



Climate Policy Engagement Review

Unilever Climate Policy Engagement Review
Progress update 2025



Unilever

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Introduction

Unilever believes that transitioning to become a net zero business has many benefits. It improves efficiency, increases resilience, and future-proofs our value chain against risks, while sparking new technologies and helping attract great people. Investments in sustainability initiatives are increasingly seen as delivering higher returns and driving value within businesses.

Climate change is a principal risk to Unilever's success. It has the potential – to varying degrees – to negatively impact our business in the short, medium, and long term. The best way to mitigate this risk is to actively engage in and support actions that limit global warming to no more than 1.5°C, as per the Paris Agreement. This is a goal that remains achievable in the long term even though the pathway to this is narrowing dangerously.

To have real impact, these actions must be consistent and emanate from all parts of our value chain. Industry bodies and trade associations are powerful actors in our value chain. They often serve as the voice of business when governments and regulatory bodies draft laws that can either undermine or keep alive a 1.5°C future.

That's why it is important that advocacy undertaken by our trade associations aligns with our own advocacy. We lobby in favour of a policy and regulatory landscape that will enable us to deliver our [Climate Transition Action Plan \(CTAP\)](#) and support Unilever's growth plans.

The CTAP sets out our updated near-term emissions reduction targets – approved in 2024 by the Science Based Targets initiative – as well as the policies we believe we need to deliver them.

While our CTAP outlines our own plans and policy positions, this update to last year's Climate Policy Engagement Review (CPEP) scrutinises the positions and engagement of our key industry bodies and trade associations, during 2024, to see how well aligned they are with our climate positions.

This update helps us identify both commendable practices and areas for improvement, with a view to informing actions that Unilever and other businesses could take to address areas of misalignment, or indeed identifying opportunities to increase constructive engagement. In this update, we also include an outline of Unilever's direct activities.

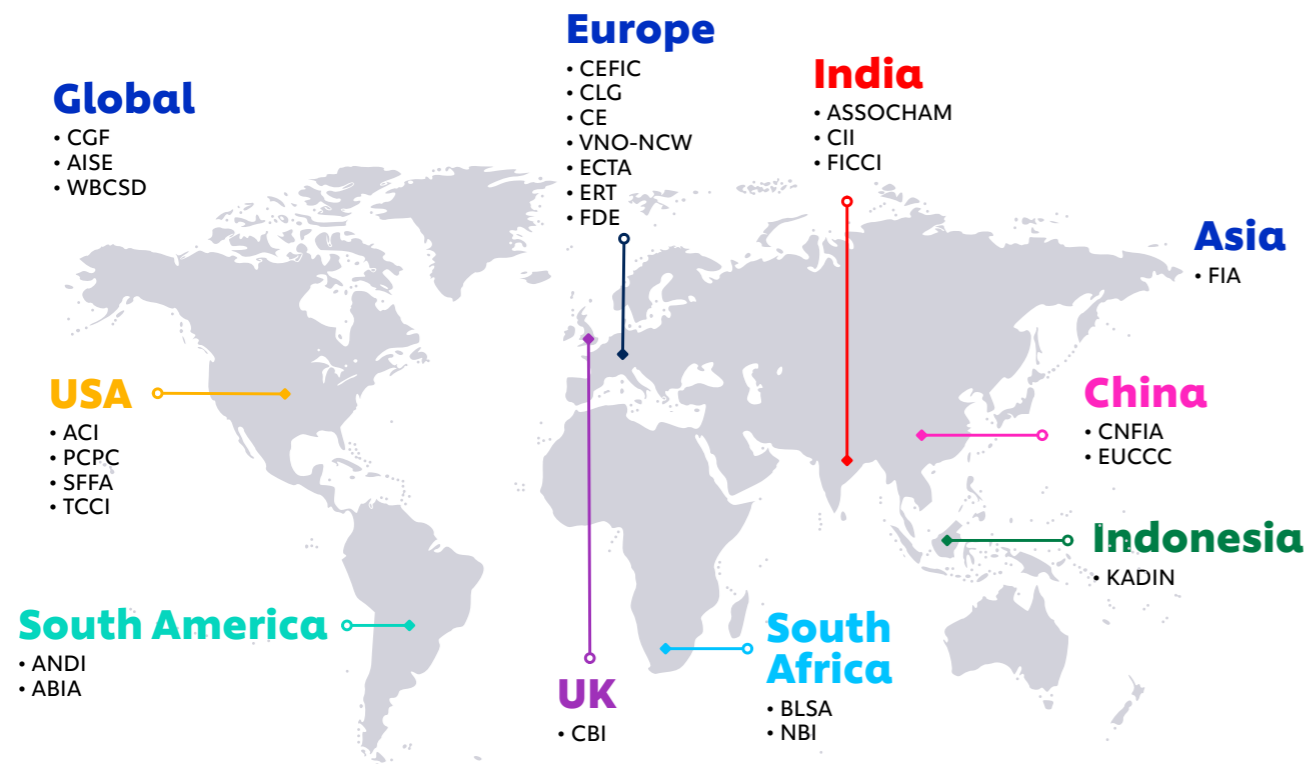
We remain committed to scaling up climate solutions and using all the channels available to us – including both our direct and indirect engagement with policymakers – to drive down emissions across our value chain and beyond.

Rebecca Marmot, Chief Sustainability and Corporate Affairs Officer

Executive summary

Our first Climate Policy Engagement Review (CPEP) published in March 2024, included an assessment of the climate policy engagement undertaken by 27 of our key industry associations during 2022 and 2023.

At the time, 13 of the 27 associations were found to have taken positions during that two-year period that were at least partially misaligned with Unilever’s climate policy positions (see CTAP¹ or page 6 of this document) and/or science-based policy,² with one other assessed as unclear due to insufficient information. This update covers all the same associations, bar one,³ and focuses on their engagement during 2024.⁴



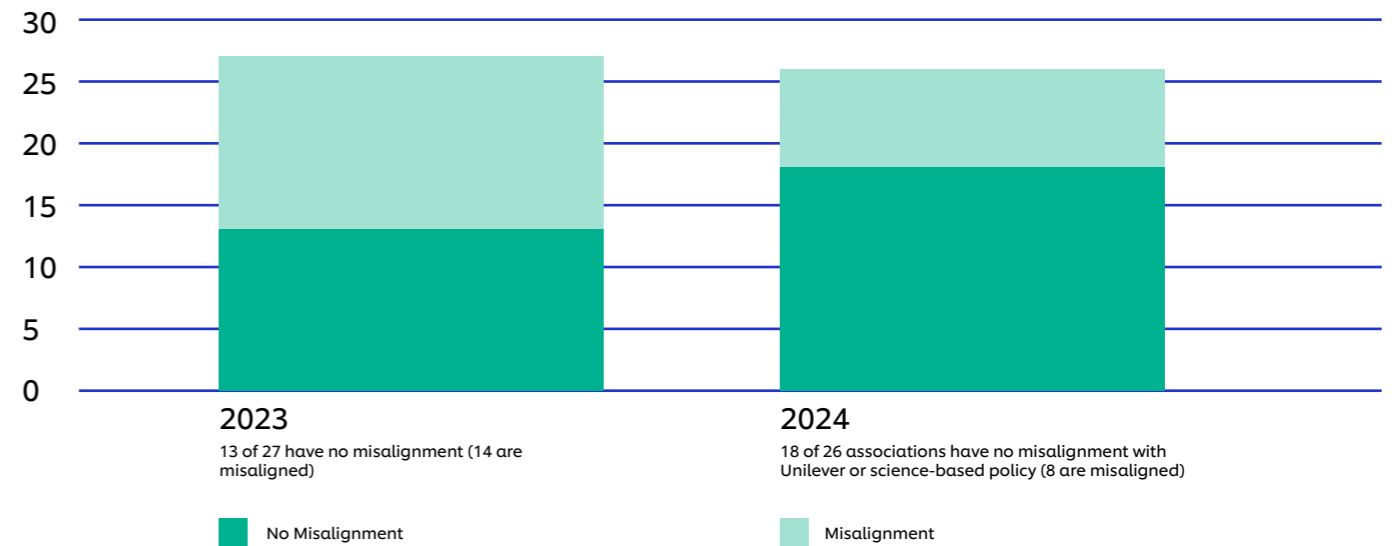
Key findings

1. Reduced resistance to Paris-aligned climate policies

Overall, of the 26 associations assessed, 18 have no instances of misalignment with Unilever’s climate policy positions or science-based policy during the review period – up from 13 out of 27 last year.

Seven associations were found to have shifted from previously obstructive or misaligned stances on a specific policy issue to more inactive or neutral positions during 2024, compared with just one instance of an association moving in the opposite direction. This is encouraging.

However, it is important to note that this may not always indicate an actual shift in the association’s stance. Associations might have been inactive on an issue during 2024 simply because it hasn’t been on the legislative or regulatory agenda in their jurisdiction. Nonetheless, inaction is better than obstruction and we intend to work with these associations to move them, where possible, from inactive or neutral to constructive.



2. Opportunities to move engagement from passive to constructive remain a key focus

13 of the 26 associations assessed can be classified as passively aligned. This means that, while an association’s public position on climate policy aligns with our positions and Paris-aligned science-based benchmarks, its actual engagement is either minimal or non-existent. Meanwhile, just five associations are assessed as fully aligned and actively engaged (up from three in 2023).

It is encouraging that more associations align with our climate policies compared with the previous year. However, active support for the 1.5°C goal of the Paris Agreement remains a concern. After last year’s CPEP, Unilever outlined additional actions for trade associations to take. Many were responsive to requests, but more work is needed to make sure these actions lead to policy changes, especially since the last review was recent.

There is an opportunity for Unilever to work with fellow trade association members to improve engagement on key business climate priorities in a coordinated way. To meet Unilever’s CTAP goals, limit climate change damage, and boost economic growth through decarbonisation, our associations must demonstrate strong engagement in supporting science-based climate policies.

There have been some notable exceptions to the findings around passive engagement.

- **Climate ambition/NDCs:** two associations were found to have actively pushed for governments to submit more ambitious nationally determined contributions (NDCs) to the UNFCCC (CLG, WBCSD).
- **Carbon pricing:** two associations were found to have engaged constructively on the issue of carbon pricing during 2024 (CBI, WBCSD).
- **Regenerative agriculture:** three associations were assessed as ‘constructive’ on policies to promote regenerative agriculture (FDE, SFFA, WBCSD).

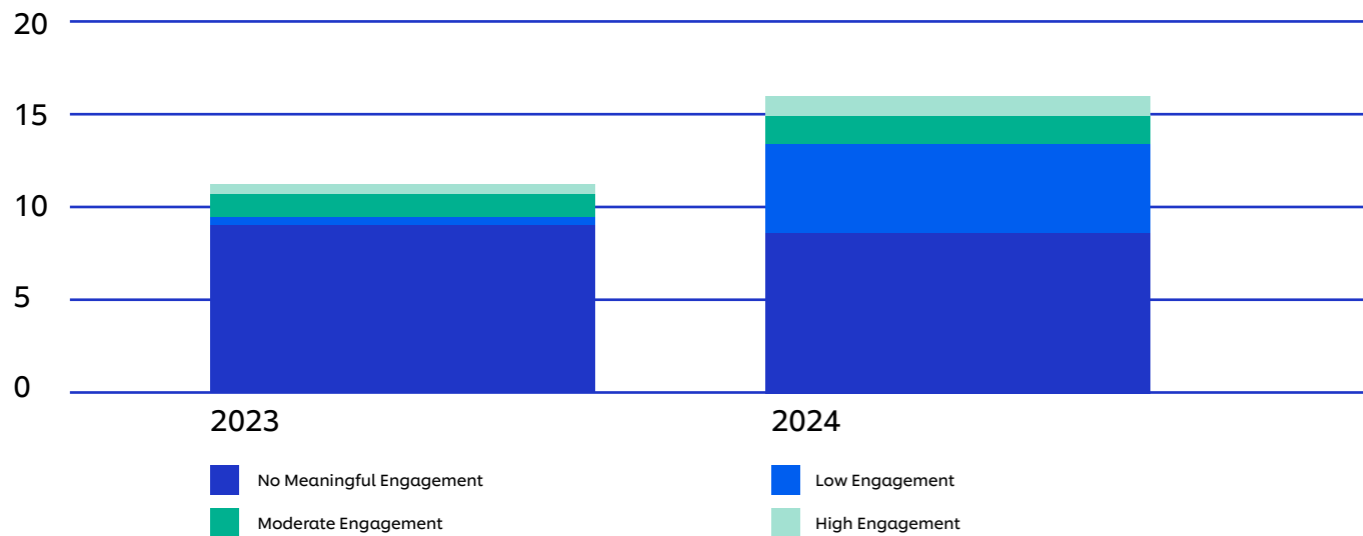
¹ Unilever Climate Transition Action Plan updated 2024

² 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).

³ The German Chemical Industry Association (VCI) has been excluded in this update on the basis that Unilever is not a direct member, and we have communicated to VCI that they do not have permission to use Unilever’s logo or in any way imply that Unilever endorses VCI’s policy positions.

⁴ Evidence of associations’ engagement activities was gathered and assessed during October and November 2024, and any activities since the previous assessment – carried out 12 months earlier – were included in scope. Technically, this update covers the period from October/November 2023 to October/November 2024.

- **Deforestation-free:** the same three associations were assessed as 'constructive' on policies to tackle deforestation (FDE, SFP, WBCSD).
- **Fossil fuel phase-out:** two associations were found to have actively lobbied in favour of a rapid phase-out of fossil fuels (CLG, WBCSD).
- **Non-fossil chemical feedstocks:** one association was found to have actively promoted policies to accelerate the scale-up of non-fossil chemical feedstocks (Cefic).



3. Constructive engagement on Unilever policy priorities has remained stable

The industry association assessment looks in detail at how associations engaged on Unilever's climate policy priorities. 17 associations were found to be constructively engaged on at least one Unilever priority during 2024. Six of these were constructively engaged on two or more of our priority issues. This is consistent with the results of our 2023 CPER.

Scaling up renewable energy capacity is the policy priority on which the most associations are constructively engaged: 16 of 26 associations are assessed as constructive on this issue – including 13 of 14 cross-industry groups. This is to be expected since access to renewable power is an issue that affects every business in every sector.

4. Contradictory positions: rapid phase-out of fossil fuels versus renewable energy

For the associations assessed as misaligned with Unilever and/or science-based policy, the most common area of misalignment is the need for a rapid phase-out of fossil fuels versus renewable energy. Of the seven associations found to be misaligned with Unilever on this issue, all seven also advocated for policies to increase renewable energy.

It is positive that these seven trade associations support the scale-up of renewable energy. However, the IPCC⁵, IEA⁶ and others are clear that scaling up renewable capacity is necessary but insufficient for successful decarbonisation.

⁵ See specifically the IPCC's [Working Group III report on the Mitigation of Climate Change](#) (published in 2022) which called for 'a substantial reduction in overall fossil fuel use' and warned that 'the continued installation of unabated fossil fuel infrastructure will "lock-in" GHG emissions'.

⁶ <https://www.iea.org/reports/net-zero-roadmap-a-global-pathway-to-keep-the-15-0c-goal-in-reach>

Phasing out fossil fuels is vital for achieving our CTAP goals, since it is a prerequisite for achieving fully decarbonised power grids. As stated in our CPER, Unilever's goal is to support policymakers to commit to 100% decarbonised power systems by 2035 in advanced economies, and by 2040 at the latest for others. Except in very limited circumstances, any continued investment in expanding fossil fuel production and infrastructure is not consistent with these ambitions.

To conclude, it is encouraging to see an improvement in the number of associations with no misalignment. However, more work is needed on constructive engagement and addressing contradictory positions on energy production. Unilever is clear on where progress is necessary, and we continue to engage with our associations to drive systems-level change that supports a policy and regulatory environment that enables the delivery of our CTAP.

