



ArcelorMittal

Mapping ArcelorMittal's advocacy alignment with the goal of net zero by 2050

Contents

Introduction	2
Paris-aligned advocacy	4
Role of membership associations and multi-stakeholder initiatives	5
Methodology of this report	6
Summary of Results	7
Endnotes	30

Introduction

COP26 and the resulting Glasgow Pact highlighted the urgent need to accelerate the momentum if we are to limit the rise in global average temperatures to 1.5°C, and that businesses need to be working constructively with government and civil society to create the means of doing so. The idea of collaboration is not new. The Paris Agreement itself ushered this new era in 2015, in which business is expected to play its part in helping to achieve the world's climate goals. In the intervening years, the focus of civil society has been on the commitments that companies themselves make to decarbonising. Now it is clear that leading companies need to play a more ambitious, broader role to accelerate progress towards a 1.5°C world.

ArcelorMittal believes it has a leadership role to play in ensuring the hard-to-abate steel industry meets the decarbonisation challenge. We have been clear in our commitment to the goals of the Paris agreement. In our series of global and Europe-specific Climate Action reports, we have outlined the scale of additional costs involved and the policy conditions required to ensure the necessary investments are feasible. The absence of these conditions poses a material risk both to steelmakers that may be unable or unwilling to absorb the necessary transition costs with potential economic, social and environmental effects on local economies and to society, such as reductions in employment, procurement and access to steel products necessary to facilitate the transition to a lower carbon economy. For both a rapid and a just transition, therefore, the work to develop effective climate policy is critical, and companies have a responsibility to work with thinktanks and policymakers to accelerate this work in the most effective way.

The role of business in relation to policy is changing. The world of 'lobbying' is giving way to a landscape in which business must work constructively, both together and with policymakers, to help create the solutions needed. Trade associations can play a valuable role in aligning their members with the ambition of the Paris Agreement, providing policymakers with an understanding of sector specific dynamics, contributing ideas to the

development of climate policy and offering feedback on its likely effectiveness.

At the same time, there are a number of policy levers that are evolving outside the formal legislative sphere, such as the voluntary standards that identify what constitutes a Paris-aligned science-based carbon reduction target or define what low or zero carbon-emissions steel is in order to underpin demand side initiatives, such as green public procurement policies. These multi-stakeholder processes and platforms therefore have the potential to generate important pieces of the jigsaw to accelerate change.

In this context, ArcelorMittal works not only with policymakers and trade associations but is proud to work with a range of climate-focused membership bodies and stakeholder initiatives and is committed to conducting all its direct and indirect policy lobbying and advocacy work in line with the Paris agreement. This means we will ensure all our own engagement on climate policy is consistent with the policy priorities we believe are needed to accelerate the decarbonisation of steelmaking to align with a 1.5°C future.

To reassure our stakeholders that we are collaborating on a consistent and Paris-focussed basis, we have for the second time mapped the policy positions of the 61 associations of which we are part against the Paris Agreement and the five policy priorities ArcelorMittal has outlined in our recent Climate Action Report 2 (CAR2). In this document, we share a summary of the results of our assessment as well as providing a breakdown by association.

Over the 18 months since our [first report](#) on this topic in 2020, we have seen some significant progress in the positions of some key trade associations, which we detail in this report. We have also strengthened our methodology, which has led to some associations moving from the category of 'aligned' to 'partially aligned', and from 'partially aligned' to 'misaligned'. We will continue to engage with associations to drive more alignment with the goals of the Paris Agreement and encourage their proactive contributions to the policy priorities we have identified.

This report represents a snapshot in time because these associations are continuously reassessing their response to the demands of limiting climate change to a 1.5°C future. We continue to engage

with them, and via this report also communicate ArcelorMittal's expectation that each association will further progress their alignment in the future to play their part in accelerating the necessary transition.

Paris-aligned advocacy

As ArcelorMittal highlighted in CAR2, an important element of our long-term business strategy is to achieve the goals of the Paris agreement through meeting our target of net zero carbon emissions by 2050. One of the key actions to achieve this is to support climate policy that facilitates our sector's accelerated decarbonisation in each of our jurisdictions. In CAR2, we outlined the vital policy conditions needed for the sector and ArcelorMittal to achieve this, as follows:

1. Measures to incentivise the production of zero carbon emissions steel e.g. emissions trading systems, carbon taxation
2. Fair and competitive market conditions to avoid carbon leakage e.g. carbon border adjustment mechanisms
3. Financial support to make long-term investments e.g. carbon contracts for difference
4. Access to sufficient, affordable clean energy
5. Measures to incentivise the consumption of zero carbon emissions steel

Different combinations of the policy conditions described above (hereafter referred to as our policy priorities) can be used to deliver the necessary end result: where the five policy conditions outlined above are achieved, low and zero carbon-emissions steel will be at least as competitive as higher carbon emissions steel and the decarbonisation of steelmaking will accelerate. Currently this is happening at different levels across the main jurisdictions in which we produce steel, as we highlight in the table below.

Jurisdiction	CO ₂ e price risk	Confidence that policy conditions will materialise within 5 years					ArcelorMittal's expected response			Resultant risk ArcelorMittal 5 year outlook on financial risk from carbon prices
		Condition 1 Measures to incentivise production of zero carbon-emissions steel	Condition 2 Fair competitive landscape	Condition 3 Financial support to make long-term investments	Condition 4 Access to sufficient, affordable clean energy	Condition 5 Incentivised consumption of zero carbon-emissions steel	2021-25	2026-30	2031-35	
EU*	↑						Accelerate	Accelerate	Accelerate	Mitigating
Canada**	↑						Accelerate	Accelerate	Accelerate	Mitigating
USA	N/A						Move	Accelerate	Accelerate	Low
Mexico	↑						Move	Move	Accelerate	Mitigating
Kazakhstan	→						Move	Move	Accelerate	Low
Ukraine	↑						Move	Move	Accelerate	Low
Brazil	→						Move	Accelerate	Accelerate	High
South Africa	↑						Move	Accelerate	Accelerate	Mitigating

* Will be impacted by final design of ETS allocation system and CBAM, and assumes additional support from individual member states is forthcoming.

** Federal + Ontario, Quebec.

As the cost of carbon rises, our incentive to decarbonise increases. This, together with our confidence that the five key policy conditions outlined above are forthcoming, are the twin factors driving the speed of our decarbonisation programme. To accelerate this programme globally and limit the average global temperature rise to 1.5°C by the end of this century, these conditions are needed consistently across all jurisdictions globally. Good policy thus provides one of the main drivers that will determine the speed and success of ArcelorMittal's decarbonisation, making policy advocacy an essential aspect of our journey to net zero.

ArcelorMittal is committed to conducting all direct and indirect policy lobbying and advocacy work in line with the Paris agreement. This includes both our engagement with policymakers and our indirect influence via trade associations, thinktanks and stakeholder-based climate initiatives. This means we will ensure all such engagement on climate policy is consistent with the policy priorities outlined above.

We will take action to ensure the company is not supporting lobbying that is misaligned with the goals of the Paris Agreement, considering ArcelorMittal's level of engagement and level of influence in the industry association. Potential actions include direct communication requesting further alignment with the Paris agreement and our five policy priorities, ensuring ArcelorMittal's financial contribution is ringfenced for non-lobbying activities (e.g. towards standard setting only), and ceasing our membership.

Role of membership associations and multi-stakeholder initiatives

ArcelorMittal believes that trade associations, other membership associations and multi stakeholder initiatives have an important role to play in creating the conditions necessary for the decarbonisation of ArcelorMittal and the steel sector more broadly, and that our engagement with this range of associations is a key part of

our climate action strategy. Effective climate action policy rests on the development and application of a consistent set of industry-specific standards and methodologies that ensure all steelmakers are incentivised to decarbonise in accordance with the goals of the Paris agreement. These may be developed by regulators or outside the policy arena by voluntary initiatives. ArcelorMittal therefore pursues its policy priorities by way of direct advocacy, indirect advocacy through industry associations, and via participation in voluntary climate initiatives.

Beyond the policy debate, being a member of a trade association, membership association or multi-stakeholder initiative can provide significant benefits.

For example, industry and multi-stakeholder standard setting initiatives can create a level playing field, but must consider the technical realities of the industry, the intricacies of the operational environments, and the similarities and differences between different operators. Standards can be effectively leveraged in policy to drive change, by translating a policy objective into actionable information and measurable indicators. ArcelorMittal has consistently applied this approach through its roles in the Net Zero Steel Pathway Methodology Project (NZSPMP), the Science-Based Targets Initiative steel project, ResponsibleSteel and the Initiative for Responsible Mining Assurance (IRMA).

ArcelorMittal's advocacy objectives have also benefited from its engagement with think tanks, partnerships and coalitions, such the Energy Transition Commission (ETC), the World Business Council for Sustainable Development (WBCSD) and the US-based Carbon Capture Coalition, all of which contribute to building and consolidating the foundations for industrial decarbonisation.

