

# Climate Lobbying Review

December 2021





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## Message from the President and CEO

The world needs a fast and reliable energy transition to mitigate climate change. To be successful, the transition must balance sustainability, affordability, and security of supply of energy. Having said that, Fortum considers climate change and biodiversity loss as the biggest sustainability challenges for mankind. We strongly support the goals of the Paris Agreement to limit the average rise in global temperature to well below 2°C above pre-industrial levels and to pursue efforts to limit it to 1.5°C. We also recognise that climate change mitigation and adaptation require strong political commitment as well as ambitious and prompt action.

In December 2020, we announced our updated strategy including ambitious, short- and long-term climate targets. With our updated strategy, we continue to drive the change for a cleaner world. In alignment with the EU's ambition and the goals of the Paris Agreement, we target carbon neutrality globally by 2050 at the latest and in our European generation already by 2035.

I am very optimistic about our future. As the third largest CO<sub>2</sub>-free power producer in the EU and a large gas provider with a pioneering position in hydrogen, we are in an excellent position to capture the opportunities presented by the energy transition. The next five to ten years will be crucial – for the energy transition, for a cleaner world, and for Fortum.

Fortum intends to be at the forefront of the drive for greater corporate transparency, which is also requested by institutional investors and non-governmental organisations. Fortum is committed to the objectives of the Climate Action 100+ initiative, which has significant influence on how climate-related corporate activities will be disclosed in the future. Since 2019, Fortum has applied the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) that call on companies to be more open about climate-related risks and opportunities. This Climate Lobbying Review is a continuation of our efforts to increase transparency around our advocacy related to climate change.

Fortum engages in climate policy discussions both directly and through our memberships in relevant industry organisations. Through

proactive lobbying, we aim to facilitate the achievement of our decarbonisation goals. Our memberships in industry associations are an important part of how we collaborate with others.

This is our first Climate Lobbying Review and it includes 15 associations where Fortum (excluding Uniper) is a member in Europe, Russia, and India. The objective of the review is to assess how aligned the industry associations are with the Paris Agreement and Fortum's key climate advocacy principles. For us, it is crucial to ensure that the industry associations we belong to do not undermine our support for the Paris Agreement and the global pursuit towards climate neutrality. It is important that the lobbying of industry associations is consistent with our climate advocacy principles. We lobby for cost-efficient and technology-neutral policy measures across all areas of climate and energy policy. We believe that market-based, technology-neutral, and flexible carbon pricing is the most efficient and cost-effective instrument to mitigate climate change, and we have been endorsing the EU ETS (Emissions Trading System) ever since it was established.

I warmly thank the associations included in our review for their collaboration and look forward to continuing our cooperation. To support the review of industry associations, a review of Fortum's own climate lobbying and public affairs work was also carried out. We will continue to publish the Climate Lobbying Reviews annually.

By being more open about Fortum's climate ambition and positions, and by encouraging our industry associations to be more transparent too, I hope that Fortum will play a greater role in advancing policies that drive the change for a cleaner world. In this way, we will power progress.

Markus Rauramo  
President and CEO





## The role of industry associations in Fortum

Active dialogue and engagement with policy makers and other stakeholders is an important part of Fortum's daily business. Fortum engages in climate policy discussions both directly and through our memberships in relevant industry organisations.

Industry associations work on a consensus principle and sometimes their position remains at a more general level than the individual company positions. Consequently, a case-by-case judgement is usually required to decide the most appropriate lobbying channel: either directly by ourselves and/or through associations. In recent years, coalitions of like-minded companies have also emerged as an effective lobbying channel.

Fortum is involved in several industry associations for joint climate engagement lobbying in its operating countries. There is always an underlying reason for us to join an industry association. Normally, this is a shared interest on policy development. Participation in associations allows us to share knowledge and best practices with other companies and provides a valuable platform to engage with policy makers and other stakeholders. In bilateral lobbying, we never use third parties to lobby on our behalf.

The electricity sector and, more broadly, the energy sector are driven by political and regulatory developments. Therefore, it is crucial for the stakeholders to actively contribute to those discussions. Fortum's expectation is that joint advocacy work in the associations is transparent and respects competition rules.

**Fortum is a member of multiple industry associations. We select the association memberships based on the following criteria, among others:**

- The business interest in participating in the association
- Alignment with Fortum's strategy
- The influencing power of the association
- Financial (and time) contributions

Fortum has diverse levels of participation and influence in different industry associations. In addition to holding general memberships, we are usually members of boards, committees, and working groups of the associations. Active involvement in the work provides us an opportunity to shape the policies and positions of the associations in line with our priorities.

We regularly review our memberships in the associations and judge whether they are still relevant for our purposes.





Collaboration partners

Fortum participates in several national and international energy-sector and sustainability organisations. The list below is not exclusive, but includes the most significant of these. For instance, smaller technology-specific associations as well as Uniper’s memberships have been excluded. In addition, selected on a case-by-case basis, Fortum has joined several joint business coalitions promoting technology neutral and ambitious climate policy

Membership fees

Fortum contributes financially to the work of industry associations by paying annual membership fees. These are normally calculated as either fixed fees for all members or, for example, as a proportion of the member’s annual turnover. Occasionally, we sponsor events and conferences organised by industry associations outside of the membership fees.

Fortum has clear guidelines on political activities. In line with our Code of Conduct, Fortum never provides funding for political purposes, to public authorities, labour organisations, regulators, municipalities, etc.

In the European Union (EU), we currently report on costs related to lobbying activities in line with the requirements set out by the EU Transparency Register. These submissions are publicly available. Fortum’s reported expenses related to lobbying practices in the EU in 2020 were between 600,000 and 700,000 euros.

Fortum is involved in the following organisations

EU & International	Finland	Sweden	Norway	Russia	Poland	India	Germany
Eurelectric	Finnish Energy	Avfall Sverige	Energy Norway	Market Council	Responsible Business Forum	CII	German Association of Energy and Water Industry
Euroheat & Power	EK	Swedenergy	Norsk Solenergiforening	Council of Electricity Producers and Strategic Electricity Investors	Chamber of Commerce Polish District Heating	European Business Grouwp	
RECS International	Corporate Responsibility Network	Energiforsk	Norsk Fjernvarme	Russian Union of Industrialists and Entrepreneurs	Polish Chamber of Biomass	FICCI	
Foratom	Finnish Environmental Industries	Svenskt Näringsliv	Avfall Norge	Association of EU Businesses in the Russian Federation	Scandinavian-Polish Chamber of Commerce		
	The Waste Management Association		Norsk Elbilforenignen	OPORA Russia	Polish Association of Energy Traders		
Bettercoal	Climate Leadership Council			SUCCI	Polish Association of Professional Heat and Power Plants		
World Energy Council							
Cogen Europe							
CEWEP							
ISWA							
EURITS							
IETA							

**Abbreviations:**  
CEWEP = Confederation of European Waste-to-Energy Plants  
ISWA = International Solid Waste Association  
EURITS = European Union for Responsible Incineration and Treatment of Special Waste  
IETA = International Emissions Trading Association  
EK = Confederation of Finnish Industries  
SUCCI = South Urals Chamber of Commerce and Industry  
CII = Confederation of Indian Industry  
FICCI = Federation of Indian Chambers of Commerce and Industry



# Review of associations' climate lobbying

## Methodology

Fortum selected the 15 industry associations in Europe, Russia, and India to be included in this report for the following reasons:

- We consider them to be influential in climate-related public policy
- They operate in regions/countries where we have significant business activities
- Fortum is considered influential in those industry associations

We have aimed at having a geographically balanced approach in including associations from our most significant operating countries.