Our approach: direct climate policy engagement

Priority climate policy areas

In March 2024, Unilever updated its Climate Transition Action Plan (CTAP). The ultimate ambition of the CTAP is to reduce emissions consistent with the 1.5°C temperature goal of the Paris Agreement, and to reach net zero emissions across our value chain by 2039.⁷ The focus of our plan is how we will meet our 2030 science-based targets and the main challenges and dependencies across our priority action areas.

We have also recognised the need for more targeted external engagement to drive systemic change, to help us meet our targets, and progress towards our long-term net zero ambition. Detailed advocacy priorities now target specific barriers to the delivery of our CTAP and provide increased clarity on where we must work with governments, regulators, or industry to shift the systems we are part of. These are:

Cross-cutting policies

1. Raise the ambition of national climate strategies and plans in key markets to align with a 1.5°C pathway.
2. Ensure carbon is priced at levels necessary for the delivery of the Paris Agreement.
3. Scale up renewable energy capacity and ensure the rapid phase-out of fossil fuels, including fossil fuel subsidies.
4. Support forest protection and nature restoration.
5. Encourage the evolution of the GHG Protocol standards to incentivise emissions reduction actions in value chains.

⁷ [Unilever Climate Transition Action Plan updated 2024](#)

⁸ Policies that drive the global transition to net zero and accelerate the impact of Unilever's mitigating actions. Importantly, by supporting policies that create a level playing field, we aim to de-risk the transition, helping us achieve our ambitions without putting the business at a competitive disadvantage.

Business Group specific advocacy priorities⁹

- **Reformulating products:** Ensure Standards of Identity rules are not a barrier to portfolio development.
- **Forest-risk commodities:** Advocate for policies that facilitate the maintenance of a deforestation-free supply chain even when sourcing increasing volumes of ingredients in a competitive market.
- **Regenerative agriculture:** Lobby for a regulatory landscape that supports farmers to transition to and maintain a regenerative agriculture approach.
- **Chemical ingredients:** Create a level playing field that supports national policies that rapidly accelerate the scale-up of non-fossil chemical feedstocks and addresses energy emissions from ingredient production.
- **Packaging:** Advocate for the development of well-designed Extended Producer Responsibility (EPR) legislation, implementation of regulated EPR schemes, and an agreed Global Plastics Treaty.
- **Logistics:** Support policies that drive the clean transition of transportation infrastructure, e.g. access to renewable energy and EV infrastructure.
- **Ice-cream cabinets:** Improve access to renewable energy and remove barriers to warming up the cold chain.
- **Aerosols:** Address potential regulatory roadblocks in Canada.

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 Corporate Affairs function. 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 and Corporate Affairs Officer.
- 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.

All public policy engagement that Unilever undertakes must adhere to our Code of Business Principles.¹⁰ Colleagues who 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 is ultimately responsible for overseeing our climate change agenda. Further details on our internal governance are included in our updated CTAP.

⁹ Unilever has five Business Groups: Beauty & Wellbeing, Personal Care, Home Care, Foods, and Ice-cream.

¹⁰ [Unilever Code of Business Principles and Code Policies 2024](#)

Our approach: indirect climate policy engagement and working with industry associations

Aligning industry associations to Unilever's objectives

Engaging directly is only one method a business can use to shape policy. Unilever is affiliated with around 600 industry associations, which address a variety of issues.

Recognising the influence industry associations have on climate policy, we have consistently advocated for aligning indirect climate lobbying with the 1.5°C goal of the Paris Agreement.

- In 2019, we wrote to our associations asking them to confirm whether their policy engagement was aligned to the 1.5°C ambition of the Paris Agreement.
- In 2022, we conducted our first internal review of our industry associations to assess which topics and issues they are most engaged with on Unilever's behalf, and which associations are most engaged on climate policy.

In 2023, we carried out more detailed analysis in the form of our first CPER,¹¹ which we published in March 2024. The objective was to gain deeper insights into the positions and levels of engagement of our trade associations, as well as to help Unilever encourage those associations to work with policymakers to implement policies that will deliver real emissions reductions and support growth.

As a result of this review, Unilever's relationship managers engaged with their trade associations on key positions and expected actions.

Examples of these actions include:

- In 2023, Unilever committed to working with the European Chemical Industry Council (Cefic) through working groups and direct engagement to further develop policies that promote the use of renewable and recycled carbon feedstocks. Since the last review, there has been constructive engagement with Cefic on non-fossil feedstocks.
- In the 2023 CPER, both the German Chemical Industry Association (VCI) and Tennessee Chamber of Commerce & Industry (TCCI) were deemed misaligned in multiple policy areas, and we took the following actions:
 - **Update on VCI:** Unilever is an indirect member of VCI through its membership of IKW – the German Cosmetic, Toiletry, Perfumery and Detergent Association. Unilever informed VCI and IKW that VCI is misaligned on climate ambition, renewables, and carbon pricing. Unilever asked VCI to remove its name from its website because Unilever is not a direct member and VCI does not speak for Unilever.
 - **Update on TCCI:** Unilever is a member of TCCI due to its ice-cream manufacturing plant in Covington, Tennessee. Due to its current position on certain environmental issues, TCCI does not speak for Unilever on climate change. Following the separation of our Ice-cream business, due in late 2025, there will be a review of our trade association memberships, including TCCI.

¹¹ [Unilever Climate Policy Engagement Review](#)

Internal governance of industry associations

Unilever reviews its membership of global industry associations on an annual basis and is committed to conducting a full review every three years. The last review took place at the end of 2022. Furthermore, we publish a list of our principal/main trade associations, alliances, and advocacy groups by spend across our regions.¹² Our Trade Association Standard, approved by the Unilever Leadership Executive, sets out that, at the point of joining or renewing membership (typically an annual process) the Unilever relationship manager must seek confirmation from industry associations that their climate policy work is consistent with Unilever's positions and the 1.5°C ambition of the Paris Agreement.

Addressing misalignment

Where our CPER 2023 found examples of industry associations having unclear or misaligned positions, we have offered 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 with the industry association to:

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

This process is led by the Unilever relationship manager 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 made to reach alignment over a 12-month period, the issue is escalated to the budget holder. 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 may decide 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 Unilever's 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.

¹² <https://www.unilever.com/files/unilever-climate-policy-engagement-review.pdf>

Climate policy engagement in action

Since CPER 2023 was published, we now disclose policy engagement in line with the European Sustainability Reporting Standards (ESRS). This disclosure goes beyond compliance; we use this to identify key areas of engagement, ensure they align with our policy ambitions, and improve governance. The full statement is disclosed in Unilever's Annual Report and Accounts.

Below are some examples of the actions we took in 2024 to address our policy priorities on climate:

Priority 1: Raise the ambition of national climate strategies and plans in key markets to align with a 1.5°C pathway.

Examples:

1. In February, Unilever supported the launch of 'Mission 2025'. This is a coalition of real economy leaders urging governments to align their upcoming national climate plans with the Paris Agreement target of limiting global warming to 1.5°C.¹³
2. In September, Unilever published a briefing to outline how business can support stronger NDCs, and how governments can catalyse private sector action.¹⁴
3. In November, Unilever attended COP29 to outline how and why NDCs should be seen as five-year investment plans that can bring positive benefits to business and nations alike.¹⁵

Priority 2: Ensure carbon is priced at levels necessary for the delivery of the Paris Agreement.

Examples:

1. In 2024, Unilever discussed the future of corporate climate frameworks and the role of voluntary carbon markets with groups like the Science Based Targets initiative (SBTi) the Voluntary Carbon Markets Integrity Initiative (VCMI) and the Natural Climate Solutions Alliance (NCSA) to understand their impact on our climate targets.
2. In May, at the EU level, Unilever participated in FoodDrinkEurope meetings with the European Commission's Head of Unit for Land Economy and Carbon Removals on the EU Emission Trading System for agri-food.
3. In October, Unilever signed a WEF COP29 letter supporting the expansion of carbon pricing to strengthen overall climate ambition.¹⁶

Priority 3: Scale up renewable energy capacity and the rapid phase-out of fossil fuels, including fossil fuel subsidies.

Examples:

1. In May, Unilever signed a letter calling on the EU to set a greenhouse gas emissions

¹³ <https://www.wemeanbusinesscoalition.org/press-release/global-coalition-launches-to-boost-government-climate-plans-ahead-of-critical-un-deadline>

¹⁴ [Driving Corporate Climate Action with Bold National Climate Commitments](https://www.unilever.com/news/news-search/2024/cop29-five-ways-business-and-government-can-collaborate-on-climate)

¹⁵ <https://www.unilever.com/news/news-search/2024/cop29-five-ways-business-and-government-can-collaborate-on-climate>

¹⁶ [Governments and business must double-down on climate action | World Economic Forum](https://www.weforum.org/articles/governments-and-business-must-double-down-on-climate-action/)

reduction target of at least 90% by 2040, underlining the importance of phasing out fossil fuels and tripling the rate of deployment of renewables.¹⁷

2. In June, Unilever, in collaboration with the We Mean Business Coalition, called on leaders at the G7 summit in Italy to set clear plans and timelines for the scale-up of renewable energy capacity and the rapid phase-out of fossil fuels.¹⁸
3. Also in June, Unilever, along with the UK Deputy Ambassador and British Chambers of Commerce, met with Vietnam's new Vice Minister of Industry and Trade. The session focused on promoting a green transition, renewable energy, and improving trade relations.

Priority 4: Support forest protection and nature restoration.

Examples:

1. In October, Unilever supported the Business for Nature COP16 statement that called for renewed policy ambition to implement the Global Biodiversity Framework and halt and reverse nature loss this decade.¹⁹
2. In November, Unilever attended COP16 to advocate for policies that require governments and businesses to protect, restore and ensure the sustainable use of nature, as well as promote regenerative agriculture practices.²⁰

Priority 5: Encourage the evolution of the GHG Protocol Standards to incentivise emissions reduction actions in value chains.

Example:

1. In 2024, Unilever actively engaged in the development of the GHG Protocol's Land Sector and Removals Guidance through our participation in relevant WBCSD working groups and our membership of the Value Change Initiative.

Priority 6: Specific policies in individual action areas that support our Business Groups.

Examples:

- **Reformulating products:** Ensure Standards of Identity rules are not a barrier to portfolio development.
 - Throughout 2024, we developed our portfolio to meet the needs of our consumers. We did so despite restrictive standards of identity and we continue to engage, where possible and appropriate, with regulators and industry partners to modernise rules and industry standards, ensuring we continue to provide full and safe choices for consumers.
- **Forest-risk commodities:** Advocate for policies that facilitate the maintenance of a deforestation-free supply chain even when sourcing increasing volumes of ingredients in a competitive market.

- Throughout 2024, Unilever has been an active and vocal supporter of implementing the EU Regulation on Deforestation-Free Products (EUDR). In March, we participated in a FoodDrinkEurope workshop and regularly engaged with the European Parliament and Commission on the implementation of the regulation. Unilever has publicly opposed reopening the substance of the regulation.²¹
- **Regenerative agriculture:** Lobby for a regulatory landscape that supports farmers to transition to and maintain a regenerative agriculture approach.
 - In July, Unilever and over 500 companies signed a letter urging Congress to pass the Farm Bill in 2024. The Farm Bill would support conservation funding and sustainable solutions for clean air and water.²²
 - We actively participated in London Climate Action Week and Climate Week NYC, in June and September respectively, advocating for scaling of regenerative agriculture.²³
- **Chemical ingredients:** Create a level playing field that supports national policies that rapidly accelerate the scale-up of non-fossil chemical feedstocks and addresses energy emissions from ingredient production.
 - In May, Unilever hosted an event in Brussels bringing together EU policymakers, trade unions, and key industry stakeholders to discuss how to reduce the greenhouse gas emissions from chemical ingredients.²⁴
- **Packaging:** Advocate for the development of well-designed extended producer responsibility (EPR) schemes, the scaling of reusable packaging models, and an ambitious and legally binding Global Plastics Treaty.
 - Throughout 2024, Unilever has been advocating for an ambitious UN treaty to end plastic pollution based on mandatory global rules across the full lifecycle of plastic, through our position as co-chair of the Business Coalition for a Global Plastics Treaty.²⁵
- **Logistics:** Support policies for clean transportation infrastructure, like renewable energy and EV infrastructure.
 - Unilever advocated for a smoother and faster transition to clean transportation through our membership of industry associations. We believe in the power of collective action and continue to support collaborative initiatives.
- **Ice-cream cabinets:** Improve access to renewable energy and remove barriers to warming up the cold chain.
 - Due to the planned demerger of the Ice-cream business, advocacy work in this area is under review.

²¹ <https://voicenetwork.cc/wp-content/uploads/2024/10/Cocoa-Coalition-EUDR-161024.pdf>

²² <https://www.fb.org/files/backgrounder/Farm-Bill-Coalition-Letter.FINAL.07.22.2024.pdf>

²³ <https://www.wbcsd.org/news/opinion-piece-in-reuters-op2b-members-unite-to-highlight-the-transformative-power-of-regenerative-agriculture>

²⁴ https://www.linkedin.com/posts/unilever_eu-policy-event-activity-7199801284567146497-peEF

²⁵ <https://www.businessforplasticstreaty.org/latest/our-statement-on-the-inc-5-outcome>

²⁶ <https://www.unilever.com/news/news-search/2024/a-meaningful-un-treaty-to-end-plastic-pollution-edges-closer>

¹⁷ [Business and Investors call on the EU to Set a Greenhouse Gas Emissions Reduction Target of at least 90% by 2040 | Corporate Leaders Groups](https://www.businessandinvestors.com/news/unilever-calls-for-90-percent-reduction-by-2040)

¹⁸ <https://www.wemeanbusinesscoalition.org/g7-fossil-fuel-phase-out>

¹⁹ <https://www.businessformature.org/business-statement>

²⁰ [Business and government must collaborate on nature at COP16 | Unilever](https://www.unilever.com/news/news-search/2024/business-and-government-must-collaborate-on-nature-at-cop16)

Results: industry association review

	Geography	Sector	Annual financial payment (€)	Climate ambition/ NDCs	Scale up renewable energy capacity	Fossil fuel phase-out	Carbon pricing	Regenerative agriculture	Non-fossil chemicals	Deforestation-free	Alignment	Engagement intensity
American Cleaning Institute (ACI)	USA	Home Care	50,000–99,999	Passive support	Constructive ●○○	Inactive ○○○	Inactive	Inactive	Inactive	Inactive	No misalignment	No meaningful engagement
Asociación Nacional de Empresarios de Colombia (ANDI)	Colombia	Cross-industry	20,000–49,999	Passive support	Constructive ●●○	Misaligned ●○○	Inactive	Inactive	Inactive	Inactive	Misaligned on rapid fossil fuel phase-out	Low
Associação Brasileira da Indústria de Alimentos (ABIA)	Brazil	Food & Drink	50,000–99,999	Passive support	Inactive ○○○	Inactive ○○○	Inactive	Inactive	Inactive	Inactive	No misalignment	Low
Associated Chamber of Commerce & Industry (ASSOCHAM)	India	Cross-industry	<20,000	Passive support	Constructive ●○○	Inactive ○○○	Neutral	Inactive	Inactive	Inactive	No misalignment	Low
Business Leadership South Africa (BLSA)	South Africa	Cross-industry	20,000–49,999	Passive support	Constructive ●●●	Misaligned ●●○	Neutral	Neutral	Inactive	Inactive	Misaligned on rapid fossil fuel phase-out	Low
European Chemical Industry Council (CEFIC)	EU	Chemicals	100,000–299,999	Passive support	Constructive ●●○	Inactive ○○○	Neutral	Neutral	Constructive	Inactive	No misalignment	High
China National Food Industry Association (CNFIA)	China	Food & Drink	<20,000	Inactive	Inactive ○○○	Inactive ○○○	Inactive	Inactive	Inactive	Inactive	No misalignment	No meaningful engagement
Confederation of British Industry (CBI)	UK	Cross-industry	20,000–49,999	Passive support	Constructive ●●●	Misaligned ●○○	Constructive	Inactive	Inactive	Inactive	Misaligned on rapid fossil fuel phase-out	Moderate
Confederation of Indian Industry (CII)	India	Cross-industry	<20,000	Passive support	Constructive ●●●	Misaligned ●●○	Neutral	Inactive	Inactive	Inactive	Misaligned on rapid fossil fuel phase-out	Moderate
Consumer Goods Forum (CGF)	Global	Food & Drink	50,000–99,999	Inactive	Inactive ○○○	Inactive ○○○	Inactive	Inactive	Inactive	Inactive	No misalignment	No meaningful engagement
Corporate Leaders Group (CLG)	EU/UK	Cross-industry	20,000–49,999	Constructive	Constructive ●●○	Constructive ●●○	Inactive	Inactive	Inactive	Inactive	No misalignment	High
Cosmetics Europe (CE)	EU	Personal Care	100,000–299,999	Passive support	Inactive ○○○	Inactive ○○○	Inactive	Inactive	Inactive	Inactive	No misalignment	No meaningful engagement
Dutch Employers' Federation (VNO-NCW)	Netherlands	Cross-industry	<100,000	Passive support	Constructive ●●○	Misaligned ●○○	Neutral	Inactive	Inactive	Inactive	Misaligned on rapid fossil fuel phase-out	Moderate

