ASSESSING TRADE AND BUSINESS GROUPS’ POSITIONS ON CLIMATE CHANGE
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The Center for Science and Democracy
at the Union of Concerned Scientists

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The opinions expressed in this report are solely the responsibility of the authors.
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CHAPTER 1

Introduction

Trade and business associations have represented commercial interests in the United States since before the American Revolution, and they have helped build the nation's industries (Mack 1991). These associations provide many advantages to member companies, including industry standards and agreements, economic services, and access to information and shared resources. In addition, over the past three decades national trade and business associations have increasingly focused on government relations. In 1970, fewer than 20 percent of them were headquartered in Washington, DC (Mack 1991), but today the majority have a significant presence there. Many trade and business associations consider government relations to be their primary purpose (Boléat 2003).

Thus trade and business associations offer significant benefits to companies that wish to influence public policy. By bringing together firms with similar interests, these associations allow industries to speak to decision makers in a more unified and powerful voice. Pooling resources means that dedicated association staff can closely track, and consistently represent, their group's interests in federal policy making.

The regulation of heat-trapping gases, as well as the physical effects of climate change, could significantly affect the private sector—both positively and negatively. In view of the business community's vested interest in policy debates on how to address climate change, many associations now actively engage in climate policy discussions.

Because of the complexity of climate change and the broad range of its effects, companies have different stakes in, and approaches to influencing, climate policy. As a result, it is common for associations to take policy positions on climate that may not represent all of their members' views or even those of their boards of directors. This is especially true of umbrella groups, such as the U.S. Chamber of Commerce and National Association of Manufacturers, which represent multiple industries with diverse interests. Moreover, some trade and business associations have been inconsistent in their positions on climate-related issues over time.

The regulation of heat-trapping gases, as well as the physical effects of climate change, could significantly affect the private sector—both positively and negatively.

Thus company leadership may not agree with their association's policy positions on climate change. In fact, our previous research suggests that many companies have board seats on associations that hold climate change positions in direct opposition to their own (UCS 2012). While this earlier UCS work analyzed climate-related actions taken by individual companies, the present report reflects our ongoing investigations of trade and business associations' role in the public conversation on climate change.
CHAPTER 2
Research Methods

To help companies understand where their trade and business associations stand, we assessed the positions that 14 associations have taken on climate science and policy in the United States between 2007 and 2012. These groups were chosen on the basis of their national prominence and level of activity in the public climate change dialogue, with particular attention paid to groups in the energy sector. Our sources of information included:

- Interviews with association staff
- Website materials
- Official statements on third-party social media pages
- Executives’ statements to the news media
- Congressional testimony
- Public comments on greenhouse gas regulations proposed by the U.S. Environmental Protection Agency
- Statements on the 2009 Waxman-Markey American Clean Energy and Security Act

Using these sources, we evaluated associations in three areas:

Acceptance of Climate Science
We examined whether or not associations have demonstrated an acceptance of basic climate science as a foundation on which to discuss climate change policies. Associations that made statements misrepresenting the consensus of climate scientists were labeled no and colored red in the graphics in Chapter 3; groups that made accurate statements in this regard were labeled yes and colored green.

Support for Climate Action
Associations discuss climate change in the context of the policy goals they favor. Groups that supported clear and substantial overall emissions-reduction goals, such as “dramatic emissions reductions” or “80 percent emissions reduction by 2050,” were labeled yes and colored green. By contrast, associations that stated more qualified and vague goals—for example, that they would only embrace a comprehensive climate policy if it were “global in scope and did not damage the economy” or if it included a benefit to their industry—were labeled limited and colored yellow to indicate lessened but not entirely absent support. None of the 14 associations we researched publicly expressed opposition to all policy action on climate change.

We examined whether or not associations have demonstrated an acceptance of basic climate science as a foundation on which to discuss climate change policies.