These different relationships, among others, continue in helping ArcelorMittal and the broader industry create consensus and progress on challenging issues, develop technical standards, enable dialogue between industry and multiple stakeholders and develop and share knowledge and promote good practice.

¹ There are some associations whose mission does not relate to climate change. Whilst these associations provide valuable platforms for information exchange and for sharing best practices in specific fields, they are not part of this review.

Methodology of this report

We want to reassure our stakeholders that we are collaborating on a consistent basis. In this second advocacy alignment report, we have mapped the policy positions of 61 industry and other membership associations to which we belong to our five policy priorities alongside an explicit commitment to the Paris Agreement,

We selected the 61 associations in this report for having an influential role in climate-related public policy; representing sectors or activities that are relevant to climate change; and operating in regions or countries where we have significant business activities.

For this report, we have strengthened the methodology used in our review. The exercise benefited from InfluenceMap's Review of CA100+ Company Disclosures on Industry Association Lobbying report published in April 2021, which has further advanced the principles of responsible lobbying reporting. During 2021, we also engaged directly with InfluenceMap to better understand the level of evidence they expect in company disclosures.

The main development in this report is the reliance of our assessment on publicly disclosed positions of associations, as opposed to last year, when findings were also informed by internal knowledge

of industry association policy priorities. This has been done in a bid to encourage industry associations to publicly disclose their climate-related policy positions.

We determined the extent of overall alignment for each association in two steps.

- The first step was to assess each industry association's policy priorities and lobbying activities against ArcelorMittal's five policy priorities alongside commitment to the Paris Agreement to determine whether they are broadly consistent with ours, absent or misaligned. Absence of alignment on a policy priority may be due to the nature of the industry association, whereby the policy priority is irrelevant, or because there is lack of consensus amongst the association's membership.
- The second step was to determine whether the overall industry association is: (1) Aligned; (2) Partially Aligned; (3) Not engaged; or (4) Misaligned. The key considerations were whether the associations stated their support for, or had activities aligned with, the Paris Agreement goal to limit global warming to well below 2 °C. If they did not, they could only be categorised as Partially Aligned, Not Engaged or Misaligned, depending on the number of broadly consistent positions. The specific criteria for each category are outlined below:

Alignment			
Extent to which the association works towards ArcelorMittal's policy priorities			
Aligned	Partially aligned	Not engaged	Misaligned
Stated support for the Paris Agreement. No evidence of policy positions or activities misaligned with ArcelorMittal five policy priorities. ≤ 50% of areas where we found no position.	Alignment with ArcelorMittal policy positions in some or most areas. No evidence of policy positions or activities misaligned with ArcelorMittal policy priorities. No position on > 50% policy priorities.	No evidence of policy positions or activities on any of ArcelorMittal's policy priorities.	Evidence of policy positions or activities misaligned with ArcelorMittal policy priorities.

Summary of Results

Of the 61 associations assessed, a total of 33 associations were found to be 'Aligned', 11 to be 'Partially Aligned' and two were 'Misaligned'. A further 15 were classified as 'Not Engaged' with climate policy.

Country/region	Alignment
<p>Aligned</p> <p><i>Global</i></p> <ul style="list-style-type: none"> • World Steel Association • The Energy Transitions Commission • ResponsibleSteel • The Initiative for Responsible Mining Assurance • World Business Council for Sustainable Development <p><i>Europe</i></p> <ul style="list-style-type: none"> • European Steel Association • European Roundtable for Industry • BusinessEurope <p><i>Argentina</i></p> <ul style="list-style-type: none"> • Argentine Industrial Union • Argentine Steel Chamber • Argentine Business Council for Sustainable Development <p><i>Belgium</i></p> <ul style="list-style-type: none"> • Belgian Steel Federation • Smart Delta Resources <p><i>Brazil</i></p> <ul style="list-style-type: none"> • Federation of Industries of the State of Minas Gerais • Brazilian Mining Institute • Brazil Steel Institute • National Confederation of Industry <p><i>Canada</i></p> <ul style="list-style-type: none"> • Mining Association of Canada • Canadian Steel Producers' Association • Canadian Chamber of Commerce • Québec Business Council on the Environment <p><i>Costa Rica</i></p> <ul style="list-style-type: none"> • Chamber of Industries of Costa Rica <p><i>France</i></p> <ul style="list-style-type: none"> • The Movement of the Enterprises of France • Alliance of Ores, Minerals and Metals • France Industry • French Association of Private Enterprises <p><i>Germany</i></p> <ul style="list-style-type: none"> • German Steel Association • German Hydrogen Association • Economic Forum of the SPD <p><i>Morocco</i></p> <ul style="list-style-type: none"> • The General Confederation of Moroccan Enterprises <p><i>United States of America</i></p> <ul style="list-style-type: none"> • Industrial Innovation Initiative <p><i>Poland</i></p> <ul style="list-style-type: none"> • The Polish Steel Association <p><i>Spain</i></p> <ul style="list-style-type: none"> • Union of Steel Companies 	

Country/region	Alignment
<p>Partially aligned</p> <p><i>Brazil</i></p> <ul style="list-style-type: none"> • Executive Council of Global Companies <p><i>Costa Rica</i></p> <ul style="list-style-type: none"> • Costa Rican Chamber of Construction <p><i>Belgium</i></p> <ul style="list-style-type: none"> • Walloon Union of Enterprises • Federation of Belgian Large Industrial Energy Consumers • Institute for Sustainable Process Technology, Belgium <p><i>Germany</i></p> <ul style="list-style-type: none"> • Economic Forum of the CDU <p><i>Mexico:</i></p> <ul style="list-style-type: none"> • Mexican Mining Chamber <p><i>India</i></p> <ul style="list-style-type: none"> • Indian Steel Associatio <p><i>United States of America</i></p> <ul style="list-style-type: none"> • National Association of Manufacturers • American Iron and Steel Institute • Carbon Capture Coalition 	
<p>Not engaged</p> <p><i>Canada</i></p> <ul style="list-style-type: none"> • Canadian Manufacturers and Exporters Association • Federation of Quebec Chambers of Commerce • Quebec Mining Association • Quebec Association of Industrial Electricity Consumers • Chamber of Commerce of Metropolitan Montreal • Chambre of commerce of Port-Cartier <p><i>Kazakhstan</i></p> <ul style="list-style-type: none"> • Kazakhstan Association of Mining and Metallurgical Enterprises <p><i>Saudi Arabia</i></p> <ul style="list-style-type: none"> • Royal Commission of Saudi Arabia • Federation of Saudi chambers, National Committee for steel industry <p><i>Mexico</i></p> <ul style="list-style-type: none"> • National Chamber of the Iron and Steel Industry, Mexico • Confederation of Industrial Chambers of Mexico <p><i>Morocco</i></p> <ul style="list-style-type: none"> • Association of steelworkers of Morocco • Moroccan Construction Federation • Federation of metallurgical, mechanical and electromechanical industries <p><i>South Africa</i></p> <ul style="list-style-type: none"> • South African Iron and Steel Institute 	
<p>Misaligned</p> <p><i>Ukraine</i></p> <ul style="list-style-type: none"> • UkrMetallurgProm <p><i>United States of America</i></p> <ul style="list-style-type: none"> • American Petroleum Institute 	

ArcelorMittal response

ArcelorMittal engages with its membership associations on an ongoing basis. Where we are actively engaged on the climate policy representations of an association, we represent our policy priorities outlined above in consultations and other fora.

- Where alignment is found with the majority of our policy priorities, we continue to work constructively with these associations and encourage further alignment where applicable. We continue to monitor their positions.
 - Where partial alignment is found, this is due to the absence of publicly available information on their policy positions and activities. This however does not necessarily indicate that supportive activities are not taking place. By basing this report on publicly available information only, ArcelorMittal encourages such associations to communicate publicly on their climate policy positions. In this way, ArcelorMittal will be driving associations to publicly share positions and activities, in a bid to create more transparency and alignment on climate-related advocacy.
 - Where neither our five policy priorities, nor a commitment to Paris, are relevant to these associations, they are categorised as 'not engaged'.
- Where misalignment is found, ArcelorMittal takes further action to ensure we are not supporting lobbying that is misaligned with its five policy priorities and the goals of the Paris Agreement taking into account ArcelorMittal's level of engagement and level of influence in the industry association. Potential escalation measures include direct communication requesting further alignment with ArcelorMittal policy priorities and the Paris agreement, ensuring ArcelorMittal's financial contribution is ringfenced for non-lobbying activities (e.g. towards standard setting only), and ceasing our membership.
 - In response to our most recent mapping in the second half of 2021, we have taken the following steps:
 - o American Petroleum Institute (API): ArcelorMittal's membership was a legacy of our US business. Following the sale of ArcelorMittal USA in 2020 the company has decided not to renew its membership.
 - o UkrMetallurgProm: ArcelorMittal KriviyRih engaged with UkrMetallurgProm resulting in a change of position to support the Paris Agreement goals and to lobby government for financial support and policies that would help companies reach the goals of Paris Agreement.

