenge of enhancing energy security and affordability.⁷³</p>
Detailed advocacy positions	<p>Support for strengthened ambition in the EU Renewable Energy Directive</p> <p>CLG, alongside several other organisations, issued a joint letter in March 2023 calling for the EU Renewable Energy Directive to set a binding EU renewable energy target of at least 45% by 2030. This was more ambitious than the proposal at the time (which was for a 40% by 2030 target).⁷⁴ The EU Parliament and Council subsequently reached a provisional agreement to raise the binding renewable energy target to at least 42.5% by 2030.⁷⁵</p>
Alignment assessment	No misalignment with Unilever policy priorities or science-based policy
Engagement intensity	High engagement
Explanation	<p>CLG's top line messaging and detailed advocacy on specific policies are both consistently aligned with Unilever's position and a science-based policy agenda.</p> <p>Given the background of events in the EU and UK during 2022 and 2023, a significant proportion of CLG's advocacy during this time period has focused on trying to prevent Government backsliding on climate policy.</p> <p>Apart from the examples cited above, most of CLG's advocacy during 2022-23 was about support for ambitious climate policy <i>in general</i> rather than detailed engagement on <i>specific</i> policies.</p>
More information	View CLG's LobbyMap profile
Actions (to be) taken	No action required.

⁷³https://content.influencemap.org/site/data/000/984/CLG_lettersignatoriesupdates_130522_May2022.pdf

⁷⁴https://content.influencemap.org/site/data/001/208/CLG_joint_letter_RED_23.03.2023_May_2023.pdf

⁷⁵https://ec.europa.eu/commission/presscorner/detail/en/IP_23_2061

Cosmetics Europe (CE)

Unilever role(s)	Member (Head of Regulatory Affairs) previously sat on the board of directors and acted as chair of the active corporate members committee, but individual has left Unilever).
Top line positions	<p>Minimal mention of climate change in top-level messaging</p> <p>Cosmetics Europe appears to be broadly supportive of the EU Green Deal agenda, including the goal of achieving net zero GHG emissions by 2050, but climate change does not feature prominently in its public messaging. It appears to be more active on circular economy policies such as the EU's Packaging and Packaging Waste Regulation and Ecodesign for Sustainable Products Regulation.⁷⁶</p>
Detailed advocacy positions	No evidence of specific climate-related lobbying by Cosmetics Europe was found.
Alignment assessment	No misalignment with Unilever policy priorities or science-based policy
Engagement intensity	No meaningful engagement
Explanation	Cosmetics Europe appears not to be engaged on climate policy beyond top line support for the EU Green Deal.
More information	View Cosmetics Europe's LobbyMap profile
Actions (to be) taken	<p>We do not believe that, at the moment, Cosmetics Europe should set up a specific workstream on climate. This is due to prioritising other issues.</p> <p>We will encourage Cosmetics Europe to address climate via current workstreams and how its positions on packaging and eco-design will enable the transition to net zero.</p>

⁷⁶https://content.influencemap.org/site/data/001/323/CosmeticsEurope_Jun2023_AnnualReport2022_Oct2023.pdf

Dutch Employers' Federation (VNO-NCW)

Unilever role(s)	Head of Unilever Netherlands, General Manager Nutrition Unilever Europe and METR/ANZ is on the general and daily board
Top line positions	<p>Support for Dutch and EU GHG emissions targets for 2030 and 2050</p> <p>VNO-NCW has consistently expressed support for both EU and Dutch climate targets and publicly called on Dutch policymakers to take concrete, near-term action to meet 2030 GHG reduction targets.⁷⁷</p> <p>Concerned about the costs of transition for Dutch businesses</p> <p>VNO-NCW's messaging on climate action – and its positions on actual policy measures – is tempered by its overriding objective to maintain the competitiveness of Dutch industry and ensure the Netherlands remains an attractive destination for investment.</p>
Detailed advocacy positions	<p>Strong support for renewables, hydrogen and CCS – but also gas</p> <p>During 2022-23, VNO-NCW has repeatedly called for accelerating permitting and tendering processes to enable a faster rollout of low-carbon electricity and hydrogen production capacity, and carbon storage infrastructure.⁷⁸ However, it has also repeatedly called on the Dutch Government during 2022-23 to increase gas production in the North Sea and build new liquefied natural gas (LNG) infrastructure, as a means of breaking the Netherlands' dependency on Russian gas.⁷⁹ It also lobbied against a proposed tax on gas in May 2023.⁸⁰ And, in November 2022, it criticised the Dutch government's plan to withdraw export support for Dutch companies financing gas projects in developing countries.⁸¹</p> <p>Conditional support for carbon pricing</p> <p>VNO-NCW has acknowledged both the EU ETS and the Netherlands' own carbon tax as being drivers of decarbonisation. Though historically (pre-2022), it had opposed reforms to the EU ETS, VNO-NCW appears now to have accepted the latest iteration of carbon pricing policy in both the EU and the Netherlands.</p>

⁷⁷https://content.influencemap.org/site/data/001/323/VNO-NCW_Aug2023_OpenLetter_Oct2023.pdf

⁷⁸https://content.influencemap.org/site/data/001/214/VNONCW_Apr2023_ImplementingClimatePolicy_May2023.pdf

⁷⁹https://content.influencemap.org/site/data/000/978/vnoncw_PR_europe-gas_31.5.22_may2022.pdf

⁸⁰https://content.influencemap.org/site/data/001/215/VNONCW_May2023_EnergyTax_May2023.pdf

⁸¹https://content.influencemap.org/site/data/001/075/VNONCW_PR_FF-financing_3.11.22_nov2022.pdf

In response to the ETS and national carbon tax, it has called on the Dutch government to accelerate investment in energy transition technologies and infrastructure to help businesses reduce their emissions.⁸² It has also expressed support for removing fossil fuel subsidies, though it raises concerns about the potential for carbon leakage, arguing that international agreements on both carbon pricing and the removal of fossil fuel subsidies are essential.⁸³

Mixed positions on other climate policies

VNO-NCW takes broadly positive positions on key Dutch climate policies such as mandates for heat pumps and zero-emission vehicles.⁸⁴ In 2022, however, VNO-NCW lobbied against a proposal to phase out tax exemptions for commercial vans in order to incentivise switching to EVs, arguing this would increase costs for Dutch businesses.⁸⁵ It also opposed a separate proposal to introduce a purchase tax on diesel delivery vans from 2025.⁸⁶

Alignment assessment

No misalignment on Unilever's policy priorities but partial misalignment with science-based policy

Engagement intensity

Moderate engagement

Explanation

VNO-NCW's top line messaging is consistently supportive of both the Dutch Government's and the EU's climate targets. However, its support for developing new fossil fuel infrastructure in the Netherlands and in developing economies is not fully aligned with the IPCC's assessment of what is required to achieve a 1.5°C trajectory, despite the fact it also strongly supports accelerating the deployment of renewables.