Policy Endorsement
Our previous work suggests that corporate actors that voice support for policy goals to address climate change, as described above, may or may not choose, in actuality, to endorse specific policies that achieve those goals when they are proposed (UCS 2012). We addressed this distinction by analyzing associations’ support of either of two national climate policies that were proposed.
in the last five years and that had a reasonable chance of being implemented: (1) the Waxman-Markey American Clean Energy and Security Act of 2009 (H.R. 2454) and (2) the Environmental Protection Agency’s regulation of greenhouse gases under the Clean Air Act (including the EPA’s finding that greenhouse gases endanger public health and welfare, as well as the agency’s subsequent regulatory proposals). Groups that endorsed either proposal were labeled yes and groups that did not support them were labeled not yet. Diverse policy tools are available to address climate change, and there are many reasons why associations may or may not choose to support a given policy; therefore declining to support either proposal is not necessarily a negative action. Rather, a label of not yet indicates that there has yet to be a broad national policy for which an association has demonstrated endorsement. For that reason, while associations with a yes are colored green, those with a not yet are not colored at all. Note, however, no policy will be perfect and true support for climate action ultimately means endorsement of actual proposed policies.

True support for climate action ultimately means endorsement of actual proposed policies.
CHAPTER 3
Where Associations Stand

The figures on the following pages show the degree to which 14 U.S. trade and business associations have expressed support for climate science and policy in three categories: acceptance of the science, support for climate action, and policy endorsement. Each characterization is accompanied by one or more representative quotes reflecting the group’s position in that category. Thus our analysis presents the “track records” of 14 associations’ positions on climate change based on information from the last five years.

Our analysis presents the “track records” of 14 associations’ positions on climate change.

The U.S. Chamber of Commerce is one of the largest associations in the United States. The group has been a prominent actor in the conversation on climate science and policy through its statements, materials, and political and legal activities.
U.S. Chamber of Commerce on Climate Science and Policy

Accepts the Science | Voices Support for Significant Climate Action | Backs Specific Policy Proposals
--- | --- | ---
No | Limited | Not Yet

The EPA "proposes a rule based entirely on untested scientific sources—mostly a U.N. report . . . [including] profound and wide-ranging scientific uncertainties."
— Comments of the U.S. Chamber of Commerce on the EPA’s Endangerment Finding (U.S. Chamber of Commerce 2009)

The “EPA professes to be 90 to 99 percent certain that anthropogenic emissions are mostly responsible for ‘unusually high current planetary temperatures,’ but the record does not remotely support this level of certainty.”
— Joint comments filed by the U.S. Chamber of Commerce and other parties that brought suit against the EPA over its authority to regulate greenhouse gas emissions (CRR v. U.S. EPA 2011)

“We opposed this specific legislation because it would not reduce the global level of greenhouse gases in the atmosphere. It is neither comprehensive nor international, and it falls short on moving renewable and alternative technologies into the marketplace and enabling our transition to a lower-carbon future. It would also impose carbon tariffs on goods imported into the U.S., a move that would almost certainly spur retaliation from global trading partners.”
— Website of the U.S. Chamber of Commerce (U.S. Chamber of Commerce 2012)

“The Clean Air Act is not the appropriate vehicle for regulating climate change. Even though the EPA is only addressing motor vehicles, the Clean Air Act is structured so that once the EPA regulates greenhouse gases in any manner the Act regulates all emitters of the gases, which includes stationary sources that have never been subject to EPA air regulation. To quote Congressman John Dingell, this will be a ‘glorious mess.’ Our economy does not need a glorious regulatory mess, especially now. Reason needs to prevail and Congress needs to enact a comprehensive climate change law.”
— Website of the U.S. Chamber of Commerce (U.S. Chamber of Commerce 2012)

“The Chamber has in its public documents, Hill letters, and testimony; supported efforts to reduce greenhouse gas emissions in the atmosphere. Our position is simple: There should be a comprehensive legislative solution that does not harm the economy, recognizes that the problem is international in scope, and aggressively promotes new technologies and efficiency. Protecting our economy and the environment for future generations are mutually achievable goals.”
— Website of the U.S. Chamber of Commerce (U.S. Chamber of Commerce 2012)
National Association of Manufacturers (NAM) on Climate Science and Policy

Accepts the Science

Voices Support for Significant Climate Action

Backs Specific Policy Proposals

No

Limited

Not Yet

The “EPA professes to be 90 to 99 percent certain that anthropogenic emissions are mostly responsible for ‘unusually high current planetary temperatures,’ but the record does not remotely support this level of certainty.”