Appendix 1: Mapping exercise results

Legend

Position aligned		No position		Position misaligned	
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Policy priorities
1. Measures to incentivise the production of zero carbon emissions steel e.g. emissions trading systems, carbon taxation
2. Fair and competitive market conditions to avoid carbon leakage e.g. carbon border adjustment mechanisms
3. Financial support to make long-term investments e.g. carbon contracts for difference
4. Access to sufficient, affordable clean energy
5. Measures to incentivise the consumption of zero carbon emissions steel

Country / region	Industry association	Paris + policy priorities						Assessment
Global	World Steel Association (WSA)	Paris	1	2	3	4	5	<p>Level of engagement: On the Executive Committee and several other committees and working groups¹. E.g. Product Sustainability and Environment committees.</p> <p>Alignment: aligned WSA has expressed the steel industry’s support of the Paris Agreement.² WSA considers partnerships between governments and the steel industry fundamental to a sustainable future. In such a partnership, the government would play a role to enable access to finance for the transition (e.g. frameworks for sustainable finance), ensure availability and affordability of low-carbon resources (e.g. hydrogen), and reduce the first mover disadvantage by increasing the demand for low-carbon materials and creating a market for low-carbon steel. Governments must also ensure that policies do not create an economic disadvantage for companies who have invested in efficient steelmaking. Additionally, steel users would support this by demanding low-carbon steel and understanding that this will come at an additional cost³. WSA also calls for the establishment of policies that promote a level playing field to ensure that steel companies are not disadvantaged based on where they operate, and that ultimately prevent the relocation of steel production.⁴</p> <p>Action: During 2021, ArcelorMittal requested that WSA improve its online disclosures to reflect its position more clearly in relation to climate change and the Paris Agreement.</p>

Global	The Energy Transitions Commission (ETC)						<p>Level of engagement: Commissioner</p> <p>Alignment: aligned The ETC works on developing transition roadmaps to reach a zero-emissions future, in line with the Paris climate objectives. As part of its 'Making Mission Possible - Delivering a Net-Zero Economy' report, the ETC developed a vision of the global energy mix in a zero-carbon emissions economy. Feasible scenarios included an expanded role for direct electricity use and a very significant expansion of the role of hydrogen and of hydrogen-based fuels. The three priorities that emerged from the report were the acceleration of zero-carbon solutions deployment, creating the right policy and investment environment (including the combination of carbon prices with carbon adjustment adjustments), and bringing the next wave of zero-carbon technologies for harder-to-abate sectors to market. In October 2021, the ETC published alongside other members of the Mission Possible Partnership (MPP), the Net Zero Steel Sector Transition Strategy that lays out what it will take for the steel sector to reach net-zero by 2050 and provides detailed reference points for the changes that will be needed over the next 30 years to deliver deep decarbonisation of the sector.⁵</p>
Global	ResponsibleSteel						<p>Level of engagement: On the board of directors</p> <p>Alignment: aligned ResponsibleSteel was behind the creation of the first steel industry low and zero carbon steel standard, which is helping drive the industry's decarbonisation. Although ResponsibleSteel does not engage in governmental lobbying activities, the standard itself (e.g. requiring corporate commitment to the Paris Agreement) and communication are aligned with ArcelorMittal policy priorities.⁶⁷⁸</p>
Global	The Initiative for Responsible Mining Assurance (IRMA)						<p>Level of engagement: On the board of directors</p> <p>Alignment: aligned IRMA has played a key role in establishing socially and environmentally responsible mining through standard setting. It provides certification against a comprehensive standard for mined materials that provides 'one-stop coverage' of the full range of issues related to the impacts of industrial-scale mines, including on greenhouse gas emissions. Among the requirements of its standard is setting meaningful and achievable targets for reductions in absolute greenhouse gas emissions (e.g. Paris Agreement aligned targets), and the identification of energy efficiency and greenhouse gas reduction opportunities across mining projects. Due to its nature, IRMA does not engage on a few of ArcelorMittal's policy priorities.⁹</p>

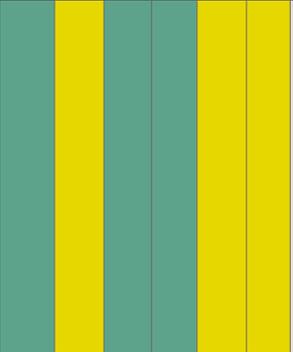
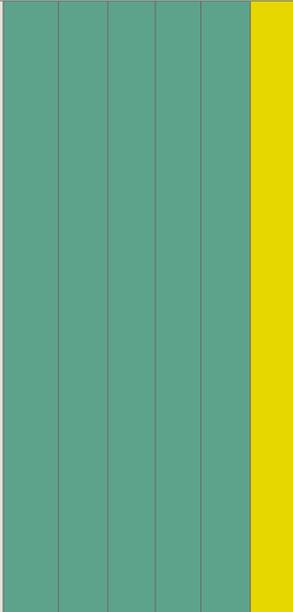
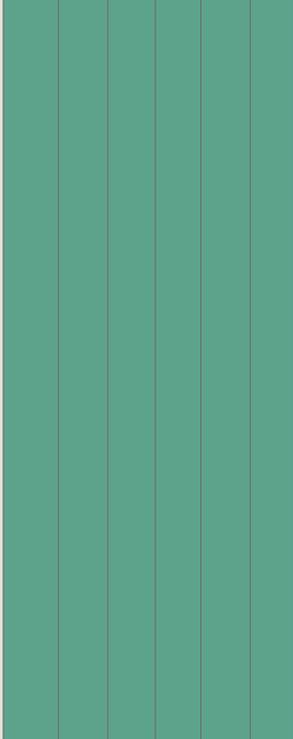
Global	World Business Council for Sustainable Development (WBCSD)		<p>Level of engagement: Member</p> <p>Alignment: aligned WBCSD is a CEO-led community of over 200 of the world's leading sustainable businesses working collectively to accelerate the system transformations needed for a net zero, nature positive, and more equitable future. Its vision for energy by 2050, includes affordable net-zero carbon energy; demand for and delivery of net-zero carbon energy; and shifts in behaviour and demand that accelerate the transition to net-zero carbon energy.¹⁰ It has also expressed its support of an effective carbon price and carbon border adjustment to counter carbon leakage.¹¹</p>
Europe	European Steel Association (Eurofer)		<p>Level of engagement: On the board of directors</p> <p>Alignment: aligned As part of its comments on the draft climate law, Eurofer affirms the European steel industry's commitment to achieving the EU's long-term climate objectives in line with the Paris Agreement.¹² With significant investment in technological development and deployment, and energy infrastructure, being key to achieving these objectives. As part of the revision of the EU Emissions Trading System (ETS), Eurofer has recommended focusing ETS revenues on industrial decarbonisation technologies; as well as strengthening the Innovation Fund with more allowances from the auctioning share to support industry's decarbonisation.¹³ Furthermore, among its comments on the draft climate law, Eurofer highlighted the need to avoid carbon and investment leakage, describing it as a pre-condition for preserving the environmental integrity of EU climate policy, since it contributes to reduce emissions at global level while maintaining jobs and investments in Europe.¹⁴ It has stated the need for effective enabling policies for a Green Deal on Steel that sets out a clear action plan for the recovery of the steel industry and boosts CO2 reduction efforts - serving as a blueprint for Europe. In a publication called "The Green Deal on Steel" Eurofer provided policy recommendations that aim to ensure that the EU steel industry remains on track to meet its emission reduction targets, this included the creation of markets for low carbon products with demand-side measures, as well as the establishment of conditions that would favour the production of low-carbon steel.¹⁵</p>

Europe	European Roundtable for Industry (ERT)		<p>Level of engagement: Member</p> <p>Alignment: aligned In 2020, ERT expressed its support of the European Green Deal, as well as the enabling policy framework that would ensure competitiveness and industrial transformation. These ambitions are considered key parts of Europe’s effort to reach the targets in the Paris agreement.¹⁷ It expressed its support for legislation to facilitate the increase of renewable energy in Europe. It also recommended de-risking investment in low carbon solutions through EU funded programmes and support schemes, increased public and private partnerships, and providing grants and other forms of risk-sharing. Finally, ERT proposes the consideration of standards and labels (national, EU or global to differentiate products based on their environmental footprint and impact on people and the environment). It has also expressed its support of EU carbon pricing policy and has argued for the inclusion of full value chains by incentivising CO2 emission cuts by each actor at each step of the value chain.¹⁶</p>
Europe	Business Europe		<p>Level of engagement: Member</p> <p>Alignment: aligned In 2020, BusinessEurope expressed its European businesses’ support of the EU ambition to reach net-zero greenhouse gas emissions in line with the objectives of the Paris Agreement.¹⁷ BusinessEurope also highlights the risk of carbon leakage and investment leakage that will exist if global actions are not aligned and are impacting the European economy and the labour market, with resulting effects on global emission levels. In 2021, it supported the direction of the fit-for-55 package, including the Carbon Border Adjustment Mechanism. As part of its vision around EU ETS, BusinessEurope recommended that ETS should be equipped with mechanisms¹⁸ to ensure the reinvestment of increased financial revenues derived from the auctioning of allowances, whether national or European, to support industrial decarbonisation. BusinessEurope also included among its recommendations the use of environmental standards, product declarations and labelling for having a significant potential to function as tools of competitiveness for Europe; as well as improving how to use public procurement to boost climate action (e.g. initiatives to develop instruments to calculate the lifecycle costs for certain products).¹⁹</p>