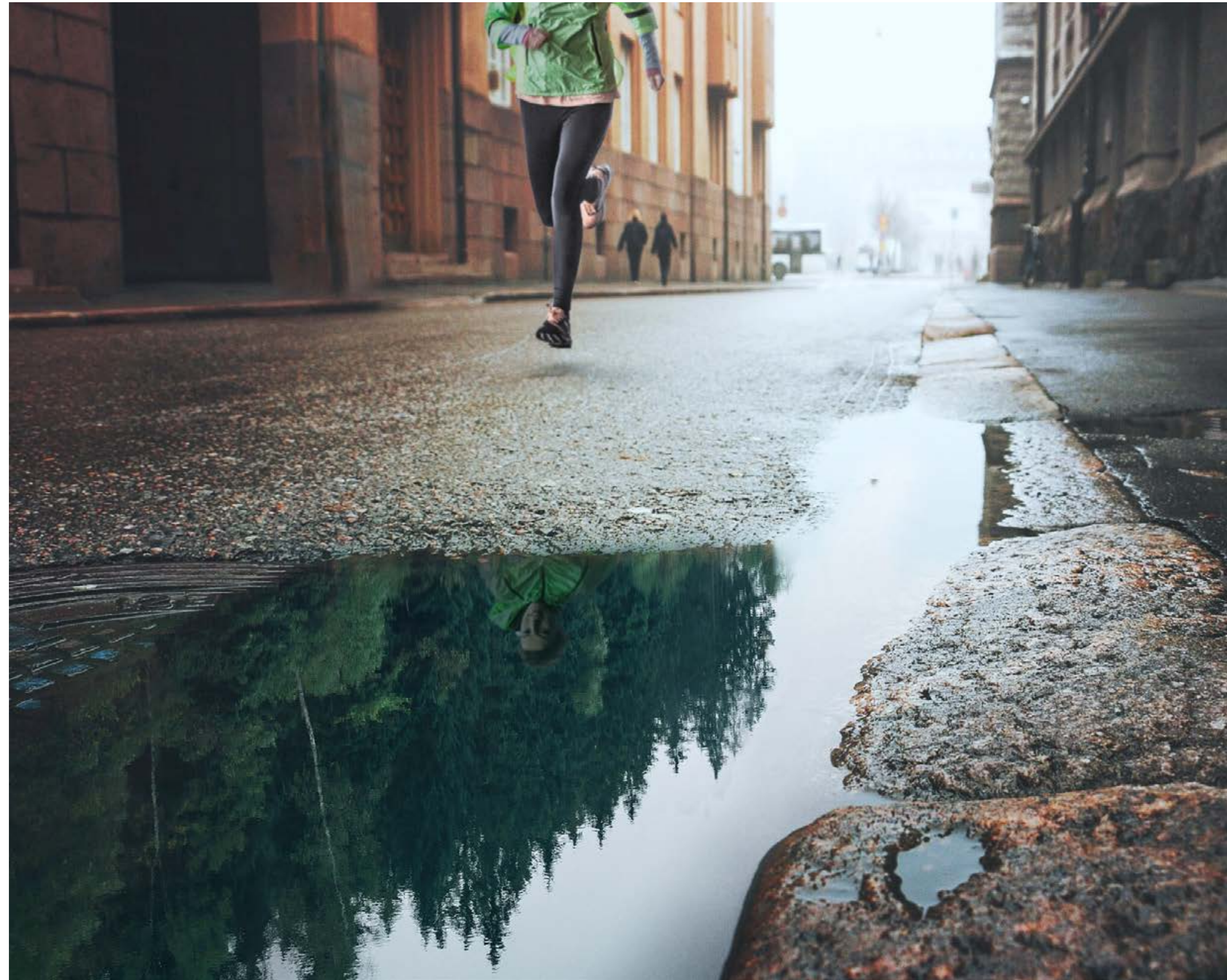
The objective was to assess how aligned the different industry associations are with the Paris Agreement and Fortum's climate advocacy principles (see Appendix 1). The three key areas of focus included:

1. Commitment to climate science and the Paris Agreement
2. Climate neutrality goal
3. Promotion of carbon pricing

Also the associations' stances on policy coherence, technology neutrality, energy transition, and carbon removal and negative emissions were considered when relevant to their work.

The review was conducted by a third-party consultancy called Milton between June and December 2021. The review included a thorough desktop review of the climate policy priorities and positions of the associations from 2019 until now through publicly available materials. The review focused on top-line policies without assessing how they are applied in practice. When information was not available publicly, complimentary interviews were conducted directly with the associations.

When an industry association had a publicly stated position in line with the Paris agreement and Fortum's climate advocacy principles, this was always considered as a clear alignment. If an industry association publicly stated a position that was contrary to one of Fortum's climate advocacy principles, this was considered to be a misalignment. If an industry association did not have a publicly stated position, this was not considered as a direct misalignment but it has been pointed out separately in the results.





The results of the review

Summary of findings

The review was welcomed by most of the 15 industry associations and, in general, received positive feedback from the associations. Policy positions for most European and international industry associations were easy to find from public sources and the associations were readily available to provide further information. Concerning the Russian and Polish associations, policy positions were often slightly harder to come by and were sometimes ambiguous, leaving room for interpretation.

Below is a summary of all reviewed industry associations’ positions on the three key climate advocacy principles identified by Fortum. A summary of each association’s full review can be found in Appendix 2 of this report.

The review showed that seven of the 15 associations reviewed are already fully aligned with the Paris Agreement and Fortum’s climate advocacy principles. Eight associations are partially aligned, including one misalignment on a key principle.

Especially the industry associations in the Nordics, as well as European-level and international associations, are mostly aligned with the Paris Agreement and Fortum’s climate advocacy on all seven principles. When misalignments occur, they are often partial and explained by differences in preferred policy options or priorities.

As to the Polish and Russian associations, they are mostly aligned with the Paris Agreement and share Fortum’s three key climate advocacy principles; however, timelines and means to achieving different goals do vary. Their stances on the four additional principles showed more variation, and many did not have a clear policy stance on all principles presented. They also often referred to their national governments’ official positions in presenting their policy views.

In general, the promotion of carbon pricing was the key principle that was least shared by the industry associations reviewed: five associations were only partially aligned with Fortum’s advocacy principle on this and one had such an ambiguous stance that it had to be interpreted as a misalignment.