— Joint comments filed by the National Association of Manufacturers and other parties that brought suit against the EPA over its authority to regulate greenhouse gas emissions (CRR v. U.S. EPA 2011)

“We know the U.S. cannot solve the climate change issue alone. The establishment of federal climate change policies to reduce greenhouse gas emissions, whether legislative or regulatory, must be done in a thoughtful, deliberative, and transparent process that ensures a competitive level playing field for U.S. companies in the global marketplace. Therefore, the NAM opposes any federal or state government actions regarding climate change that could adversely affect the international competitiveness of the U.S. marketplace economy. Any climate change policies should focus on cost-effective reductions, be implemented in concert with all major emitting nations, and take into account all greenhouse sources and sinks. The NAM believes that federal climate policies generally should preempt state policies.”

— Website of the National Association of Manufacturers (NAM 2012a)

“The National Association of Manufacturers today launched a multistate, multi-million-dollar comprehensive advertising campaign opposing the American Clean Energy and Security Act (H.R. 2454), also known as the Waxman-Markey climate change bill.”

— Press release of the National Association of Manufacturers (NAM 2009)

“The National Association of Manufacturers is fighting the EPA’s aggressive actions in all three branches of government. We support legislation that would prevent the EPA from regulating greenhouse gases. We have filed numerous petitions against the agency’s actions. We have challenged the EPA’s agenda in federal court and filed a number of briefs in litigation addressing the EPA’s agenda.”

— Website of the National Association of Manufacturers (NAM 2012b)
American Petroleum Institute (API) on Climate Science and Policy

Accepts the Science | Voices Support for Significant Climate Action | Backs Specific Policy Proposals

No | Limited | Not Yet

“The major difference between greenhouse gases and air toxics is that there is no local effect with climate change, if there is any effect at all.”
— Howard Feldman, regulatory and scientific affairs director at the American Petroleum Institute (Harder 2012)

“The EPA professes to be 90 to 99 percent certain that anthropogenic emissions are mostly responsible for ‘unusually high current planetary temperatures,’ but the record does not remotely support this level of certainty.”
— Joint comments filed by the American Petroleum Institute and other parties that brought suit against the EPA over its authority to regulate greenhouse gas emissions (CRR v. U.S. EPA 2011)

“Climate change is a serious issue demanding focused and effective action that is best taken with legislation dedicated to the problem rather than through the existing structure of the CAA [Clean Air Act].”
— Comments of the American Petroleum Institute on the EPA’s Endangerment Finding (API 2009a)

“[T]he approach taken by the Waxman-Markey bill is so fundamentally flawed that the House should reject it.”
— Jack Gerard, president of the American Petroleum Institute (API 2009b)

“This action poses a threat to every American family and business if it leads to regulation of greenhouse gases under the Clean Air Act. Such regulation would be intrusive, inefficient, and excessively costly. It could chill job growth and delay business expansion. The Clean Air Act was meant to control traditional air pollution, not greenhouse gases that come from every vehicle, home, factory, and farm in America.”
— Press release of the American Petroleum Institute (API 2009b)
National Mining Association (NMA) on Climate Science and Policy

Accepts the Science

Voices Support for Significant Climate Action

Backs Specific Policy Proposals

No

Limited

Not Yet

The “NMA believes that there are several problems with the agency’s finding. First, it does not address at all the significant scientific evidence that calls into question whether observed variations in . . . Earth’s climate are natural or man-made.”