Argentina	Argentine Industrial Union - Unión Industrial Argentina (UIA)								<p>Level of engagement: On the board of directors Committees/ working groups: all working committees</p> <p>Alignment: aligned In a document published 2021, the UIA expressed its support of the Paris Agreement aligned government strategy and presented the main measures needed to advance towards a low-carbon economy.²⁰ It warned against the risk of carbon leakage because of carbon pricing measures. It also recommended the acceleration of public-private investment to increase productive capacity of green hydrogen in the domestic and external markets at competitive price and scale.²¹</p> <p>UIA also participates in the Expanded Bureau of the National Cabinet for Climate Change, which coordinates high-level government climate policy and facilitates inter-secretarial cooperation. Furthermore, The UIA produced a document with public policy proposals to assist industry in various aspects, including the transition to decarbonisation, the most important of which is access to public financing.^{22 23} The UIA collaborates with the activities of the European Commission's Low Carbon & Circular Economy Business Action (LCBA) programme; and efforts are being made to access programs that foster transition with the support and transfer of technologies from the European Union.²⁴</p> <p>In partnership with Accenture, UIA has created an innovation centre in 2020 that is meant to promote and facilitate more sustainable production methods by disseminating information on process simulation, internet of things, additive manufacturing, blockchain, artificial intelligence, among others.²⁵</p>
Argentina	Argentine Steel Chamber - Cámara Argentina del Acero (CAA)							<p>Level of engagement: On the board of directors Committees/ working groups: all working committees</p> <p>Alignment: aligned Although CAA itself has a weak position and direct engagement on climate, we looked at its participation in UIA, Energy Intensive Industries Association (AGUERA), and the Argentina Climate Change Cabinet, which indicates that it is aligned with our policy priorities.</p>	
Argentina	Argentine Business Council for Sustainable Development - Consejo Empresario Argentino para el Desarrollo Sostenible (CEADS)							<p>Level of engagement: On the board of directors Committees/ working groups: all working committees</p> <p>Alignment: aligned CEADS, part of the World Business Council for Sustainable Development (WBCSD), has climate change and energy as one of its main working areas, with the Paris Agreement and SDGs being a main aspect of the agenda.²⁶ We consider CEADS to be aligned with positions of WBCSD.</p>	

Belgium	Belgian Steel Federation - Groupement de la Sidérurgie (GSV)						<p>Level of engagement: On the board of directors Committees/ working groups: Climate and Energy and Social Affairs</p> <p>Alignment: aligned GSV has expressed the commitment of the Belgian steel sector to the objective of reaching carbon neutrality in Europe by 2050. It also expressed the Belgian steel industry's commitment to contributing positively to the EU Green Deal, which would require both public and private financial resources. In 2020, the Steel Federation continued to advocate competitive electricity prices for the Belgian steel industry. It also expressed its support of Carbon Border Adjustment Mechanism to preserve the competitiveness of European steel. In 2020, GSV collaborated on a study (the Context analysis and roadmap study – Towards carbon-neutral and low-CO2 Flemish industry) that confirmed the potential of the Belgian steel industry to achieve CO2 neutral production by 2050.²⁷</p>
Belgium	Smart Delta Resources						<p>Level of engagement: On the board of directors</p> <p>Alignment: aligned Smart Delta Resources has expressed its support for the Paris Agreement. Its ambitions include the establishment of a competitive and climate-neutral industry by 2050, and to play a pioneering role in the industrial energy transition. It has also listed the financial, regulatory and infrastructure conditions needed for the realisation of its CO2 reduction ambitions/ transition paths, which is based on the application of CCS, electrification, hydrogen, CCU and process optimisation.²⁸</p>
Belgium	Union Wallonne des Entreprises (UWE)						<p>Level of engagement: On the board of directors</p> <p>Alignment: partially aligned UWE is generally supportive of the Paris Agreement, but does not engage strongly on climate change.^{29 30}</p>
Belgium	Institute for Sustainable Process Technology, Belgium						<p>Level of engagement: On the board of directors</p> <p>Alignment: partially aligned The Institute for Sustainable Process Technology is generally supportive of the Paris Agreement. Its projects touch on different themes, such as hydrogen, electrification and the circular economy. On green hydrogen, its efforts are partially characterized by a focus on upscaling and cost reduction, a systems integration perspective and a value chain vision.³¹</p>
Belgium	Federation of Belgian Large Industrial Energy Consumers						<p>Level of engagement: On the board of directors</p> <p>Alignment: partially aligned Part the Federation of Belgian Large Industrial Energy Consumers' mission is to secure competitive prices of electricity and natural gas for companies in Belgium (including renewable energy). It does not seem to engage strongly on other policy priorities.³²</p>

Brazil	The Brazil Steel Institute - Instituto AçoBrasil		<p>Level of engagement: Member</p> <p>Alignment: Partially aligned In a position paper, AcoBrasil highlighted the importance of public and private funding essential for large investments for the development of disruptive technologies in the production of low-emission steel. It indicated its support of measures that would supply sufficient renewable energy at competitive prices to meet current and future demands of the sector; as well as the implementation of appropriate mechanisms to prevent carbon leakage. Finally, it voiced its support for the development of mechanisms for incentivising technological innovation and promotion of technologies viable for the mitigation of GHG emissions in the production process.³³</p>
Brazil	Federation of Industries of the State of Minas Gerais - Federação das Indústrias do Estado de Minas Gerais (FIEMG)		<p>Level of engagement: On the board of directors Committees/ working groups: Sustainability, Scrap, Energy, Climate, Natural Gas, and By-products</p> <p>Alignment: aligned FIEMG and partners in the Minas Gerais region have signed a commitment prioritizing the global climate emergency, indicating willingness to collaborate to reduce greenhouse gas emission, aiming to achieve the goals established by Brazil under the Paris Agreement, and in the Race to Zero Campaign. It also supported the mobilisation of climate finance, obtaining financial resources and generating new business that will contribute to the consolidation of a low carbon economy; as well as fostering a sustainable economic development through the expansion of renewable energy and low-emission technologies. The commitment also expressed support for the creation of Sustainable Development Mechanisms (MDS) and establishment of a global carbon market.³⁴</p>
Brazil	Brazilian Mining Institute - Instituto Brasileiro de Mineração (IBRAM)		<p>Level of engagement: On the board of directors Committees/ working groups: Sustainability</p> <p>Alignment: aligned In a position paper published in 2021 ahead of Brazil COP26 participation, IBRAM expressed its support of the Paris Agreement and outlined the necessary conditions to be established for Brazil to reach its decarbonisation commitments, including increasing the access of industry to financial resources to encourage investment in low carbon technologies; the establishment of carbon pricing as a mechanism to facilitate the transition to a low-carbon economy; and the implementation of infrastructure with greater resilience to climate change, including around energy generation and distribution.^{35 36}</p>

Brazil	National Confederation of Industry, Brazil - Confederação Nacional da Indústria (CNI)		<p>Level of engagement: On the board of directors</p> <p>Alignment: aligned CNI expressed its support of Brazil's plans to achieve carbon neutrality by 2050, and for the implementation of a regulated domestic carbon market. It highlighted financing as a key requirement to the structural changes of decarbonisation in the country. The carbon border adjustment is also one of its agenda priorities on climate change. 37</p>
Canada	Mining Association of Canada (MAC)		<p>Level of engagement: Member</p> <p>Alignment: aligned MAC supports climate action that is consistent with the ambition of the Paris Agreement.³⁸ In its principles for climate change policy design, MAC made several recommendations, including the introduction of a broad-based carbon price; addressing competitiveness and carbon leakage; as well as greater funding for the development and implementation of lower carbon processes through investment of carbon price revenues, and public-private investment partnerships.³⁹ It also adopts a positive position on the electrification of the mining sector. MAC has contributed to greater energy efficiency and emission reduction in the mining sector -and so in the steel value chain- through its Towards Sustainable Mining initiative, namely the Climate Change Protocol. 40</p>
Canada	Canadian Steel Producers' Association (CSPA)		<p>Level of engagement: On the board of directors Committees/ working groups: Environment, Climate, Trade and Public Policy</p> <p>Alignment: aligned CSPA indicates that Canada's steel producers have the ambition to achieve net-zero CO2 emissions by 2050, in line with the Paris Agreement. It also stressed the importance of access to energy for operations across Canada at a competitive cost for the fulfilment of the climate strategy, with access to renewable energy serving as an opportunity for the steel sector to achieve anticipated greenhouse gas reductions. It also indicates that significant capital investments, public-private partnerships, and policies are necessary for the support of the steel industry during the transition, and for the establishment of a low-carbon steel sector. It supports the review procurement policies and trade measures such as carbon border to prevent carbon leakage. Finally, it recommended the recycling of all carbon pricing revenues from the steel sector back into the industry to support the development of low-emission technologies.⁴¹</p>