During 2022-23, VNO-NCW has been largely passive in other areas of climate policy. It has moderated its previous (pre-2022) opposition to EU ETS reforms that would increase the carbon price paid by companies, moving to a position of acceptance of current EU and Dutch carbon pricing policies.

More information

View VNO-NCW's [LobbyMap](#) profile

Actions (to be) taken

We will ask VNO-NCW to develop and publish a roadmap that sets out how industry can deliver the Dutch and EU climate targets, and the levers that need to be pulled by policy makers to deliver the transition, including the EU ETS.

EU Chamber of Commerce in China (EUCCC)

Unilever role(s)

Member; a Unilever senior executive is chair of the EUCCC's Shanghai agriculture, food and beverage Working Group

Top line positions

Strong support for China's NDC – and for enhancing ambition

EUCCC has consistently expressed support for China's goal of achieving carbon neutrality by 2060 and peak emissions by 2030. It has also signaled support for increasing the ambition of China's climate policies. In a 2022 report, it cited studies showing that bringing forward China's net zero target date could have additional socio-economic benefits and make the transition cheaper.⁸⁷ It also advocated for clear, binding targets and a coordinated nationwide approach to enforcement of environmental regulations.

Detailed advocacy positions

Support for carbon pricing policy

EUCCC appears to be broadly supportive of China's Emissions Trading Scheme (ETS). In 2022, it called for both an absolute cap on emissions and a progressive tightening of emissions caps in China's national ETS as a way to facilitate higher carbon prices.⁸⁸ In 2023, a paper from EUCCC's Petrochemicals, Chemicals and Refining Working Group expressed concern about delays to the planned expansion of China's ETS to cover high emitting sectors such as aluminium, cement and petrochemicals, due to poor quality data.⁸⁹ Prior to this, EUCCC had also expressed support for measures to enhance the accuracy and transparency of carbon emissions Monitoring, Reporting, and Verification (MRV) to align with international standards.⁹⁰

⁸²https://content.influencemap.org/site/data/001/346/VNONCW_Oct2023_ImplementingClimatePlan_Dec2023.pdf

⁸³https://content.influencemap.org/site/data/001/343/VNO-NCW_Sep2023_ThijssenOnClimate_Dec2023.pdf

⁸⁴<https://www.vno-ncw.nl/standpunten/fossiele-subsidies>

⁸⁵https://content.influencemap.org/site/data/001/346/VNONCW_Dec2023_ClimateAgreementEnergyTransition_Dec2023.pdf

⁸⁶https://content.influencemap.org/site/data/001/343/VNO-NCW_Sep2023_ThijssenOnClimate_Dec2023.pdf

⁸⁷https://content.influencemap.org/site/data/000/975/VNO-NCW_PR_vanstaxNL_23.5.22_may2022.pdf

⁸⁸https://content.influencemap.org/site/data/001/062/VNO-NCW_PR_dieseltax_26.9.22_oct2022.pdf

⁸⁹https://content.influencemap.org/site/data/001/331/EUCCC_report_2022_p16_17.pdf

⁹⁰https://content.influencemap.org/site/data/001/331/EUCCC_report_2022_p26.pdf

⁹¹https://content.influencemap.org/site/data/001/331/EUCCC_Chemistry_Sep2023.pdf

⁹²https://content.influencemap.org/site/data/001/331/EUCCC_Energy_Sep2022.pdf

Support for renewables – but also gas

EUCCC has advocated for accelerating the integration of renewable energy into the grid and increasing the share of renewables in China's energy mix. However, it also strongly supports gas as a transition fuel. Its Energy Working Group published position papers in both 2022 and 2023, in which speeding up the shift from coal to gas in China's energy mix is promoted as a top priority.⁹¹

Alignment assessment

No misalignment on Unilever's policy priorities but partial misalignment with science-based policy

Engagement intensity

Low engagement

Explanation

EUCCC's top-line messaging on the need for increased climate ambition is aligned with Unilever's position on the need for strengthened, high quality NDCs. Its calls for ETS expansion and a tightening of emissions caps to drive up carbon prices is also consistent with Unilever's position on the need for a meaningful price on carbon.

While EUCCC supports accelerating the rollout of renewables, it is also a strong supporter of gas as a transition fuel in China. This position is not fully aligned with the IPCC's assessment of what is required to achieve a 1.5°C trajectory.

Overall, the majority of EUCCC's engagement on climate policy is positive, though its engagement intensity to promote this agenda could be higher.

More information

View EUCCC's [LobbyMap](#) profile

Actions (to be) taken

Write to EUCCC, encouraging them to increase engagement intensity in the areas where it is aligned with Unilever and has a track record of calling for higher ambition (e.g., carbon pricing, renewables).

European Clean Trucking Alliance (ECTA)**Unilever role(s)**

Direct member

⁹¹https://content.influencemap.org/site/data/001/331/EUCCC_Energy_Sep2022.pdf;
https://content.influencemap.org/site/data/001/331/EUCCC_Energy_Sep2023.pdf

Top line positions**Strong support for EU Climate targets and policies**

ECTA has consistently advocated in favour of the EU Green Deal and given strong support to the target of reducing GHG emissions by 55% by 2030 and achieving climate neutrality by 2050. It recognises the importance of decarbonising the trucking industry for achieving these goals and advocates for policies and regulations affecting the industry to be aligned with what is necessary to achieve them.

Detailed advocacy positions**Actively pushing for policies to enable a faster transition to zero-emission trucks (ZETs) – and opposing the introduction of potential loopholes**

In 2022-23, ECTA responded to consultations on the EU heavy-duty CO₂ emission standards calling for higher ambition. Specifically, it proposed a 2035 phase-out target for internal combustion engine heavy-duty vehicles in the EU and a target for ZETs to constitute at least 65% of sales by 2030. It pushed back against proposals to loosen the criteria for what types of vehicle are incentivised, arguing that dual-fuel vehicles running on diesel should not be included. It also advocated for ambitious charging infrastructure targets and various other enabling policies.⁹²

Alignment assessment

No misalignment with Unilever policy priorities or science-based policy

Engagement intensity

Moderate engagement

Explanation

ECTA's top line messaging, as well as its detailed engagement on specific policies, is consistently aligned with a science-based policy agenda. It has not only supported the EU's 2030 and 2050 climate targets but pushed for strengthened ambition in specific policies affecting the trucking industry.

