

**ERT**



**Keidanren**  
Japan Business Federation



**InfluenceMap**

# CEOs Challenge Industry Associations on Climate Policy

An InfluenceMap Paper

May 2021

# CEOs Challenge Industry Associations on Climate Policy

An InfluenceMap Briefing

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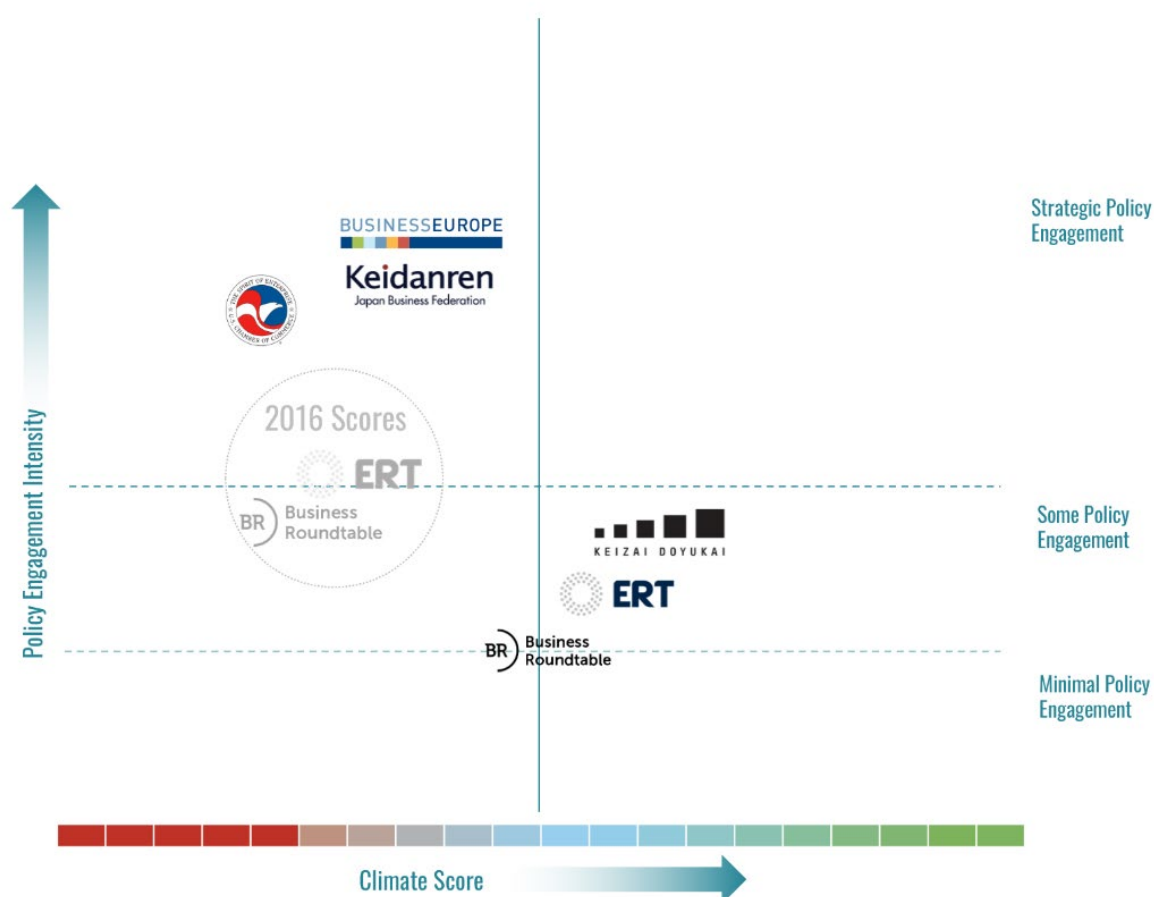
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## Executive Summary

- Amid the escalating climate emergency and resurgence of global political will to address it, a rift has emerged between groups representing the voice of business on climate policy in the EU, Japan and the US. CEO groups like the European Round Table for Industry (ERT), Japan Association of Corporate Executives (Keizai Doyukai), and Business Roundtable appear to have become increasingly supportive of climate policy, while the major cross-sector industry lobby groups in these regions continue to oppose robust action from governments. This is despite both types of groups representing similar corporate memberships.
- The CEO groups' shift to a more supportive stance appears to be broadly limited to light touch advocacy, such as top-line statements on climate ambition and some support for specific policies. In contrast, major cross-sector business federations like the European Business Confederation (BusinessEurope), Japan Business Federation (Keidanren) and the US Chamber of Commerce have made caveated top-line statements in support of climate action, but continue to conduct sophisticated and powerful opposition to specific policies and regulations.
- The limitations of the CEO groups' advocacy are demonstrated by InfluenceMap's Engagement Intensity metric which measures the frequency of engagement across various forms of climate policy, whether positive or negative. The average (mean) engagement intensity of the industry associations is over twice as high as the three CEO groups. As such, the current approach from CEO groups is unlikely to shift the balance of lobbying power in Brussels, Tokyo and Washington.
- Since the Paris Agreement in 2015, InfluenceMap has analyzed the climate policy engagement of powerful cross-sector industry associations. These associations *claim to represent all sectors of the economy*, a highly valuable perspective that enables unparalleled lobbying access to policy makers. Widely cited InfluenceMap *analysis* shows that BusinessEurope, Keidanren, and the US Chamber of Commerce have leveraged their influence to mount sustained and highly effective opposition to climate policy.
- The divergent positions of CEO groups likely represent a shift in outlook from corporate leadership on climate policy that is not being reflected across companies' influence value-chain, including the advocacy they outsource to industry associations. This places an onus on CEOs to address this

misalignment within their companies with enhanced governance processes, including board-level responsibility for climate-related lobbying.