Canada	Canadian Manufacturers and Exporters Association (CME)							<p>Level of engagement: On the board of directors Committees/ working groups: Public Policy, Energy, and Environment</p> <p>Alignment: Not engaged CME does not engage strongly on climate change.</p>
Canada	Canadian Chamber of Commerce (CCC)							<p>Level of engagement: Member Committees/ working groups: International Affairs and Liaison</p> <p>Alignment: aligned CCC broadly supports Canada's NDC and climate strategy, while seeing the development of policy recommendations to ensure the decarbonisation of Canadian energy grids as a catalyst for further economic growth and development.⁴² It has also recommended the direction of majority of revenues from the carbon tax towards efforts that directly facilitate businesses' transition to a low-carbon economy (e.g. investment in low-carbon processes).⁴³</p>
Canada	Québec Business Council on the Environment - Conseil Patronal de l'Environnement du Québec (CPEQ)							<p>Level of engagement: Member Committees/ working groups: Greenhouse Gas and Sustainable Development</p> <p>Alignment: aligned The CPEQ expressed its support of Canada' net-zero by 2050 ambitions, notably in the Canada December 2020 climate plan, including measures to strengthen carbon pricing. In parallel, it emphasized the need for a carbon border adjustment to safeguard the competitiveness of Canadian industry and prevent investment/ carbon leakage. It reacted positively to measures aimed at the local production of low-emission building materials, financial support for the electrification of heavy transport, and measures to support local production in certain key areas, including automotive and aerospace. It also expressed its support of the Strategic Fund for Innovation, which will allow the rapid implementation of decarbonisation projects for large emitters and the deployment of clean technologies.⁴⁴ The CPEQ hosts the Environmental Markets Trading Platform, which facilitates the sale and purchase of carbon credits.⁴⁵</p>

Canada	Federation of Quebec Chambers of Commerce (FQCC)							<p>Level of engagement: Member</p> <p>Alignment: Not engaged FQCC does not engage strongly on climate change.</p>
Canada	Quebec Mining Association - Association minière du Québec (AMQ)							<p>Level of engagement: On the board of directors</p> <p>Alignment: Not engaged AMQ does not engage strongly on climate change.</p>
Canada	Quebec Association of Industrial Electricity Consumers - Association québécoise consommateurs industriels électricité (AQCIE)							<p>Level of engagement: Member</p> <p>Alignment: Not engaged AQCIE does not engage strongly on climate change.</p>
Canada	Chamber of Commerce of Metropolitan Montreal - Chambre de commerce Montréal métropolitain (CCMM)							<p>Level of engagement: Member</p> <p>Alignment: Not engaged CCMM does not engage strongly on climate change.</p>
Canada	Port-Cartier Chambre of Commerce - Chambre de commerce de Port-Cartier (CCPC)							<p>Level of engagement: Member</p> <p>Alignment: Not engaged CCPC does not engage strongly on climate change.</p>

Costa Rica	Chamber of Industries of Costa Rica (CICR)						<p>Level of engagement: Member Committees/ working groups: Energy Commission</p> <p>Alignment: aligned The CICR has expressed its support of the Paris Agreement.⁴⁶ It is one of the few associations in Costa Rica that are engaging on climate finance through awareness raising, training and lobbying actions.⁴⁷ It is also a partner in BIOFIN, which is a global project promoted by the United Nations Development Program that seeks to identify financial solutions to meet the goals of the National Biodiversity Strategy. The CICR manages the annual Energy and Environment Congress, in which matters of alternative, clean and lower-cost energy are addressed.^{48 49 50}</p>
Costa Rica	Costa Rican Chamber of Construction (CRCC)						<p>Level of engagement: Member Committees/ working groups: Competition Commission</p> <p>Alignment: partially aligned The CRCC has issued formal statements that credit and tax incentives and streamlining procedures would be essential to encouraging sustainable construction in Costa Rica. It has also urged the consolidation of laws to encourage the development and use of renewable energy sources. It also supports Sustainable Construction guidelines in the public sector, that would lead to greater adoption of sustainable construction criteria in the scope of construction, remodelling or extensions.</p>
France	The Movement of the Enterprises of France - Mouvement des Entreprises de France (MEDEF)						<p>Level of engagement: Member</p> <p>Alignment: aligned Since 2019, MEDEF has supported carbon neutrality in France by 2050, by initiating the French Business Climate Pledge.⁵¹ It highlighted the importance of accelerating public and private financial resources into research and investment, as well as developing solutions, products and services that significantly reduce GHG emission, in meeting climate challenges. Among the commitments of the French Business Climate Pledge were ensuring an affordable, reliable and clean electricity supply. It also highlighted the necessity of establishing interconnected carbon pricing mechanisms in the main economic regions to enable economic actors to integrate climate issues in their decisions. It has supported the introduction of a Carbon Border Adjustment Mechanism.⁵²</p>

France	Alliance of Ores, Minerals and Metals - Alliance des Minerais, Minéraux et Métaux (A3M)		<p>Level of engagement: On the board of directors Committees/ working groups: Decarbonisation Roadmap, Taxonomy, and Energy</p> <p>Alignment: aligned The positions of A3M are reflected in the roadmap for the decarbonisation of the mining and steelmaking sector that was presented by A3M partners on behalf of the steel and mining sector. The roadmap is based on decarbonisation trajectories of the sectors in line with the low-carbon national strategy. The paper highlighted the different measures needed for the roadmap, among them the establishment of financing tools around R&D and industrial deployment; the need for long-term visibility on electricity prices to guarantee the viability of future investments; the prevention of carbon leakage through the introduction of a carbon border adjustment; creating tools allowing competitive and predictable access to low-carbon electricity; and working on the implementation of Carbon Contracts for Difference.^{53 54}</p>
France	France Industry - France Industrie		<p>Level of engagement: Member</p> <p>Alignment: aligned France Industrie expressed its support of carbon neutrality by 2050, where Horizon Europe should help European industry pursue the objective by investing on innovative processes and products.^{55 56} It has highlighted the need for EU funding support for transition pathways. As part of its comments on the Carbon Border Adjustment Mechanism Legislative proposal, France Industrie emphasized that the carbon value and price must be based on precise and objective elements, to guarantee the solidity of the system; and stressed on the coverage all known methods of circumvention in order to reduce the risk of carbon leakage (e.g. carbon border adjustment mechanism).⁵⁷</p>

France	French Association of Private Enterprises - Association Française des Entreprises Privées (AFEP)		<p>Level of engagement: Member</p> <p>Alignment: aligned AFEP has expressed its support of the Paris Agreement and the EU Green Deal. As part of the EU ETS consultation, AFEP has advocated setting up a Carbon Border Adjustment Mechanism, as well as the establishment of additional product benchmarks. It has also indicated that EU-ETS revenues should support investments in low-carbon technologies in ETS sectors, energy efficiency investments in buildings, low/zero emission mobility, and support for innovation. In the scope of the Innovation Fund, AFEP has argued that the funding rate for projects financed should go beyond the current level of 60%. Finally, it expressed its support for new mechanisms that would support the deployment of low-carbon technologies to promote the development of markets for low-carbon products (e.g. Carbon Contracts for Difference). Finally, it has highlighted that in the absence of a price steering mechanism (e.g. ceiling price), there is a high risk of a sudden rise in the price of the allowances, which is why measures such as a price ceiling and a price floor should be implemented in order to provide better predictability.^{58 59}</p>
Germany	German Steel Association		<p>Level of engagement: On the board of directors Committees/ working groups: all working groups</p> <p>Alignment: aligned The German Steel Association has expressed its support of the Paris Agreement. In the scope of the decarbonisation of the German steel sector,⁶⁰ it has highlighted the importance of the expansion of renewable energies in the electricity mix, and to secure competitive electricity prices; as well as the need for state funding for research, development and investment in initial implementation of low-carbon processes in the steel sector. It expressed its support for a Carbon Border Adjustment Mechanism to prevent loss of international competitiveness. It also highlighted the importance of green steel in the decarbonisation of the industrial value chain. In the scope of creating the incentive for transformation, the German Steel Association mentions the introduction of Contracts for Difference as a mean to cover the additional operational costs compared to current steel processes.⁶¹</p>

