



17th October, 2016

Business and Human Rights Resource Center
Attn: Kasumi Maeda & Eniko Horvath
630 Ninth Avenue, Suite 304
New York, NY 10036

Dear Kasumi and Eniko,

Many thanks for giving us the opportunity to comment on the Union of Concerned Scientists' report "The Climate Accountability Scorecard: Ranking Major Fossil Companies on Climate Deception, Disclosure, and Action." To be more easily understandable, we have set our responses alongside the UCS recommendations for ConocoPhillips (COP) from the report along with links to our publicly available information.

UCS Recommendation: Improve communications by affirming the need for swift and deep reductions in emissions from the burning of fossil fuels.

COP Response:

- Our climate change position already states that effective policy is that which will result in the stabilization of global GHG concentrations at safe levels. http://www.conocophillips.com/sustainable-development/our-approach/Documents/Climate%20Change%20Position_FINAL.pdf
- We also acknowledge a range of possible scenarios that can evolve from government actions and the pace of technology adoption in our information on addressing carbon asset risk:

USC Recommendation: Use CEO's role as chair of API and its leverage as a leader within NAM and US Chamber of Commerce to demand an end to the groups' disinformation on climate science and policy, and speak publicly about these efforts. Also distance itself from WSPA's positions on climate science and policy.

COP Response:

- We explain our primary purpose for joining API, NAM and the US Chamber of Commerce at: <http://www.conocophillips.com/sustainable-development/our-approach/policies-positions/political-support-policy-procedures/Pages/lobbying-related-activities-trade-association-membership.aspx>.

- [We have previously explained to the Union of Concerned Scientists our relationship with WSPA. The following is a quote from our letter to them dated 23rd July 2015, ‘In May 2012 ConocoPhillips separated into two independent publically traded companies. The “upstream” \(oil and gas exploration and production\) business remained with ConocoPhillips and the “downstream” \(refined products manufacturing, transportation and marketing\) business was transferred to a newly created entity named Phillips 66. Since the separation, we have retained a Western States Petroleum Association membership solely for ConocoPhillips’ Polar Tankers subsidiary to keep on top of regulatory changes, so that it can ensure compliance at all times for our operations along the west coast. <http://www.conocophillips.com/what-we-do/transportation-and-marketing-energy/sea/Pages/default.aspx>](#)

UCS Recommendation: Publicly acknowledge the Paris Climate Agreement’s long-term goal and its implications for the swift transition to global net-zero emissions.

COP Response:

- Ryan Lance’s (ConocoPhillips CEO) introduction to the 2015 Sustainability Report references the Paris Agreement (Page 1). Likewise, the introduction to the Climate Change section of the report also acknowledges the Agreement (Page 13). We describe the Agreement on page 17 of the report and indicate our participation in IPIECA’s ‘Paris Puzzle’ publication. <http://www.conocophillips.com/sustainable-development/SD%20Report%20Download/16-0310%20SD%20Book.pdf>.
- [Our work in developing carbon scenarios illustrates that we are taking the goals of the Paris Agreement seriously. <http://www.conocophillips.com/sustainable-development/environment/climate-change/climate-change-strategy/Pages/carbon-scenarios.aspx>](#)

UCS Recommendation: Set and disclose initial near-term companywide targets to reduce emissions from its operations and the use of its products

COP Response:

- We set out details of our GHG emission reduction target on page 13 of our Sustainability Report and reported our results against the target. <http://www.conocophillips.com/zmag/15SR.html#14>
- [We also describe our approach to managing performance and the use of target setting along with other types of goals to develop, over time, a focus on emission reductions within our operations.](#)

UCS Recommendation: Develop and publicly communicate a clear plan and timeline to deepen reductions consistent with the agreement’s long-term goal

COP Response:

- We discuss our Climate Change Action Plan on our website at: <http://www.conocophillips.com/sustainable->

[development/environment/climate-change/climate-change-action-plan/Pages/default.aspx](#)

- [This is a forward-looking 5-year plan, and we have had such plans in place since 2009. In various places in our sustainability reporting, we indicate the significant work we have already done, and our investments toward the next step changes in key technologies for reducing our emissions.](#)
- We work with industry's cutting-edge technology vendors and to develop new technology and assess existing and emerging technology for use in our operational design. As a founding member of Canada's Oil Sands Innovation Alliance (COSIA), we share technologies and best practices that have an environmental benefit with 12 other member companies and associate members, including universities and leading innovators, to multiply our technology development efforts across industry. Our Oil Sands Technology infographic illustrates the various ways our most progressive technologies can simultaneously reduce our impacts on water, air and land.
<http://www.cpcsustainability.com/where-we-work/oilsands/oilsandstechnology/index-oil-sands-tech.cfm>

UCS Recommendation: Call for US policy action on climate change, identify specific federal and/or state legislation or regulation that it supports, and advocate publicly and transparently for those policies

COP Response:

- We set out our Climate Change Public Policy principles in our Climate Change Position and we spotlighted our efforts to achieve 'Breakthrough Policy Engagement in Canada' on page 18 of the 2015 Sustainability Report. The article demonstrates that having flexibility to investigate new ideas around a set of clearly stated principles can prove an effective method of unlocking polarized debate.
<http://www.conocophillips.com/zmag/15SR.html#20>
- [We have also outlined our history of engagement in US policy discussions since 2007, which includes public support for certain policies in the US: http://www.conocophillips.com/sustainable-development/environment/climate-change/public-policy-engagement/Pages/climate-change-policy-history.aspx](#)

UCS Recommendation: Disclose physical climate risks by providing details on: the operational segments and/or specific company facilities that might be impacted; the magnitude and time frames of the anticipated impacts (quantified, when feasible); and how the company plans to respond to physical impacts

- COP Response: Our response to question CC5.1b in the 2015 CDP Questionnaire sets our inherent risks that are driven by changes in physical climate parameters. It lists descriptions, potential impact, timeframe, the magnitude of impact and how we manage the risk.
<https://www.cdp.net/en>

Further Comments:

We question the rating of 'Egregious' for disclosure of corporate governance on climate-related risks by board and senior management. We have a section in 'Our Approach' on the website which describes our governance in detail.:

<http://www.conocophillips.com/sustainable-development/our-approach/accountability-for-sustainability-issues/Pages/default.aspx> . Our governance structure for managing sustainable development risks and opportunities, including climate change, is comprehensive and integrates sustainability into key processes and requirements in the company. It includes champion roles for 4 members of the executive team, including climate change, and describes the engagement with our board. Furthermore, we give specific details related to climate change governance in our answers to section CC1 of the CDP questionnaire. <https://www.cdp.net/en>

We note that, alongside with BP, we are ranked highest of the 8 companies 'analyzed,' with an overall ranking of 'Fair.' We take these issues seriously and have frameworks in place to drive the company's performance and continuous improvement. We review the disclosure in our Sustainability Report annually and consider feedback from stakeholders as we update our plans. Our process and priorities are described in our 2015 Sustainability Report <http://www.conocophillips.com/zmag/15SR.html#46>

Best regards,

Sabrina Watkins
Head of Sustainable Development