	Geography	Sector	Annual financial payment (€)	Climate ambition/ NDCs	Scale up renewable energy capacity	Fossil fuel phase-out	Carbon pricing	Regenerative agriculture	Non-fossil chemicals	Deforestation-free	Alignment	Engagement intensity
EU Chamber of Commerce in China (EUCCC)	China	Cross-industry	<20,000	Passive support	Constructive ●○○	Inactive ○○↑	Passive support	Inactive	Inactive	Inactive	No misalignment	Low
European Clean Trucking Alliance (ECTA)	EU	Transport & Logistics	No membership fees	Passive support	Inactive ○○○	Inactive ○○○	Inactive	Inactive	Inactive	Inactive	No misalignment	Moderate
European Round Table for Industry (ERT)	EU	Cross-industry	20,000–49,999	Passive support	Constructive ●●○	Misaligned ●○○↓	Neutral ↑	Inactive	Inactive	Inactive	Misaligned on rapid fossil fuel phase-out	Moderate
Federation of Indian Chambers of Commerce & Industry (FICCI)	India	Cross-industry	<20,000	Passive support	Constructive ●●○	Misaligned ●●○	Passive support	Inactive	Inactive	Inactive	Misaligned on rapid fossil fuel phase-out	Low
FoodDrinkEurope (FDE)	EU	Food & Drink	50,000–99,999	Passive support	Constructive ●○○	Inactive ○○○	Inactive	Constructive	Inactive	Constructive	No misalignment	Moderate
Food Industry Asia (FIA)	Asia	Food & Drink	20,000–49,999	Inactive	Inactive ○○○	Inactive ○○○	Inactive	Inactive	Inactive	Inactive	No misalignment	No meaningful engagement
Indonesian Chamber of Commerce and Industry (KADIN)	Indonesia	Cross-industry	<20,000	Passive support	Constructive ●○○	Inactive ○○○	Passive support	Inactive	Inactive	Inactive	No misalignment	Low
International Association for Soaps, Detergents and Maintenance Products (A.I.S.E.)	Global	Home Care	100,000–299,999	Passive support	Inactive ○○○	Inactive ○○○	Inactive	Inactive	Inactive	Inactive	No misalignment	No meaningful engagement
National Business Initiative (NBI)	South Africa	Cross-industry	<20,000	Passive support	Constructive ●●○	Inactive ○○↑	Inactive	Inactive	Inactive	Inactive	No misalignment	Low
Personal Care Products Council (PCPC)	USA	Personal Care	>300,000	Inactive	Inactive ○○○	Inactive ○○○	Inactive	Inactive	Inactive	Inactive	No misalignment	No meaningful engagement
Sustainable Food Policy Alliance (SFPA)	USA	Food & Drink	100,000–299,999	Passive support	Inactive ○○○↓	Inactive ○○○	Inactive	Constructive	Inactive	Constructive	No misalignment	Low
Tennessee Chamber of Commerce & Industry (TCCI)	USA	Cross-industry	<20,000	Inactive	Inactive ○○○	Inactive ○○○↑	Inactive	Inactive	Inactive	Inactive	Misaligned on science-based policy	Low
World Business Council for Sustainable Development (WBCSD)	Global	Cross-industry	50,000–99,999	Constructive	Constructive ●●○	Constructive ●○○	Constructive	Constructive	Inactive	Constructive	No misalignment	High

Compared with the 2023 review, the following changes have been made to how the assessment results are presented in the summary table:

1. Engagement on scaling up renewables and engagement on phasing out fossil fuels are now assessed separately (previously, these were grouped under the heading of 'renewables/energy transition').

For renewables and fossil fuel phase-out, we have introduced a rating system to measure how actively trade associations engage with these issues (see red and green dots in the summary table: 1 dot = minimal engagement; 3 dots = high engagement). This will enable us to track progress in a more granular way over time.

2. Where an association's position on a particular priority has shifted relative to last year's review, this is indicated with an up or down arrow.

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

American Cleaning Institute (ACI)

Geography	USA
Sector	Home Care
Membership payment	Between €50,000 and €99,999 p.a.
Unilever role(s)	Member
Top-line positions	High-level support for 1.5°C and net zero by 2050 ACI has voiced support for the IPCC's recommendations and supports 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'. ACI also expressed support for the Biden administration's goal of achieving a 100% renewable/clean US electricity grid by 2035. ²⁷
Detailed advocacy positions	ACI appears not to have actively engaged on climate policy during 2024, beyond top-line statements in support of 1.5°C and the sustainable manufacturing and procurement of cleaning products.

²⁷ https://content.influencemap.org/site/data/001/621/ACI_Oct2024_2024SusReport_Oct2024-b396d1bc16404d4997cb00c442ff6e73.pdf
https://content.influencemap.org/site/data/001/328/ACI_Oct2023_NetZeroEmissions_Oct2023.pdf

Alignment assessment	No misalignment
Engagement intensity	No meaningful engagement
Change(s) relative to previous assessment	ACI's climate policy positions have remained consistent over 2024. Its engagement on climate-relevant policies remains limited to high-level statements in support of 1.5°C.
More information	View ACI's LobbyMap profile
Recommended action(s)	Encourage ACI to work on policies for promoting uptake of non-fossil chemicals in the cleaning industry supply chain.

Asociación Nacional de Empresarios de Colombia (ANDI)

Geography	Colombia
Sector	Cross-industry
Membership payment	Between €20,000 and €49,999 p.a.
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 indicated support for Colombia's NDC of achieving carbon neutrality by 2050. It has also called for a 50% emissions reduction by 2030. ²⁸
Detailed advocacy positions	Mixed position on the energy transition ANDI supports growing Colombia's renewable energy sector. ²⁹ It has signalled support for strengthening the hydrogen production and usage ecosystem generally ³⁰ and the expansion of green hydrogen production in particular. ³¹ It has also publicly supported the roll-out of zero-emission vehicles along with investments in clean energy and changing mobility patterns. ³²

²⁸ https://content.influencemap.org/site/data/001/358/andi_mascolombia_chemicals_jan2024.pdf

²⁹ https://content.influencemap.org/site/data/001/338/Andi_InformeSostenibilidad-Procultivos2023_nov2023.pdf

³⁰ https://content.influencemap.org/site/data/001/380/ANDI_noticiasya_h2_mar2024.pdf

https://content.influencemap.org/site/data/001/325/andi_president_hydrogen_19.10.23.pdf

³¹ https://content.influencemap.org/site/data/001/323/ANDI_infobae_hydrogen_13.10.23_oct2023.pdf

³² https://content.influencemap.org/site/data/001/392/andi_X_mobility_apr2024.pdf

However, ANDI's President has also repeatedly called for an expansion of domestic gas production and infrastructure, citing concerns about energy security.³³ Moreover, ANDI has actively engaged with the Colombian government in support of blending hydrogen and natural gas, without clarifying how the hydrogen will be produced or setting a timeline for full decarbonisation.³⁴

Unclear position on carbon pricing

ANDI does not appear to have engaged on the issue of carbon pricing to any meaningful extent during 2024. In September, ANDI's President criticised the Colombian government's tax reform project (Reforma Tributaria) which included plans to expand and increase Colombia's national carbon tax. But it is unclear to what extent (if any) ANDI's concerns about the tax reforms were to do with the carbon tax component.³⁵

Alignment assessment

Misaligned on rapid fossil fuel phase-out

Engagement intensity

Low

Change(s) relative to previous assessment

There has been no discernible shift in ANDI's climate policy positions during 2024. Its top-line messaging remains generally supportive of climate action and Colombia's NDC. Its detailed engagement continues to be mixed – specifically in the areas of carbon pricing (though its engagement on this topic in 2024 appears to be minimal) and the energy transition (ANDI supports expanding both renewables and fossil gas).

More information

View ANDI's [LobbyMap](#) profile

Recommended action(s)

Encourage ANDI to clarify its positions on carbon pricing and on rapid phase-out of fossil fuels and fossil fuel subsidies.

Associação Brasileira da Indústria de Alimentos (ABIA)

Geography

Brazil

Sector

Food & Drink

Membership payment

Between €50,000 and €99,999 p.a.

Unilever role(s)

Board member

Top-line positions

Minimal mention of climate change in public messaging
ABIA makes few explicit references to climate change in its top-line messaging and has not taken a clear position on the Paris Agreement or the Brazilian government's NDC. In its 2024 annual report, ABIA discloses that it participated in preparatory meetings ahead of COP28 and that the energy transition and deforestation were both discussed – but no detail of ABIA's position on these topics is provided.³⁶

Highlighting importance of regenerative agriculture
ABIA has publicly acknowledged the role of regenerative agriculture practices in mitigating climate change, emphasising that the food sector is already investing in line with the Ministry of Agriculture's low-carbon agriculture plan. No indication is given of whether ABIA supports further incentives for regenerative agriculture beyond existing policies.³⁷

Detailed advocacy positions

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

ABIA did actively oppose a tax reform proposal that included within it a plan to introduce a surcharge on foods deemed environmentally harmful or unhealthy. ABIA argued that taxes on food in Brazil are already high and further tax increases would harm consumers through higher food prices.³⁸ We consider this to be a legitimate objection.

³³ https://content.influencemap.org/site/data/001/630/ANDI_elpais_president_gas_oct2024-78abd6565235468ea102b5940f353566.pdf
https://content.influencemap.org/site/data/001/563/ANDI_X_gas_jul2024-7605dca928c6480fa9a641503b34b989.pdf
https://content.influencemap.org/site/data/001/620/Andi_X_president_gasstorage_sep2024-bfbcae74f61f48a2a5c22e4cbee1f072.pdf
³⁴ https://content.influencemap.org/site/data/001/574/ANDI_comment-ProyectoAgendaRegulatoria2024_nov2023-623dbbb5fe-9545f0a50f94f7d848fc04.pdf

³⁵ https://content.influencemap.org/site/data/001/616/ANDI_president_X_carbontax_sep2024-1deb7fef2a7440c9b9f7eca29dff4e5.pdf

³⁶ https://content.influencemap.org/site/data/001/631/ABIA_RelatorioAnual2024_p.29-30_jul2024-9935ce195c364ac1a764985c6900958a.pdf

³⁷ https://content.influencemap.org/site/data/001/631/ABIA_GZH_emissions_dec2023-b79b3e03b8e7471db2187938b8236bcc.pdf

³⁸ https://content.influencemap.org/site/data/001/632/ABIA_comments_CAE-committee_selectivetax_sep2024-e834d740be384e8aa5df3232d-fef5ca.pdf

https://content.influencemap.org/site/data/001/631/ABIA_p.16-18_RelatorioAnual2024_jul2024-3bcac0f5f7264fa780abaddccc1c143a.pdf

https://content.influencemap.org/site/data/001/631/ABIA_correiobraziliense_selectivetax_jul2024-478c3013e4544df4b269cd7db7ac8011.pdf

https://content.influencemap.org/site/data/001/632/ABIA_president_poder360_selectivetax_jul2024-30a89a39cf194a52a60ee5a3caf976c.pdf

https://content.influencemap.org/site/data/001/631/ABIA_estadao_selectivetax_2024-cb914f00bc174b3bb3e548b54c4c004d.pdf

https://content.influencemap.org/site/data/001/632/ABIA_pressrelease_selectivetax_may2024-699e6073f154442aa3c89f7b41b0b43d.pdf

Alignment assessment	No misalignment
Engagement intensity	Low
Change(s) relative to previous assessment	ABIA's climate policy positions have remained largely consistent over 2024, and it continues to have low overall engagement.
More information	View ABIA's LobbyMap profile
Recommended action(s)	Unilever will work with ABIA's Sustainability Committee on climate issues.

Associated Chambers of Commerce & Industry (ASSOCHAM)

Geography	India
Sector	Cross-industry
Membership payment	Under €20,000 p.a.
Unilever role(s)	Member
Top-line positions	<p>Support for India's net zero by 2070 target ASSOCHAM has publicly called for India to become a global leader in tackling climate change.³⁹ It has voiced support for India's net zero by 2070 target.⁴⁰</p>
Detailed advocacy positions	<p>Support for India's renewable energy transition ASSOCHAM has endorsed the Government of Gujarat's renewable energy policy.⁴¹ ASSOCHAM has also clearly stated its support for electrifying mobility, though this is again limited (at least publicly) to expressions of support for existing government schemes, rather than calling for new policy measures.⁴²</p>

³⁹ https://content.influencemap.org/site/data/001/324/ASSOCHAM_Sustainability_AccessedOct23.pdf

⁴⁰ https://content.influencemap.org/site/data/001/632/ASSOCHAM_PressRelease_Aug2024_AccessedOct2024-213f099e37774924af5645386d436fde.pdf

⁴¹ https://content.influencemap.org/site/data/001/326/ASSOCHAM_X_Oct23_AccessedOct23.pdf

⁴² https://content.influencemap.org/site/data/001/611/ASSOCHAM_ElectroMobilityReport_Sept2024p51-f4f001c973e64798a71342e902ed3b36.pdf

Neutral position on the EU Carbon Border Adjustment Mechanism (CBAM)

ASSOCHAM has published a report on the EU CBAM, indicating the opportunities it provides for India and its businesses to transition to clean technologies (as well as challenges). While the report doesn't set out an advocacy position per se (its purpose is to inform Indian businesses about the implications of the EU CBAM) it does signal a broadly constructive attitude towards national and international carbon pricing policies.⁴³

Alignment assessment	No misalignment
Engagement intensity	Low
Change(s) relative to previous assessment	ASSOCHAM's climate policy positions have largely remained consistent over 2024. Significantly, though, it does not appear to have advocated for new fossil fuel infrastructure during this period, meaning that the one area of misalignment identified in the 2023 review no longer applies.
	Overall, ASSOCHAM remains relatively passive on climate policy. It has not done anything to undermine Unilever's climate policy priorities over 2024, but it also does not appear to have proactively promoted higher ambition climate policies.
More information	View ASSOCHAM's LobbyMap profile
Recommended action(s)	Recommend ASSOCHAM make public its positive engagement on climate policy.