Its engagement intensity has been rated as moderate despite only receiving a 15% engagement intensity score from InfluenceMap. This adjustment reflects the fact that ECTA's narrow focus limits how highly it can score under InfluenceMap's engagement intensity scoring methodology.*

Overall, if ECTA's policy recommendations were to be implemented in full, this would positively impact Unilever's ability to deliver its Climate Transition Action Plan (CTAP).

*Because ECTA only engages on policies related to the trucking industry, it is inactive on other aspects of climate policy which are not part of its remit. InfluenceMap counts this inactivity towards its overall engagement intensity score, which brings that score down.

⁹²https://content.influencemap.org/site/data/001/330/ECTA_HDV_ReactionPaper-May23_Accessed-Nov23.pdf

More information View ECTA's [LobbyMap](#) profile

Actions (to be) taken None required

European Round Table for Industry (ERT)

Unilever role(s) Member of:

- Antitrust working group
- Tax working group
- ED&I and Corporate Comms working group

Top line positions **High-level support for the EU Green Deal**
ERT has issued statements in support of the EU's goal of achieving climate neutrality by 2050 and a 55% reduction in GHG emissions by 2030. In 2022, it supported the European Commission's RePowerEU plan to end European dependence on Russian fossil fuels. It called for a swift adoption of the EU Renewable Energy Directive (RED) and strengthening the provisions of the EU Energy Efficiency Directive (EED).⁹³

Detailed advocacy positions **Constructive engagement on the EU's response to the US inflation reduction act**
The competitiveness of European industry is a key concern for ERT. It has endorsed proposals for an EU Green Deal Industrial Plan that responds to the US Inflation Reduction Act. It has called for funding to support the decarbonisation of energy-intensive industries (in addition to boosting the production of clean technologies) to be included in the proposed EU Net Zero Industry Act. It also called for investment in strategic industrial projects in areas such as wind, solar, heat pumps, energy storage, hydrogen and innovative materials.⁹⁴

Negative position on EU emissions trading system (ETS) reform and the phase-in of a carbon border adjustment mechanism (CBAM)

ERT called for a review of ETS CBAM reform proposals included in the EU's Fit for 55 package in the wake of Russia's invasion of Ukraine. In October 2022, ERT published a special report on European industrial competitiveness in which it called for electro-intensive industries to be protected from the effect of high carbon prices through CO₂ cost compensation measures and

described the gradual withdrawal of ETS free allowances while CBAM is phased in as "very problematic"⁹⁵ ERT justified these objections on the grounds that high carbon prices pose a threat to the competitiveness of European industry.

Alignment assessment Misalignment in one Unilever policy priority area

Engagement intensity Low engagement

Explanation ERT's top line messaging is generally supportive of the EU's climate agenda – as are the majority of its detailed positions on specific policies. In line with Unilever's priorities, ERT has been a consistent advocate of policies to boost renewable energy and industrial decarbonisation (including for the chemicals industry).

The one area where ERT's lobbying during 2022-23 appears to be misaligned is on carbon pricing. Its proposals for CO₂ cost compensation and its implied opposition to tapering the free allocation of ETS allowances would mean the actual cost of emitting carbon (for companies covered by the EU ETS) would remain lower for longer than if its proposals were not adopted.

ERT's concerns about the impact on competitiveness and the problem of carbon leakage may be justified, but its proposals fail to address these concerns in a way that is consistent with the goal of pricing GHG emissions at a level that reflects the full costs of climate change.

ERT appears not to have actively engaged with government or media on any of Unilever's other climate policy priorities during 2022-23.

More information View ERT's [LobbyMap](#) profile

Actions (to be) taken Encourage ERT to continue to engage constructively on the Green Deal. Explore how ERT can revise its position on ETS.

⁹³https://content.influencemap.org/site/data/000/973/ERT_corporate_website_EU_energy_May_2022_May_2022.pdf

⁹⁴https://content.influencemap.org/site/data/001/121/ERT_letter_to_EU_Council_Green_Deal_Industrial_Plan_February_2023_February_2023.pdf

⁹⁵https://content.influencemap.org/site/data/001/084/ERT_corporate_website_EU_climate_October_2022_November_2022.pdf

Federation of Indian Chambers of Commerce & Industry (FICCI)

Unilever role(s)	Member of Resource Efficiency and Circular Economy Industry Coalition (RECEIC)
Top line positions	<p>Support for India's NDC / Net Zero by 2070 commitment FICCI is a member of the Ministry of Environment, Forest and Climate Change's NDC Implementation Committee and the Sub Committee on Mitigation.⁹⁶ However, it has not disclosed any details about the recommendations it has made in its capacity as a member of these committees. It does support the Indian Government's Net Zero by 2070 target, though it does not appear to have lobbied for such a target prior to its adoption and has not called publicly for ambition to be further increased.</p> <p>Mixed position on energy transition FICCI has made clear its support for increasing renewable energy capacity in order to decarbonise electricity, mobility and industry. However, it has also advocated for both coal and gas to be expanded. For example, in April 2023, FICCI's President called for urgent steps to be taken to increase the capacity of existing coal mines and operationalise new ones for coking coal production.⁹⁷ Separately, the Chair of FICCI's Climate Change Committee described natural gas as an "indispensable" transition fuel during COP27.⁹⁸</p> <p>High level support for a carbon tax In a March 2022 briefing co-authored with Trilegal, a law firm, FICCI indicated in principle support for a uniform carbon tax in India to incentivise companies to use alternative energy sources.⁹⁹</p>
Detailed advocacy positions	<p>Constructive engagement on developing carbon markets in line with Article 6 of the Paris Agreement In September 2023, FICCI, in collaboration with IETA (the International Emissions Trading Association), produced a paper on developing an effective framework for emissions trading and voluntary carbon markets. The paper contained detailed, practical recommendations for implementation of Article 6 and was delivered to the Minister of Environment, Forest and Climate Change at the 14th India Climate Policy and Business Conclave, organised by FICCI. The paper also made clear that FICCI sees carbon markets as a key tool for incentivising sustainable agriculture practices and for tackling deforestation.¹⁰⁰</p>