Organisation	Commitment to climate science and the Paris Agreement	Climate neutrality goal	Promotion of carbon pricing
Eurelectric	●	●	●
Euroheat & Power	●	●	●
International Emissions Trading Association	●	●	●
Confederation of Finnish Industries	●	●	●
Finnish Energy	●	●	●
Energiföretagen Sverige (Swedenergy)	●	●	●
Energy Norway	●	●	●
German Association of Energy and Water Industry	●	●	●
Chamber of Commerce Polish District Heating	●	●	●
Polish Association of Professional Heat and Power Plants	●	●	●
Federation of Indian Chambers of Commerce and Industry	●	●	●
Council of Electricity Producers and Strategic Electricity Investors	●	●	●
Russian Union of Industrialists and Entrepreneurs	●	●	●
OPORA Russia	●	●	●
South Urals Chamber of Commerce and Industry	●	●	●

Evaluation of whether the association is fully (green) or partially (yellow) aligned or misaligned (red) with the Paris Agreement and Fortum’s climate advocacy principles, including a mention (grey) if the principle in question is not relevant to the work of the association or a clear policy does not exist.

# Review of Fortum's own climate lobbying positions

As part the Climate Lobbying Review, Fortum also wished to review its own climate lobbying positions in relation to the same three key climate advocacy principles and four additional principles set for the association reviews. Similar to the association reviews, also this review has been conducted independently by the same third-party actor, and Fortum has been able to comment only on the accuracy of facts presented.

## 1. Commitment to climate science and the Paris Agreement

Fortum supports the scientific basis of climate change, and the link between human activity and climate change is evident starting from the company's strategy. Fortum bases its decisions and actions on the reports by the Intergovernmental Panel on Climate Change (IPCC).

Furthermore, Fortum strongly supports the goal of the Paris Agreement to limit the average rise in global temperature to below 2°C above pre-industrial levels and to pursue efforts to limit it to 1.5°C. Fortum updated its strategy in December 2020 to even further align itself with the goals of the Paris Agreement, setting out both its long- and mid-term goals.

However, Fortum has not set a science-based climate target (SBT). An SBT must cover at least 95% of a company's direct and indirect greenhouse gas emissions. In practice, Fortum should include its Russian emissions in the scope of an SBT. Today roughly 60% of Fortum's emissions, Uniper included, originate from Russia, where energy production is still heavily reliant on fossil fuels. As large-scale emissions reductions in using fossil fuels – natural gas, in particular – would not be possible in Russia in the short term, setting an SBT would not be appropriate for Fortum. However, Russia is part of the Group's carbon neutrality target for 2050.

All in all, Fortum shows strong commitment to basing its climate lobbying positions on scientific information and the Paris Agreement.

## 2. Climate neutrality goal

Fortum's updated strategy acts as a basis for the company's efforts to support policies towards making the world climate neutral by 2050.

Fortum is committed to the carbon neutrality target (scope 1, 2, and 3 greenhouse gas emissions) globally and is aligned with the goals of the Paris Agreement to reach carbon neutrality by 2050. Fortum aims to be carbon neutral in its European generation business already by 2035 (scope 1 and 2 emissions). In addition, carbon dioxide emissions (scope 1 and 2) in its European energy production will be decreased by 50% by 2030 from 2009. Currently, Fortum has presented a roadmap for reaching the 2035 target but does not yet have a roadmap for the 2050 target.

Scope 3 greenhouse gas (GHG) emissions play a significant role in Fortum's total GHG emissions. In December 2021, Fortum committed to a reduction target of 35% in Scope 3 emissions by 2035 at the latest, compared to the base year 2021. Fortum's updated strategy has two strategic priorities that contribute to the achievement of the climate targets: transforming Fortum's operations to carbon neutral, and strengthening and growing in CO<sub>2</sub>-free power generation. Fortum will be closing almost 40% of its coal capacity faster than originally planned. In addition, Fortum's new investments are going to focus on renewable energy, clean gas, and industrial and infrastructure solutions that will enable Fortum to reduce emissions in other sectors as well.

## 3. Promotion of carbon pricing

Fortum advocates for a market-based response to climate change, supporting carbon pricing as the EU's main instrument of climate regulation. Fortum considers carbon pricing and emissions trading as technology neutral, flexible, and cost efficient.

Fortum welcomes the European Commission's comprehensive Fit for 55 package, which is an important implementation step towards the EU's goal of climate neutrality and global leadership. Fortum supports continued commitment to carbon pricing and the EU Emissions Trading Scheme (ETS) as a key instrument of EU climate policy, including extending it to cover new sectors.

## 4. Policy coherence

Fortum has been consistently calling for coherence between the EU Emissions Trading Scheme (ETS) and other energy policies. In the EU, Fortum supports renewable energy and energy efficiency as important tools to reach the climate targets. However, the related targets and policies need to be coherent with the EU ETS so that the effectiveness of the ETS is not diluted. Policies that overlap with the EU ETS have been a significant contributor to its past ineffectiveness.

## 5. Technology neutrality

Fortum considers technology neutrality as one of the core principles of energy policy. Fortum believes that transforming the European economy into a climate-neutral economy requires an approach that relies on both carbon-free and low-carbon energy technologies that are complementary. These include all renewable energy sources (wind, solar, hydropower, biomass, geothermal, etc.), nuclear energy, energy storage, and clean gases to carbon-negative technologies. Furthermore, Fortum has consistently supported the EU Emissions Trading Scheme and carbon pricing, which are both essential for achieving technology neutrality.

## 6. Energy transition

Global megatrends like climate change, resource efficiency, and technology development drive the transition to a low-carbon world. As stated in its strategy, Fortum wants to be driving the clean energy transition. According to Fortum, a successful shift towards a zero-emissions energy system requires a balance between sustainability, affordability, and security of supply. For Fortum, the energy transition requires not only renewables and other carbon-free energy sources, like nuclear, but increasingly also clean gas, energy storage, and other flexible solutions.

In Fortum's view, sector coupling is key in the transition: clean electricity and gas enable other sectors to decarbonise. The energy transition will increase demand for electricity and hydrogen. Natural gas will play an important role, especially in Central Europe, in providing



security of supply and flexibility in the power system and thus enabling the transition until clean gases are available.

Fortum is well positioned to take advantage of the opportunities presented by the energy transition and to mitigate climate change. For Fortum, this means transforming its own operations to carbon neutral and helping its customers and society to reduce emissions through cleaner solutions.

## 7. Carbon removal and negative emissions

For Fortum carbon removal is a complementary tool to actual emissions reductions, yet essential for reaching the 1.5-degree target set out in the Paris Agreement. One of the most efficient methods in doing this is carbon capture and storage (CCS). Fortum is working through multiple partnerships especially across the Nordics to make carbon capture technologies efficient and profitable. As a concrete example, Fortum is developing a carbon capture and storage project at a waste incineration plant in Oslo, Norway. The waste treated at the plant consists of approximately 50% biological carbon. When this is captured and stored, the plant will be carbon negative. Fortum has been actively calling for a legal framework for carbon removal in order to make technical solutions for carbon removal and negative emissions commercially viable.