- Such steps are now *expected* by the investment community, for example Blackrock recently updated its *2021 Stewardship Expectations* to focus on “alignment between a company’s public statements on policy issues that are material to its strategy and its corporate political activities, including those of the industry associations where they are active members”. Lobbying alignment is also a key aspect of the Climate Action 100+ initiative, a coalition of 540 investors with over \$52 trillion in assets collectively under management urging companies to take action on climate change.
- InfluenceMap's well-recognized method for assessing corporate influence over policy relies on the scoring of numerous pieces of relevant, publicly available information (such as comments on pending government regulations). Full details of our methodology can be found [here](#).<sup>1</sup>



<sup>1</sup> Given that InfluenceMap did not score Keizai Doyukai in 2016, a comparator score is not available.

## Overview

### Background

The IPCC's October 2018 [Special Report on Global Warming of 1.5°C](#) laid out the urgency to act on climate and the key role of government policy in driving this process. According to a [2020 UNEP report](#), current Nationally Determined Contributions (NDCs) to the Paris Agreement remain insufficient to meet even the 2°C target. Governments worldwide are lagging on introducing meaningful policy designed to drive the energy transition. A key contributing factor to this lack of climate policy is the historical and ongoing opposition by corporate vested interests on a global scale. [InfluenceMap](#) maintains the world's leading platform analyzing corporate policy engagement on climate policy, and a full explainer of corporate opposition to climate policy can be found in our [corporate policy engagement](#) report.

Powerful cross-sector industry associations are among the most important players in the climate lobbying battleground. These groups have broad, 'federated' governance structures where direct members can include other business associations. Despite claiming to represent all sectors of the economy, cross-sector industry associations have mounted sustained and highly effective opposition to climate policy which appears to contrast sharply with the more positive views held by many of their members. InfluenceMap's report [Industry Groups and their Carbon Footprints](#) highlighted the sheer extent of their influence, ranking the US Chamber of Commerce ("the Chamber"), Japan Business Federation, and BusinessEurope as the 2nd, 7th, and 12th most influential groups on climate globally.

In response to the consistently oppositional positions of these industry associations, several individual companies are increasing their positive climate policy engagement and directly demanding that industry associations reform their positions so as to represent the company's views. For example, a number of EU companies such as [Iberdrola](#) have persistently pushed to increase ambition on the role of renewables and electrification across the economy. In 2019, Unilever CEO Alan Jope wrote a [letter to Unilever's industry groups](#) demanding they align their climate positions with those of the company.

This action follows pressure on companies from institutional investors to reform lobbying positions that oppose climate policy. Blackrock recently updated its [2021 Stewardship Expectations](#) to focus on "alignment between a company's public statements on policy issues that are material to its strategy and its corporate political activities, including those of the industry associations where they are active members". [The Climate Action 100+ initiative](#), a coalition of 540 investors with over \$52 trillion in assets collectively under management, are also targeting this issue, urging companies to ensure their lobbying – both direct, and indirect via industry associations – is aligned with the Paris Agreement.

## CEO Groups and Cross Sector Business Groups Disconnected on Climate

This briefing distinguishes between cross-sector industry associations, which tend to have 'federated' governance structures where direct members can include companies as well as other business associations, and CEO groups directly representing individual corporate executives. While these groups differ in structure, they claim to play similar roles as the voice of business when seeking to influence policy.

There is also a significant overlap in the membership of the two types of groups in terms of corporate representation. The industry associations and CEO groups in the three geographies analyzed in this report are set out in the table below, alongside their statements regarding business representation.

Geography	Cross-sector Industry Association	CEO Group
<b>European Union</b>	<i>BusinessEurope</i> is the leading advocate for growth and competitiveness at European level, standing up for companies across the continent and campaigning on the issues that most influence their performance."	<i>The European Round Table for Industry (ERT)</i> 's members include CEOs and Chairs from around 55 of Europe's largest companies in the industrial and technological sector. Companies led by ERT members represent 5 million direct jobs globally, €2,000 billion combined annual revenues, €60 billion investment in R&D each year."
<b>Japan</b>	<i>Japan Business Federation (Keidanren)</i> is a comprehensive economic organization with a membership comprised of 1,444 representative companies of Japan, 109 nationwide industrial associations and the regional economic organizations for all 47 prefectures (as of April 1, 2020)."	<i>Japan Association of Corporate Executives (Keizai Doyukai)</i> membership comprises approximately 1,400 top executives of some 1,000 corporations, all sharing the common belief that corporate managers should be key players in formulating solutions of a broad range of political, economic, and social issues."
<b>United States</b>	<i>US Chamber of Commerce ('the Chamber')</i> is the world's largest business organization representing companies of all sizes across every sector of the [US] economy. They count on the U.S. Chamber to be their voice in Washington"	<i>Business Roundtable</i> exclusively represents chief executive officers (CEOs) of America's leading companies. These CEO members lead companies with more than 15 million employees and more than \$7 trillion in annual revenues."