⁹⁶https://content.influencemap.org/site/data/001/201/FICCI_Corp_Web_Envir_AccessedApril23.pdf

⁹⁷https://content.influencemap.org/site/data/001/200/FICCI_Chairman_Apr23_AccessedApr23.pdf

⁹⁸<https://www.businessworld.in/article/Energy-Efficiency-Electrification-Renewable-Energy-leading-India-To-Secure-Net-Zero-Path-way-MNRE-/14-11-2022-453997/>

⁹⁹https://content.influencemap.org/site/data/001/345/FICCI_Trilegal_ESGReport_March2022_AccessedDec2023.pdf

¹⁰⁰https://k5x2e9z8.rocketcdn.me/wp-content/uploads/2023/09/IETA_AdvancingCarbonMarketsinIndia_2023.pdf

Alignment assessment	Misalignment in one Unilever policy priority area
Engagement intensity	Low engagement
Explanation	<p>FICCI's top line messaging is generally supportive of climate policies and the Indian Government's Net Zero by 2070 target. However, its position on the role of gas and coal in the energy mix is not consistent with Unilever's goal of 100% decarbonised power systems for all countries by 2040 at the latest.</p> <p>FICCI's engagement intensity score from InfluenceMap is relatively low (13% as of December 2023). However, this may be misleading given FICCI's membership of the Indian Government's NDC Implementation Committee. The lack of publicly available information on FICCI's contribution to the Committee makes it difficult to assess the overall impact of its work on climate policy.</p>
More information	View FICCI's LobbyMap profile
Actions (to be) taken	<ul style="list-style-type: none"> • Seek greater transparency regarding the perspective FICCI contributes to the Indian Government's NDC Implementation Committee. • Recommend FICCI continues to make public its positive engagement on climate policy.

FoodDrinkEurope

Unilever role(s)	Member of climate and environment, agriculture committees
Top line positions	<p>High-level support for EU climate policies and the Paris Agreement targets FoodDrinkEurope's top line messaging is consistently supportive of the EU's Green Deal, Fit for 55 package and Farm to Fork strategy. It has expressed support for both the net zero by 2050 and 55% reduction by 2030 targets. It wrote to the Presidents of the European Commission, European Parliament and the Swedish EU Presidency in March 2023 calling for an EU Food Investment and Resilience Plan, along the same lines as the Green Deal Industrial Plan.¹⁰¹</p>

¹⁰¹<https://www.fooddrinkurope.eu/wp-content/uploads/2023/03/FoodDrinkEurope-letter-on-Green-Deal-Industrial-Plan-for-Agri-food.pdf>

It also expressed support for the EU Nature Restoration Law and Soil Health Law in a meeting with the EU Agriculture Commissioner in June 2023, at a time when the EU's nature agenda was being heavily attacked by others.¹⁰²

Detailed advocacy positions

Support for policies to incentivise a shift to regenerative agriculture

FoodDrinkEurope has called for regenerative agriculture to be recognised and rewarded via EU rules for carbon removals, in the EU Soil Health Law, and in National Strategic Plans under the Common Agricultural Policy.¹⁰³ It has called for policy makers to support the transition to a zero fossil fuel agricultural sector and for farmers implementing sustainable and regenerative farming practices to receive financial and technical support. It supports the inclusion of carbon farming as a means of generating carbon removal certificates and advocates that these certificates should be used first and foremost to reduce emissions within the agri-food value chain.¹⁰⁴

Support for EU regulation on deforestation-free products (with caveats about the pace of implementation)

FoodDrinkEurope published a position paper in February 2022 expressing support for the EU proposal for a regulation on deforestation-free products (as well as international agreements such as the New York Declaration on Forests, the Amsterdam Declaration and the UN strategic plan for forests 2017-2030). FoodDrinkEurope provided detailed input to EU policymakers on the draft regulation, which included a number of caveats – for example cautioning policymakers about the need for an “appropriate” transition period and argued that the list of commodities covered by the regulation should only be extended after an impact assessment had been conducted.¹⁰⁵

Alignment assessment

No misalignment on Unilever's policy priorities but partial misalignment with science-based policy

Engagement intensity

Low engagement

Explanation

FoodDrinkEurope's top line messaging is consistently supportive of the EU's climate policies and, for the most part, its engagement on the detail of policies that are material to decarbonising the food and drink sector backs this up. It has engaged constructively at EU level on at least two of Unilever's climate policy priorities: Regenerative Agriculture and Deforestation Free.

However, it also appears to be unsupportive of policy to transition to more plant-based diets and has opposed proposals to exclude red meat from the EU Promotion Policy for agricultural food products.¹⁰⁶ This opposition to measures to incentivise dietary change is not fully aligned with the IPCC's assessment of what is required to achieve a 1.5°C trajectory.

More information

View FDE's [LobbyMap](#) profile

Actions (to be) taken

Encourage FDE to continue to drive the regenerative agriculture agenda at the EU level.

Food Industry Asia (FIA)

Unilever role(s)

Member

Top line positions

High-level support for Paris alignment

Food Industry Asia states on its website that the association 'is committed to helping countries across Asia reach their carbon reduction targets to keep global temperatures within the levels stipulated by Paris Agreement.'¹⁰⁷ Sustainability & resilience is identified as one of its three 'strategic focal areas', but its focus within this appears to be exclusively on packaging, food waste and food security, rather than climate.

Detailed advocacy positions

No evidence of specific climate-related lobbying by FIA was found.

Alignment assessment

No misalignment with Unilever policy priorities or science-based policy

Engagement intensity

No meaningful engagement

¹⁰²https://content.influencemap.org/site/data/001/297/FDE_Jun2023_GovernmentInvestment_AGRF_FOI_Aug2023.pdf

¹⁰³<https://content.influencemap.org/site/data/001/061/FoodDrinkEurope-Recommendations-for-Building-EU-Food-and-Drink-Sector-Resilience.pdf>

¹⁰⁴https://content.influencemap.org/site/data/001/244/FoodDrinkEurope_Mar2023_CertificationOfCarbonRemovals_Consultation_Jun2023.pdf

¹⁰⁵<https://content.influencemap.org/site/data/001/061/2202-Deforestation-free-products.pdf>

¹⁰⁶https://content.influencemap.org/site/data/001/079/JointLetter_Agri_AWP_Oct22.pdf

¹⁰⁷https://content.influencemap.org/site/data/001/324/FIA_STATEMENT_ON_SUSTAINABILITY_Oct2023.pdf

Explanation	FIA appears not to be engaged on climate policy beyond top line support of the Paris Agreement.
More information	View FIA's LobbyMap profile
Actions (to be) taken	Encourage FIA to create a workstream on one of Unilever's climate policy priorities that is relevant to the food industry (e.g., regenerative agriculture).