— Comments of the National Mining Association on the EPA’s Endangerment Finding (NMA 2009a)

The “EPA professes to be 90 to 99 percent certain that anthropogenic emissions are mostly responsible for ‘unusually high current planetary temperatures,’ but the record does not remotely support this level of certainty.”

— Joint comments filed by the National Mining Association and other parties that brought suit against the EPA over its authority to regulate greenhouse gas emissions (CRR v. U.S. EPA 2011)

The “NMA opposes H.R. 2454, the ‘American Clean Energy and Security Act,’ because it does not promote economic and energy security."

— Hal Quinn, president and CEO of the National Mining Association (NMA 2009b)

“Requiring coal-based power plants to meet an emissions standard based on natural gas technology is a policy overtly calculated to destroy a significant portion of America’s electricity supply. This proposal is the latest convoy in EPA’s regulatory train wreck that is rolling across America, crushing jobs and arresting our economic recovery at every stop.”

— Hal Quinn, president and CEO of the National Mining Association (OurEnergyPolicy.org 2012)

“Encouraging climate policies that promote fuel diversity, development of technology, and long-term actions to address climate concerns in order to ensure that technological and financial resources are available to support the needs of the future.”

— Website of the National Mining Association (NMA 2012)
American Coal Council (ACC) on Climate Science and Policy

Accepts the Science | Voices Support for Significant Climate Action | Backs Specific Policy Proposals
---|---|---
**No** | **Limited** | **Not Yet**

“The ‘hockey stick’ graph produced by Michael Mann at Penn State may have suffered the final blow to its credibility. As more original data sets are released to the public and other scientists and statisticians have the opportunity to recreate Mann’s work, their findings are lacking the distinct 20th-century uptick in temperatures.”
— Jason Hayes, communications director of the American Coal Council (Hayes 2012)

“Senator Inhofe, ranking minority member of the Senate Committee on Environment and Public Works, has just released a damning Senate report titled ‘Consensus? Exposed: The CRU Controversy.’ [This] report reviews the leaked emails and documents from the East Anglia Climate Research Unit (and the associated ‘Climagegate’ issues). . . . [Senator Inhofe also] claims that the EPA relied on IPCC [U.N. Intergovernmental Panel on Climate Change] reports that have now been shown to be based on faulty science.”
— Jason Hayes, communications director of the American Coal Council (Hayes 2010)

“We cannot rush to implement a legislative fix for an environmental challenge without also fully considering the potentially destabilizing social and fiscal impacts of that fix. . . . Fataly goring our electricity supply . . . will not advance the cause of environmental or human well-being.”
— Jason Hayes, communications director of the American Coal Council (Hayes 2009)

“In the near future, the Senate will take up consideration of S.J.Res.26, a [congressional] resolution to disapprove EPA’s proposal to regulate greenhouse gases. Our organizations, representing millions of workers in every state of the nation, in every walk of life, across a broad spectrum of the economy from rural communities to the largest cities, urge you to vote in favor of this resolution.”
— Letter to Congress signed by the American Coal Council (Agricultural Retailers Association et al. 2010)

“There is no generic or monolithic industry approach to the issue of climate change and, as such, there is no industry-wide take on how to address climate-related concerns.”
— Website of the American Coal Council (American Coal Council 2012)
Business Roundtable (BRT) on Climate Science and Policy

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“According to leading scientists, there is increasing evidence that . . . Earth’s climate has been warming over the last century and that increases in . . . Earth’s temperature are affecting many global ecosystems, especially [in] the polar areas. At the same time that warming has been occurring, greenhouse gas (GHG) concentrations in the atmosphere have increased due to rising worldwide emissions of GHGs. Major sources of these emissions include the combustion of fossil fuels, tropical deforestation, and other land use changes.

“Because the consequences of global warming for society and ecosystems are potentially serious and far-reaching, steps to address the risks of such warming are prudent even now, while the science continues to evolve.”