⁴³ https://content.influencemap.org/site/data/001/599/ASSOCHAM_CBAMPublicationAug2024-cedd7585e44844a19968d19aa37605c7.pdf

Business Leadership South Africa (BLSA)

Geography	South Africa
Sector	Cross-industry
Membership payment	Between €20,000 and €49,999 p.a.
Unilever role(s)	Council member
Top-line positions	<p>High-level support for 1.5°C and A Just Transition BLSA has expressed support for limiting warming to 1.5°C above pre-industrial levels and for South Africa's Climate Change Act, which was signed into law in July 2024.⁴⁴ It has also voiced support for a Just Transition, calling for transitioning the economy in a way that ensures justice for those whose jobs and livelihoods are at risk.⁴⁵</p> <p>Mixed position on the energy transition BLSA has voiced support for renewables, indicating that South Africa's 'green transition' provides opportunities, for example, via green hydrogen, green electricity generation, mining critical minerals, and battery storage.⁴⁶ At the same time, it has raised concerns about the Department of Mineral Resources & Energy's insufficient preparations for an imminent gas supply crunch and, in that context, advocates for investment in fossil gas supply and infrastructure.⁴⁷</p>
Detailed advocacy positions	<p>Support for policies to enable renewable energy deployment BLSA has consistently supported policies to enable and incentivise faster deployment of renewables in 2024. For example, it applauded the Renewable Energy Independent Power Producer Procurement (REIPPP) Programme and credited recent changes in regulation as a key driver for private sector investment in renewable energy production.⁴⁸ BLSA also acknowledged the role of government in incentivising household and business investment in rooftop solar, e.g. via tax incentives.⁴⁹</p>

⁴⁴ https://content.influencemap.org/site/data/001/645/BLSA_CEONewsletter_Jul24_AccessedOct24-0ba409f7cd3f43bfbf443c57f177ff39.pdf

⁴⁵ https://content.influencemap.org/site/data/001/645/23_AccessedOct24-111fd5946a7349c487c392a57013bb47.pdf

⁴⁶ https://content.influencemap.org/site/data/001/645/BLSA_PressRelease_Aug24_AccessedOct24-84dd82ef58c54da59175d26588c7a31b.pdf;

https://content.influencemap.org/site/data/001/645/23_AccessedOct24-e904739338a841e1817704034c1ee989.pdf

⁴⁷ https://content.influencemap.org/site/data/001/645/BLSA_PressRelease_Aug24_AccessedOct24-84dd82ef58c54da59175d26588c7a31b.pdf;

https://content.influencemap.org/site/data/001/382/BLSA_EngineeringNews_Mar24_AccessedApr24.pdf; https://content.influencemap.org/site/data/001/645/BLSA_CEONewsletter_Jan24_AccessedOct24-2efefca550d14988985c96372118eda5.pdf

⁴⁸ https://content.influencemap.org/site/data/001/645/BLSA_CEONewsletter_Mar24_AccessedOct24-bb1fd6e311584acd822fb9f15e3d8213.pdf

⁴⁹ https://content.influencemap.org/site/data/001/645/BLSA_CEONewsletter_Feb24_AccessedOct24-dac1aa8d803646dbb5da5fe40540fc1d.pdf;

https://content.influencemap.org/site/data/001/645/BLSA_CEONewsletter_5Feb24_AccessedOct24-e8d44536fc104f23a608d51c8a1aad4e.pdf;

https://content.influencemap.org/site/data/001/645/BLSA_CEONewsletter_Dec23_AccessedOct24-59edf480027245abb396015dbb2506c5.pdf

In addition, BLSA critiqued the South African government's Integrated Resources Plan published in early 2024, arguing that its target for new renewable energy capacity to be installed via public procurement by 2030 was too low and its reliance on fossil gas was too high.⁵⁰

Support for new fossil gas infrastructure

BLSA was publicly critical of the South African government's Gas Master Plan for failing to show how security of gas supply will be maintained for South African industry beyond 2026.⁵¹ BLSA has called for the government to create 'an enabling environment for the necessary licensing' to bring new gas sources online.⁵²

Alignment assessment

Misaligned on rapid fossil fuel phase-out

Engagement intensity

Low*

Change(s) relative to previous assessment

Overall, BLSA's engagement on climate policy does not appear to have changed significantly in 2024, though some of its more detailed positions have evolved. In last year's review, it was found to be misaligned with Unilever on the issue of carbon pricing. This year, BLSA has not lobbied either for or against measures to increase carbon prices. Meanwhile, on the energy transition, it remains a staunch advocate for renewables, but has also been vocal about the need for investment in new fossil gas during 2024 – a position that is not fully consistent with Unilever's stance on the need for a rapid phase-out of fossil fuels.

**BLSA's engagement intensity score from InfluenceMap (at the time this assessment was completed) is 11%, which is 1% below the threshold for 'low engagement' (as opposed to 'no meaningful engagement'). Yet, based on the detailed assessment above, it is clear that BLSA has engaged on climate policy in a way that goes beyond generic top-line statements during the review period. Therefore, its engagement intensity rating has been adjusted to reflect this.*

More information

View BLSA's [LobbyMap](#) profile

Recommended action(s)

Unilever will recommend that BLSA continues its positive engagement on renewables.

⁵⁰ <https://blsa.org.za/thought-leadership/blsas-ceos-weekly-newsletter-the-latest-version-of-the-irp-needs-to-be-reworked-immediately/>

https://content.influencemap.org/site/data/001/645/BLSA_CEONewsletter_May24_AccessedOct24-166e255b04aa42a7ba4bb67734842ae2.pdf

⁵¹ https://content.influencemap.org/site/data/001/395/BLSA_TheCitizen_May24_AccessedMay24.pdf

⁵² https://content.influencemap.org/site/data/001/645/BLSA_CEONewsletter_March24_AccessedOct24-d020adc49c274c5e9580b5d92397e0f7.pdf

European Chemical Industry Council (Cefic)

Geography	EU
Sector	Chemicals
Membership payment	Between €100,000 and €299,999 p.a.
Unilever role(s)	Member and active participant in several working groups
Top-line positions	<p>Support for EU climate goals – with a strong emphasis on not harming the European chemical industry’s competitiveness</p> <p>Cefic’s messaging regarding the EU Green Deal has been fairly neutral over 2024. Its emphasis has been on calling for complementary measures – particularly an EU Industrial Deal – that ensure European industry is supported to decarbonise in ways that do not harm and, ideally, enhance its competitiveness.⁵³ Along with other bodies representing energy-intensive industries, Cefic emphasises the importance of keeping energy costs low.⁵⁴ While this leads Cefic at times to appear hesitant about specific measures, its engagement appears to be more constructive than obstructive.</p>
Detailed advocacy positions	<p>Support for a wide range of renewable and low-carbon technologies</p> <p>Cefic has engaged constructively on policies designed to decarbonise electricity and industry in the EU over 2024. It advocates in favour of nuclear, hydrogen (both blue and green) wind, solar, and carbon capture, utilisation and storage (CCUS). It has also called on European policymakers to prioritise improving grid connections and faster permitting for renewables.</p> <p>Constructive engagement on promoting uptake of sustainable chemical feedstocks</p> <p>Cefic has consistently spoken up about the need for policy support to incentivise innovation and deployment of non-fossil sources of carbon in the chemical sector over 2024. In April, it endorsed a joint statement issued by a group of European national governments calling for an EU-level ‘Sustainable Carbon Policy Package’ to promote a switch to sustainable feedstocks in the chemical industry.⁵⁵ In June, Cefic’s Director General spoke at a Unilever-hosted event in Brussels to promote EU-level policy action to cut emissions from the chemicals used in cleaning products.⁵⁶</p>

⁵³ https://content.influencemap.org/site/data/001/393/Antwerpdeclaration_feb2024.pdf

https://content.influencemap.org/site/data/001/628/Cefic_Innovation_9_points_plan_Sep_2024-28440fe3124c4b23941d5c88a4b1fc78.pdf

⁵⁴ https://content.influencemap.org/site/data/001/572/Cefic_Transition_pathway_July_2024-0e84b4296a9d47acad6133fdb59db768.pdf

⁵⁵ <https://cefic.org/media-corner/newsroom/access-to-sustainable-carbon-will-be-a-major-enabler-for-the-transformation-of-the-chemical-sector>

⁵⁶ https://www.linkedin.com/posts/unilever_eu-policy-event-activity-7199801284567146497-peEF/

https://www.linkedin.com/posts/ruPERTposner_accelerating-the-necessary-shift-to-bio-based-activity-7199478411109564417-FtNU/

Alignment assessment

No misalignment

Engagement intensity

High

Change(s) relative to previous assessment

Cefic continues to engage actively on EU climate policy and does so in a broadly constructive manner. Its top-line messaging emphasises the importance of preserving and enhancing the European chemical industry’s competitiveness even more so than previously. We consider this to be entirely legitimate, so long as Cefic continues to work constructively on resolving tensions between decarbonisation and competitiveness.

In September, Cefic published a nine-point plan to boost the EU chemical industry’s innovation leadership, in which it called on policymakers to implement ‘market-pull mechanisms to stimulate demand in innovative net zero, low-carbon and circular products’.⁵⁷

Detailed input on the methodology for calculating emissions savings from low-carbon fuels

In June 2024, Cefic, alongside a number of other industry associations, provided detailed feedback to the European Commission on its proposed Low-Carbon Fuels Certification Delegated Act. The input was broadly constructive, with some technical caveats (for example, regarding the technical maturity and availability of hydrogen leakage detection technologies).⁵⁸ Cefic provided further feedback on the Act in October 2024, again calling for some technical amendments – for example, to make carbon captured from industrial sources fully eligible to be utilised in low-carbon fuel.⁵⁹

Highlighting risk of carbon leakage in relation to reforms of the EU Emissions Trading System (ETS)

Cefic’s messaging on carbon pricing has continued to emphasise the role of free allocations and indirect cost compensation for companies affected by the EU ETS as an effective means of mitigating the risk of carbon and investment leakage.⁶⁰ Its support for the EU Carbon Border Adjustment Mechanism (CBAM) which is also designed to mitigate these risks, remains heavily caveated – though its engagement on the topic is constructive in that it details clear recommendations about how to make CBAM work for the European chemical industry.⁶¹

⁵⁷ <https://cefic.org/app/uploads/2024/09/A-9-point-action-plan-for-the-European-Chemical-Industrys-Innovation-Leadership.pdf>

⁵⁸ https://content.influencemap.org/site/data/001/557/low-carbon-hydrogen-da-letter-gie-others_Jun2024-41b237ada74e46f5ba3956c7b7857e28.pdf

⁵⁹ https://cefic.org/app/uploads/2024/10/Chemical-Industry-Views-on-the-Low-carbon-Fuel-DA_102024.pdf

⁶⁰ https://content.influencemap.org/site/data/001/600/Cefic_EU_ETC_free_allocation_rule_reform_Dec2023-261df6cc6d234ef691f4758b19d7151f.pdf

https://content.influencemap.org/site/data/001/364/EU_2040_climate_target_-_cefic.org.pdf

⁶¹ <https://cefic.org/policy-matters/climate-change-and-energy/eu-carbon-market-and-ets-link-tbc>

Change(s) relative to previous assessment	<p>Its detailed policy positions on topics relevant to Unilever have remained broadly stable over 2024. Its position on grid decarbonisation has become marginally more positive during 2024. Its position on carbon pricing (EU ETS and CBAM) remains highly nuanced, but it appears to be engaging in good faith with a view to making these policies work. Therefore, it has been assessed as neutral on carbon pricing (as opposed to obstructive, as it was in last year's review).</p> <p>It has increased engagement on fossil-free chemical scale-up in 2024.</p>
More information	View Cefic's LobbyMap profile.
Recommended action(s)	Continue to advocate to scale up non-fossil chemical feedstocks.

China National Food Industry Association (CNFIA)

Geography	Asia
Sector	Food & Drink
Membership payment	Under €20,000 p.a.
Unilever role(s)	<ul style="list-style-type: none"> Executive member of the Council Regulatory Committee member Food Contact Material (FCM) Working Group member
Top-line positions	CNFIA does not appear to have issued any new statements regarding climate policy during 2024.
Detailed advocacy positions	No evidence of specific climate-related lobbying by CNFIA was found.

Alignment assessment	No misalignment
Engagement intensity	No meaningful engagement
Change(s) relative to previous assessment	CNFIA does not appear to have any publicly available evidence of climate-related lobbying in 2024.
More information	View CNFIA's LobbyMap profile
Recommended action(s)	Continue efforts to work with CNFIA to propose policies that help the food sector contribute to China's double carbon goal, such as efforts to establish Post-Consumer Recycled regulations that permit recycled materials used in food contact materials.

Confederation of British Industry (CBI)

Geography	UK
Sector	Cross-industry
Membership payment	Between €20,000 and €49,999 p.a.
Unilever role(s)	General member
Top-line positions	<p>Supports UK Government's net zero by 2050 target and updated NDC</p> <p>CBI has consistently spoken out in support of net zero targets over 2024 and has called on the government to set out concrete policies to achieve these targets. It has been broadly supportive of the current Labour government's plans to create a state-owned renewable energy company, reverse the previous government's de facto ban on onshore wind, and prioritise planning reform to enable faster build-out of grid infrastructure required for decarbonisation.⁶² In November 2024, it welcomed the UK Government's announcement of a new NDC increasing the ambition of its 2035 emissions reduction target, though it does not appear to have engaged on this issue ahead of time.⁶³</p>

⁶² https://content.influencemap.org/site/data/001/581/CBI_Jun2024_PR_2024LabourManifesto_July2024-a928b8556a6e4903828175dc34249ba8.pdf; <https://www.cbi.org.uk/media-centre/articles/cbi-responds-to-climate-change-committee-net-zero-assessment/>

⁶³ <https://www.cbi.org.uk/media-centre/articles/cbi-responds-to-prime-ministers-cop29-announcement-on-ndcs>

Detailed advocacy positions

Support for specific measures to decarbonise energy and industry in the UK

During 2024, CBI has called for the creation of a Net Zero Investment Plan to crowd in private finance, 'green' tax credits and capital allowances to incentivise industry investment in clean technologies, and a strategic prioritisation process for grid connections. It claims to have successfully persuaded the (previous) Chancellor of the Exchequer to cut the time it takes to build electricity transmission infrastructure and obtain connections to the grid in November 2023 – and has continued to advocate for planning reform during 2024.⁶⁴

Constructive engagement on plans for a UK Carbon Border Adjustment Mechanism

CBI has continued to express support for plans to introduce a Carbon Border Adjustment Mechanism (CBAM).⁶⁵ In its response to the Autumn Budget in October 2024, it expressed concerns that the UK Government's plan does not align with the EU's CBAM implementation and promised to continue to campaign on the importance of UK-EU linkage on carbon pricing policy.⁶⁶

Indirect support for fossil gas expansion

While CBI has not directly spoken out in support of fossil fuels during 2024, it continues to be indirectly associated with the promotion of new fossil gas via its membership of BusinessEurope. For example, the 'Brussels Declaration' issued by BusinessEurope's Council of Presidents in November 2023 calls for investment in natural gas capacities, as well as renewables and nuclear.⁶⁷

Alignment assessment

Misaligned on rapid fossil fuel phase-out

Engagement intensity

Moderate

Change(s) relative to previous assessment

There has been no discernible shift in CBI's climate policy positions during 2024. Its Top-line messaging remains overwhelmingly positive, and it is constructively engaged on policies to accelerate decarbonisation of the UK energy grid as well as on carbon pricing and wider tax reforms to incentivise investment in clean technologies.

The only significant blemish on its record as an advocate of science-based policies is a result of its affiliation with BusinessEurope, which seems to take fewer pro-climate positions than CBI does – in particular, promoting fossil gas expansion.

More information

View CBI's [LobbyMap](#) profile

Recommended action(s)

Recommend CBI to continue supporting a pro-climate agenda and raise its engagement intensity on net zero policy.

Confederation of Indian Industry (CII)

Geography

India

Sector

Cross-industry

Membership payment

Under €20,000 p.a.