German Chemical Industry Association (VCI)

Unilever role(s)	Unilever is an indirect member of VCI via its membership of IKW, the German Cosmetic, Toiletry, Perfumery and Detergent Association
Top line positions	<p>Critical of the EU green deal and opposed to any increase in ambition of EU and German climate targets</p> <p>VCI's overriding message on European climate policy is that the regulatory burden on companies is too great. It has called for the EU to respond to the US Inflation Reduction Act by prioritising deregulation, but does not make clear how this is compatible with meeting climate goals. It has argued that the Fit for 55 agenda is already "too ambitious" given the impact of Russia's invasion of Ukraine on European industry.¹⁰⁸ Even prior to this, however, it opposed increasing the ambition of both the EU's and Germany's 2030 emissions reduction targets, and it opposed a proposal to bring forward Germany's net zero target date to 2045.</p>
Detailed advocacy positions	<p>Opposed to EU emissions trading system (ETS) reform and the implementation of a carbon border adjustment mechanism (CBAM)</p> <p>VCI supports the EU ETS in principle but has consistently opposed proposals for phasing out free allowances (which would have the effect of increasing the carbon price paid by European industry). At the same time, the VCI Director General has argued that mandatory net zero transition plans are unnecessary since carbon prices should be sufficient to incentivise companies to decarbonise.¹⁰⁹ VCI has also stated consistent opposition to the implementation of a CBAM, preferring a multilateral solution to the problem of carbon leakage.</p>

¹⁰⁸https://content.influencemap.org/site/data/001/038/VCI_Position_EUlegislationETSEED_12.07.2022_Jul2022.pdf

¹⁰⁹https://content.influencemap.org/site/data/000/928/VCI_pressrelease_EUETSreforms_2022-01-13_feb2022.pdf

Detailed advocacy positions

Supports the development of non-fossil feedstocks
VCI acknowledges that alternative sources of carbon, including from CO₂ captured from industrial processes, waste, and bio-based feedstocks will be necessary to mitigate the chemical industry's contribution to climate change.¹¹⁰ It supports policies that would encourage chemical recycling and argues that using captured CO₂ as a feedstock should be classified as carbon removal; a position that is not consistent with the IPCC's guidance on what is required to achieve a 1.5°C trajectory.

Mixed position on renewable energy, prioritising energy security and affordability over decarbonisation

VCI recognises that reducing the chemical industry's GHG emissions requires access to abundant, affordable, and reliable renewable electricity. Consequently, it acknowledges the need for faster deployment of renewables and calls for accelerated planning and permitting for renewable energy projects, as well as for other industrial projects, including liquefied natural gas (LNG) terminals. However, in the context of Russia's invasion of Ukraine, it called for the German renewable energy surcharge to be abolished and argued that commissioning new gas power plants is necessary. It publicly endorsed the inclusion of gas in the EU's Green Taxonomy.

Alignment assessment	Misalignment in two+ Unilever policy priority areas
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Engagement intensity	High engagement
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Explanation

VCI has been very active on climate policy during 2022-23 and its stance has mostly been obstructive. It has consistently criticised the EU's climate policies for placing too great a regulatory burden on European industry, without making clear how deregulation will enable the EU to meet its NDC commitments.

VCI is at least partially misaligned in 3 areas:

- 1. Climate ambition / NDCs:** its claim that the EU's Fit for 55 package is "too ambitious" seems to be at odds with Unilever's position in support of NDC commitments that align with 1.5°C. VCI has consistently opposed any strengthening of EU and German climate targets.
- 2. Renewables / energy transition:** its support for building new gas power plants in response to Russia's invasion of Ukraine is not compatible with the goal of reaching 100% decarbonised power systems by 2035 in advanced economies.

¹¹⁰https://content.influencemap.org/site/data/001/316/VCI_EUFeedback_CarbonRemovals_17.03.2023_Sep2023.pdf

3. Carbon pricing / markets: its lobbying on the EU ETS and CBAM – as well as its support for an electricity price cap and the reduction of energy taxes in general is not consistent with the goal of ensuring a meaningful price on carbon that reflects the full costs of climate change. Implementation of its recommendations would lead to lower carbon prices for companies covered by the EU ETS than if its proposals were not adopted.

Positively, VCI’s messaging on the need to incentivise uptake of non-fossil feedstocks is in line with Unilever’s agenda. However, its engagement on this topic appears to be weaker than in other policy areas assessed: very few examples of VCI making concrete recommendations for how to do this were found.

Overall, if VCI’s policy recommendations were to be implemented in full, this would seriously impair Unilever’s ability to deliver its Climate Transition Action Plan (CTAP) and achieve net zero across Scopes 1-3 by 2039.

More information

View VCI’s [LobbyMap](#) profile

Actions (to be) taken

Ask VCI to remove Unilever from its website since Unilever is not a direct member of VCI. Notify both VCI and IKW about the areas of misalignment identified.

Indonesian Chamber of Commerce and Industry (KADIN)

Unilever role(s)

Member of forestry and environment taskforce

Top line positions

Support for Indonesia’s NDC

KADIN has expressed support for Indonesia’s NDC commitment to achieve net zero by 2060.¹¹¹ No evidence was found to suggest KADIN has at any stage lobbied for the ambition of Indonesia’s NDC to be either increased or decreased.

Support for carbon pricing and carbon markets

KADIN has expressed support for Presidential Regulation No. 98 of 2021 on the implementation of carbon pricing. Its messaging emphasises that Indonesia’s carbon absorption potential is high and therefore the development of carbon markets represents an economic opportunity for the country.¹¹² Once again, KADIN’s support appears to be mostly passive: no evidence was found to suggest KADIN lobbied on this issue prior to Presidential Regulation No. 98 being passed.

Support for renewables

KADIN’s Chair, Arsjad Rasjid, has championed renewable energy and called for the use of competitive tariffs and predictable project pipelines to bring solar costs down.¹¹³ He has also expressed support for the Indonesian Government’s electric vehicle incentive programme.¹¹⁴

Detailed advocacy positions

No evidence was found to suggest KADIN is actively engaged on specific climate-related policies.

Alignment assessment

No misalignment with Unilever policy priorities or science-based policy

Engagement intensity

No meaningful engagement

Explanation

KADIN’s top line messaging is generally supportive of climate policies and the Indonesian Government’s Net Zero by 2060 target.