**InfluenceMap's** analysis shows that CEO groups are reforming faster on climate policy than the major cross-sector industry associations in the same regions. The result is two sets of groups that claim to represent the voice of industry yet communicate increasingly divergent messages to politicians and policymakers on business' appetite for robust and Paris-aligned climate change policy.

- **In Europe**, the European Round Table for Industry (ERT) has supported both specific climate policy and emissions reduction targets. For example, in 2020 the ERT *supported* renewable energy legislation and *advocated* for the increased ambition of the EU's 2030 emissions reduction target. In contrast, BusinessEurope has adopted oppositional stances to several specific climate policies as well as emissions reduction targets. It *advocated* for a continuation of EU Emissions Trading System (EU ETS) free allowances alongside new carbon leakage protections under the proposed Carbon Border Adjustment Mechanism, a move which would weaken existing incentives for companies to reduce emissions. It also *appeared not to support* the EU's increased 2030 emissions reduction target, seeming to dispute the policy's evidence base.
- **In Japan**, the Japan Association of Corporate Executives (Keizai Doyukai) has become increasingly positive on climate policy, *advocating for* an increased share of renewable energy and *supporting* more ambitious emissions reductions targets. It also appears to be *supporting* "game-changing" measures to meet the Paris goals, highlighting policy measures such as the abolition of coal plants by 2030 and a ban on petrol vehicles by 2040 implemented elsewhere in the world. In contrast, the Japanese Business Federation (Keidanren) has lobbied negatively on most strands of climate change regulation in Japan, *opposing* emissions trading/carbon tax schemes and advocating *in favor* of a prolonged role for coal in the energy mix.
- **In the US**, Business Roundtable has endorsed *economy-wide emissions reductions* in line with the Paris Agreement, a stance the Chamber has not assumed. In 2017, Business Roundtable wrote a *letter* to the White House outlining the negative impacts of various climate policies, including the Obama-era Clean Power Plan; since then, the CEO group has shown significantly less engagement with specific strands of climate policy than its industry association counterpart. Despite the Chamber's 2019 position statement shifting to a nominally more positive stance on climate, InfluenceMap's assessment finds a history of consistent opposition to multiple forms of climate policy, from *opposing emissions reductions targets* to supporting the buildout of *fossil fuel infrastructure*. The Chamber has continued to lobby actively in 2021, while Business Roundtable remains absent from current policy debates.

**The divergent positions of CEO groups and industry associations could mark a shift in outlook on climate policy from CEOs that is not being reflected across their companies' climate policy engagement activities, including indirect lobbying via industry associations.** This misalignment also raises questions around the policy position development processes of these industry groups and the extent to which oppositional climate policy positions can be said to represent all members. InfluenceMap's research shows that the cross-sector groups are generally not publicly transparent about this decision-making process.

**Notably, the major cross-sector industry associations in each continent were found to engage far more intensively than the CEO groups, rendering the positive shift from CEO groups of minimal importance to the overall debate.** InfluenceMap's Engagement Intensity metric measures the frequency of engagement across various forms of climate policy, whether positive or negative. According to this metric, scores above 12 indicate active engagement, and scores above 25 indicate highly active or strategic engagement. The average (mean) engagement intensity of the three industry associations is 37% compared with an average engagement intensity of 16% for the CEO groups.

While CEO groups have tended toward high-level statements, cross-sector groups are heavily engaged on detailed policy such as emissions trading mechanisms, fuel economy standards, and national directives around the composition of the energy mix. As a result, the more positive statements from CEO groups are consistently overpowered by the active and detailed oppositional lobbying of the cross-sector industry associations. This finding places an onus on CEOs to address the fact that any positive influence they seek to have is being undermined by the relationships their companies have to industry associations opposing science-based and Paris Agreement-aligned climate policy and regulations.<sup>2</sup>

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<sup>2</sup> InfluenceMap has not carried out a full analysis of the overlap between members of the CEO groups and their respective industry associations.



## Europe

### European Round Table for Industry vs BusinessEurope

- The *European Round Table for Industry's* (ERT) engagement with climate policy appears to have become significantly more positive, adopting positive positions on both specific climate policy and emissions reduction targets. This shift marks a clear point of divergence from the ERT's industry association counterpart, *BusinessEurope*, which continues to lobby negatively on a number of key EU climate policies, including on emissions reduction targets. However, BusinessEurope lobbies more intensively than the ERT, represented by its engagement intensity score of 42% compared to the ERT's lower engagement intensity of 16%.
- In 2020, the ERT *supported* renewable energy legislation, including a faster permitting system and incentives for distribution networks and energy storage. It also *advocated* for the increased ambition of the EU's 2030 emissions reduction target and *supported* the EU's 2050 climate neutrality target. These supportive positions mark a positive shift from the ERT's previously oppositional stance to *renewable energy targets* and *increased emissions reduction targets*.
- In contrast, BusinessEurope has adopted oppositional stances to a number of specific climate policies as well as emissions reduction targets. In January 2021, BusinessEurope *advocated* for a continuation of EU ETS exemptions such as free allowances and indirect cost compensation alongside new carbon leakage protections to be introduced under the proposed Carbon Border Adjustment Mechanism, a move which would duplicate carbon leakage protections for high emitting companies, thereby weakening existing incentives for companies to reduce emissions. However, in March 2021 it *accepted* that those protections could be phased out at the end of the testing phase on the condition that the mechanism had proven its effectiveness.
- In terms of emissions reduction targets, in December 2020 BusinessEurope *appeared not to support* the 55% greenhouse gas emission reduction target for 2030 proposed by the EU Commission, by seeming to dispute the policy's impact assessment and indicating that the policy proposal did not take into account the prospect of sustained economic damage from COVID-19. In December 2020, BusinessEurope also *adopted an unclear position* on the EU's goal of climate neutrality by 2050, stopping short of supporting the date proposed by the EU Commission, and advocating instead for climate neutrality by "around mid-century." In February 2021 the association appeared to state *support* for the specific date of 2050.