## Summary view

In conclusion, Fortum's own climate lobbying positions are well aligned with the Paris Agreement. Most of the principles chosen here, including climate science, the climate neutrality goal, the promotion of carbon pricing, technology neutrality, and energy transition, are at the heart of Fortum's strategy while others are manifested through pioneering projects. A key milestone still ahead is establishing a roadmap for Fortum's target of carbon neutrality globally by 2050. In order to increase transparency and dialogue, Fortum should also aim to make information on key climate principles and lobbying positions more readily and aggregately available to external stakeholders.





## Closing comment and next steps

Fortum wants to engage positively and constructively with governments, investors, non-governmental organisations, industry associations, coalitions, and partnerships on climate change. The publication of this review is a further step towards greater transparency around our activities in this area.

This Climate Lobbying Review, the first of its kind for Fortum, has been a welcome first step towards aligning our climate ambition and advocacy principles with the industry associations where we are a member. We were happy to see the positive response from the associations reviewed and will take the conclusions of this report as guidance in developing our co-operation with industry associations. We will continue to evaluate our industry association memberships and increase dialogue with them on climate policy advocacy.

We consider this Climate Lobbying Review a continuously developing process and dialogue with our industry associations. Based on the current review, Fortum will monitor and address misalignment whenever the associations' current positions differ from Fortum's climate advocacy principles. We will have bilateral discussions with those associations that are partially aligned or misaligned and will encourage

them to take development actions. We will report on the progress of this dialogue and explain the actions we took as a result of this first review in our next Climate Lobbying Review in 2022. In instances where an association's positions are ambiguous, Fortum is engaging with them to encourage them to make their positions clearer and more accessible.

This review focused on top-line policies of the associations without assessing how they are applied in practice. In our next review, we aim to assess – where appropriate – also the advocacy activities that flow from the associations' policies.

This review also showed that we can always do better in making our own climate advocacy principles even more transparent and known to stakeholders. Similarly to our efforts towards more transparency and making policy positions available to external stakeholders, we will also encourage all industry associations to do the same.

This review included a selection of 15 key industry associations identified by us. In the future we will strive to include even more industry associations in the annual Climate Lobbying Review.





# Appendices

## Appendix 1. Fortum's climate advocacy principles

For this review Fortum chose a set of key principles that we see important for reaching the targets of the Paris Agreement. Below is an overview of Fortum's Paris-aligned climate advocacy principles, which form the basis for the review:

### 1. Commitment to climate science and the Paris Agreement

Fortum considers the scientific basis of climate change and the link between human activity and climate change as evident. Fortum recognises the reports by the Intergovernmental Panel on Climate Change (IPCC) as an authoritative source on climate change. Fortum strongly supports the goal of the Paris Agreement to limit the average rise in global temperature to well below 2° C above pre-industrial levels and to pursue efforts to limit it to 1.5° C.

Fortum encourages the EU and governments to continue implementing and further intensifying policies aimed at reducing greenhouse gas emissions in line with the Paris Agreement.

### 2. Climate neutrality goal

In line with the Paris Agreement, Fortum supports the development of robust and sustainable policies to help the world get to net zero emissions by 2050.

Fortum recognises that the nature and pace of change will vary between countries and regions, reflecting different types of economies and development priorities.

### 3. Promotion of carbon pricing

Fortum views government-led market-based instruments – in particular carbon pricing – to mitigate climate change as the key policy for meeting the Paris goal. Carbon pricing is cost efficient, technology neutral, and flexible.

In the EU, Fortum support the Emissions Trading System (ETS) as the main climate policy instrument. The system has to be further reinforced

and extended in order to be able to deliver on the increased climate ambition.

In Russia, Fortum would like to see increasing climate ambition and development of carbon pricing. In Fortum's view, carbon pricing could boost the energy transition in Russia.

### 4. Policy coherence

Fortum recognises that government-led carbon pricing mechanisms alone are not likely to deliver the necessary reductions in emissions to achieve the Paris goal.

In the EU, Fortum supports renewable energy and energy efficiency as important tools in reaching the climate targets. However, the related targets and policies need to be coherent with the EU ETS so that the effectiveness of the ETS is not diluted.

### 5. Technology neutrality

Fortum considers technology neutrality as one of the core principles of modern energy policy. Fortum believes that transforming the European economy into a climate-neutral economy requires an approach that relies on a complementarity of carbon-free and low-carbon energy technologies, ranging from all renewable energy sources (wind, solar, hydropower, biomass, geothermal, etc.), nuclear, energy storage, and clean gases to carbon-negative technologies.

### 6. Energy transition

Fortum believes that the energy transition will require growth in renewables accompanied by a significant contribution from other carbon-free energy sources, including nuclear.

As the power sector will be highly decarbonised by 2030, other sectors will play an increasingly important role in reducing greenhouse gas emissions. Fortum believes that electrification – both direct and indirect – and sector integration are key tools in decarbonising industrial sectors, heating and cooling, and transport.

As Europe transitions away from coal, Fortum sees natural gas playing an important role in providing much-needed flexibility to the power system on the road to net zero emissions.

### 7. Carbon removal and negative emissions

Fortum believes that carbon removal and negative emissions have a crucial role to play in achieving climate neutrality. Fortum stresses that carbon removal and negative emissions are supplemental to emissions reduction.



**Appendix 2. Review of each association**





# Assessment results

Fully aligned

## Eurelectric

Eurelectric is an association representing the European electricity industry. Its members are based in 32 countries. Their work covers a wide range of issues, from electricity generation and markets to distribution networks and customers issues. They seek to boost the competitiveness of the industry, provide representation in public affairs, and promote the role of electricity in sustainable development. Fortum is indirectly represented in Eurelectric via Finnish Energy and Swedenergy.

### Commitment to climate science and the Paris Agreement

Eurelectric supports climate science and bases its goals and arguments on climate science. Eurelectric has strongly welcomed the Paris Agreement as a major landmark in addressing the global climate change challenge.

### Climate neutrality goal

Eurelectric is committed to the objective of making the EU climate neutral by 2050, in line with the Paris Agreement: Eurelectric supports the ambition of net zero greenhouse gas (GHG) emissions in the European economy by 2050.

### Promotion of carbon pricing

Eurelectric believes that a robust emissions trading system (EU ETS) and efficient carbon pricing are core instruments in reaching increased climate ambitions.

### Policy coherence

Eurelectric strongly supports the development of a coherent policy framework at the EU level – combining carbon pricing, renewable energy expansion, and energy-efficiency initiatives – to achieve climate neutrality.

### Technology neutrality

Eurelectric supports technology neutrality at the generation level, provided that it ensures the achievement of full carbon neutrality in the EU by 2050.

### Energy transition

Eurelectric is committed to leading the required energy transition and to securing cost-effective decarbonisation, supported by a strong carbon market, which would stimulate the use of renewable and low-carbon energy technologies.

### Carbon removal and negative emissions

Eurelectric has expressed openness towards the use of and research on CCS/U technologies.

### Summary view

Eurelectric is fully aligned with the Paris Agreement and Fortum’s climate advocacy principles. The membership is beneficial especially in ensuring that the role of electricity in sustainable development is taken into account on the European level.