However, no evidence of KADIN actively engaging with government to promote policies aligned to Unilever’s climate agenda was found.

¹¹¹https://content.influencemap.org/site/data/001/198/KADIN_Chairman_ANTARA_Aug22_AccessedApr23.pdf

¹¹²https://content.influencemap.org/site/data/001/198/KADIN_CorpWeb_Sustainability_AccessedApr23.pdf

¹¹³https://content.influencemap.org/site/data/001/198/KADIN_Chairman_EcoBusiness_Nov22_AccessedApr23.pdf

¹¹⁴[https://content.influencemap.org/site/data/001/198/KADIN_\(1\)Chairman_CorpWeb_Apr23_AccessedApr23.pdf](https://content.influencemap.org/site/data/001/198/KADIN_(1)Chairman_CorpWeb_Apr23_AccessedApr23.pdf)

More informationView KADIN's [LobbyMap](#) profile**Actions (to be) taken**

Encourage KADIN to be more active in promoting higher policy ambition, for example by using its net zero hub to promote policies that will deliver net zero goals. Improved meaningful engagement is needed.

International Association for Soaps, Detergents and Maintenance Products (AISE)

Unilever role(s)

Board member

Top line positions

High-level support for the EU Green Deal
AISE has stated that it supports the European Commission's objectives for climate change mitigation on multiple occasions.

Detailed advocacy positions

AISE does not appear to be actively engaged on climate policy beyond top line statements in support of the EU Green Deal and net zero GHG emissions by 2050.

Alignment assessment

No misalignment with Unilever policy priorities or science-based policy

Engagement intensity

No meaningful engagement

Explanation

AISE's top line messaging is generally supportive of climate policies and the EU Green Deal agenda.

AISE's focus is on product regulation and therefore its engagement on climate policy per se is limited (though it does engage on related topics such as Product Environmental Footprinting).

More informationView AISE's [LobbyMap](#) profile**Actions (to be) taken**

No action. Unilever believes AISE's focus areas do not merit a step up in climate policy engagement beyond its current workstreams.

National Business Initiative (NBI)

Unilever role(s)

Member of CEO Champions Committee, Just Transition and Climate Pathways Committee, and Advisory Council for Environment and Society (ACES)

Top line positions**Support for Paris-aligned decarbonisation trajectory for South Africa**

NBI has expressed support for the Paris Agreement and called for enhanced ambition in NDCs and a just transition for the South African economy. Its advocacy focuses particularly on renewable energy, new energy vehicles (including EVs) and green hydrogen.¹¹⁵

It has also expressed support for gas as a transition fuel, but in the context of both a rapid rollout of wind and solar capacity, and a rapid phaseout for coal. It argues that natural gas assets can and should be repurposed for green hydrogen from the mid-2030s and natural gas should be phased out completely by 2050.¹¹⁶

Detailed advocacy positions

Since 2021, NBI has published a series of in-depth reports on sectoral decarbonisation pathways designed to create a robust base of knowledge to inform policy and planning. Sectors covered include energy, mining, chemicals, transport and agriculture, forestry and land use.¹¹⁷ These reports contain some high-level policy recommendations – for example, calling for South Africa's Integrated Resource Plan to be revised to incorporate a more aggressive pathway for renewable energy.¹¹⁸ But NBI does not appear to be actively engaged in more detailed policy discussions.

Alignment assessment

No misalignment with Unilever policy priorities or science-based policy

Engagement intensity

Low engagement

Explanation

NBI's top line messaging is consistently supportive of enhanced ambition in climate action. It has created an impressive body of research and knowledge on sectoral decarbonisation pathways – including for sectors like energy, chemicals and agriculture that are of high importance to Unilever. However, its direct engagement with government on the specific policies required to accelerate the transition to net zero appears to be limited.

¹¹⁵<https://www.nbi.org.za/wp-content/uploads/2023/01/NBI-COP27-OP-ED-Series-Post-COP27-Outlook-South-Africa-needs-to-get-going-on-the-transition-to-a-low-carbon-economy.pdf>

¹¹⁶<https://www.nbi.org.za/report/it-all-hinges-on-renewables/>; https://content.influencemap.org/site/data/000/949/NBI_Gas_Report_p20_p23_Feb22.pdf

¹¹⁷<https://www.nbi.org.za/reports/>

¹¹⁸<https://www.nbi.org.za/wp-content/uploads/2023/01/NBI-Financing-South-Africas-Just-Transition-Dec-22.pdf>

NBI's position on gas as a transition fuel is a borderline case in terms of alignment with science-based policy. The IPCC's 6th Assessment Review concluded that 'purely fossil fuel to fossil fuel switching is a limited and potentially dangerous strategy unless it is used very carefully and in a limited way.'¹¹⁹ It is at least arguable that NBI's heavily caveated support for gas as a transition fuel meets the criteria set out by the IPCC – i.e., it advocates for gas to be used very carefully and in a limited way.

More information

View NBI's [LobbyMap](#) profile

Actions (to be) taken

Encourage NBI to continue on its pro-climate positions and increase its engagement with policymakers on the net zero agenda, leveraging the detailed sector-level research it has commissioned over the last three years.

Personal Care Products Council (PCPC)

Unilever role(s)

Unilever North America is a member

Top line positions

Minimal mention of climate change in top-level messaging

PCPC has expressed high-level commitment to reducing the personal care industry's environmental impact. However, it makes very few explicit references to climate change and/or net zero in its public communications and has not taken a clear position on whether it supports Paris-aligned decarbonisation policies.

Detailed advocacy positions

No evidence of specific climate-related lobbying by PCPC was found.

Alignment assessment

No misalignment with Unilever policy priorities or science-based policy

Engagement intensity

No meaningful engagement

Explanation

PCPC is clearly active on many different environmental policy issues – both in the US and globally – but appears not to engage on climate policy per se. For example, in a 2022 report, it indicated that it had been actively engaged on several different components of the EU Green Deal – e.g., the EU's chemicals management programme, REACH; the Classification, Labelling and Packaging Regulation; and the Cosmetics Products Regulation – but none of these were directly climate-related. In any case, the detail of the positions taken is not disclosed.

More information

View PCPC's [LobbyMap](#) profile

Actions (to be) taken

PCPC has been active on propellant policy by assisting Unilever with its application to the California Air Resources Board (CARB). PCPC will continue to advocate once CARB proposes new VOC reductions or changes to the CARB VOC regulations. PCPC is advocating per our direction and will continue to support.