## Membership statements

Descriptors copied verbatim from the groups' websites:

### ERT

"ERT Members include CEOs and Chairs from around 55 of Europe's largest companies in the industrial and technological sector. Companies led by ERT members represent

- 5 million direct jobs globally
- €2,000 billion combined annual revenues
- €60 billion investment in R&D each year"

### BusinessEurope

"BusinessEurope is the leading advocate for growth and competitiveness at European level, standing up for companies across the continent and campaigning on the issues that most influence their performance. A recognized social partner, we speak for all-sized enterprises in 35 European countries whose *national business federations* are our direct members. Alongside the national federations which together constitute BusinessEurope, the Corporate Advisory and Support Group offers particular services to a selection of companies in all sectors of activity."

## Lobbying Comparison

The summary table below draws on more detailed comparative analysis provided in the appendix.

Name	Score	Engagement Intensity	Climate ambition	Carbon Border Adjustment Mechanism	Energy Efficiency Legislation	Renewable Energy Legislation	EU 2030 Climate Target
ERT	58%	15%	Supporting climate neutrality by 2050 in the EU.	Supports a CBAM with a gradual phase-out of existing carbon leakage protection in the ETS until a mechanism has proven effectiveness.	Supports energy efficiency targets and policies to such as energy performance standards.	Supports renewable energy legislation and subsidies.	Supports raising the target to 55%.
Business Europe	41%	43%	Has consistently supported climate neutrality in the EU "around mid-century", recently stated support for 2050 in February 2021.	Has supported a CBAM alongside existing carbon leakage protection in the ETS. Recently changed position in March 2021 to acknowledge protections could be phased out in the future.	Supports energy efficiency legislation in the building sector, but does not seem to support increasing the Energy Efficiency Target, nor placing a cap on energy usage.	Does not seem to support the revision of the Renewable Energy Directive nor increasing the Renewable Energy Target, but supports an ambitious policy framework.	Does not fully support raising the target to 55%.

## Japan

### Japan Association of Corporate Executives (Keizai Doyukai) vs Japanese Business Federation (Keidanren)

#### Overview

- The Japan Association of Corporate Executives' (Keizai Doyukai) engagement with climate policy in Japan appears to have evolved in the recent years, becoming increasingly more supportive. In contrast, the Japanese Business Federation (Keidanren) has lobbied negatively on most strands of climate change regulation in Japan.
- Although Keizai Doyukai stated *support* for voluntary measures over regulatory measures in 2018 to reduce GHG emissions, the group has become increasingly more supportive of a low carbon energy mix, *advocating* for a 40% renewable energy target in the energy mix by 2030 and *supporting* a net zero emissions reduction target by 2050. It has also communicated *support for* "game-changing" measures to meet the Paris-goals, highlighting policy measures such as the abolition of coal plants by 2030 and a ban on petrol vehicles by 2040 implemented elsewhere in the world.
- Keidanren has lobbied negatively on most strands of climate change regulation in Japan, including *stating opposition* to a carbon tax. Keidanren has historically remained *in favor of* a prolonged role for coal in the energy mix. Although in 2020 it *appeared to support* some decarbonization of the energy system, no specific timescale for the transition has been specified.
- Many Japanese corporations defer their political engagement to industry associations, of which Keidanren is the largest, comprising of 1,444 representative company memberships, and the most actively engaged on climate and energy policy in Japan. Keidanren lobbies more aggressively than Keizai Doyukai, represented by its engagement intensity score of 36% compared with Keizai Doyukai which scores 17%.

#### Membership Statements

Descriptors copied verbatim from the groups' websites:

### Keizai Doyukai

“DOYUKAI membership comprises approximately 1,400 top executives of some 1,000 corporations, all sharing the common belief that corporate managers should be key players in formulating solutions of a broad range of political, economic, and social issues.”

### Keidanren

“KEIDANREN (Japan Business Federation) is a comprehensive economic organization with a membership comprised of 1,444 representative companies of Japan, 109 nationwide industrial associations and the regional economic organizations for all 47 prefectures (as of April 1, 2020).”

## Lobbying Comparison

The summary table below draws on more detailed comparative analysis provided in the appendix.

Name	Score	Engagement Intensity	Climate Ambition	The need for government policy	Carbon tax	Energy mix
<i>Keizai Doyukai</i>	64%	22%	<i>Supporting</i> net zero by 2050 and <i>supporting</i> “game-changing” measures, including phaseout of coal power and gasoline cars.	<i>Supporting</i> carbon reduction targets and disclosure standards.	<i>Supporting</i> carbon consumption tax but opposing direct tax on industries.	<i>Supporting</i> 40% renewable energy in energy mix by 2030.
<i>Keidanren</i>	41%	37%	<i>Supporting</i> net zero by 2050 with innovative technology solutions.	<i>Supporting</i> voluntary sector action plan over Government regulation.	<i>Opposing</i> explicit carbon pricing policy and carbon tax.	<i>Supporting</i> renewable energy only if competitive with other sources including coal and nuclear.