— Report released by the Business Roundtable (Business Roundtable 2007)

“Michael Burnham: Just to clarify. So, [the] Business Roundtable has not formerly endorsed the Waxman-Markey bill either?

“Mike Morris: No, it has not.”

— Mike Morris, chair of the Business Roundtable’s Sustainable Growth Initiative (Business Roundtable 2009)

“America’s business leaders believe in a smarter approach to regulation that takes account of the total burden on jobs and the economy. GHG stationary-source emissions require a legislative solution, not regulations based on a law that was created before the effects of such emissions were understood.”

— John Engler, president of the Business Roundtable (Business Roundtable 2011)

The “Business Roundtable supports collective actions that will lead to the reduction of GHG emissions on a global basis with the goal of slowing increases in GHG concentrations in the atmosphere and ultimately stabilizing them at levels that will address the risks of climate change. . . . Although (the) Business Roundtable supports actions to address global warming, our members have a range of views and preferences about the policy tools that will best achieve that objective. Some companies support mandatory approaches; others do not.”

— Report released by the Business Roundtable (Business Roundtable 2007)
National Solid Wastes Management Association (NSWMA) on Climate Science and Policy

"Earth’s atmosphere is like a greenhouse. Life-sustaining heat is trapped within that atmosphere, while some of the sun’s harmful rays are reflected away. Climatic changes caused by natural cycles have led to ice or glacial ages and periods of intense heat. During the last two decades, scientific studies have shown a significant increase in atmospheric concentrations of greenhouse gases, primarily carbon dioxide generated by burning fossil fuels such as coal and oil. Other greenhouse gases include methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Scientific consensus is clear: these emissions are making Earth warmer in an unusually fast time period."

— Website of the Environmental Industry Associations (EIA 2012)

"The National Solid Wastes Management Association (NSWMA) recently submitted comments to the United States Environmental Protection Agency on how greenhouse gas (GHG) emissions from biogenic sources should be treated under the Prevention of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule (generally referred to as the “Tailoring Rule”). [The] NSWMA argued that the GHG produced from biomass should not be regulated in the same manner as anthropogenic GHG (i.e., fossil fuel use) under the Tailoring Rule."

— National Solid Wastes Management Association (EIA 2010)

The “NSWMA believes that a national greenhouse-gas control program should: recognize inclusion of landfill-gas recovery as an offset in a cap-and-trade program and as a renewable energy source; support recycling and compost programs; recognize “early actions” that achieved greenhouse gas reductions (e.g., flaring or recovering landfill gas for energy and recycling); and support emission[s] reporting rules that address anthropogenic greenhouse gas emissions and recognize net emissions and reductions on a lifecycle basis. . . . We are proud to be one of the few industries whose greenhouse gas emissions have declined over the last 20 years.”

— Website of the Environmental Industry Associations (EIA 2012)
American Chemistry Council (ACC) on Climate Science and Policy

Accepts the Science: Yes

Voices Support for Significant Climate Action: Limited

Backs Specific Policy Proposals: Not Yet

The “ACC is not challenging the endangerment finding. . . . We just think that it’s . . . counterproductive and inconsistent with our interests in economic recovery to subject stationary sources to these rules.”

— Cal Dooley, president and CEO of the American Chemistry Council (American Chemistry Council 2010)

“The American Chemical Council is not opposed to the legislation—the Waxman-Markey bill (H.R. 2454). Officially, the organization is neutral, explained . . . Jennifer Scott, ACC communications director, but there are aspects of it that they would like to see changed—most especially higher emission[s] allowances during the earlier years of the program.”

— Big Sky Business Journal (Pyburn 2009)

The “ACC’s policy position: To attract manufacturing in the United States and to double exports in five years, as President Obama has pledged, [the] EPA must fix its boiler MACT [Maximum Achievable Control Technology] standards and stop GHG emissions regulations.”

— Website of the American Chemistry Council (American Chemistry Council 2012)

“Tom Gibson: We believe that the new regime, the comprehensive regime, needs to replace the Clean Air Act as the sole method for regulating greenhouse gases in the United States.