# Assessment results

Partially aligned

## Euroheat & Power

Euroheat & Power (EHP) is a network of district energy organisations and professionals based in the European Union. It is connecting industry players, decision-makers, and researchers in a joint effort to drive forward sustainable heating and cooling. Fortum is a member of EHP.

### Commitment to climate science and the Paris Agreement

EHP bases its positions on climate science and states that it is committed to pursuing decarbonisation of DHC networks in Europe before 2050 in line with goals set out in the Paris Agreement.

### Climate neutrality goal

EHP supports both the EU’s 2050 climate neutrality goal as well as increased EU-level climate action ambitions for 2030.

### Promotion of carbon pricing

EHP is aligned with Fortum only partially on the promotion of carbon pricing. The association is in favour of “a uniform CO<sub>2</sub> price across the whole heating sector” but considers improvements in energy efficiency as the key means to achieve climate neutrality in the industry.

### Policy coherence

EHP is partially aligned with Fortum on policy coherence. It recognises three pillars of policies for the energy transition (carbon pricing, renewable energy, and energy efficiency), but it considers that measures promoting energy efficiency should be prioritised.

### Technology neutrality

EHP believes that the EU should not prescribe the technologies used to achieve carbon neutrality. However, the organisation acknowledges that certain technologies will likely come to dominate specific sectors.

### Energy transition

EHP is partially aligned with Fortum’s position. It supports the energy transition, and the association considers natural gas to be a crucial “bridging fuel” until the supply of sufficient renewable energy capacities can be guaranteed. However, EHP does not have a position on nuclear power.

### Carbon removal and negative emissions

EHP is supportive of carbon removal in principle and sees promise in CCS/U technologies. However, the association has not yet reached a conclusion as to the overall importance of carbon removal for the energy transition.

### Summary view

EHP is broadly aligned with Fortum on the principles of energy sector decarbonisation but differs on the details of policy: most significantly, EHP prioritises energy efficiency initiatives over carbon pricing and declined to take a position on the merits of nuclear energy in promoting the climate transition.

### Fortum’s development action

We will have bilateral discussions with EHP and encourage them to take development actions. We will report on the progress of this dialogue and explain the actions we took as a result of this first review in our next Climate Lobbying Review in 2022.



# Assessment results

Fully aligned

## International Emissions Trading Association

The International Emissions Trading Association (IETA) is a non-profit business organisation created in 1999 to establish a functional international framework for trading in greenhouse gas emission reductions. Fortum is a member of IETA and represented in the European Working Group.

### Commitment to climate science and the Paris Agreement

IETA supports the use of the scientific findings of the Intergovernmental Panel on Climate Change (IPCC) for developing climate policy. IETA is strongly committed to the targets of the Paris Agreement and to the measures required to achieve these.

### Climate neutrality goal

IETA fully supports the objective of making the EU climate neutral by 2050, in line with the Paris Agreement.

### Promotion of carbon pricing

IETA believes that the EU ETS must play a leading role in reaching climate neutrality. It considers the ETS a powerful policy instrument for managing greenhouse gas emissions, with cap and trade providing an incentive and path for the deployment of new and existing technologies.

### Policy coherence

IETA calls for ensuring alignment and consistency between the EU ETS and other key EU climate policies (such as renewable energy and energy efficiency).

### Technology neutrality

IETA advocates a neutral approach to removal mechanisms: both technological and nature-based solutions will be required to meet the net zero target.

### Energy transition

For IETA, emissions trading is the best policy option to drive the low-carbon transition.

### Carbon removal and negative emissions

IETA believes in the need for trading systems to recognise all verifiable key abatement technologies, including Carbon Capture and Storage. IETA stresses the increasing importance of Carbon Dioxide Removals (CDR) – addition to carbon reductions and avoidance. Net zero targets cannot be met without scaled contributions from Negative Emission Technologies – including capturing carbon dioxide from the ambient air.

### Summary view

IETA is fully aligned with the Paris Agreement and Fortum’s climate advocacy principles. The membership benefits Fortum in its efforts to promote the role of electricity in sustainable development in Europe and internationally. The work IETA is doing to establish an international framework for trading greenhouse gas emission reductions is essential for creating global solutions to climate change.



# Assessment results

Fully aligned

## Confederation of Finnish Industries

Confederation of Finnish Industries (EK) is the leading business organisation in Finland. It represents and defends the interests of the Finnish business community on the national, EU, and international levels. Finnish Energy is a member of the Confederation of Finnish Industries. Fortum does not have any members in the Board or Executive Committee, but it does have some members in thematic committees.

### Commitment to climate science and the Paris Agreement

EK bases its goals and arguments on climate science. EK is strongly committed to the targets of the Paris Agreement and to the measures required to achieve these.

### Climate neutrality goal

EK believes that the EU should reach net zero CO<sub>2</sub> emissions by 2050, first by significantly reducing emissions and secondly by compensating for the remaining emissions.

### Promotion of carbon pricing

EK states that to ensure sufficient incentive for the net zero target and to develop and deploy cleantech innovations, emissions need a global price tag. Furthermore, the EU needs effective means to prevent carbon leakage and to ensure a level playing field. Carbon leakage should be tackled first and foremost by the EU Emissions Trading System (EU ETS).

### Policy coherence

EK believes that legislation must go hand in hand with the emissions trading system and the targets must be binding but the means flexible. Emissions trading should be the main instrument with carbon taxation as an instrument for the non-emissions trading sector.

### Technology neutrality

EK’s view is that the necessary measures should rely on technology neutrality, cost-efficiency, market-based approaches like EU ETS, and flexibility.

### Energy transition

EK states that it is committed to leading the required energy transition. It holds the view that electrification is a key to decarbonisation, that sectoral integration and the hydrogen economy will bring new ways of consuming and producing energy, and that sustainably produced biomass is also needed to replace fossil fuels.

### Carbon removal and negative emissions

EK believes that emissions trading should also encourage the use of new technologies such as carbon capture and utilisation.

### Summary view

EK is fully aligned with the Paris Agreement and Fortum’s climate advocacy principles. Fortum derives benefit from its membership of EK, in particular in relation to joint industry action on climate change to promote the sustainable development of Finland’s business environment as a whole.



# Assessment results

Fully aligned

## Finnish Energy

Finnish Energy is an organisation responsible for the industrial policy and labour market policy of the employers’ side of the energy sector. It represents companies that produce, procure, distribute, and sell electricity, gas, district heat and district cooling and related services. Fortum is a member of Finnish Energy and has a member in the Executive Board. Fortum also has members in two Committees and Industry Groups. Fortum is also the Chair of the association’s Advocacy Steering Group.

### Commitment to climate science and the Paris Agreement

Finnish Energy supports climate science and bases its goals and arguments on climate science. Finnish Energy is also committed to the Paris Agreement to limiting global warming.

### Climate neutrality goal

Finnish Energy supports the EU goal of net zero carbon emissions by 2050 and an increased ambition to at least 55% GHG reductions by 2030.

### Promotion of carbon pricing

Finnish Energy believes in the necessity of carbon pricing. Specifically, the association believes that developing the role of emissions trading is crucial to channel investment in a smart and efficient, market-oriented way.