Germany	German Hydrogen Association – Deutscher Wasserstoff Verband						<p>Level of engagement: Member</p> <p>Alignment: aligned The main purpose of Deutscher Wasserstoff Verband is to enable the steel industry to make a substantial contribution to achieving the goals of the Paris Climate Agreement and the European Green Deal through its activities within the HySteel cluster. It highlights the need for forward-looking and sufficient investments, supported by appropriate state subsidies for the decarbonisation of the steel industry; as well as the creation of specifications around trading in low-emission steel products. Among its recommendations is to drive renewable energies forward to guarantee the production of green hydrogen. Among its goals is the development of appropriate market design for low-emission steel while ensuring the international competitiveness of European low-emission steel manufacturers.⁶²</p>
Germany	The Economic Forum of the CDU – Wirtschaftsrat der CDU						<p>Level of engagement: Member Committees/ working groups: Energy and Climate working group, and Regional Bodies</p> <p>Alignment: partially aligned Wirtschaftsrat der CDU has supported the response to the Paris Agreement, while emphasizing different requirements, such as openness to different technologies and the need for investment incentives.^{63 64}</p>
Germany	Economic Forum of the SPD – Wirtschaftsforum der SPD						<p>Level of engagement: Member</p> <p>Alignment: aligned The Wirtschaftsforum der SPD has expressed its support of the Paris Agreement, and highlighted the great potential of green hydrogen as a building block for achieving the Paris climate goals.⁶⁵ Members have also highlighted the importance of intelligent framework conditions for investments, for operating costs and for adapting the regulatory environment; as well as the enforcement of fair competitive conditions in steel trading and a level playing field for CO2 costs compared to competitors outside the EU; and the development of lead markets for green steel.⁶⁶</p>
India	Indian Steel Association (ISA)						<p>Level of engagement: On the board of directors</p> <p>Alignment: Not engaged The ISA appears to support public funding support for long-term investments for decarbonisation. It does not engage strongly on ArcelorMittal's other policy priorities.⁶⁷</p>

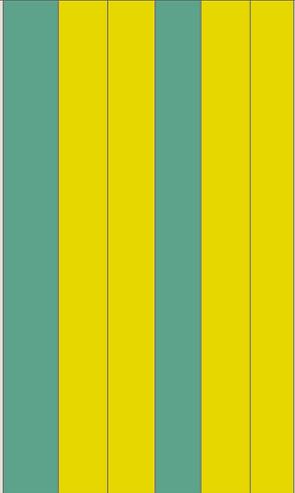
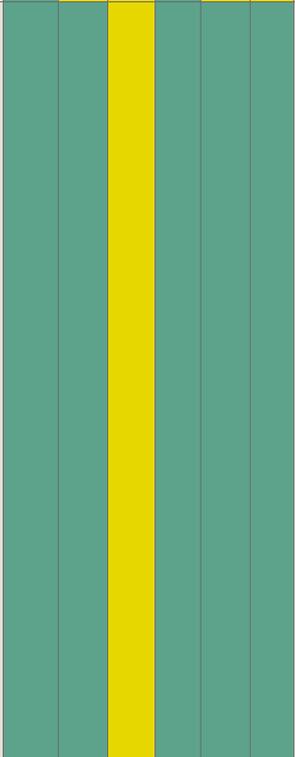
Kazakhstan	Kazakhstan Association of Mining and Metallurgical Enterprises							<p>Level of engagement: Member</p> <p>Alignment: Not engaged The Kazakhstan Association of Mining and Metallurgical Enterprises does not engage strongly on climate change.</p>
Luxembourg	FEDIL							<p>Level of engagement: On the board of directors</p> <p>Alignment: aligned FEDIL has expressed its support for the Paris Agreement. It also emphasized the need to protect against carbon leakage to maintain the competitiveness in global trade (e.g. Carbon Border Adjustment Mechanism). It expressed its support of the Commission's proposal to strengthen the Innovation Fund, including the proposals to increase the funding rate to up to 100%, of eligible costs and the introduction of Contracts for Difference.⁶⁸ It also called for an effective supporting strategy to guarantee access to sufficient and competitively priced renewable energy.⁶⁹ It also listed the development of markets for low-carbon products among the conditions necessary for delivering on the Net-Zero vision.⁷⁰</p>
Mexico	Mexican Mining Chamber - Camara Minera de México (CAMIMEX)							<p>Level of engagement: Member</p> <p>Alignment: Partially engaged CAMIMEX exhibits a generally positive position on climate change and the Paris Agreement and supports the access to sufficient, affordable clean energy.⁷¹</p>
Mexico	National Chamber of the Iron and Steel Industry - Camara Nacional de la Industria del Hierro y del Acero (CANACERO)							<p>Level of engagement: Member</p> <p>Alignment: Not engaged CANACERO does not engage strongly on climate change.</p>
Mexico	Confederation of Industrial Chambers of Mexico - Confederación de Cámaras Industriales (CONCAMIN)							<p>Level of engagement: Member</p> <p>Alignment: Not engaged CONCAMIN does not engage strongly on climate change.</p>

Mexico	Executive Council of Global Companies, Brazil - Consejo Ejecutivo de Empresas Globales (CEEG)							<p>Level of engagement: Member</p> <p>Alignment: Partially engaged As part of its Mexico 2030 Vision, CEEG emphasized the importance of a knowledge-based economy and the need to drive innovation through public and private investments in R&D, which would result in new products, goods, and processes. CEEG does not engage strongly on other policy priorities.⁷²</p>
Morocco	General Confederation of Moroccan Enterprises - La Confédération Générale des Entreprises du Maroc (CGEM)							<p>Level of engagement: Member</p> <p>Alignment: aligned CGEM launched in July 2016, the «Morocco Climate Business Initiative», which aims to provide facilities to companies regarding outreach, capacity building and support in the domain of climate change. IECM manages approximately fifty facilities/ projects, such as supporting the creation of GHG inventories at the company level or the formulation of funding requests to international donors.⁷³</p>
Morocco	Association of Steelmakers of Morocco - Association des Sidérurgistes de Maroc (ASM)							<p>Level of engagement: On the board of directors</p> <p>Alignment: partially aligned ASM highlights the importance of the diversification of energy sources, including solar and wind energy, to satisfy the energy needs of the Moroccan steel sector. ASM does not engage strongly on other policy priorities.⁷⁴</p>
Morocco	Moroccan Federation of Construction - Fédération marocaine de la construction (FMC)							<p>Level of engagement: On the board of directors</p> <p>Alignment: not engaged FMC does not engage strongly on climate change.</p>
Morocco	Federation of Mechanical, Metallurgical, and Electrical Industries - Fédération des Industries Métallurgiques, Mécaniques et Électromécaniques (FIMME)							<p>Level of engagement: Member</p> <p>Alignment: not engaged FIMME does not engage strongly on climate change.</p>

Saudi Arabia	Royal Commission of Saudi Arabia		<p>Level of engagement: On the board of directors</p> <p>Alignment: Not engaged The Royal Commission of Saudi Arabia does not engage strongly on climate change.</p>
Saudi Arabia	Federation of Saudi chambers, National Committee for steel industry		<p>Level of engagement: On the board of directors</p> <p>Alignment: Not engaged The Federation of Saudi chambers, National Committee for steel industry does not engage strongly on climate change.</p>
Ukraine	UkrMetallurgProm		<p>Level of engagement: Member.</p> <p>Alignment: misaligned UkrMetallurgProm highlighted need for public subsidisation for vulnerable industries that are decarbonising in order to facilitate their investment process. It has also suggested that the government must support renewable energy via budget support as opposed to tax increase. UkrMetallurgProm has criticized excessive commitments of Ukraine under the Paris Agreement.</p> <p>Action: ArcelorMittal KriviyRih engaged with UkrMetallurgProm resulting in a change of position to support the Paris Agreement goals and to lobby government for financial support and policies that would help companies reach the goals of Paris Agreement</p>
Poland	The Polish Steel Association - Hutnicza Izba Przemysłowo Handlowa (HIPH)		<p>Level of engagement: On the council of the chamber Committees/ working groups: Trade</p> <p>Alignment: aligned HIPH is aligned with the Paris Agreement and other policy priorities. As a member of EUROFER, HIPH supports its policy positions on decarbonisation and the Carbon Border Adjustment Mechanism.⁷⁵ It has highlighted that to enable the 'greening' of the steel industry in Poland, it is necessary to ensure access to cheap, low-emission electricity, with onshore wind energy bearing the greatest potential.⁷⁶ It highlighted the need to secure funding opportunities for projects aimed at CO2 reduction.⁷⁷ It also argued that although the Polish steel industry has ambitions and potential to engage in the development of renewable energy capacity, appropriate legal solutions are needed in this regard, as well as the adoption of Power Purchasing Agreements.⁷⁸</p>