## United States

### Business Roundtable vs the US Chamber of Commerce

#### Overview

- Business Roundtable and the Chamber released updated climate policy positions in late 2020 and early 2021, respectively, with both expressing support for a market-based approach to climate action. The Chamber has engaged negatively on most strands of climate policy whereas Business Roundtable maintains a top-line approach to climate lobbying and appears to lobby infrequently on detailed climate policies. With an Engagement Intensity of 32%, the Chamber lobbies on climate change with roughly three times the intensity of Business Roundtable at 11%.
- Business Roundtable has endorsed economy-wide emissions reductions *to limit global temperature rise* to well below 2 degrees Celsius above pre-industrial levels. While the Chamber supports *“durable” climate policy*, it has not endorsed IPCC-demanded action.
- The Chamber has supported some climate legislation in the US, such as the *Energy Act of 2020* and various *energy efficiency policies in 2019*. However, it played an active role supporting deregulation from 2016 to 2020. For example, the Chamber lobbied heavily to *weaken* and roll back national fuel economy standards for vehicles from *2017* to *2020*.
- The Chamber has, in particular, *opposed regulation* that would limit unabated coal in the energy mix. Despite offering top-line support for the new US Nationally Determined Contribution (NDC) under the Paris Agreement announced in April 2021, the Chamber issued *a policy statement* in March 2021 strongly advocating for a continued role for fossil fuels in the energy mix. In 2021, it opposed various *executive actions* by the Biden administration to *limit new fossil fuel infrastructure*.
- Since 2017, Business Roundtable demonstrates little engagement with specific policies and has not commented on President Biden’s recent orders to transition the energy mix. However, the group’s 2020 policy statement notes that the *energy transition* is “likely to take decades” and will require a “diverse spectrum of fuels and energy sources” to meet global energy demand, a position which does not appear aligned with IPCC advice to phase out unabated fossil fuels.

#### Membership Statements

Descriptors copied verbatim from the groups’ websites:

## Business Roundtable

“Business Roundtable exclusively represents chief executive officers (CEOs) of America’s leading companies. These CEO members lead companies with more than 15 million employees and more than \$7 trillion in annual revenues.”

## US Chamber of Commerce

“The US Chamber of Commerce is the world’s largest business organization representing companies of all sizes across every sector of the economy. Our members range from the small businesses and local chambers of commerce that line the Main Streets of America to leading industry associations and large corporations.”

## Lobbying comparison

The summary table below draws on more detailed comparative analysis provided in the appendix.

Name	Score	Engagement Intensity	Climate ambition	Energy Transition	GHG Emissions Standards	Fuel Economy Standards
Business Roundtable	52%	12%	Supports limiting global temp. rise to well below 2C, market-based climate policy and the Paris Agreement.	Does not support urgent decarbonization in line with IPCC advice. Limited engagement with specific policies in the last 3 years.	No engagement found in the last 3 years. Opposed Clean Power Plan (CPP) in 2017.	No engagement found in the last 3 years.
Chamber of Commerce	23%	32%	Has not endorsed IPCC-demanded action. Supports market-based climate policy and the Paris Agreement.	In 2021, listed coal, oil, and natural gas as “critical to America’s energy and economic security” and opposed executive actions to limit new fossil fuel infrastructure.	Supported methane standards in 2021 following efforts to repeal them in 2017. Lobbied against GHG standards from 2015 to 2019, and in 2018, supported replacing the CPP with the ACE rule.	Led an active campaign against national and state-level fuel economy standards from 2017 to 2020.

## Appendix: Detailed Information on Recent Lobbying Points

### Europe

Policy Area	Group	Position
Top-Line Climate Ambition	<i>The ERT</i>	The ERT <i>supported</i> climate neutrality in Europe by 2050 and has stated support for the European Green Deal in a position paper in 2020, and <i>in a letter</i> to Angela Merkel, President of the EU, in 2020.
	<i>BusinessEurope</i>	In 2020, BusinessEurope <i>stated support</i> for the European Green Deal in direct communication with the European Council, but specified the timeline for climate neutrality in Europe to be “around mid-century.” This has been the association’s dominant position apart from one consultation response in 2021, where it <i>supported</i> reaching climate neutrality by 2050.
The need for government policy	<i>The ERT</i>	In a position paper in 2020, the ERT <i>seemed to support</i> climate policy but specified that it must ensure industrial competitiveness as one of its founding pillars. The association also <i>advocated for</i> carbon pricing mechanisms in the 2020 position paper.
	<i>BusinessEurope</i>	BusinessEurope in a message to the European Council in 2020, <i>stated support for</i> an industrial strategy but seemed to emphasize the impact on competitiveness and the threat of carbon leakage due to unilateral action. The President Pierre Gattaz in 2021 <i>suggested</i> that policymakers should avoid “too much burden [...] on companies that are deeply affected by an unprecedented crisis. Rigid, prescriptive and intrusive new norms, legal requirements or taxes should really be minimised.”
	<i>The ERT</i>	The ERT <i>does not seem to fully support</i> the upcoming revision of the EU ETS in 2021, suggesting in a position paper in 2020 that it had just been revised in 2018 for Phase IV (2020/21) and that companies need regulatory and investment certainty. The association also <i>appeared to not fully support</i> extending the EU ETS to other sectors and advocated that they should potentially be in similar but separate schemes. However, the ERT <i>advocated for</i> revenues from the EU ETS to be used for the energy transition. In 2016, the then-President of the ERT Benoit Pôtier <i>seemed to state that</i> the ETS does not work, and argued that the reduction of quotas to raise the carbon price would seriously harm the steel industry.