### Policy coherence

Finnish Energy believes that legislation must go hand in hand with the emissions trading system. It believes that new European or national measures must not undermine the steering effect of emissions trading.

### Technology neutrality

Finnish Energy supports the aim of technology neutrality for climate-neutral energy policy.

### Energy transition

Finnish Energy supports the energy transition and believes that the main components are nuclear, hydro and wind power, together with combined heat and power generation based on domestic bioenergy. These are supplemented by the development of distributed power generation.

### Carbon removal and negative emissions

Finnish Energy believes that it is essential to develop different carbon capture, storage and utilisation technologies, with public funding focused primarily on the R&D and demonstration phase of technologies.

### Summary view

Finnish Energy is fully aligned with the Paris Agreement and Fortum’s climate advocacy principles. The membership yields benefit for Fortum in amplifying the voice of the Finnish energy sector in societal discussion and decision-making in Finland.



# Assessment results

Fully aligned

## Energiföretagen Sverige (Swedenergy)

Energiföretagen Sverige (Swedenergy) is a non-profit industry and special-interest organisation for companies that supply, distribute, sell, and store energy. Swedenergy monitors and promotes the interests of its members and the Swedish energy sector in general. The organisation has a total of 400 members, which includes state-owned, municipal, and private companies as well as associations within the energy sector. Fortum is a member of Swedenergy and is represented in the Board of Directors.

### Commitment to climate science and the Paris Agreement

Swedenergy bases its goals and arguments on climate science and is strongly committed to the targets of the Paris Agreement and to the measures required to achieve these.

### Climate neutrality goal

Swedenergy believes that the EU should reach net zero CO<sub>2</sub> emissions by 2050. The association is committed to contributing to Sweden’s climate goal of becoming a fossil-free nation by 2045.

### Promotion of carbon pricing

Swedenergy holds a detailed and climate-oriented position on carbon pricing. Swedenergy believes that EU ETS should be the main driver to reach the increased EU climate ambition. Specifically, the organisation believes that the linear reduction factor (LRF) should be aligned to the revised 2030-target as soon as possible. The association also believes in extending the EU ETS to cover more sectors, among others, by including the entire heating sector.

### Policy coherence

Swedenergy views that legislation must go hand in hand with the emissions trading system. The CO<sub>2</sub> target must be binding, but the means must be flexible. Emissions trading forms the main instrument, and carbon taxation is a functioning instrument for the non-emissions trading sector.

### Technology neutrality

All measures should rely on technology neutrality, cost-efficiency, and market-based approaches like the EU ETS, and offer flexibility, while at the same time addressing coherency, competitiveness, and sustainability.

### Energy transition

Swedenergy’s “Roadmap Electricity – for a fossil-free society” focuses on how the energy industry will enable a national energy transition away from fossil fuels in all sectors. Swedenergy believes that moving away from fossil fuels involves a major transition to fossil-free electricity.

### Carbon removal and negative emissions

Swedenergy supports new technologies such as carbon capture.

### Summary view

Swedenergy is fully aligned with the Paris Agreement and Fortum’s climate advocacy principles. The association is ambitious in their climate goals for Sweden and the EU. Fortum derives benefit from its membership in Swedenergy, in particular in relation to joint industry action on climate change to promote the sustainable development of Sweden as a whole.



# Assessment results

Fully aligned

## Energy Norway

Energy Norway is a non-profit industry organisation representing about 300 companies involved in the production, distribution, and trading of electricity in Norway. Fortum is a member of Energy Norway.

### Commitment to climate science and the Paris Agreement

Energy Norway bases its goals and arguments on climate science. Energy Norway is strongly committed to the targets of the Paris Agreement and to the measures required to achieve these.

### Climate neutrality goal

Energy Norway views that the EU should reach net zero CO<sub>2</sub> emissions by 2050. The association believes that Norway should take a leading role as the first renewable and all-electric society in the world.

### Promotion of carbon pricing

Energy Norway believes that the EU Emissions Trading Scheme (EU ETS) is an extremely important tool to reduce emissions in a cost-effective way. However, confidence in the EU ETS is still low, and the current revision of the directive creates a window of opportunity for strengthening the system.

### Policy coherence

Energy Norway states that legislation must go hand in hand with the emissions trading system, and the CO<sub>2</sub> target must be binding but the means must be flexible. The same matter should not be addressed through several policies. Emissions trading is the main instrument, and carbon taxation is a functioning instrument for the non-emissions trading sector.

### Technology neutrality

Energy Norway supports technology neutrality in order to reach the set climate aims.

### Energy transition

Norway has set the objective to be a low-emission, zero-carbon nation by 2050, and Energy Norway fully supports this energy transition.

### Carbon removal and negative emissions

Energy Norway considers that emissions trading should also encourage the use of new technologies such as carbon capture.

### Summary view

Energy Norway is fully aligned with the Paris Agreement and Fortum’s climate advocacy principles. Fortum derives benefit from its membership in Energy Norway, in particular in relation to joint industry action on climate change to promote the sustainable development of Norway as a whole.



# Assessment results

Partially aligned

## German Association of Energy and Water Industry (Bundesverband der Energie- und Wasserwirtschaft)

The German Association of Energy and Water Industry (BDEW) is an industry federation representing the German energy and water sectors. Gathering almost 2,000 members, it is active at local, national, and European levels. Fortum is a member of the Steering Group on Energy and Environmental Policies.

### Commitment to climate science and the Paris Agreement

BDEW fully recognises the scientific analysis of the Intergovernmental Panel on Climate Change (IPCC) and supports the aims of the Paris Agreement.

### Climate neutrality goal

BDEW wholly supports the European Union’s goal of climate neutrality in 2050. It has furthermore endorsed the EU’s 2030 climate target that foresees cutting the bloc’s greenhouse gas emissions by at least 55% compared to 1990 levels.

### Promotion of carbon pricing

BDEW considers the EU ETS to be “the key instrument for a cost-efficient and market-driven GHG reduction in the energy sector”. At the same time, the organisation attributes greatest priority to the expansion of renewable energy capacities for successfully concluding the climate transition, with carbon pricing as a means to achieve this end.

### Policy coherence

BDEW supports a policy mix that combines carbon pricing, renewable energy expansion, and energy efficiency policies. However, it considers the proactive development of greater renewable energy capacities as the most important of the three measures.

### Technology neutrality

BDEW supports the principle of technology neutrality. However, the organisation does not understand technology neutrality in absolute terms and prioritises the use of certain technologies in particular sectors where they have proven to offer the most straightforward pathway to decarbonisation (e.g., electrification in mobility). The BDEW also strongly supports the phase out of nuclear energy in Germany.

### Energy transition

BDEW is in favour of an energy transition that combines electrification with other technologies, in particular natural gas. It does not support the deployment of nuclear energy.

### Carbon removal and negative emissions

BDEW is, in principle, open to carbon removal and negative emissions technologies.