Unilever role(s)

Member of national committee on environment

Top-line positions

Support for India's net zero by 2070 target

CII has supported the Indian government's net zero by 2070 target and has called for the government to set up a Green Transition Fund.⁶⁸ In January 2024, CII reiterated its support for India's NDC, including reducing carbon intensity by 45% by 2030 and achieving non-fossil renewables capacity of 500GW by 2030.⁶⁹

General support for carbon pricing

CII has recommended the Indian government 'launch carbon markets and explore options for carbon pricing mechanisms', though without providing further specificity regarding a timeline or the kind of pricing mechanism CII supports.⁷⁰

High-level support for natural climate solutions

In a report in partnership with the World Economic Forum in January 2024, CII acknowledged the role of natural climate solutions in supporting nature and driving emissions reductions. It indicated that clear regulatory frameworks, incentives, and partnerships can support increased investment in natural climate solutions.⁷¹

Detailed advocacy positions

Mixed position on the energy transition

CII generally supports the transition to renewable energy. During 2024, it has called on the Indian government to

⁶⁴ <https://www.cbi.org.uk/our-campaigns/driving-green-growth-and-the-transition-to-net-zero>

⁶⁵ https://content.influencemap.org/site/data/001/349/CBI_Twitter_Dec2023_AccessedDec2023_2.pdf

⁶⁶ <https://www.cbi.org.uk/articles/autumn-budget-2024-the-cbi-impact>

⁶⁷ https://content.influencemap.org/site/data/001/341/businessseurope_brusselsdeclaration_councilpresidents_2023-11-24.pdf

⁶⁸ https://content.influencemap.org/site/data/001/385/CII_CompetitiveandSustainableIndiaReport_March2024_AccessedApril2024.pdf

⁶⁹ https://content.influencemap.org/site/data/001/356/CII_Blog_Jan2024.pdf

⁷⁰ https://content.influencemap.org/site/data/001/385/CII_Communique_Oct2023_AccessedApril2024.pdf

⁷¹ https://content.influencemap.org/site/data/001/356/CII_EuropeanSting_Jan2024.pdf

Detailed advocacy positions

increase the budget allocated to the Ministry of New and Renewable Energy and to provide financing support for offshore wind development.⁷² In its 2023–24 Annual Report, CII indicated that it provided input on the Draft Delhi Solar Policy and advocated for ‘defining clear timelines for granting all necessary No Objection Certificates (NOCs) related to solar plant projects’ to accelerate solar energy infrastructure development.⁷³

Additionally, CII has advocated for the electrification of mobility, including investments in EV manufacturing and charging infrastructure. It has called for power generation companies to innovate in emissions reduction technologies, including carbon capture, utilisation and storage (CCUS) and emphasised the role of biofuels as an alternative to fossil fuels.⁷⁴ It has also been active in promoting policies to accelerate the development of a green hydrogen industry. Via its Taskforce on Green Hydrogen, CII advocates in favour of subsidies and demand aggregation measures to make green hydrogen competitive with conventional hydrogen (i.e. hydrogen produced from fossil gas).⁷⁵

At the same time, CII has called for an increase in coal gasification capacity (without referencing CCS) and for taxes on petrol and diesel to be reduced.⁷⁶ It states that there is a need (for energy security reasons) to continue to ‘explore and sustain supplies from traditional energy sources’ while transitioning to renewables.⁷⁷

Neutral position on the EU’s Carbon Border Adjustment Mechanism (CBAM)

CII appears to have accepted the EU CBAM as a done deal and is now engaged in how to make it work best for Indian industry (as opposed to fighting it, as others have continued to do). It has called for the tax revenue to be collected in India and used to support small businesses to decarbonise.⁷⁸

Alignment assessment

Misaligned on rapid fossil fuel phase-out

Engagement intensity

Moderate*

Change(s) relative to previous assessment

In 2024, CII has noticeably increased the visibility of its climate policy engagement and has become more vocal in support of the Indian government’s climate commitments.

The substance of its positions does not appear to have changed dramatically. It remains a strong supporter of renewables, electrification and green hydrogen, while also indicating that it supports some expansion of fossil fuel infrastructure. Based on the evidence available, its pro-renewables advocacy appears to have comfortably outweighed its pro-fossil fuels advocacy during the period of this review.

**CII’s engagement intensity has been rated as moderate despite only receiving a 21% engagement intensity score from InfluenceMap, which is 3% below the threshold for ‘moderate engagement’. Yet, based on the detailed assessment above, it is clear that CII has engaged on climate policy, particularly energy policy, in detail. Therefore, its engagement intensity rating has been adjusted to reflect this. This is the same engagement intensity rating as CII received last year.*

More information

View CII’s [LobbyMap](#) profile

Recommended action(s)

Recommend CII makes its detailed engagement on climate policy public, such as supporting the expansion of renewable energy capacity.

Consumer Goods Forum (CGF)

Geography

Global

Sector

Food & Drink

Membership payment

Between €50,000 and €99,999 p.a.

Unilever role(s)

Member of all workstreams

Top-line positions

High-level support for decarbonisation

CGF works to accelerate emissions reductions across the value chains of consumer goods companies via its Towards Net Zero Coalition, as well as via other Coalitions of Action, for example, its Forest Positive Coalition.⁷⁹ It continues to be focused (at least primarily) on mobilising industry action as opposed to engaging with policymakers.

⁷² https://content.influencemap.org/site/data/001/385/CII_Communique_Feb2024_AccessedApril2024.pdf

⁷³ https://content.influencemap.org/site/data/001/385/CII_CompetitiveandSustainableIndiaReport_March2024_AccessedApril2024.pdf

⁷⁴ https://content.influencemap.org/site/data/001/632/CII_AR_2024_AccessedOct2024p24-38-fec41faf770346e7adfecafc8039942b.pdf; https://content.influencemap.org/site/data/001/632/CII_AR_2024_AccessedOct2024p95-99-1458e1156ffa40e2bb5ff3ccb5781222.pdf; https://content.influencemap.org/site/data/001/385/CII_Communique_Oct2023_AccessedApril2024.pdf; https://content.influencemap.org/site/data/001/341/CII_Blog_Nov2023.pdf

⁷⁵ https://content.influencemap.org/site/data/001/385/CII_Communique_Oct2023_AccessedApril2024.pdf

⁷⁶ https://content.influencemap.org/site/data/001/385/CII_Communique_Feb2024_AccessedApril2024.pdf; <https://www.thehindu.com/business/slash-petroleum-taxes-cheaper-crude-not-reflecting-in-prices-cii/article68305317.ece>

⁷⁷ https://content.influencemap.org/site/data/001/341/CII_PressRelease_Nov2023.pdf

⁷⁸ https://content.influencemap.org/site/data/001/347/CBAM_TheHindu_December2023.pdf

⁷⁹ <https://www.theconsumergoodsforum.com/environmental-sustainability/net-zero/>; <https://www.theconsumergoodsforum.com/environmental-sustainability/forest-positive>

Detailed advocacy positions	It is unclear to what extent CGF has engaged with policymakers on climate-relevant policies over 2024. In a July 2024 interview, CGF's Sustainability Director expressed a desire to engage constructively with EU regulators (both in general and specifically in relation to the EU Deforestation Regulation) but it is not clear from CGF's public disclosure whether such engagement has taken place. ⁸⁰
Alignment assessment	No misalignment
Engagement intensity	No meaningful engagement
Change(s) relative to previous assessment	There has been no discernible shift in CGF's positions during 2024. Its climate-related work remains focused on facilitating private sector action, rather than lobbying policymakers.
More information	View CGF's LobbyMap profile
Recommended action(s)	Encourage more climate-related policy engagement.

Corporate Leaders Group (CLG)

Geography	EU/UK
Sector	Cross-industry
Membership payment	Between €20,000 and €49,999 p.a.
Unilever role(s)	Member
Top-line positions	Strong support for Paris-aligned policies Over 2024, CLG UK and CLG Europe have consistently advocated in favour of increased ambition from UK and EU policymakers to accelerate the transition to net zero.

Detailed advocacy positions

Pushing for increased ambition in UK and EU climate targets

During 2024, CLG Europe called on EU policymakers to set a target of reducing greenhouse gas emissions by at least 90% by 2040.⁸¹ It has publicly advocated for an ambitious EU Green Industrial Strategy, setting clear criteria for what this needs to contain.⁸² Meanwhile, ahead of COP29 in November 2024, CLG UK called on the UK government to set an ambitious 2035 NDC (which it did) as well as to focus on implementing its existing 2030 NDC (which it is not currently on track to meet, according to the UK Climate Change Committee).⁸³

Support for phasing out fossil fuels and fossil fuel subsidies

Both CLG UK and CLG Europe have called for policymakers in the UK, EU and globally (via COP agreements) to commit to phasing out unabated fossil fuels and fossil fuel subsidies and to ensure these are backed up with clear phase-out plans and timelines.⁸⁴ This is in addition to measures to scale up renewable capacity and improve energy efficiency across industry and the built environment.

Alignment assessment

No misalignment

Engagement intensity

High

Change(s) relative to previous assessment

CLG continues to be constructively engaged on climate policy in the EU and UK, pushing policymakers to increase the ambition of emissions reduction targets and to back these up with robust implementation plans. It is highly engaged overall, though this is mostly limited to support for ambitious climate policy in general rather than detailed engagement on specific policies (this is consistent with what we found in last year's review).

More information

View CLG's [LobbyMap](#) profile

Recommended action(s)

No action required.

⁸⁰ <https://www.theconsumergoodsforum.com/blog/2024/07/30/sustainability-director-didier-bergeret-discusses-the-role-of-sustainability-in-a-changing-corporate-world/>

⁸¹ https://content.influencemap.org/site/data/001/381/CLG_Mar2024_2040_climate_target_business_letter.pdf

⁸² https://content.influencemap.org/site/data/001/664/CLG_uk_policy_briefing_making_it_happen_Oct2024-a3a0498dad2a43b19ccfaf595e4b218b.pdf

⁸³ https://content.influencemap.org/site/data/001/664/CLG_uk_policy_briefing_making_it_happen_Oct2024-a3a0498dad2a43b19ccfaf595e4b218b.pdf

⁸⁴ https://content.influencemap.org/site/data/001/339/CLG_principles_for_an_ambitious_eu_green_industrial_strategy_Nov2023.pdf; https://content.influencemap.org/site/data/001/347/europeanbusinesses_phaseoutfossilfuel_statementcop28_Dec2023.pdf; https://content.influencemap.org/site/data/001/347/mid-cop28_uk_business_statement_of_support_Dec2023.pdf

Cosmetics Europe (CE)

Geography	EU
Sector	Personal Care
Membership payment	Between €100,000 and €299,999 p.a.
Unilever role(s)	Member
Top-line positions	<p>Constructive but vague top-line messaging on EU climate policy</p> <p>Cosmetics Europe clearly states that it supports the ambitions and objectives of the EU Green Deal. However, details on what this means in terms of concrete policy positions remain unclear. In its manifesto for the 2024 European elections, the sole reference to the Green Deal legislative agenda is a call for 'coherence and consistency across different pieces of legislation stemming from the European Green Deal'.⁸⁵</p>
Detailed advocacy positions	<p>Support for a European Industrial Deal to complement the EU Green Deal</p> <p>Cosmetics Europe was a signatory to the Antwerp Declaration in February 2024, which calls for a European Industrial Deal to complement the Green Deal. The Declaration's key climate policy-related asks are for the European Commission to: a) include a strong public funding chapter with a Clean Tech Deployment Fund, and b) boost demand for net zero, low-carbon and circular products, including through public procurement and by expanding the scope of the Net Zero Industry Act.⁸⁶</p>
Alignment assessment	No misalignment
Engagement intensity	No meaningful engagement
Change(s) relative to previous assessment	There has been no discernible shift in Cosmetics Europe's climate policy positions during 2024. Its top-line messaging remains positive, but it does not appear to engage on climate policy beyond signing high-level statements such as the Antwerp Declaration (referenced above). Its engagement intensity score has increased since last year's review but remains low.

⁸⁵ https://cosmeticseurope.eu/files/9117/1266/3098/CE_Manifesto_5.pdf

⁸⁶ <https://antwerp-declaration.eu/#signatories>

More information

View Cosmetics Europe's [LobbyMap](#) profile

Recommended action(s)

Encourage Cosmetics Europe to increase their engagement beyond Top-line statements and to double-down on their pro-climate policy.

Dutch Employers' Federation (VNO-NCW)

Geography	Netherlands
Sector	Cross-industry
Membership payment	Under €100,000 p.a.
Unilever role(s)	Head of Unilever Netherlands, General Manager Nutrition Unilever Europe and METR/ANZ, is on the General Board and the Daily Board.
Top-line positions	<p>Support for EU and Dutch climate goals</p> <p>During 2024, VNO-NCW has consistently voiced its support for national and international climate targets – both interim 2030 targets and reaching carbon neutrality by 2050 (in line with the existing stated ambitions of the Dutch government and European Commission). It has emphasised the need for supportive policies to enable these targets to be met, while also addressing energy affordability issues that are particularly acute in the Netherlands.⁸⁷</p>
Detailed advocacy positions	<p>Support for policies to accelerate energy transition</p> <p>VNO-NCW has, on multiple occasions, called for measures to accelerate the transformation of energy infrastructure to support the electrification of transport and industry along with a greater share of renewables in the energy mix. This includes taking constructive positions on improving grid infrastructure, the role of hydrogen, and using proceeds from the EU Emissions Trading System (ETS) to invest in transforming energy infrastructure.⁸⁸</p>

⁸⁷ <https://www.vno-ncw.nl/artikelen/eu-energieprijzen-komende-decennia-substantieel-hoger-zonder-actie-2>

⁸⁸ <https://www.vno-ncw.nl/artikelen/maximaal-inzetten-op-het-uitvoeren-van-de-klimaatplannen>; https://content.influencemap.org/site/data/001/557/VNO-NCW_PositionPaper_Hydrogen_May2024-c061897906294dfb8d67d4fe0803405d.pdf

https://content.influencemap.org/site/data/001/346/VNONCW_Dec2023_ClimateAgreementEnergyTransition_Dec2023.pdf; https://www.vnoncw-brabantzeeland.nl/wp-content/uploads/2024/04/VNO-NCW-MKB-Nederland-Brochure-Naar-een-sterker-NL_spreads.pdf

Detailed advocacy positions**Support for current carbon pricing regime**

VNO-NCW clearly acknowledges the EU ETS as a key tool in driving decarbonisation.⁸⁹ In relation to the Netherlands' national carbon tax, it argues that government must now accelerate progress on creating the infrastructure to enable businesses to decarbonise and thus avoid paying high carbon costs. Specifically, VNO-NCW highlights that there are currently thousands of Dutch businesses awaiting a grid connection to enable them to switch from gas to electricity. In a July 2024 position paper, VNO-NCW recommends that businesses that can demonstrate they have electrification plans ready should be exempted from the national carbon tax and the higher rate of energy tax on gas.⁹⁰ We regard this as a reasonable proposal – clearly intended to incentivise faster action on energy infrastructure transformation, rather than an attempt to weaken carbon pricing signals per se.

Indirect support for fossil gas expansion

While VNO-NCW has not directly spoken out in support of fossil fuels during 2024, it continues to be indirectly associated with the promotion of new fossil gas via its membership of BusinessEurope. For example, the 'Brussels Declaration' issued by BusinessEurope's Council of Presidents in November 2023 calls for investment in natural gas capacities, as well as renewables and nuclear.⁹¹

Alignment assessment

Misaligned on rapid fossil fuel phase-out

Engagement intensity

Moderate

Change(s) relative to previous assessment

VNO-NCW's climate policy positions have remained broadly consistent during 2024. Its top-line messaging remains overwhelmingly positive, and it appears to have somewhat increased the intensity of its constructive engagement in support of energy transition policies. It also appears to have dropped any reference to expanding fossil fuel infrastructure from its direct advocacy and communications, though it still remains indirectly associated with pro-fossil fuel advocacy as a result of its membership of BusinessEurope.