European Emissions Trading Scheme (EU ETS)	<i>BusinessEurope</i>	In response to the consultation regarding the EU ETS revision in 2021, BusinessEurope <i>stated that</i> the scheme is a key policy, but also seemed to oppose reducing the amount of free allowances for industry, and advocate for indirect cost compensation. In comments on the EU's Impact Assessment of the increased 2030 Climate Target, BusinessEurope <i>appeared to advocate for</i> exemptions for industry such as the continuation of free allowances as carbon leakage protection and opposed the Cross-Sectoral Correction Factor, among other ETS mechanisms. In feedback on the EU's 2030 Climate Target Plan, the association <i>did not seem to support</i> extending the scheme to new sectors, suggesting the potential creation of separate sector schemes instead, and emphasized the threat of carbon and investment leakage from the revision of the ETS.
Carbon Border Adjustment Mechanism (CBAM)	<i>The ERT</i>	In a letter to EU Council President Angela Merkel in September 2020 the association <i>appeared to support</i> a CBAM in the absence of a global carbon pricing scheme. In a position paper in 2020 the ERT <i>seemed to support</i> a CBAM under certain conditions regarding sufficient preassessment and has stated that it should gradually replace current carbon leakage protection in the EU ETS (free allowances and indirect cost compensation) until the CBAM has proven its effectiveness.
	<i>BusinessEurope</i>	BusinessEurope <i>seemed to support</i> a CBAM alongside current carbon leakage protection in the ETS (free allowances and indirect cost compensation) in a letter to the Portuguese Presidency of the EU in 2021, a position the association <i>had expressed</i> consistently since the European Commission introduced the concept in October 2020. However, in March 2021 the Director General Markus J. Beyrer <i>acknowledged</i> that free allowances under the ETS could be phased out at the end of the testing phase if the mechanism has proved its effectiveness.
Energy Efficiency Legislation	<i>The ERT</i>	In a 2020 position paper, the ERT <i>supported</i> energy efficiency targets and policies to incentivize action such as enhanced energy performance standards. The group's position has evolved since 2014 when it <i>appeared to oppose</i> energy efficiency targets.
	<i>BusinessEurope</i>	BusinessEurope, in a 2021 position paper on the Energy Efficiency Directive, <i>stated support for</i> energy efficiency legislation in the building sector, such as the Energy Performance for Buildings Directive, and investment in the sector, but did not seem to support increasing the Energy Efficiency Target, nor placing a cap on energy usage.



Renewable Energy Legislation	<i>The ERT</i>	In a 2020 position paper, the ERT <i>supported</i> legislation to facilitate the increase of renewable energy such as ensuring a faster permitting process. However, the association <i>seemed to support</i> exemptions for energy intensive industry from renewable energy levies in a position paper on Competition Policy. This position has evolved since 2014 when the association <i>appeared to oppose</i> a renewable energy target in the EU.
	<i>BusinessEurope</i>	In 2020 the Director General Markus J. Beyrer <i>seemed to support</i> power purchase agreements for renewable energy, and stated that “industry-led initiatives must have their full space when discussing the framework conditions that enable Europe to reach climate ambitions.” In a position paper on the Renewable Energy Directive revision in 2021, BusinessEurope <i>did not seem to support</i> the revision of the legislation, suggesting that it was revised recently, and did not support increasing the EU Renewable Energy Target, also advocating for a technology neutral approach. However, the organization also seemed to support improving the regulatory framework for renewable energy and improving permitting processes in the 2021 position paper.
Energy Transition	<i>The ERT</i>	In a 2020 position paper the ERT <i>supported</i> the decarbonization of the energy mix and the electrification of industry. It also <i>supported</i> the revision of the Energy Taxation Directive to become more in line with the EU's climate goals. However, the association <i>appeared to advocate</i> for the use of natural gas as a transition fuel without placing conditions on the use of CCS.
	<i>BusinessEurope</i>	BusinessEurope seems to support the electrification of energy-intensive industry and the decarbonization of the energy sector, in 2020 in response to the EU consultation on the revision of the EU ETS state aid guidelines <i>advocating for</i> cost compensation in the EU ETS in order to incentivize this. However, in 2020 BusinessEurope <i>did not seem to support</i> aligning the Energy Taxation Directive with new EU ambition, as not supporting reforming existing exemptions for fossil fuels.
	<i>The ERT</i>	In a position paper in 2020, the ERT <i>supported</i> the increased ambition of the EU 2030 Climate Target to 55%, and in a 2017 position paper <i>advocated for</i> Emission Performance Standards for capacity payments. This is a change from 2013, when the association <i>seemed to oppose</i> increasing emissions reductions targets.