South Africa	South African Iron and Steel Institute (SAISI)		<p>Level of engagement: Member</p> <p>Alignment: Not engaged SAISI does not engage strongly on climate change.</p>
Spain	Union of Steel Companies - Unión de Empresas Siderurgicas (UNESID)		<p>Level of engagement: On the management committee Committees/ working groups: Foreign Trade, Economic Studies, Innovation, and Environment</p> <p>Alignment: aligned In policy positions and different forums such as Congress, meetings with the Ministers of Industry and Ecological Transition, in the European Union, the position of UNESID has coincided with that of the ArcelorMittal on aspects such as the need to obtain aid from the Government for investments in decarbonisation, the need to have stable and competitive energy prices with other European countries, and trade policies that would safeguard the competitiveness of Spanish steel and prevent carbon/ investment leakage.⁷⁹ In a press release, it has expressed the commitment of the Spanish steel industry to reach carbon neutrality by 2050 and stated support for mechanisms that would ensure that public procurement favours steel products with better environmental profiles.⁸⁰</p>
United States of America	National Association of Manufacturers (NAM)		<p>Level of engagement: Member</p> <p>Alignment: partially aligned While NAM does not explicitly endorse the Paris Agreement, it advocates for negotiating and ratifying a binding international climate action treaty that is both fair and enforceable. Furthermore, NAM states that one of the goals of a global climate treaty must be to address the climate threat in a manner that prevents carbon leakage by ensuring that no country gains a competitive advantage for not taking action to reduce carbon emissions. Among the immediate actions suggested by NAM are the massive investment in public and private sector energy and water efficiency; the funding and expansion of climate and clean energy R&D programmes; as well as commercializing and deploying carbon capture, utilisation and storage technologies.⁸¹</p>

<p>United States of America</p>	<p>American Petroleum Association (API)</p>		<p>Level of engagement: ArcelorMittal’s membership of the API was via ArcelorMittal USA, which joined a technical committee setting technical standards for steel pipes (e.g. gas transportation with potential application to hydrogen) but not in committees setting policy positions. The company has no strategic influence in the API.</p> <p>Alignment: misaligned API has been historically misaligned, most notably regarding the Paris Agreement, the role of renewables and methane emissions, and recognition of the need for a carbon border adjustment with carbon regulation. However, in 2021 it has shifted to a more aligned position, whereby it expressed support of the Paris Agreement ambition.⁸² Among the actions of its Climate Action Framework, the API included the acceleration of technology and innovation to reduce emissions while meeting growing energy needs (e.g. Fast-track the Commercial Deployment of Carbon Capture, Utilisation and Storage); endorsement of a carbon price policy by government to drive market-based solutions, which will partially contribute to addressing carbon leakage; as well as advancing cleaner fuels to provide lower-carbon choices for consumers.⁸³ The API has also supported the introduction of a carbon price, but it did not explicitly support the introduction of a carbon tax. However, in 2021, the API has opposed the renewable fuels standard.⁸⁴</p> <p>Action: ArcelorMittal’s membership was a legacy of our US business. Following the sale of ArcelorMittal USA in 2020 the company has decided not to renew its membership.</p>
<p>United States of America</p>	<p>American Iron and Steel Institute (AISI)</p>		<p>Level of engagement: On the board of directors Committees/ working groups: Council of US Producers, North American Steel Council, Trade Working Group, Environment, Sustainability, Transportation & Infrastructure, Occupational Health & Safety, and Communications</p> <p>Alignment: partially aligned AISI does not explicitly support the goal of the Paris Agreement, public funding support for long-term investments to decarbonize our business activities, nor measures to incentivise the production and production of zero carbon emissions steel. As part of its energy and climate change principles, AISI has highlighted the importance of including effective border adjustment in future climate legislation, as well as the adoption of policy that acknowledges that emission reduction is dependent on the development of new processes for steelmaking that significantly reduce GHG emissions by minimizing reliance on carbon-intensive fuels.^{85 86}</p>

<p>United States of America</p>	<p>Carbon Capture Coalition (CCC)</p>		<p>Level of engagement: Participant</p> <p>Alignment: partially aligned The CCC combines businesses and associations building federal policy support to enable economywide, commercial scale deployment of carbon capture technologies, which it considers to be essential to achieving net zero emissions to meet mid-century climate goals, strengthening and decarbonising domestic energy, and industrial production and manufacturing.⁸⁷ Its main goals include fostering domestic energy production and reducing emissions. In its Federal policy Blueprint CCC elaborates on the role of carbon capture in addressing climate change, as well as the different levers needed to facilitate this, such as the amelioration of project finance and feasibility.⁸⁸</p>
<p>United States of America</p>	<p>Industrial Innovation Initiative (I3)</p>		<p>Level of engagement: Participant</p> <p>Alignment: aligned The I3 coalition is focused on driving emissions reductions and job creation in key industrial sectors of the Midcontinent region. It brings various stakeholder, including industry, NGOs, power companies and government to advance strategies, policies, and programs for achieving industrial decarbonisation by mid-century. I3 recently published a Federal and State Policy Blueprint, in which it recommended to government a suite of policies aimed at putting American industry on a net-zero emissions path. Recommendations included increasing investment and incentives for Research, Design, Development, critical to scaling up carbon management technologies; creating the necessary measures to give investors the confidence in a future market for low- and zero-carbon industrial products, fuels, and electricity that will justify their carbon management investments over the long term (e.g. establishing lifecycle-based procurement standards and programs and portfolio standards); ensuring additional financing mechanisms for hydrogen; offering financial incentives for low- and zero-carbon hydrogen production and use; and the development of public sector procurement standards.⁸⁹</p>

Endnotes

- 1 See https://corporate-media.arcelormittal.com/media/ob3lptom/car_2.pdf
- 2 https://www.worldsteel.org/en/dam/jcr:228be1e4-5171-4602-b1e3-63df9ed394f5/worldsteel_climatechange_policy%2520paper.pdf
- 3 https://www.worldsteel.org/en/dam/jcr:228be1e4-5171-4602-b1e3-63df9ed394f5/worldsteel_climatechange_policy%2520paper.pdf
- 4 <https://www.worldsteel.org/en/dam/jcr:c4532192-07eb-43ba-955c-cec8aead6763/Climate+Change+Position+Paper+FINAL+WEB.pdf>
- 5 <https://www.energy-transitions.org/publications/making-mission-possible/>
- 6 <https://www.responsiblesteel.org/news/the-relevance-of-responsiblesteel-standards-to-the-implementation-of-climate-policies-such-as-cbam/>
- 7 https://www.responsiblesteel.org/wp-content/uploads/2019/11/ResponsibleSteel_Standard_v1-0.pdf
- 8 <http://www.responsiblesteel.org/wp-content/uploads/2021/10/AllAboutUs.pdf>
- 9 https://responsiblemining.net/wp-content/uploads/2018/08/Chapter_4.5_GHG_Emissions.pdf
- 10 https://timetotransform.biz/wp-content/uploads/2021/03/WBSCD_Vision2050_Pathway-Energy.pdf
- 11 http://docs.wbcsd.org/2017/11/WBCSD_carbon_pricing.pdf
- 12 https://www.eurofer.eu/assets/publications/position-papers/eurofer-comments-on-the-draft-eu-climate-law/20200430-EUROFER-paper_Draft-climate-law.pdf
- 13 https://www.eurofer.eu/assets/publications/position-papers/revision-of-the-eu-emissions-trading-system/20210127-EUROFER-paper_ETS-revision.pdf
- 14 <https://www.eurofer.eu/publications/position-papers/a-green-deal-on-steel-update>
- 15 https://www.eurofer.eu/assets/publications/position-papers/a-green-deal-on-steel-update/2020-10-14-EUROFER-Policy-paper-A-Green-Deal-on-Steel_V5.pdf
- 16 https://ert.eu/wp-content/uploads/2020/12/ERT-Paper-Making-the-most-of-Europes-climate-leadership_December-2020-1.pdf
- 17 https://www.businesseurope.eu/sites/buseur/files/media/position_papers/rex/2020-06-22_what_can_trade_can_do_for_climate_0.pdf
- 18 <https://www.businesseurope.eu/publications/eu-fit-55-direction-right-devil-details>
- 19 https://www.businesseurope.eu/sites/buseur/files/media/position_papers/iaco/2021-02-05_eu_ets_revision_-_reply_to_consultation.pdf
- 20 <https://www.uia.org.ar/medio-ambiente-y-desarrollo-sustentable/3842/sustentabilidad-productiva-y-economia-de-bajo-carbono-aportes-ua-para-el-diseno-de-una-estrategia-a-largo-plazo/>
- 21 https://uiaorgar-cmsdev.s3.amazonaws.com/pdf/Posicion_UIA_Cambio_Climatico_27.10.21.pdf?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIAJXL23AJMKLGIZFNA%2F20211202%2Fus-east-1%2Fs3%2Faws4_request&X-Amz-Date=20211202T203947Z&X-Amz-Expires=3600&X-Amz-SignedHeaders=host&X-Amz-Signature=b0434ae1885adf7409c3889465351243fe62f39a5eec12946097630bc5672d24
- 22 <https://uia.org.ar/politica-tributaria/3654/hacia-una-nueva-normalidad-propuestas-para-la-reactivacion-productiva/>
- 23 <https://uia.org.ar/publicaciones/3517/plan-productivo-2023-una-plataforma-para-generar-y-exportar-valor-al-mundo/>
- 24 <https://latam.lowcarbonbusinessaction.com/#about>
- 25 <https://www.accenture.com/gb-en/services/industry-x-0/ix-0-innovation-center-buenos-aires>
- 26 <http://www.ceads.org.ar/areas-de-trabajo/clima-energia/>
- 27 <https://steelbel.be/images/2020UK.pdf>
- 28 https://www.smartdeltaresources.com/sites/default/files/inline-files/SDR%20Regioplan%202030-2050-spread_2.pdf
- 29 <https://www.uwe.be/ey-aura-un-bilan-carbone-negatif-en-2021-et-un-bilan-net-zero-en-2025/>
- 30 https://www.rtbef.be/info/economie/detail_l-effort-pour-le-climat-ne-doit-pas-trop-se-repercuter-sur-le-prix-pour-le-client-selon-l-union-wallonne-des-entreprises?id=10871521
- 31 <https://ispt.eu/themes/hydrogen/>
- 32 http://www.febelic.be/data/1603353698Renewables%20ENG_20200922.pdf
- 33 https://acobrasil.org.br/site/wp-content/uploads/2021/09/ACOBASIL_Position_Paper_Mudan%C3%A7as_Climaticas.pdf
- 34 https://www7.fiemg.com.br/Cms_Data/Contents/central/Media/Documentos/Biblioteca/PDFs/2021/Minuta-Carta-Compromisso-MG-FIEMG-e-FAEMG.pdf
- 35 https://ibram.org.br/wp-content/uploads/2021/10/Posicionamento-Setorial-da-Mineracao-sobre-a-Agenda-Climatica-no-Brasil_Out2021-versao-final-aprovada-1.pdf
- 36 <https://ibram.org.br/noticia/ibram-anuncia-posicionamento-da-mineracao-sobre-mudancas-climaticas/>
<https://www.portaldaindustria.com.br/cni/canais/industria-sustentavel/temas-de-atuacao/mudanca-do-clima/>
- 37 <https://www.portaldaindustria.com.br/cni/canais/industria-sustentavel/temas-de-atuacao/mudanca-do-clima/>
- 38 <https://mining.ca/our-focus/climate-change/>
- 39 <https://mining.ca/resources/press-releases/mining-industry-supports-carbon-price-address-climate-change/>
- 40 <https://mining.ca/resources/guides-manuals/tsm-climate-change-protocol/>
- 41 https://canadiansteel.ca/files/resources/CSPA_Climate-Call-to-Action-EN.pdf
- 42 https://chamber.ca/issue/natural-resources-environment-energy/?doing_wp_cron=1639403739.8330628871917724609375
- 43 <https://chamber.ca/wp-content/uploads/publications/documents/Chamber%20Site/Helping%20Industries%20and%20Communities%20Transition%20to%20a%20Low-Carbon%20Economy.pdf>
- 44 <https://www.cpeq.org/fr/salle-de-presse/le-cpeq-reagit-au-nouveau-plan-climatique-renforce-du-gouvernement-federal>
- 45 https://www.platforme.cpeq.org/en/?_ga=2.182177319.1045770161.1639475042-1888992274.1638562902