More information

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

Recommended action(s)

To continue to actively stimulate policies that increase investment in carbon reduction. To prioritise current discussions around Government Green Policies in the Netherlands and to stimulate the Clean Industrial Deal in EU (Climate/NetZero/Clean Growth).

EU Chamber of Commerce in China (EUCCC)**Geography**

China

Sector

Cross-industry

Membership payment

Under €20,000 p.a.

Unilever role(s)

- Vice Chair of EUCCC's Agriculture, Food and Beverage Working Group
- Core member of Cosmetics Advisory Committee
- Member of multiple working groups

Top-line positions**High-level support for European and Chinese climate goals**

EUCCC has acknowledged 'climate change is the biggest challenge that all of us must face' and has expressed support for both the European Union's and China's carbon neutrality targets.⁹² EUCCC's webinars and working group meetings include updates on EU regulations such as the Corporate Sustainability Due Diligence Directive (CSDDD) Carbon Border Adjustment Mechanism (CBAM) EU Deforestation Regulation (EUDR) and EU Emissions Trading System (ETS). However, its engagement on these topics appears to be primarily about information sharing rather than advocacy (with a few exceptions, outlined below).⁹³

Detailed advocacy positions**Support for the green energy transition**

EUCCC has called for further collaboration between China and the EU to accelerate the energy transition and appears to have engaged constructively with policymakers on the issue of green energy procurement.⁹⁴ For example, in December 2023, EUCCC and a delegation of member companies met with a representative of the Ministry of Commerce to discuss the obstacles to green energy procurement.⁹⁵ Further, in May 2024, EUCCC attended a roundtable with the National Energy Administration and the Shenzhen Energy Bureau, where it communicated the challenges SMEs face in terms of green energy and certification, requesting government support.⁹⁶

⁹² <https://www.europeanchamber.com.cn/en/lobby-actions/7257/European-Chamber-Southwest-China-Chapter-Chair-Massimo-Bagnasco-attended-the-Ecomondo-China-CDEPE-2024-Opening-Ceremony>

⁹³ <https://www.europeanchamber5.com.cn>
<https://www.europeanchamber6.com.cn/>
<https://www.europeanchamber7.com.cn>
<https://www.europeanchamber8.com.cn>

⁹⁴ https://content.influencemap.org/site/data/001/614/EUCCC_July2024_AutomotiveDecarbonisation_NewsRelease_Sept2024-c3fde6ff532d4fc-18c2962152ddea351.pdf; https://content.influencemap.org/site/data/001/615/EUCCC_Jun2024_GreenProcurement_NewsRelease_Sept2024-5e0ef-ab56da84a5b956854c5b3710413.pdf; https://content.influencemap.org/site/data/001/331/EUCCC_Advocacy_Actions_Oct2023.pdf

⁹⁵ https://content.influencemap.org/site/data/001/615/EUCCC_May2024_ClimateAction_NewsRelease_Sept2024-140f86761767429e9320015e-62a4ae6f.pdf

⁹⁶ https://content.influencemap.org/site/data/001/614/EUCCC_May2024_GreenProcurement_NewsRelease_Sept2024-d9351046604e4a7c-915d558ad0deb5dd.pdf

⁸⁹ <https://www.vno-ncw.nl/artikelen/maximaal-inzetten-op-het-uitvoeren-van-de-klimaatplannen>

⁹⁰ https://content.influencemap.org/site/data/001/566/VNO-NCW_July2024_PositionPaper_July2024-b1111e0a2cf14a23bd9cf5f7c5278914.pdf

⁹¹ https://content.influencemap.org/site/data/001/341/businessseurope_brusselsdeclaration_councilpresidents_2023-11-24.pdf

Detailed advocacy positions

Green policy related to net zero supply chains was also a focus at EUCCC’s Carbon Neutrality Summit in September 2024.⁹⁷ EUCCC has also organised several meetings and fora in 2024 on topics related to renewable energy (e.g., renewable methanol, green power, hydrogen, energy storage, power purchase agreements, and Green Electricity Certificates).⁹⁸

Support for EU Carbon Border Adjustment Mechanism (CBAM)

EUCCC appears to support the EU CBAM. For example, in a May 2024 speech, the EUCCC Chair called the EU CBAM a ‘very important EU policy,’ and emphasised the need for cooperation between China and Europe.⁹⁹ Further, EUCCC was a supporting organisation for an April 2024 training session on the interpretation of the EU CBAM for Chinese businesses, stating that the CBAM acts as an incentive to Sichuan businesses to establish carbon accounting capabilities and drive ‘carbon competitiveness’ towards low carbon.¹⁰⁰

Support for EU Corporate Sustainability Due Diligence Directive (CSDDD)

EUCCC appears to support the EU CSDDD. For example, EUCCC was a lead author of the European Business Organisation (EBO) Worldwide Network EU CSDDD Position Paper, published in June 2024. The paper calls for further clarification of CSDDD guidelines and for the CSDDD to ‘become a directly applicable EU-wide regulation’.¹⁰¹

Alignment assessment

No misalignment

Engagement intensity

Low

Change(s) relative to previous assessment

EUCCC’s top-line messaging on climate policy has not shifted over 2024. In terms of detailed policy engagement, it has been less active on carbon pricing and more active on support for renewables during 2024 than it had been in the previous review period.

⁹⁷ https://www.europeanchamber.com.cn/en/past-events-archive/26324/Participation_from_Tianjin_Gov_Confirmed_The_European_Chamber_4th_Carbon_Neutrality_Summit_Navigating_the_Path_to_Global_Net_Zero_Supply_Chains

⁹⁸ <https://www.europeanchamber1.com.cn/>
<https://www.europeanchamber.com2.cn/>
<https://www.europeanchamber.com3.cn/>
<https://www.europeanchamber.com4.cn/>
https://www.europeanchamber.com.cn/en/lobby-actions/7237/European_Chamber_Clean_Energy_Business_Tour_to_Inner_Mongolia

⁹⁹ https://www.europeanchamber.com.cn/en/lobby-actions/7257/European_Chamber_Southwest_China_Chapter_Chair_Massimo_Bagnasco_attended_the_Ecomondo_China_CDEPE_2024_Opening_Ceremony

¹⁰⁰ https://content.influencemap.org/site/data/001/614/EUCCC_Apr2024_CBAM_NewsRelease_Sep2024-8b36b5ad7eb24a9a95b67ebddd2ffce3.pdf

¹⁰¹ https://www.europeanchamber.com.cn/en/national-news/3628/ebo_worldwide_network_releases_csddd_position_paper

Significantly, too, it does not appear to have advocated for gas as a transition fuel during 2024, meaning that the one area of partial misalignment with science-based policy identified in last year’s review no longer applies.

More information

View EUCCC’s [LobbyMap](#) profile

Recommended action(s)

Encourage EUCCC to increase engagement intensity in the areas where it is aligned with Unilever.

European Clean Trucking Alliance (ECTA)

Geography

EU

Sector

Transport & Logistics

Membership payment

No membership fees

Unilever role(s)

Direct member

Top-line positions

Support for EU Green Deal

ECTA has consistently advocated in favour of the EU Green Deal during 2024, calling on the new European Commission to prioritise delivery of it and stating support for an accompanying Clean Industrial Deal.¹⁰²

Detailed advocacy positions

Constructive engagement on regulation and incentives for zero-emission trucks

On several occasions during 2024, ECTA has provided detailed input to policymakers in Brussels on policies to incentivise an EU-wide shift to zero-emission trucks.¹⁰³ In April 2024, it also intervened publicly to call on MEPs to vote in favour of new, stricter EU CO2 standards for heavy-duty vehicles.¹⁰⁴ The proposal was subsequently passed and formally ratified by the Council of the European Union in May 2024.¹⁰⁵

¹⁰² https://content.influencemap.org/site/data/001/555/Joint-Statement-confirming-the-Green-Deal_Jun2024-dadc7151dadcd4a75be3f-493b5e730906.pdf

¹⁰³ <https://clean-trucking.eu/publications/position-paper-on-greening-corporate-fleets/>; https://content.influencemap.org/site/data/001/644/ECTA_press_ZEV-trucks_march24-da293b1f0e424d6786e6fa4d9233c4d9.pdf

¹⁰⁴ https://content.influencemap.org/site/data/001/632/ECTA_HDV_CO2_industry_letter_final_apr24-fadd57e87891477f8b68c765c62a8ecd.pdf

¹⁰⁵ <https://globaldrivetozero.org/2024/05/13/european-council-signs-off-on-hdv-co2-emissions-standards>

Alignment assessment	No misalignment
Engagement intensity	Moderate*
Change(s) relative to previous assessment	<p>ECTA's climate policy positions and level of engagement have stayed consistent over 2024. As expected, its direct engagement is limited to policies designed to incentivise the decarbonisation of trucking. While this is not one of Unilever's climate policy priorities, it is an area in which progress is needed in order to enable delivery of Unilever's Climate Transition Action Plan.</p> <p><i>*ECTA's 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. This is the same engagement intensity rating as ECTA received last year.</i></p>
More information	View ECTA's LobbyMap profile
Recommended action(s)	No action required

European Round Table for Industry (ERT)

Geography	EU
Sector	Cross-industry
Membership payment	Between €20,000 and €49,999 p.a.
Unilever role(s)	<p>Member of:</p> <ul style="list-style-type: none"> • Anti-trust working group • Tax working group • ED&I and Corporate Comms working group

Top-line positions

Consistent support for the goals of the EU Green Deal – combined with an emphasis on competitiveness
 In a series of reports published in March 2024, ERT clearly articulates its support for the EU's climate goals and puts forward constructive ideas for achieving those goals while also ensuring European industries remain globally competitive.¹⁰⁶ Its messaging consistently couples decarbonisation and re-industrialisation, emphasising that ERT believes the two can go hand-in-hand.¹⁰⁷

Detailed advocacy positions

Strong support for renewables, with conditional support for fossil gas as a transition fuel

ERT has called for a 'fundamental transformation [of Europe's energy infrastructure] to meet our climate goals and remain globally competitive'.¹⁰⁸ This includes advocating an accelerated build-out of modern electricity grids, pipelines (for gas, hydrogen, and CO₂) ports and railways, energy storage and charging infrastructure, and carbon capture, utilisation and storage (CCUS). Its support for fossil gas is caveated: it acknowledges the importance of setting clear phase-out dates for new fossil gas infrastructure, addressing methane emissions and creating a CCUS ecosystem.¹⁰⁹

Conditional support for EU Carbon Border Adjustment Mechanism (CBAM) and EU Emissions Trading System (ETS) reform

ERT's tone regarding CBAM has shifted during 2024 to become more constructive. It still expresses reservations about the policy as currently designed, but appears more eager to engage constructively to help make CBAM work than was previously the case. Likewise, it appears to have accepted the European Commission's position on phasing out free ETS allowances alongside the phase-in of CBAM. However, ERT continues to raise concerns that this will reduce the export competitiveness of European energy-intensive industries.¹¹⁰

Alignment assessment

Misaligned on rapid fossil fuel phase-out

Engagement intensity

Moderate

¹⁰⁶ https://content.influencemap.org/site/data/001/379/ERT_competitiveness-and-benchmarking-report_Mar2024.pdf; https://content.influencemap.org/site/data/001/386/ERT_Strengthening-Europes-energy-infrastructure_Mar2024.pdf; https://content.influencemap.org/site/data/001/386/ERT_competitiveness-of-europes-energy-intensive-industries_Mar2024.pdf

¹⁰⁷ https://content.influencemap.org/site/data/001/329/ERT_vision-Paper-2024-2029-green-transition_Oct2023.pdf

¹⁰⁸ https://content.influencemap.org/site/data/001/386/ERT_Strengthening-Europes-energy-infrastructure_Mar2024.pdf

¹⁰⁹ https://content.influencemap.org/site/data/001/386/ERT_Strengthening-Europes-energy-infrastructure_Mar2024.pdf

¹¹⁰ https://content.influencemap.org/site/data/001/386/ERT_competitiveness-of-europes-energy-intensive-industries_Mar2024.pdf

Change(s) relative to previous assessment

Overall, ERT’s engagement on climate policy has become slightly more positive over 2024.

It remains highly concerned about high energy costs for European industry but has evolved its engagement on carbon pricing via CBAM and ETS reform in a more constructive direction. This is emblematic of ERT’s overall direction of travel: it recognises that decarbonisation and competitiveness need to go hand-in-hand and appears more committed than it has in the past to presenting policy ideas that optimise for both.

ERT has expressed support for new fossil gas infrastructure during 2024 – albeit with caveats that go some way towards allaying concerns about fossil fuel lock-in. Nonetheless, ERT’s position on this issue is not fully consistent with Unilever’s stance on the need for a rapid phase-out of fossil fuels.

More information

View ERT’s [LobbyMap](#) profile

Recommended action(s)

ERT is moving in a positive direction. Unilever will encourage ERT to double-down on its pro-climate agenda and increase its engagement intensity on net zero policy.

Unilever will work with ERT to ensure EU Sustainability reporting rules facilitate better business practice while also reserving the right to deviate on certain ERT positions by including a disclaimer such as on the Omnibus review.

Federation of Indian Chambers of Commerce & Industry (FICCI)

Geography

India

Sector

Cross-industry

Membership payment

Under €20,000 p.a.

Unilever role(s)

Member of Resource Efficiency and Circular Economy Industry Coalition (RECEIC)

Top-line positions

High-level support for India’s climate commitments

FICCI has publicly supported the Indian government’s climate commitments, including achieving net zero by 2070. It has also concretely committed to support delivery on the government’s target of increasing non-fossil fuel-based energy capacity to 500GW by 2030 via its Renewable Energy Developers Taskforce.¹¹¹ It also has taskforces on energy storage and solar manufacturing with complementary aims.

Mixed position on the energy transition

FICCI has indicated support for increasing renewable energy investment and storage capacity.¹¹² Additionally, FICCI supported the scale-up of solar manufacturing and green hydrogen production via committees specific to these topics.¹¹³ It has also supported the expansion of fossil gas as a transition fuel in India, highlighting the role of gas in power generation (as a substitute for coal) transport and industry.¹¹⁴ FICCI also has a committee for Oil & Gas – Upstream, focused on increasing investments in the sector.¹¹⁵

High-level support for carbon markets

FICCI appears to be broadly supportive of the Indian government’s plans to develop robust carbon markets and implement a carbon credit trading scheme, though it does not appear to be engaged on the detail of policy design in this area.¹¹⁶ It acknowledges the value of an effective carbon price in driving innovation and decarbonisation.¹¹⁷

Detailed advocacy positions

Constructive engagement on EV subsidy scheme

FICCI has advocated for a five-year extension to the current EV subsidy scheme – the Fast Adoption and Manufacturing of Hybrid and Electric Vehicles (FAME) II scheme – to incentivise EV adoption.¹¹⁸

Alignment assessment

Misaligned on rapid fossil fuel phase-out

Engagement intensity

Low

¹¹¹ https://content.influencemap.org/site/data/001/622/FICCI_Blog_Budget_Sept2024-97473b58f41a4e998e91879f328f9e4c.pdf; https://content.influencemap.org/site/data/001/628/FICCI_RETTaskForce_AccessedOct2024-d14d993326d94e889894b1e0df32448a.pdf

¹¹² https://content.influencemap.org/site/data/001/622/FICCI_Blog_RenewableBudget_Sept2024-e98ea9d08ebe4609abbf371a06ad0136.pdf; https://ficci.in/press_release_details/4800

¹¹³ https://content.influencemap.org/site/data/001/628/FICCI_SolarTaskForce_AccessedOct2024-62c423b8e21e495a94236affb2fca983.pdf; https://content.influencemap.org/site/data/001/623/FICCI_Hydrogen_Energy_accessedOct2024-c59700ccf228474fb0e78cc6dcd745f.pdf

¹¹⁴ https://content.influencemap.org/site/data/001/629/FICCI_Aug2024_GasDistribution_Oct2024p6.11-154f93135a754c95a672166e0598eac8.pdf

¹¹⁵ https://content.influencemap.org/site/data/001/622/FICCI_Oil_Gas-Upstream_AccessedOct2024-d18c59a069e54215bf1fed3b48102439.pdf

¹¹⁶ https://content.influencemap.org/site/data/001/622/FICCI_Blog_RenewableBudget_Sept2024-9b6aca5a36a44d559ba038a1d110b82d.pdf

¹¹⁷ https://content.influencemap.org/site/data/001/348/FICCI_PressRelease_Dec2023.pdf

¹¹⁸ https://content.influencemap.org/site/data/001/356/FICCI_AutoCarPro_Jan2024.pdf; https://content.influencemap.org/site/data/001/343/FICCI_PR-Dec23_Accessed-Dec23.pdf; https://content.influencemap.org/site/data/001/351/FICCI_BNNBreaking_Dec2023.pdf

Change(s) relative to previous assessment

There has been minimal shift in FICCI's climate policy positions during 2024. Its top-line messaging remains supportive of India's climate commitments, and its position on the energy transition remains mixed. FICCI continues to promote fossil gas as a transition fuel alongside its advocacy for scaling up renewables.