GHG Emissions Legislation and the EU 2030 Climate Target	<i>BusinessEurope</i>	BusinessEurope <i>does not seem to fully support</i> the increasing of the 2030 target to 50-55%, as the association, in a letter to the European Council in 2020, raised concerns regarding the economic situation in which the target has been increased due to the COVID-19 pandemic, and stated that it was concerned that the Commission had not considered this in the impact assessment which had been undertaken for the increased target. In response to the 2030 Climate Target Plan consultation in 2021, BusinessEurope <i>stressed doubts</i> regarding the risks from “an incomplete 2030 impact assessment.” BusinessEurope <i>does not support</i> the creation of GHG emission standards for industrial installations under the Industrial Emissions Directive, citing overlapping regulation.
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## Japan

<i>Policy Area</i>	<i>Group</i>	<i>Position</i>
The need for strong government policy	<i>Keizai Doyukai</i>	Although Doyukai stated <i>support</i> for voluntary measures in 2018 to reduce GHG emission, in 2019, they appeared to <i>advocate</i> for the establishment of standardized carbon reduction targets and disclosure standards for companies.
	<i>Keidanren</i>	Keidanren has continuously <i>advocated</i> for its voluntary sector action plan with a focus on technological innovation in emissions reduction, while appearing to <i>oppose</i> government regulation against climate change.  In June 2020, Keidanren also launched its Challenge Zero initiative, <i>emphasizing</i> the role of voluntary, business-led technology innovation in decarbonization.
Climate Ambition	<i>Keizai Doyukai</i>	In its position statement in 2019, Doyukai appears to be <i>supportive</i> of a net zero GHG emission target in Japan by 2050. They also appear to be <i>supporting</i> “game-changing” measures to meet the Paris-goals, highlighting measures such as abolition of coal plants by 2030 and ban on petrol vehicles by 2040 implemented elsewhere in the world.
	<i>Keidanren</i>	In 2019 in a <i>public consultation</i> , Keidanren warned against the use of a new explicit GHG emission target, pushing instead for a “vision”. <i>Media reports</i> in 2019 suggests the organization was influential in advocating this position to the government, influencing the outcome of the final long-term economic growth strategy under the Paris agreement.

		<p>In 2020, Keidanren appears to generally <b>support</b> the Paris agreement goals, including decarbonization, although it does not give a specific timeline, only stating “at the earliest possible date”. It also stated <b>support</b> for Japan’s NDC targets, however stated that this should be achieved by voluntary initiatives with government backing and technology innovation. In October 2020, Keidanren’s chairman <b>supported</b> Japan to aim for carbon neutrality by 2050 within a presentation to the cabinet office. However, he suggested this should be led by innovative technology solutions.</p>
Carbon tax	<i>Keizai Doyukai</i>	<p>In 2019, Doyukai appears to communicate a relatively <b>supportive</b> position on a ‘carbon consumption tax’ although in 2018, they had <b>opposed</b> a direct tax on industries that emit CO<sub>2</sub> and stressed the need for further discussion.</p>
	<i>Keidanren</i>	<p>Since <b>opposing</b> the inclusion of an emissions trading scheme in the Ministry of the Environment’s (MoEJ) Plan for Global Warming Countermeasures under the Paris Agreement (2016), Keidanren has consistently <b>opposed</b> explicit carbon pricing policy and carbon taxes, including at government <b>subcommittee meetings</b>.</p> <p>In 2018, Keidanren also directly advocated <b>against</b> an explicit carbon tax in the Ministry of Economy, Trade and Industry (METI)’s proposed 5th Basic Energy Plan.</p>
Energy mix	<i>Keizai Doyukai</i>	<p>In 2020, Doyukai stated <b>support</b> for increasing renewable energy in the energy mix to 40% by 2030. In 2018, Doyukai also communicated in <b>support</b> of moving away from coal as baseload energy, due to uncertainty in its future potential due to climate change. On the other hand, in 2019 Doyukai appears to <b>support</b> the continued export of Japan’s high efficiency coal power plant technology to developing countries.</p> <p>On renewable energy legislation, Doyukai appears to be <b>supporting</b> the relaxation and reform of any regulation that is limiting renewable energy production and access, stated in its 2020 position statement on the energy mix. In its 2018 response to METI’s consultation on the energy mix, Doyukai <b>stated</b> the need for system reform for renewable energy production to be viable as a business, without the need for reliance on the FIT scheme.</p>
	<i>Keidanren</i>	<p>Keidanren has remained in favor of a prolonged role for coal in the energy mix, both <b>domestically</b> and in <b>Asia</b>.</p> <p>In 2019, in consultation with policymakers over Japan’s long-term growth strategy under the Paris Agreement, Keidanren explicitly <b>opposed</b> the inclusion of the statement in the strategy for the</p>

		<p>abolition or ban on the construction of new coal-fired power plants, <i>watering down</i> the statement to "reduced dependence" on coal. It also appears to have <i>opposed</i> the halting of international investment into coal power, but instead to "invest in line with Paris aligned GHG emission goals".</p> <p>in January 2020, Keidanren appeared <i>to support</i> renewable energy legislation in its response to a government consultation, with the exception that it does not result in increased electricity prices, particularly for large-scale industrial users, suggesting any further dissemination of renewable generation capacity and upgrades to the network system must be kept to a minimal cost.</p> <p>In 2020, through a position statement on economic recovery post-Covid-19, it appears to <i>support</i> decarbonization of the energy system through measures including mainstreaming of renewable energy, although no specific timescale for the transition is given.</p>
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## United States