Sustainable Food Policy Alliance (SFPA)

Unilever role(s)

Founding member

Top line positions

High-level support for a 1.5°C pathway and the United States' NDC

SFPA has expressed support for a legislative approach that ensures a pathway to no more than 1.5°C of global warming and has specifically endorsed the US Government's goal of reducing GHG emissions by 50% by 2030.

Support for carbon pricing, clean energy and climate-smart agriculture

SFPA's publicly available climate policy principles and priorities include support for an ambitious carbon pricing system, investment in clean energy and incentives for adopting 'climate-smart land management practices' across US farm, ranch and forest land.¹²⁰

¹¹⁹See Chapter 11, Section 11.3.5: <https://www.ipcc.ch/assessment-report/ar6/>

¹²⁰https://content.influencemap.org/site/data/001/336/sfpa_climate-principles-2021_nov2021_2023.pdf

Detailed advocacy positions

Active support for climate-related provisions in the US Farm Bill

In 2023, SFPA expressed support for the US Farm Bill and called for the scale up of actions to address climate change, water quality/conservation and soil health. It signed a joint letter to the leadership of the Senate Agriculture, Nutrition and Forestry Committee and the House Agriculture Committee, indicating overall support for the 2023 US Farm Bill and calling on the Committees to ensure funding for conservation and climate programmes is sustained in the Bill.¹²¹

Positive engagement on the development of policies to tackle deforestation in agricultural supply chains

SFPA has expressed general support for legislation that complements industry efforts to address deforestation. Specifically, in December 2022, it wrote to the Assistant Secretary at the Bureau of Oceans and International Environmental and Scientific Affairs calling for legislation to address deforestation, in line with SFPA's principles on Forest and Natural Ecosystem Conservation. These principles include the need for coordination between international governments (encouraging the US to align with the EU's approach), a clear incentive and penalty structure for importers and all producer countries bolstered by mandatory due diligence, and the allocation of adequate government resources.¹²²

Support for strengthened policies to accelerate deployment of renewable energy

In August 2023, SFPA signed a joint letter addressed to the US EPA Administrator supporting the Clean Air Act and calling for strengthened ambition, for example by expanding the scope of coverage for affected power plants and accelerating compliance schedules and deadlines.¹²³ In April 2022, it signed another joint letter to Members of Congress, calling for an economic infrastructure package centered on clean energy investments.¹²⁴ This was on the back of the Infrastructure Investment and Jobs Act (passed in November 2021), and can clearly be read as support for what would become the Inflation Reduction Act (passed in August 2022).

Alignment assessment

No misalignment with Unilever policy priorities or science-based policy

Engagement intensity

Low engagement

Explanation

Both SFPA's top line messaging and its engagement on specific policies is consistently supportive of higher ambition on climate mitigation.

During 2022-23, SFPA appears to have been constructively engaged on at least three of Unilever's policy priorities: support for rapid deployment of renewable energy, tackling deforestation, and support for farmers to adopt practices that protect and regenerate farm environments.

Overall, if SFPA's policy recommendations were to be implemented in full, this would positively impact Unilever's ability to deliver its Climate Transition Action Plan (CTAP).

More information

View SFPA's [LobbyMap](#) profile

Actions (to be) taken

None required

Tennessee Chamber of Commerce & Industry (TCCI)

Unilever role(s)

Cornerstone member through Covington facility

Top line positions

No clear top-line position on climate change

TCCI does not appear to make any direct reference to climate change, 1.5°C or the Paris Agreement in its top-line messaging. The closest it comes is a statement, available on its website, saying it takes 'a fair and balanced approach to new and existing laws, regulations and policies that provide minimum economic burden to business and development and increase efficiency while also protecting natural resources.'¹²⁵

Detailed advocacy positions

Opposition to the inflation reduction act

The Tennessee Chamber signed a coalition letter in August 2022 urging US Senators to oppose the Inflation Reduction Act.¹²⁶

Promotion of bills that support new fossil fuel infrastructure

TCCI has supported several bills that are designed to restrict local governments' ability to prohibit the building of new fossil fuel infrastructure. For example,

¹²¹https://content.influencemap.org/site/data/001/336/sfpa_farm-bill-letter_03.16.23.pdf

¹²²https://content.influencemap.org/site/data/001/337/sfpa_state-dept-comment_deforestation_dec2022.pdf

¹²³https://content.influencemap.org/site/data/001/337/SFPA_letter-ceres_GHGs_aug2023.pdf

¹²⁴https://content.influencemap.org/site/data/001/337/sfpa_ceres-letter_IJA_april2022.pdf

¹²⁵https://content.influencemap.org/site/data/001/200/TNChamber_2023_EnergyandEnvironment_April2023.pdf

¹²⁶https://content.influencemap.org/site/data/001/056/TNChamber_2022_IRA_September2022.pdf

in 2022, it cited passage of Public Chapter 591, a law that ensures that local governments cannot prohibit the use of existing energy sources, as a legislative success, pointing out that it would 'mitigate efforts in states like California where local governments have sought to ban the connection of natural gas.'¹²⁷ Also in 2022, TCCI's Associate VP of Environment and Energy gave verbal testimony to the Tennessee Senate Commerce and Labor Committee in support of Senate Bill 2077, which similarly aims to restrict local governments' power to prohibit fossil fuel infrastructure from being built in their jurisdiction.

Opposed to extended producer responsibility rules for packaging

In 2022, TCCI lobbied against an Extended Producer Responsibility programme for packaging.¹²⁸ It has also previously opposed efforts to implement a bottle deposit program, create a single-use bag reduction programme and a state-wide litter reduction programme.¹²⁹

Alignment assessment

Misalignment in two+ Unilever policy priority areas

Engagement intensity

Low engagement

Explanation

TCCI's opposition to the US Inflation Reduction Act (IRA), a vital piece of legislation for delivering on the USA's NDC and the goal of grid decarbonisation by 2035, means that it is significantly misaligned with Unilever. At no point does it appear to have expressed support for the Paris Agreement and the US Government's NDC –let alone calling for strengthened ambition.

Its promotion of measures that would restrict the ability of local governments to prohibit the building of new fossil fuel infrastructure is inconsistent with the goal of decarbonising the power system by 2035.

TCCI appears to be inactive on all of Unilever's other climate policy priorities.

Overall, if TCCI's policy recommendations were to be implemented in full, this would seriously impair Unilever's ability to deliver its Climate Transition Action Plan (CTAP).