More information

View FICCI's [LobbyMap](#) profile

Recommended action(s)

Encourage FICCI to make public its positive engagement on climate policy, notably its support of renewable energy.

FoodDrinkEurope (FDE)

EU

Food & Drink

Between €50,000 and €99,999 p.a.

Member of climate and environment, agriculture committees

Support for the Paris Agreement and EU climate goals

FoodDrinkEurope's top-line messaging continues to be supportive of the Paris Agreement – including specific references to 1.5°C – and the EU's 2050 carbon neutrality target. It set out its high-level climate policy asks in a June 2024 report. These include ensuring access to renewable energy for manufacturing businesses of all sizes; strengthening the EU Common Agricultural Policy and other agricultural initiatives to support sustainable farming; and developing new funding pathways to meet the €30 billion+ investment needed to transition to sustainable farming practices across Europe.¹¹⁹

Constructive engagement on implementing the EU Deforestation Regulation (EUDR)

In May 2024, FoodDrinkEurope co-signed a letter to the European Commission President that highlighted concrete

Issues with the EUDR Information System and presented clear recommendations for overcoming problems with the initial version of the System.¹²⁰ FoodDrinkEurope's Director General also flagged these concerns publicly in June.¹²¹ We judge these interventions to be constructive since the recommendations presented to the Commission were practical and achievable within the timeframe then available.

Support for a broad range of policies to incentivise more sustainable and regenerative agriculture practices

FoodDrinkEurope's Director General participated in the Strategic Dialogue on the Future of EU Agriculture, which published its final report in September 2024. The report lays out a comprehensive policy agenda for shifting towards a more sustainable food system – including recommendations that align with a regulatory landscape that supports farmers to transition to and maintain a regenerative agriculture approach. The report also highlights the desirability of dietary change (reducing consumption of animal proteins) though it has little to say about how this might be incentivised (beyond raising consumer awareness and using public procurement).¹²²

Alignment assessment

No misalignment

Engagement intensity

Moderate*

Change(s) relative to previous assessment

FoodDrinkEurope continues to have positive top-line messaging and to engage constructively on the issues of deforestation and regenerative agriculture.

The one change relative to last year's review is that FoodDrinkEurope does not appear to have lobbied against measures to incentivise dietary change in 2024, which means we no longer consider it to be misaligned with science-based policy.

**FoodDrinkEurope's engagement intensity score from InfluenceMap (at the time this assessment was completed) is 23%, which is 2% below the threshold for 'moderate engagement'. However, we believe this score does not fairly reflect the intensity of FoodDrinkEurope's engagement during the review period, specifically because of the nature of the Strategic Dialogue on the Future of EU Agriculture.*

¹¹⁹ <https://www.fooddrinkeurope.eu/wp-content/uploads/2024/07/Action-Project-for-Sustainable-Resilient-Food-Systems-2024.pdf>

¹²⁰ https://content.influencemap.org//site/data/001/629/FDE_May2024_EUDR_VDL_Oct2024-e899791b60494d1fb8703acb5f6c5771.pdf

¹²¹ https://content.influencemap.org//site/data/001/629/FDE_May2024_EUDR_VDL_Oct2024-e899791b60494d1fb8703acb5f6c5771.pdf

¹²² <https://agriculture.ec.europa.eu/>

Change(s) relative to previous assessment	<i>The Strategic Dialogue was an intensive process that ran over nine months from January to September 2024, involving seven plenary meetings (two days each).¹²³ The intensity of this process is not captured in InfluenceMap's scoring system (which is based on published outputs) which is why FoodDrinkEurope's engagement intensity rating has been adjusted up one band.</i>
More information	View FoodDrinkEurope's LobbyMap profile
Recommended action(s)	Continue to work with FDE on its pro-climate agenda and support their proactive activities to increase its engagement intensity.

Food Industry Asia (FIA)

Geography	Asia
Sector	Food & Drink
Membership payment	Between €20,000 and €49,999 p.a.
Unilever role(s)	Member
Top-line positions	<p>High-level support for climate-smart agriculture FIA has expressed support for increased investment in 'climate-smart agriculture, capacity-building programmes and knowledge transfer initiatives' to enable ASEAN food manufacturing industries to mitigate and adapt to climate change.¹²⁴</p> <p>Support for global dialogue to ease the cost of the climate transition FIA has called for increasing global dialogue to support ASEAN food producers in meeting incoming environmental policies, such as the EU Deforestation Regulation (EUDR) and the EU CBAM, to reduce the cost of the climate transition.¹²⁵</p>
Detailed advocacy positions	No evidence of specific climate-related lobbying by FIA was found.

¹²³ https://agriculture.ec.europa.eu/common-agricultural-policy/cap-overview/main-initiatives-strategic-dialogue-future-eu-agriculture_en

¹²⁴ <https://www.oxfordeconomics.com/resource/climate-change-and-food-prices-in-southeast-asia-2024-update>

¹²⁵ <https://www.oxfordeconomics.com/resource/climate-change-and-food-prices-in-southeast-asia-2024-update>

Alignment assessment	No misalignment
Engagement intensity	No meaningful engagement
Change(s) relative to previous assessment	FIA continues to have minimal engagement on climate-related policies, limited to high-level recommendations about the kind of support ASEAN food producers need in order to transition to net zero and adapt to the impact of climate change.
More information	View FIA's LobbyMap profile
Recommended action(s)	Encourage FIA to double-down on its pro-climate agenda and increase its engagement intensity on Unilever's climate policy priorities relevant to the food industry.

Indonesian Chamber of Commerce and Industry (KADIN)

Geography	Indonesia
Sector	Cross-industry
Membership payment	Under €20,000 p.a.
Unilever role(s)	Head of Permanent Committee of Circular Economy and Waste Management (appointed 1 Dec 2024)
Top-line positions	<p>Support for Indonesia's NDC KADIN has continued to express consistent support for the Indonesian Government's target of reaching net zero by 2060 and has implied that it will also support Indonesia's updated NDC (expected in 2025).¹²⁶</p> <p>Support for renewables KADIN representatives have been vocal about the desirability of expanding Indonesia's renewable energy capacity, as well as investing in the supply chain and infrastructure to enable deployment of renewables and electric vehicles at scale.¹²⁷ KADIN states that it supports the government in harmonising new renewable energy regulations, but specifics of this support are not disclosed.¹²⁸</p>

¹²⁶ <https://netzerohub.id/why-net-zero/>

¹²⁷ <https://indonesiabusinesspost.com/insider/indonesia-has-3686-gw-renewable-energy-resource-potentials-kadin>

<https://kumparan.com/kumparanbisnis/kadin-sebut-regulasi-hingga-pendanaan-jadi-tantangan-investasi-energi-terbarukan-23W5GYJk0KH/2>

¹²⁸ https://content.influencemap.org/site/data/001/632/KADIN_Netzerohub_AccessedOct24-c354002663a346d6a46aaabae14b7d9e.pdf

Detailed advocacy positions	No public evidence of KADIN engaging on specific climate policies during 2024 was found, though it appears likely from its public messaging that KADIN has engaged constructively on policies to support renewable energy and electric vehicles during this period.
Alignment assessment	No misalignment
Engagement intensity	Low
Change(s) relative to previous assessment	There has been no discernible shift in KADIN's climate policy positions during 2024 due to changes in the organisation's internal situation as it adjusts to the new government. Its engagement intensity has increased somewhat – from no meaningful engagement to low engagement. Its climate-related work – particularly via its Net Zero Hub and Energy Transition Task Force – remains focused primarily on enabling private sector action as opposed to lobbying policymakers.
More information	View KADIN's LobbyMap profile
Recommended action(s)	Encourage KADIN to double-down on its pro-climate agenda and increase its engagement intensity on net zero policy.

International Association for Soaps, Detergents and Maintenance Products (A.I.S.E.)

Geography	Global
Sector	Home Care
Membership payment	Between €100,000 and €299,999 p.a.
Unilever role(s)	<ul style="list-style-type: none"> President for 2024–2026 Board member
Top-line positions	High-level support for EU's climate policy agenda A.I.S.E. has expressed support for the EU's net zero by 2050 goal and the implementation of the EU Green Deal. ¹²⁹

¹²⁹ https://content.influencemap.org/site/data/001/621/AISE_Oct2024_ProductStewardship_Oct2024-7826f177ceda4156a49def18f5b3f6b7.pdf;
https://content.influencemap.org/site/data/001/621/AISE_Sep2024_YearInReview2023-4_Oct2024-7006e286f9734683805a5d5b6d82884e.pdf;
https://content.influencemap.org/site/data/001/324/AISE_Oct2023_SustainableCleaningKPIReport_Oct2023.pdf

Detailed advocacy positions	Support for a European Industrial Deal to complement the EU Green Deal A.I.S.E. was the first downstream sector to sign the Antwerp Declaration in February 2024, which calls for a European Industrial Deal to complement the Green Deal. The Declaration's key climate policy-related asks are for the European Commission to: a) include a strong public funding chapter with a Clean Tech Deployment Fund, and b) boost demand for net zero, low-carbon and circular products, including through public procurement and expanding the scope of the Net Zero Industry Act. ¹³⁰
Alignment assessment	No misalignment
Engagement intensity	No meaningful engagement
Change(s) relative to previous assessment	There has been no discernible shift in A.I.S.E.'s climate policy positions during 2024. Its top-line messaging remains positive, but it does not appear to engage on climate policy beyond signing high-level statements such as the Antwerp Declaration (referenced above). Its engagement intensity score has increased since last year's review but remains low.
More information	View A.I.S.E.'s LobbyMap profile
Recommended action(s)	A.I.S.E. is already undertaking an in-depth review of its advocacy strategy. No action required.

National Business Initiative (NBI)

Geography	South Africa
Sector	Cross-industry
Membership payment	Under €20,000 p.a.
Unilever role(s)	Member of CEO Champions Committee, Just Transition and Climate Pathways Committee, and Advisory Council for Environment and Society (ACES)

¹³⁰ <https://antwerp-declaration.eu/#signatories>; https://content.influencemap.org/site/data/001/621/AISE_Feb2024_AntwerpDeclaration_NewsRelease_Oct2024-b3defefafc58499db26b90ee502bc697.pdf

Top-line positions	Support for South Africa's NDC and a Just Transition NBI has expressed support for South Africa's NDC to achieve net zero by 2050, as well as interim targets for 2025 and 2030. It has also expressed support for the goal of limiting warming to 1.5°C above pre-industrial levels. ¹³¹ NBI emphasises the importance of a Just Transition in its public messaging. It has developed a Just Transition roadmap and leads an employment programme to foster skills for the net zero transition. ¹³²
Detailed advocacy positions	Support for a rapid roll-out of renewable energy NBI is consistently supportive of increasing the pace of renewable energy deployment in its public messaging. It appears to be constructively engaged with relevant government departments, particularly on the issues of capacity building and job creation in the renewable energy value chain. ¹³³ It also advocates in favour of a broader suite of climate policy goals, such as electrifying road transport and building a green hydrogen industry. ¹³⁴
Alignment assessment	No misalignment
Engagement intensity	Low
Change(s) relative to previous assessment	Overall, NBI remains relatively passive on climate policy. Its top-line messaging remains positive, but it does not appear to engage on the detail of specific climate-relevant policies. Significantly, NBI does not appear to have advocated for gas as a transition fuel during 2024 (this was the one issue it was found to be partially misaligned on in last year's review).
More information	View NBI's LobbyMap profile
Recommended action(s)	Encourage NBI to double-down on its pro-climate agenda and increase its engagement intensity on net zero policy.

¹³¹ <https://www.nbi.org.za/wp-content/uploads/2024/07/NBI-2022-2023-Annual-Report-Final.pdf>; https://content.influencemap.org/site/data/001/346/NBI_WBCSD_Nov23_AccessedDec23.pdf

¹³² https://content.influencemap.org/site/data/001/645/NBI_AnnualReport23_p61_Jul24_AccessedOct24-3f8e721ebd764212b7713a90a8f6011a.pdf; https://content.influencemap.org/site/data/001/540/NBI_EngineeringNews_May24_accessedMay24.pdf; https://content.influencemap.org/site/data/001/395/NBI_BusinessLive_May24_AccessedMay24.pdf; https://content.influencemap.org/site/data/001/645/NBI_JTInfograph_Apr24_accessedOct24-41414f8bec2d40068dfc7e2ed69c58e7.pdf

¹³³ https://content.influencemap.org/site/data/001/645/NBI_AnnualReport23_p62-66_Jul24_AccessedOct24-049b005e6367468a9cf9d31acd03c640.pdf; https://content.influencemap.org/site/data/001/645/NBI_Energy_Webpage_AccessedOct24-7accabb6197d482cb2223a23dbba58b5.pdf

¹³⁴ https://content.influencemap.org/site/data/001/646/NBI_JTInfograph_Apr24_accessedOct24-7dee4ec90b124d52926fd61b599f9820.pdf

Personal Care Products Council (PCPC)

Geography	USA
Sector	Personal Care
Membership payment	Above €300,000 p.a.
Unilever role(s)	Unilever North America is a member and holds two seats on the PCPC Board
Top-line positions	Minimal mention of climate change in high-level messaging PCPC has expressed high-level commitment to reducing the personal care industry's environmental impact, including transitioning towards lower carbon/renewable energy and reducing GHG emissions. 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 policies. ¹³⁵
Detailed advocacy positions	No evidence of specific climate-related lobbying by PCPC was found.
Alignment assessment	No misalignment
Engagement intensity	No meaningful engagement
Change(s) relative to previous assessment	There has been no discernible shift in PCPC's climate policy positions during 2024. It continues to be active on different environmental policy issues – in the US and globally – but, as in the previous review, PCPC appears not to engage on climate policy per se. Overall, PCPC remains relatively inactive on climate policy. It has not done anything to undermine Unilever's climate policy priorities over 2024, but it also does not appear to have proactively promoted higher ambition climate policies – at least not in public.
More information	View PCPC's LobbyMap profile
Recommended action(s)	Clarify PCPC's intended engagement in climate-relevant policy.