- 46 https://www.larepublica.net/noticia/camara_llama_a_industriales_a_seguir_acuerdo_de_paris
- 47 <https://cambioclimatico.go.cr/wp-content/uploads/2017/02/giz2018-0277es-diagnostico-sector-financiero.pdf>
- 48 https://cicr.com/noticias_pt/congreso-de-energia-y-ambiente-desarrollara-temas-como-las-tarifas-electricas-2021-la-generacion-distribuida-y-la-importacion-de-gas-natural/
- 49 https://cicr.com/colecciones_recursos/energia-electricidad-y-combustibles/
- 50 https://issuu.com/camaraindustriascr/docs/congreso_de_ambiente_y_energi_aissuu
- 51 https://www.societegenerale.com/sites/default/files/documents/Document%20RSE/french_business_climate_pledge_2019_eng.pdf
- 52 <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12228-Carbon-Border-Adjustment-Mechanism/F509946>
- 53 <https://www.a3ms.fr/impact-de-desindustrialisation-lempreinte-carbone-de-france-letude-publiee/>
- 54 <https://a3ms.sharepoint.com/Documents%20partages/Forms/AllItems.aspx?id=%2FDocuments%20partages%2FSignature%20avenant%20CSF%2FD%C3%A9carbonation%20%D%20feuille%20de%20route%20Mines%20et%20M%C3%A9tallurgie%20Fmaquett%C3%A9%20%5Fv202105%2E%2E%2E2Epdf&parent=%2FDocuments%20partages%2FSignature%20avenant%20CSF&p=true>
- 55 <https://www.lopinion.fr/economie/lindustrie-francaise-arme-de-reduction-massive-de-lempreinte-carbone-par-alexandre-saubot>
- 56 https://www.franceindustrie.org/wp-franceindustrie/wp-content/uploads/2020/09/Strategic-Planning_FI-Position-Paper_101219.pdf
- 57 <https://www.franceindustrie.org/wp-franceindustrie/wp-content/uploads/2021/10/France-Industrie-CBAM-Considerations-and-proposals-04102021-VF.pdf>
- 58 https://afep.com/wp-content/uploads/2021/02/AFEP-position-on-the-revision-of-the-EU-ETS-directive-for-2021-5_2_2021-FINAL.pdf
- 59 <https://afep.com/wp-content/uploads/2021/11/AFEP-Position-on-Fit-for-55-ETS-CBAM.pdf>
- 60 <https://www.stahl-online.de/dossiers/klimaneutrale-wirtschaft-2050-beitrag-der-stahlindustrie/>
- 61 https://www.stahl-online.de/wp-content/uploads/202103_Positionspapier_WVS_Leitmaerkte.pdf
- 62 <https://dvv-hysteel.de/>
- 63 <https://www.wirtschaftsrat.de/wirtschaftsrat.nsf/id/2226115054A6F0B1C125866F0043D267>
- 64 <https://www.wirtschaftsrat.de/wirtschaftsrat.nsf/id/umweltpolitik-de?open&ccm=000200010086>
- 65 https://www.spd-wirtschaftsforum.de/news/stahlgipfel_20201104-2/
- 66 <https://www.spd-wirtschaftsforum.de/news/wirtschaftsforum-der-spd-fordert-oekologische-industriepolitik-zenke-wir-brauchen-eine-wasserstoffstrategie/>
- 67 <https://indsteel.org/pdf/indian-steel-association-annual-report-2019-20.pdf>
- 68 <https://www.fedil.lu/wp-content/uploads/2021/10/2021-09-20-ETS-Reform-FEDIL-proposition-with-explanations-VFR.pdf>
- 69 <https://www.fedil.lu/en/press-releases/national-climate-goal-for-industry/>
- 70 <https://www.fedil.lu/wp-content/uploads/2021/10/2021-06-30-FEDIL-H2-Thinktank-VFR.pdf>
- 71 URL: https://www.camimex.org.mx/application/files/3216/3034/0876/02_info_2021.pdf
- 72 https://ceeg.mx/publicaciones/Agenda_CEEG_2017-con-carta.pdf
- 73 <https://ndcpartnership.org/sites/default/files/Insight%20Brief%20Energy%20Morocco%20Final.pdf>
- 74 https://fmc.org.ma/asso_post/l-association-des-siderurgistes-du-maroc/
- 75 Although this was mentioned in the Bulletin data February 2021, I cannot make reference to it because it is not accessible publicly.
- 76 <https://www.cire.pl/artykuly/serwis-informacyjny-cire-24/185247-hiph-i-psew-energia-z-wiatru-na-ladzie-wzmocni-konkurencyjnosc-hutnictwa>
- 77 https://hiph.org/pliki/aktualnosci/OPINIA_do_KPRU_II_2012.pdf
- 78 <https://www.bankier.pl/wiadomosc/Eksperci-cena-i-zielone-pochodzenie-energii-kluczowe-dla-konkurencyjnosci-hutnictwa-8192421.html>
- 79 <https://www.youtube.com/watch?v=gVQrr-4HCjw>
- 80 https://unesid.org/docs/2019_12_02_unesid_nprensa-fin.pdf
- 81 <https://www.nam.org/wp-content/uploads/2021/01/The-Promise-Ahead.pdf>
- 82 <https://www.api.org/-/media/Files/EHS/climate-change/2021/api-climate-action-framework.pdf?la=en&hash=E6BB3FA3013B52153E10D3E66C52616E00411D20>
- 83 <https://www.api.org/news-policy-and-issues/blog/2021/01/19/why-us-natural-gas-is-key-to-addressing-ambitions-of-the-paris-agreement>
- 84 <https://www.api.org/news-policy-and-issues/fuels-and-renewable-policy>
- 85 <https://www.steel.org/public-policy/energy-and-climate-change/>
- 86 <https://www.steel.org/wp-content/uploads/2020/12/2020-AISI-Profile-Book.pdf>
- 87 <https://carboncapturecoalition.org/about-us/>
- 88 https://carboncapturecoalition.org/wp-content/uploads/2021/02/2021_Blueprint.pdf
- 89 <https://industrialinnovation.org/wp-content/uploads/2021/11/i3-Federal-and-State-Policy-Blueprint.pdf>