### Summary view

BDEW endorses the climate goals set by the Paris Agreement and is fully aligned with Fortum on the fundamental issues relating to climate action. However, it occasionally diverges from Fortum on the preferred policy options and priorities: BDEW attributes a lesser role to carbon pricing than to the expansion of renewable energy and is sceptical of nuclear energy’s role in the energy transition.

### Fortum’s development action

We will have bilateral discussions with BDEW and encourage them to take development actions. We will report on the progress of this dialogue and explain the actions we took as a result of this first review in our next Climate Lobbying Review in 2022.



# Assessment results

Partially aligned

## Chamber of Commerce Polish District Heating(Izby Gospodarczej Ciepłownictwo Polskie)

The Chamber of Commerce Polish District Heating (IGCP) works for the development of modern district heating in Poland. It brings together the organisationally diverse producers and suppliers of district heating and supports the companies in their long-term plans. The Association has over 280 members of various sizes and structures. Fortum is a member of IGCP.

### Commitment to climate science and the Paris Agreement

IGCP supports climate science. The association follows the Polish position and is not against the Paris Agreement but sees the need for a differentiated approach based on domestic specificities. The main point of conflict lies in the timeline and financial means available to boost the transition.

### Climate neutrality goal

IGCP supports the set climate neutrality goal, but only sees it feasible for Poland after 2050.

### Promotion of carbon pricing

IGCP supports carbon pricing. However, it expresses concern about the rising prices for end consumers and energy poverty.

### Policy coherence

The position of IGCP is one of energy efficiency first.

### Technology neutrality

IGCP considers gas as the main transition fuel that would lead towards a wider range of renewable energy sources and other solutions in the future.

### Energy transition

IGCP sees gas as the main transition fuel. Several plans already exist on providing gas transmissions. The main question that remains is the availability of gas.

### Carbon removal and negative emissions

IGCP does not hold a policy stance on carbon removal and negative emissions technologies.

### Summary view

IGCP aligns with the official Polish position on the energy transition and the Green Deal, including the Fit for 55 package and the Paris Agreement. However, as the means and timetables in reaching the targets differ significantly, the association can only be considered partially aligned with the Paris Agreement and Fortum’s key climate advocacy principles. Polish district heating systems are old and still heavily dependent on coal. Furthermore, IGCP acts mostly as a platform for cooperation, rather than forming strong policy statements.

### Fortum’s development action

We will have bilateral discussions with IGCP and encourage them to take development actions. We will report on the progress of this dialogue and explain the actions we took as a result of this first review in our next Climate Lobbying Review in 2022.



# Assessment results

Partially aligned

## Polish Association of Professional Heat and Power Plants (Polskie Towarzystwo Elektrociepłowni Zawodowych)

The Polish Association of Professional Heat and Power Plants (PTEZ) was founded in 1991. PTEZ members are professionally associated with the production and use of heat and electricity. The association’s activities cover all key areas of the combined heat and power industry, most importantly the promotion of CHP development in Poland. Fortum is a member of PTEZ and represented in its Management Board. Fortum also has a representative in the Audit Committee.

### Commitment to climate science and the Paris Agreement

PTEZ supports climate science. The association follows the Polish position and is not against the Paris Agreement but sees the need for a differentiated approach based on domestic specificities. The main point of conflict lies in the timeline and financial means available to boost the transition.

### Climate neutrality goal

PTEZ supports the set climate-neutrality goal, but only sees it feasible for Poland after 2050.

### Promotion of carbon pricing

PTEZ is supportive of carbon pricing. However, it expresses concern about the rising prices for end consumers and energy poverty.

### Policy coherence

The position of PTEZ is one of energy efficiency first.

### Technology neutrality

PTEZ considers gas as the main transition fuel that would lead towards a wider range of renewable energy sources and other solutions in the future.

### Energy transition

Gas is seen as the main transition fuel in the view of PTEZ. Several gas transmission plans already exist. The main question that remains is the availability of gas.

### Carbon removal and negative emissions

PTEZ does not hold a policy stance on carbon removal and negative emissions technologies.

### Summary view

PTEZ aligns with the official Polish position on the energy transition and the Green Deal, including the Fit for 55 package and the Paris Agreement. However, as the means and timetables in reaching the targets differ significantly, the association can only be considered partially aligned with the Paris Agreement and Fortum’s key climate advocacy principles. Polish district heating systems are old and still heavily dependent on coal. Furthermore, PTEZ acts mostly as a platform for cooperation, rather than forming strong policy statements.

### Fortum’s development action

We will have bilateral discussions with PTEZ and encourage them to take development actions. We will report on the progress of this dialogue and explain the actions we took as a result of this first review in our next Climate Lobbying Review in 2022.



# Assessment results

Partially aligned

## Federation of Indian Chambers of Commerce and Industry

The Federation of Indian Chambers of Commerce and Industry (FICCI) is a non-governmental, not-for-profit organisation and the voice of India’s business and industry. From influencing policy to encouraging debate, engaging with policy makers and civil society, FICCI articulates the views and concerns of the industry. Fortum is a member of FICCI.

### Commitment to climate science and the Paris Agreement

FICCI does not have a position on climate science, but it does support the Paris Agreement through its membership in Nationally Determined Contributions under the Paris Agreement. FICCI’s climate work emphasises international collaboration.

### Climate neutrality goal

FICCI has not taken an official position on the matter.  
Promotion of carbon pricing  
FICCI has not taken an official position on carbon pricing in India.

### Policy coherence

FICCI sees that the key barrier for achieving the SDGs is the lack of policy coherence. The lack of consideration for economic, social and environmental indicators for framing national policies, plans, and projects appears to be the major barrier towards the implementation of sustainable development initiatives by businesses in India.

### Technology neutrality

FICCI works to promote renewable energy, bioenergy, hydrogen energy, and nuclear energy.

### Energy transition

FICCI supports the energy transition and promotes hydrogen energy as a cornerstone of India’s energy transition.

### Carbon removal and negative emissions

FICCI has not taken positions on the matters.

### Summary view

FICCI supports the Paris Agreement but it does not have positions on several other issues regarding climate change. FICCI is thus only partially aligned with Fortum’s climate advocacy principles.

### Fortum’s development action

We will have bilateral discussions with FICCI and encourage them to take development actions. We will report on the progress of this dialogue and explain the actions we took as a result of this first review in our next Climate Lobbying Review in 2022.



# Assessment results

Fully aligned

## Council of Electricity Producers and Strategic Electricity Investors

The Council of Electricity Producers and Strategic Electricity Investors was founded in 2008 and unites the interests of large thermal and nuclear generating companies in Russia. The association is actively involved in the preparation of important policy documents adopted in the electric power industry. Fortum is a member of the association.

### Commitment to climate science and the Paris Agreement

The Council of Electricity Producers and Strategic Electricity Investors fully shares and supports the state policy on environmental and climate issues, including the Paris Agreement, adopted by Decree of the Government of the Russian Federation.

### Climate neutrality goal

The association shares the goals of achieving carbon neutrality in ways that are economically and technologically feasible under the current conditions and in specific situations. It shares the official position of the Russian Federation on this issue.