More information

View TCCI's [LobbyMap](#) profile

Actions (to be) taken

Unilever belongs to a number of state manufacturing associations or chambers of commerce where we have facilities. The purpose of these memberships is to help support on issues that directly affect the running of facilities in those states. While we will continue to be a member of TCCI, they do not speak for Unilever on climate policy issues. We will write to TCCI to make this clear. We will also make this position clear on our website.

The World Business Council for Sustainable Development (WBCSD)

Unilever role(s)

Member

Top line positions

High-level support for a 1.5°C pathway

WBCSD is clear and consistent in its headline messaging about the imperative to keep global warming to below 1.5°C and to achieve net zero emissions by 2050.¹³⁰ Through its Policy Advocacy and Member Mobilisation workstream, WBCSD seeks to ensure that its member companies' policy engagement is science-based.¹³¹ Its Climate Policy Working Group brings together member companies to align on advocacy related to implementation of the Paris Agreement and as a member of the We Mean Business Coalition it supports strengthened ambition in country NDCs.¹³²

Detailed advocacy positions

Support for strengthened NDCs

The We Mean Business Coalition, of which WBCSD is a founding partner, calls on governments to 'adopt strengthened, high quality nationally determined contributions (NDCs) by 2025 in line with a 1.5°C trajectory and the latest science to halve global emissions by 2030.'¹³³ As a registered UNFCCC observer, WBCSD is actively engaged in promoting this call for strengthened ambition at the UNFCCC's annual COP meetings.

Support for phasing out fossil fuels and scaling up renewable energy

Through We Mean Business, WBCSD also supports policies to accelerate the clean energy transition, including phasing out unabated fossil fuels in line with

¹²⁷https://content.influencemap.org/site/data/000/977/TNChamber_website_advocacy_may2022.pdf

¹²⁸https://tnchamber.org/images/uploads/site_files/TNChamberResultsReport2022.pdf

¹²⁹https://tnchamber.org/images/uploads/site_files/2021_Legislative_Report_TNChamber.pdf

¹³⁰<https://www.wbcd.org/Imperatives/Climate-Action>

¹³¹<https://www.wbcd.org/Overview/Policy-Advocacy-and-Member-Mobilization-PAMM>

¹³²<https://www.wbcd.org/Programs/Climate-and-Energy/Climate/Climate-Action-and-Policy>

¹³³<https://www.wemeanbusinesscoalition.org/policy/>

1.5°C, commitments to reach 100% decarbonised power systems by 2035 in advanced economies, and by 2040 for other countries, and a meaningful price on carbon.¹³⁴

Support for policies that would eliminate forest loss and reverse land degradation

Also through We Mean Business, WBCSD calls for governments to set bold targets for food systems transformation that reflect the ambition of the Glasgow Leaders Declaration on Forests and Land Use to reverse forest loss and land degradation by 2030 – and to eliminate commodity-driven deforestation by 2025.¹³⁵

Support for climate-related reporting standards

WBCSD has actively advocated for businesses and governments to adopt the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD).¹³⁶ It has also welcomed the International Sustainability Standards Board's (ISSB) requirements for sustainability-and-climate-related disclosures and works to promote adoption and implementation of these standards globally.¹³⁷

Alignment assessment	No misalignment with Unilever policy priorities or science-based policy
Engagement intensity	No meaningful direct policy engagement but moderate indirect engagement*
Explanation	WBCSD's top-line messaging is consistently supportive of higher ambition on climate mitigation. Its direct engagement with specific policies is very limited. This is due to the nature of WBCSD's remit, which is primarily about coordinating and driving voluntary private sector action. However, as a founding member of the We Mean Business Coalition, WBCSD is indirectly engaged in climate policy engagement at the global level. We Mean Business's policy positions are consistently aligned both with Unilever's and with a science-based policy agenda.
More information	View the WBCSD website
Actions (to be) taken	No specific action required

¹³⁴<https://www.wemeanbusinesscoalition.org/cop28-businesses-urge-governments-to-phase-out-fossil-fuels/>

¹³⁵<https://www.wemeanbusinesscoalition.org/policy/>

¹³⁶<https://www.wbcsd.org/Programs/Redefining-Value/TCFD>

¹³⁷<https://www.wbcsd.org/Programs/Redefining-Value/News/WBCSD-welcomes-ISSB-Standards-and-launches-a-Preparer-Forum-for-Sustainability-Disclosure>

* WBCSD is not currently assessed by InfluenceMap, therefore Volans made its own independent assessment of engagement intensity based on the evidence found of climate policy engagement by WBCSD and We Mean Business Coalition.

Appendix 2: Technical appendix

This appendix outlines the specific criteria used to evaluate industry associations' positions on:

- **The role of fossil fuels in the energy transition**
- **The need for dietary change**

Fossil fuels and the energy transition

Associations supportive of new fossil fuel exploration or infrastructure were deemed to be misaligned with science-based policy. This is in line with the IPCC's statements indicating that existing fossil fuel reserves and infrastructure exceed what is needed if warming is to be kept below 1.5°C, and that investment in new fossil fuel exploration infrastructure is not in line with a 1.5°C pathway.¹³⁸

Industry associations supporting new coal and/or oil were deemed misaligned with Unilever's position on the energy transition. Associations supportive of gas as a transition fuel were deemed to be partially misaligned with science-based policy but are not necessarily misaligned with Unilever's policy priorities. This is because the IPCC is clear that 'purely fossil fuel to fossil fuel switching is a limited and potentially dangerous strategy unless it is used very carefully and in a limited way.' (Cf. IPCC AR6, Chapter 11 Section 11.3.5). Support for new fossil gas, without very significant caveats, is deemed partially misaligned with science. However, Unilever does not have a position on gas, therefore this isn't highlighted as an example of misalignment with one of Unilever's policy priorities.

Dietary change

The IPCC has identified changing demand in the food system as a solution to climate change – noting that changing dietary preferences towards increased consumption of plant-based foods can reduce land-based GHG emissions to one-third of the 'business-as-usual' case for 2050.¹³⁹

Since Unilever does not have an explicit stance on this issue, industry associations that opposed measures to incentivise a shift towards more plant-based diets were deemed to have no misalignment with Unilever's policy priorities, but partial misalignment with science-based policy.

¹³⁸<https://www.ipcc.ch/assessment-report/ar6/>

¹³⁹<https://www.ipcc.ch/srccl/chapter/chapter-5/>