Policy Area	Group	Position
Top-Line Climate Ambition	Business Roundtable	As of 2020, in alignment with IPCC guidance, Business Roundtable supports a goal of reducing net US GHG emissions by at least 80% from 2005 levels by 2050 in order to <i>limit global temperature rise</i> to well below 2 degrees Celsius.
	Chamber of Commerce	The Chamber has not endorsed IPCC-demanded action to reduce economy-wide emissions. Rather, the Global Energy Institute <i>website</i> currently references "a timeframe [for emissions reduction] that is not viewed as feasible," with no further detail on the specific timeframes the organization does or does not support.
The need for government policy	Business Roundtable	In its 2020 position paper, Business Roundtable expresses support for a market-based approach to emissions reduction. <i>Market-based mechanisms</i> , it writes, are "more often than not... more cost-effective and efficient than regulations for reducing emissions." Central to Business Roundtable's preferred approach is <i>putting a price on carbon</i> .
	Chamber of Commerce	In January 2021, the Chamber updated its position to support a market-based approach to emissions reduction. The Chamber specifies that " <i>durable</i> " <i>climate policy</i> should avoid economic harm to

		businesses and protect national competitiveness, among other qualifications.
Carbon Tax	Business Roundtable	InfluenceMap did not find evidence of recent engagement from Business Roundtable with carbon tax policies.
	Chamber of Commerce	In December 2019, the Chamber cautioned against a <i>carbon border adjustment tax</i> in Europe.
Emissions Trading	Business Roundtable	InfluenceMap did not find evidence of recent engagement from Business Roundtable with emissions trading schemes/policies.
	Chamber of Commerce	The Chamber criticized the <i>EU Emissions Trading Scheme</i> in 2018 and highlighted the failure of national-level cap and trade proposals in the US.
Energy Efficiency Policy	Business Roundtable	In its 2020 climate policy position paper, Business Roundtable states support for policy to encourage and incentivize <i>energy efficiency</i> in buildings, equipment, appliances, transportation, manufacturing, and the electricity sector. InfluenceMap did not find evidence of recent engagement from Business Roundtable with specific energy efficiency policy.
	Chamber of Commerce	The Chamber lobbied heavily against federal CAFE standards as well as California's right to enact its own fuel economy standards, including through an <i>amicus brief</i> submitted in September 2020. In 2019, the Chamber supported the <i>Federal Energy and Water Management Act</i> , which aimed to increase energy efficiency in federal buildings, and the <i>Energy Savings and Industrial Competitiveness Act</i> , which aimed to strengthen building codes through voluntary standards set by the states.
Renewable Energy Policy	Business Roundtable	InfluenceMap analysis finds limited engagement with renewable energy policy. In 2017, Business Roundtable supported extension of the <i>wind production tax credit</i> .
	Chamber of Commerce	In the first quarter of 2021, the Chamber offered an unclear position on the <i>clean electricity standard</i> proposed in congress. The Chamber supported extension of the <i>wind production tax credit</i> in 2020, but in the past, lobbied against several renewable energy policies such as the <i>Clean Energy Incentive program</i> under the Clean Power Plan in 2016 and <i>distributed solar</i> policies in 2017.

Energy Mix Policy	Business Roundtable	Business Roundtable's current position on the <i>energy mix</i> notes that the energy transition will take several more decades and takes no clear position on decarbonization. In 2017, it supported the buildout of infrastructure for <i>natural gas</i> and <i>oil</i> .
	Chamber of Commerce	The Chamber's current position on the <i>energy mix</i> emphasizes innovation, carbon capture and storage, and a "technology-neutral" approach to the energy transition. In 2021, the Chamber named <i>coal, oil, and natural gas</i> as "critical to America's energy and economic security" after opposing President Biden's executive order to <i>suspend new permits for oil and gas</i> . In 2019, it <i>opposed regulation</i> to limit unabated coal in the energy mix while supporting the <i>repeal</i> of a rule that would have tied construction of new coal plants to the use of CCUS. The Chamber also wrote a <i>2019 letter</i> to US Senators opposing the Green New Deal. In 2018, it <i>published</i> a report on the economic costs of the 'Keep it in the Ground' movement.
GHG Emissions Policy	Business Roundtable	Business Roundtable opposed <i>GHG emissions standards</i> and the overreach of the EPA through the Clean Power Plan but appears not to have engaged with GHG emissions policy after 2017. It did not appear to take a stance on the US NDC of 50% emissions reductions by 2030 based on 2005 levels announced by the Biden administration in April 2021.
	Chamber of Commerce	The Chamber released a vague response to the <i>GHG emissions reduction target</i> announced by the Biden administration under the Paris Agreement in April 2021. The Chamber updated its stance in 2021 to offer <i>conditional support</i> for methane standards, but does not appear to have made any public statements supporting or engaging with new legislation to regulate the super-pollutant, such as the Methane Waste Prevention Act of 2021. This follows active lobbying to <i>repeal methane standards</i> in 2017. It lobbied heavily against the Clean Power Plan from <i>2015 to 2019</i> , and in 2018, <i>supported its replacement</i> with the far weaker ACE rule.