### Promotion of carbon pricing

The association supports the idea of carbon pricing, taking into account a balanced approach in its implementation and avoiding hasty decisions regarding “traditional” electricity producers.

### Policy coherence

The association believes that achieving the goals of the Paris Agreement is possible through the development of renewable energy sources and by increasing the energy efficiency of using primary energy sources.

### Technology neutrality

The association supports technology neutrality and the development of highly efficient cogeneration units.

### Energy transition

According to public sources, the association sees the construction of renewable energy facilities as significantly more expensive than, for example, building coal or gas-based facilities. However, it is taking actions to advance the use of renewable energy.

### Carbon removal and negative emissions

The association supports carbon removal and declares the need to introduce low-carbon certifications and to take these certifications into account in other countries.

### Summary view

The Council of Electricity Producers and Strategic Electricity Investors is fully aligned with the Paris Agreement and Fortum’s climate advocacy principles. Fortum benefits from the membership especially in relation to joint industry action on climate change to promote the sustainable development of Russia as a whole.



# Assessment results

Partially aligned

## Russian Union of Industrialists and Entrepreneurs

The Russian Union of Industrialists and Entrepreneurs (RSPP) is a non-governmental organisation promoting the interests of the Russia’s business community both in Russia and abroad. The RSPP operates in two capacities: as a non-governmental organisation and as a national association of employers. Fortum is a member of RSPP and chairs the Utilities Commission.

### Commitment to climate science and the Paris Agreement

The Russian Union of Industrialists and Entrepreneurs (RSPP) says that it unconditionally supports the goals of the Paris Agreement. However, RSPP also believes that emissions reductions should remain voluntary.

### Climate neutrality goal

RSPP shares the official goals set by the Russian Federation, in particular, the goal of carbon neutrality by 2060 with the obligatory consideration of the absorption of greenhouse gases by various ecosystems. The organisation sees zero emissions in the climatic and socio-economic conditions of Russia as practically impossible.

### Promotion of carbon pricing

RSPP sees the concept and definition of carbon pricing as ambiguous. The organisation supports the model envisaged by the Russian law on limiting greenhouse gas emissions, which includes a carbon unit trade mechanism. The organisation does not support trading in quotas nor a carbon tax, which are considered unacceptable in Russian realities.

### Policy coherence

RSPP sees some main directions for the development of the state climate policy in Russia. One of them is the creation of an integrated system for the accounting of emissions and absorption of greenhouse gases. The organisation also sees it important to develop a national register and procedures for the carbon unit trade.

### Technology neutrality

RSPP supports the implementation of new energy-efficient technologies and advocates for the recognition of nuclear power and hydropower as low-carbon energy production with a minimal carbon footprint.

### Energy transition

RSPP has no clear stance on the matter.

### Carbon removal and negative emissions

RSPP has no clear stance on the matter.

### Summary view

RSPP is partially aligned with the Paris Agreement and Fortum’s climate advocacy principles. RSPP does not have clear policy statements on all principles reviewed, and there are also some misalignments, for instance, regarding net zero emissions and carbon pricing.

### Fortum’s development action

We will have bilateral discussions with RSPP and encourage them to take development actions. We will report on the progress of this dialogue and explain the actions we took as a result of this first review in our next Climate Lobbying Review in 2022.



# Assessment results

Partially aligned

## South Urals Chamber of Commerce and Industry

The South Urals Chamber of Commerce and Industry (SUCCI) is a local organisation for businesses and companies in the Chelyabinsk Region. SUCCI has the intention to develop and promote the interests of its members, both local companies and global companies with operations in the area, by safeguarding business interests, sharing experiences and insight, establishing contact with governments, civil society, and media and by organising trade shows and events. Fortum is a member of SUCCI.

### Commitment to climate science and the Paris Agreement

SUCCI supports the Paris Agreement and states that it also supports initiatives by its member organisations aimed at research in the field of climate change.

### Climate neutrality goal

SUCCI supports the goal of climate neutrality by 2050 and provides support to its member organisations in complying with the local laws and regulations in order to reach the goal. SUCCI support local green policies and calls for practical actions while stressing the importance of large companies taking the first steps to reduce emissions. The association offers programmes for large industrial plants to minimise their negative environmental impact.

### Promotion of carbon pricing

SUCCI claims to support the introduction of carbon pricing, although it hasn't taken a public stance in support of it. Officially, it shares the position of the Russian Chamber of Commerce on the issue, which is against carbon pricing.

### Policy coherence

SUCCI hasn't taken any proactive position on this matter, but, as with carbon pricing, it shares the position of the Russian Chamber of Commerce.

### Technology neutrality

SUCCI has no clear stance on technology neutrality.

### Energy transition

SUCCI has no clear stance on energy transition.

### Carbon removal and negative emissions

SUCCI has no clear stance on carbon removal or negative emissions.

### Summary view

SUCCI supports the Paris Agreement and strongly welcomes the desire of its members to achieve zero CO<sub>2</sub> emissions, especially since the region is not among the cleanest in Russia. While SUCCI is thus partially aligned with Fortum's climate advocacy principles, it does not have clear policy positions on all of the reviewed principles, and some policy positions remain vague.

### Fortum's development action

We will have bilateral discussions with SUCCI and encourage them to take development actions. We will report on the progress of this dialogue and explain the actions we took as a result of this first review in our next Climate Lobbying Review in 2022.



# Assessment results

Partially aligned

## OPORA Russia

OPORA Russia is focused on resolving issues faced by Russian entrepreneurs in a wide range of areas including legal advisory, attracting financing, obtaining government support, and establishing business contacts. The organisation is a platform for effective professional dialogue between small- and medium-sized enterprises and representatives of federal executive bodies, regional authorities and municipalities, supervisory bodies, and other key stakeholders. Fortum’s director is a member of the Executive Committee of OPORA Russia.

### Commitment to climate science and the Paris Agreement

OPORA Russia supports climate change research and says that it also supports the Paris Agreement in general.

### Climate neutrality goal

OPORA Russia says they share the goal of net zero CO<sub>2</sub> emissions by 2050. In general, OPORA supports recycling and energy-saving initiatives in households and the promotion of sustainable development and renewable energy in enterprises as ways to reduce emissions.

### Promotion of carbon pricing

OPORA has not taken an official position on carbon pricing in Russia due to the size of its member companies, which are not subject to regulation.

### Policy coherence

OPORA has not taken an official position on the matter.

### Technology neutrality

OPORA has not taken an official position on the matter.

### Energy transition

OPORA has not taken an official position on the matter.

### Carbon removal and negative emissions

OPORA has not taken an official position on the matter.

### Summary view

OPORA Russia rarely speaks proactively on energy policy and follows the general guidelines of the Russian Federation in its policies. OPORA supports climate science and has its own Committee on Energy Efficiency and Energy Saving. As there are no official positions on most of the principles reviewed here, OPORA is only partially aligned with Fortum’s climate advocacy principles.

### Fortum’s development action

We will have bilateral discussions with OPORA Russia and encourage them to take development actions. We will report on the progress of this dialogue and explain the actions we took as a result of this first review in our next Climate Lobbying Review in 2022.



### Further information:

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