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Business and Human Rights Resource Center  
Attn: Annabel Short  
Program Director  
630 Ninth Avenue, Suite 304  
New York, NY 10036

Dear Annabel:

Thank you for the opportunity to respond to a report from the Union of Concerned Scientists claiming that ConocoPhillips and other companies engaged in “decades of miscommunication” on the harmful impacts of climate change. We are disappointed that the Union of Concerned Scientists continues to misrepresent our participation in the complex, ongoing dialogue about climate change. Our position on this very important issue has been consistent and available to the public for several years in our Sustainable Development Report. <http://www.conocophillips.com/sustainable-development/environment/climate-change/Pages/global-climate-change.aspx>

We have been clear that *‘ConocoPhillips recognizes that human activity, including the burning of fossil fuels, is contributing to increased concentrations of greenhouse gas in the atmosphere that can lead to adverse changes in global climate. While uncertainties remain over the extent of human contributions and the timing and magnitude of future impacts, we are committed to taking action.’* These are not just words. We have taken significant action that includes completing many projects that reduced the equivalent of more than one million metric tons of carbon dioxide emissions each year since we introduced our first Climate Change Action Plan in 2008 (totaling 6.2 million metric tonnes of CO2 equivalent by the end of 2014, keeping our emissions effectively flat at 26.9 million metric tonnes).

In 2010, we became a co-sponsor of the MIT Joint Program on the Science and Policy of Global Change along with other major industrial companies and several US government agencies.

The program's mission is to:

- Improve knowledge of interactions among human and natural Earth systems, with a particular focus on climate and energy, and of the forces that drive global change.
- Prepare quantitative analyses of global change risk and its social and environmental consequences.
- Provide independent assessments of potential responses to global risks, through emissions mitigation and anticipatory adaptation, contributing to improved understanding of these issues among other analysis groups, policy-making communities and the public, and
- Augment the pool of people needed for work in this area by the education of graduate and undergraduate students in relevant disciplines of economic and Earth science analysis and methods of policy assessment. <http://globalchange.mit.edu/>

We do not agree with the premise in the May 2012 (*A Climate of Corporate Control: How Corporations Have Influenced the U.S. Dialogue on Climate Science and Policy*) report that our company is using our influence to muddy the water on climate change science and adding confusion to policy discussions.

The report uses comparison criteria that incorrectly juxtaposes our climate change positions with statements made during specific legislative initiatives. ConocoPhillips has often engaged in climate change regulatory and legislative policy discussions. These policy decisions could have a significant impact on our business, and with respect to the creation of legislation and regulation, details matter. Sometimes the details in proposed laws and rules can make them impractical for our company, the industry and the public - even if the concepts or frameworks appear constructive. A timeline of our engagement in the US Climate Policy process with details of our press releases clearly shows what we could and could not support at each step of the evolving legislation and regulation: [http://www.conocophillips.com/sustainable-development/environment/climate-change/Documents/United\\_States\\_Climate\\_Change\\_Policy.pdf](http://www.conocophillips.com/sustainable-development/environment/climate-change/Documents/United_States_Climate_Change_Policy.pdf)

We also engage with hundreds of trade associations at the national, state and local levels. In the vast majority of instances our membership and involvement isn't based on a single issue, and to imply that our participation with those groups somehow taints our position on climate change is wrong.

A good example of this is our membership in WSPA. We note that in the Take Action section of your website you say, *'Through the oil industry's trade association—the Western States Petroleum Association (WSPA)—ConocoPhillips supports attacks on climate and clean energy solutions in California, Oregon, and Washington. WSPA has promoted undeniably false information about the true costs of policies to cut global warming pollution and oil use—often through a network of WSPA-backed groups masquerading as citizen-led organizations.'*

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>; <http://polartankers.conocophillips.com/Pages/default.aspx>.

We have not made political contributions in California and our lobbying expenditures in 2013-2014 were only \$72,000. (More information on our Political Support Policy and Procedures can be found on our website here: <http://www.conocophillips.com/sustainable-development/our-approach/living-by-our-principles/policies/political-support-policy-procedures/Pages/default.aspx>)

We remain committed to succeeding in a carbon-constrained world as demonstrated by our recent disclosures on our approach to carbon asset risk: <http://www.conocophillips.com/sustainable-development/environment/climate-change/managing-risks-and-opportunities/Pages/carbon-asset-risk.aspx>. Our score on the Carbon Disclosure Project (CDP) for 2014 was 89/B, which reflects our continued strong performance and disclosure.

We are committed to working constructively toward effective, fit-for-purpose solutions to address climate change while providing for the nation's vital energy needs.

Best regards,



Sabrina Watkins  
Head of Sustainable Development