¹³⁵ <https://www.personalcarecouncil.org/climate-change>

Sustainable Food Policy Alliance (SFPA)

Geography	USA
Sector	Food & Drink
Membership payment	Between €100,000 and €299,999 p.a.
Unilever role(s)	Founding member
Top-line positions	<p>Passive support for the United States' current NDC SFPA has publicly endorsed the US government's goal of reducing GHG emissions by 50% by 2030 – a goal that was set in 2021.¹³⁶</p> <p>Support for climate-smart farming, incentives for low-carbon approaches and renewable energy deployment SFPA's key policy priorities include support for farm policies that address climate change, water quality, and conservation issues, and which provide support for regenerative agriculture, improved soil health, and renewable energy deployment (particularly wind and solar). SFPA also supports state-level policies to accelerate the expansion of renewable energy and land-based solutions.¹³⁷</p>
Detailed advocacy positions	<p>Proactive support for conservation and climate investments contained in the US Farm Bill In May 2024, SFPA wrote to the leadership of the Senate Committee on Agriculture, Nutrition and Forestry, and the House Committee on Agriculture, calling on the Committees to ensure funding for conservation and climate programmes is sustained at current levels in the 2024 US Farm Bill.¹³⁸</p> <p>Support for policies to address deforestation in agricultural supply chains SFPA has expressed support for legislation that complements voluntary efforts to address deforestation. Specifically, in March 2024, it released a high-level statement in support of the Fostering Overseas Rule of Law and Environmentally Sound Trade (FOREST) Act, arguing that it would provide 'a credible framework with reasonable incentives and penalties to prevent illegal deforestation and ensure harmonization and enforcement between international jurisdictions'.¹³⁹ Based on evidence in the public domain, this appears to be the extent of SFPA's engagement on a potentially vital piece of legislation that has so far failed to make it through the US Congress.</p>

¹³⁶ <https://foodpolicyalliance.org/app/uploads/2022/06/sfpa-climate-principles-2021c.pdf>

¹³⁷ <https://foodpolicyalliance.org/issue/environment>

¹³⁸ https://content.influencemap.org/site/data/001/558/SFPA_Letter_US_Congress_Farm_Bill_May_2024_June_2024-b63f99db7a7c42d-9871242f120b68535.pdf

¹³⁹ <https://foodpolicyalliance.org/news/sfpa-statement-on-the-forest-act>

Alignment assessment	No misalignment
Engagement intensity	Low
Change(s) relative to previous assessment	SFPA's climate policy positions have largely remained consistent over 2024. It continues to engage constructively on the issues of regenerative agriculture and legislation to combat deforestation. It does not appear to have been active on policies to support renewable energy deployment during 2024, meaning it has gone from constructive to inactive on that policy priority. There has also been no discernible shift in the intensity of SFPA's climate policy engagement, which remains low.
More information	View SFPA's LobbyMap profile
Recommended action(s)	Unilever will encourage SFPA to double-down on its pro-climate agenda and increase its engagement intensity on net zero policy.

Tennessee Chamber of Commerce & Industry (TCCI)

Geography	USA
Sector	Cross-industry
Membership payment	Under €20,000 p.a.
Unilever role(s)	Cornerstone member
Top-line positions	<p>No clear top-line position on climate change TCCI does not make any direct reference to climate change or the Paris Agreement in its top-line messaging, though it does profess to 'advocate for transparent and science-based policymaking, as well as policies that support innovative approaches to environmental stewardship'.¹⁴⁰</p> <p>General opposition to environmental regulations TCCI reports that, during 2024, it opposed several proposed environmental bills.¹⁴¹</p>

¹⁴⁰ https://content.influencemap.org/site/data/001/200/TNChamber_2023_EnergyandEnvironment_April2023.pdf

¹⁴¹ https://content.influencemap.org/site/data/001/646/TNCh_2024LegislativeResultsReport_Oct24-cec0be3bf1954c5d90afbbf4c009c1d1.pdf

Top-line positions

In reporting on its legislative achievements in this domain, it does not offer any explanation of how its positions on specific policies are compatible with its overall commitment to science-based policymaking and environmental stewardship.

Unclear position on the energy transition

TCCI states that it 'will work to modernize energy infrastructure in Tennessee in order to meet energy demands and contribute to regional and national energy independence while also supporting the environmental footprint reduction goals of our members.' During 2024, it has publicly expressed support for nuclear energy.¹⁴² It does not appear to have commented publicly on, or engaged on policies related to, renewables or fossil fuels.

Detailed advocacy positions**Opposition to mandates for zero-emissions rail transportation**

In 2024, TCCI signed a coalition letter to the US Environmental Protection Agency (EPA) calling on it to reject a proposal by the California Air Resources Board (CARB) that would mandate railroads across the US to purchase zero-emission locomotives. The letter described the proposed mandates as 'unfeasible'.¹⁴³

Alignment assessment

Misaligned with science-based policy

Engagement intensity

Low

Change(s) relative to previous assessment

TCCI's climate policy positions have remained consistent over 2024. At no stage has it endorsed the Paris Agreement or the goal of limiting global warming to 1.5°C. Significantly, though, it does not appear to have actively advocated in favour of new fossil fuel infrastructure during the period under review.

More information

View TCCI's [LobbyMap](#) profile

Recommended action(s)

Unilever is a member of TCCI due to its ice-cream manufacturing plant in Covington, Tennessee. TCCI plays an important role in advocating for business and manufacturing interests on key economic issues.

However, Unilever expects its trade associations not to oppose other policies aligned with its priorities and views. Due to its current position on certain environmental issues, TCCI does not speak for Unilever on climate change. Following the separation of our Ice-cream business, due in late 2025, there will be a review of our trade association memberships, including TCCI.

The World Business Council for Sustainable Development (WBCSD)**Geography**

Global

Sector

Cross-industry

Membership payment

Between €50,000 and €99,999 p.a.

Unilever role(s)

Member

Top-line positions**High-level support for a 1.5°C pathway**

WBCSD is clear in its messaging about the imperative to keep global warming within 1.5°C above pre-industrial levels and its goal to mobilise member companies to achieve net zero by 2050.¹⁴⁴ Through its Policy, Advocacy, and Member Mobilization (PAMM) workstream, WBCSD provides members with insights and a forum to shape the global policy agenda.¹⁴⁵ WBCSD's Positive Policy Engagement Advisory Board convenes member companies to provide tools and knowledge on climate policy engagement and acts as a forum to align on engagement tactics.¹⁴⁶

Support for regenerative agriculture

WBCSD's One Planet Business for Biodiversity coalition seeks to catalyse policy changes that promote nature-positive outcomes, including via scaling up regenerative agriculture.¹⁴⁷

Detailed advocacy positions**Support for more ambitious NDCs**

WBCSD has supported Mission 2025's statement calling for governments 'to align their upcoming national climate plans with the Paris Agreement target of limiting global warming to 1.5°C,' ahead of the February 2025 deadline for countries to submit their updated NDCs for 2025–2035.¹⁴⁸

¹⁴⁴ <https://www.wbcsd.org/actions/climate-action>

¹⁴⁵ <https://www.wbcsd.org/actions/policy-advocacy-and-member-mobilization-pamm>

¹⁴⁶ <https://www.wbcsd.org/>

¹⁴⁷ <https://www.wbcsd.org/news/briefing-for-policy-makers-driving-business-impact-on-regenerative-agriculture>;

<https://www.wbcsd.org/actions/one-planet-business-for-biodiversity-op2b>

¹⁴⁸ <https://www.wemeanbusinesscoalition.org/press-release/global-coalition-launches-to-boost-government-climate-plans-ahead-of-critical-un-deadline>

¹⁴² https://content.influencemap.org/site/data/001/645/TNCH_TwitterNuclear_Oct24-d7a21fa354084586b788411522eb7caf.pdf

¹⁴³ https://content.influencemap.org/site/data/001/588/BCNYS_et_al_coalition_comments_CARB_EPA_rail_decarbonization_April_2024-aa252899c-c694ecb84811d52a263f0a2.pdf

Detailed advocacy positions

Support for the EU Corporate Sustainability Due Diligence Directive (CSDDD)

WBCSD has supported the CSDDD, calling on EU member states to support the directive in the final European Council vote. It highlighted the benefits of the directive, such as establishing a level playing field and enhancing corporate accountability.¹⁴⁹

Support for scaling up renewable energy and phasing out fossil fuels

The We Mean Business Coalition, of which WBCSD is a founding partner, calls for commitments to reach ‘100% decarbonized power systems by 2035 in advanced economies and by 2040 for other countries, at the latest’.¹⁵⁰ The Coalition also supports policies that accelerate the renewable energy transition, such as putting a meaningful price on carbon – i.e. one ‘that reflects the full costs of climate change and de-risks investment in key sectors;’ the phase-out of unabated fossil fuels in line with 1.5°C; and the elimination of all fossil fuel subsidies by 2025.¹⁵¹

Support for policies that decrease deforestation and reverse land degradation

Through the We Mean Business Coalition, WBCSD has supported the US FOREST Act, calling for more businesses to voice their support to help the bill get passed, as well as endorsing the Business for Nature policy recommendations for the implementation of the Global Biodiversity Framework.¹⁵² In addition, WBCSD and the US Department of State launched the Forest Finance Risk Consortium to ‘help financial institutions eliminate financed emissions and nature loss driven by deforestation,’ advocating for the adoption of the recommendations of the Task Force on Nature-related Financial Disclosures (TNFD).¹⁵³

Alignment assessment

No misalignment

Engagement intensity

High*

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

¹⁴⁹ <https://www.wbcsd.org/news/wbcsd-public-statement-in-support-of-the-corporate-sustainability-due-diligence-directive-csddd>

¹⁵⁰ <https://www.wemeanbusinesscoalition.org/fossil-to-clean-follow-the-principles>

¹⁵¹ <https://www.wemeanbusinesscoalition.org/policy>

¹⁵² <https://www.wemeanbusinesscoalition.org/blog/how-the-forest-act-and-business-can-help-stop-deforestation-globally>; <https://www.wemeanbusinesscoalition.org/policy/>

¹⁵³ <https://www.wbcsd.org/resources/deforestation-disclosure-guide-for-financial-institutions-towards-integrated-nature-and-climate-related-financial-disclosure/>

Change(s) relative to previous assessment

WBCSD’s climate policy positions have largely remained consistent over 2024. It appears to have somewhat increased its direct policy engagement since last year, though the majority of its policy engagement remains indirect (via the We Mean Business Coalition, of which it is a founding member). The We Mean Business Coalition’s policy positions continue to be aligned both with Unilever’s and a science-based policy agenda.

More information

View the WBCSD [website](#)

Recommended action(s)

No action required.

Appendix 2: industry association review process and method

Selection process

This review covers 26 of Unilever’s industry associations. For this update, we have included the same trade associations assessed in the [CPER](#), published in March 2024.¹⁵⁴

The associations were originally selected based on two criteria:

1. The importance of the association for climate policy: indicators considered 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 the 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.
2. Unilever’s level of influence within the association: indicators considered include the amount spent annually on membership and whether Unilever has a position that could give us particular influence (e.g. a board seat).

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

1. 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.

¹⁵⁴ The German Chemical Industry Association (VCI) has been excluded in this update on the basis that Unilever is not a direct member, and we have communicated to VCI that they do not have permission to use Unilever’s logo or in any way imply that Unilever endorses VCI’s policy positions.

2. 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/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, UK, France, Mexico, Philippines, Germany	Indonesia, Brazil	US, India, China	Regional	Global
Sector	Sub-national ¹⁵⁵	Personal Care	Consumer Goods, Home Care	Food & Drink, Transport & logistics	Cross-industry, Chemicals, Energy

3. 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).
4. 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 our 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)

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):

- Asociación Nacional de Empresarios de Colombia (ANDI)
- Business Leadership South Africa (BLSA)
- Dutch Employers' Federation (VNO-NCW)
- National Business Initiative (South Africa)
- Tennessee Chamber of Commerce & Industry (TCCI)

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

Assessment methodology

What alignment means

Once again, we commissioned Volans, a think tank and advisory firm, to conduct an independent review of our industry associations' climate policy engagement. As with our 2023 Review, all associations were assessed against Unilever's climate policy priorities, as articulated in our [Climate Transition Action Plan \(see page 35\)](#) as well as against a broader science-based policy benchmark – specifically the IPCC's 2018 Special Report on 1.5°C and its Sixth Assessment Report, published in 2023.¹⁵⁶

Key areas of divergence are highlighted in the individual association assessments in Appendix 1.

For each policy priority, associations were assigned one of the following ratings:

- Constructive (the association is actively engaged on this topic and its position is aligned with Unilever's).
- Obstructive (the association is actively engaged on this topic, but its position is misaligned with Unilever's).
- Inactive (the association is not actively engaged on this topic).
- Neutral (the association is at least somewhat engaged on this topic, but the net effect of its engagement is neither obstructive nor constructive).
- Passive support (the association endorses a government climate policy after the fact, but without evidence of constructive engagement ahead of time).

Based on these policy-level assessments, each association is also given an overall alignment rating: either 'no misalignment' or 'misaligned on X issue'.

These ratings are based exclusively on evidence from the 12-month review period (Q4 2023 to Q4 2024 – evidence was gathered and assessed during October and November 2024). Historic instances of misalignment prior to this review period have not been taken into account on the basis that these were covered in our previous review.

¹⁵⁵ Sub-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.

¹⁵⁶ <https://www.ipcc.ch/sr15/>

How Unilever's policy priorities map onto the industry association review framework

The industry association review focuses on associations' engagement across seven distinct climate policy issues. These correspond to the direct advocacy priorities listed in our CTAP and **on page 6** as follows:

- The first three 'cross-cutting policies' (ambitious NDCs, price on carbon, energy transition) with the third split into two separate categories to allow for a more granular understanding of how industry associations engage on energy policy: support for renewables and support for phasing out fossil fuels are distinct policy positions that do not always go hand-in-hand.
- The second, third and fourth 'Business Group decarbonisation levers' (forest-risk commodities, regenerative agriculture and chemical ingredients).

Industry associations have not been assessed against the other direct advocacy priorities listed **on page 6**. This is because the other priorities are either about technical standards or issues in specific geographies that we do not anticipate the associations covered in this review being actively engaged on.

Ultimately, Unilever views climate policy engagement as a tool to help the company deliver on its net zero ambition and 2030 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 Transition Action Plan](#) (published in 2024).

Alignment with the Paris Agreement

The near-term emissions reduction targets set out in our Climate Transition Action Plan (CTAP) were approved in 2024 by the Science Based Targets initiative, indicating that they are aligned with the Paris Agreement. Unilever's climate policy engagement focuses on issues that materially impact our ability to deliver our CTAP goals. We are confident that Unilever's climate policy positions are consistent with science-based policy required to meet the Paris Agreement. By default, therefore, associations that were assessed as aligned with Unilever on a particular issue are also assumed to be aligned with science-based policy (and vice versa).

There are, however, some aspects of climate policy that Unilever does not engage with directly. 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 derived from the IPCC's assessment of what is necessary to limit global warming to 1.5°C above pre-industrial averages.¹⁵⁷

The science-based policy benchmark assessment 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.

What counts as alignment or 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.¹⁵⁸ 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 versus 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 on top-line statements, such as generic endorsements of the Paris Agreement or the need to transition to net zero emissions, without reference to specific policies. 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 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 versus 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).

Each association gets an overall engagement intensity rating – from 'no meaningful engagement' to 'high engagement'. These ratings are based primarily on InfluenceMap's engagement intensity scores. The thresholds used are listed below:

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

In a few specific borderline cases, Volans has adjusted an association's rating on the basis that InfluenceMap's scoring system generates a result that does not fairly reflect the true level of engagement. In these cases, an explanation as to why an adjustment has been made is included in the detailed association review in the appendix.

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.

¹⁵⁷ <https://www.ipcc.ch/sr15>

¹⁵⁸ <https://climateactiontracker.org/countries>

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.¹⁵⁹ 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 an update to Unilever's CPER, we covered the 12-month period from Q4 2023 to Q4 2024 to provide an update on how our associations have engaged on climate policy since the last 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.

¹⁵⁹ <https://lobbymap.org/index.html>