“Cal Dooley: We—ACC—would concur with Tom’s statement there.”

— Tom Gibson is president and CEO of the American Iron and Steel Institute and Cal Dooley is president and CEO of the American Chemistry Council (American Chemistry Council 2010)

“For the chemical industry, which is both energy-intensive and globally competitive, it’s especially important that any agreement gain widespread participation, that it not distort markets or U.S. competitiveness, and that it actually reduces emissions. If an agreement fails to meet these criteria, net global GHG emissions could increase as industrial production shifts to those countries that are more carbon-intensive—a phenomenon known as ‘carbon leakage.’ By avoiding carbon leakage, a global climate policy can help ensure [that] the chemistry industry reaches its potential for helping society reduce GHG emissions.”

— Cal Dooley, president and CEO of the American Chemistry Council (Dooley 2009)
Biomass Thermal Energy Council (BTEC) on Climate Science and Policy

Accepts the Science | Voices Support for Significant Climate Action | Backs Specific Policy Proposals
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Yes | Limited | Not Yet

“Global climate change is the most pressing environmental challenge of our time and the major cause of climate change is emissions of carbon dioxide (CO₂) from burning fossil fuels such as oil, gas, coal, and gasoline.”
— Case study of the Biomass Energy Resource Center (BTEC 2008)

“BTEC supports the passage of federal climate change legislation that recognizes the enormous potential of carbon-neutral biomass thermal energy to offset the greenhouse gas emissions of fossil fuel-based heating systems.”
— Website of the Biomass Thermal Energy Council (BTEC 2012)

“[B]y essentially equating biomass fuel use with fossil fuels, [the] EPA’s Tailoring Rule is upending established state and federal biomass policy. BTEC recommends a return to the accepted, established, and consistent federal interpretation of biomass carbon neutrality.”
— Biomass Thermal Energy Council comments on the Tailoring Rule (BTEC 2010)
“We’re not in the business of arguing the science of climate change . . . . Not only is climate change happening, but it will have significant consequences for us.”
— Paula Gant, vice president of regulatory affairs at American Gas Association (Gant 2012)

“The American Clean Energy and Security Act of 2009 (H.R. 2454), passed today by the House of Representatives, includes several important provisions that will reduce carbon emissions and improve energy efficiency in homes and businesses that use natural gas for heating and cooling, said the American Gas Association.”
— Website of the American Gas Association (AGA 2009c)

“The AGA agrees with [the] EPA that it would be preferable to address greenhouse gas emissions through comprehensive national legislation. In past comments, we urged [the] EPA not to proceed with plans to regulate greenhouse gas emissions under the existing Clean Air Act but instead to allow Congress time to complete work on national legislation. We still believe this would be the best course.”
— Comments of the American Gas Association on the Tailoring Rule (AGA 2009d)

“In the wake of new and modified climate change and energy legislation being introduced on Capitol Hill, the American Gas Association maintains that any such legislation should take into account the monumental strides [that] U.S. natural gas consumers have made during the past 40 years to reduce greenhouse gas emissions and increase energy efficiency. [The] AGA believes that natural gas could, and should, be used as a tool to improve environmental quality and energy efficiency.”
— Press release of the American Gas Association (AGA 2009a)

The “AGA supports a comprehensive national legislative approach to reduce greenhouse gas emissions.”
— Comments of the American Gas Association on the EPA’s Endangerment Finding (AGA 2009b)
Nuclear Energy Institute (NEI) on Climate Science and Policy

Accepts the Science | Voices Support for Significant Climate Action | Backs Specific Policy Proposals
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Yes | Yes | Not Yet

“The need for climate change legislation is based on a scientific consensus that increasing [emissions of] man-made greenhouse gas[es] are leading to higher temperatures worldwide. To counter the potential[ly] damaging effects of excessive global warming, many scientists and policy makers are pushing for some type of price on greenhouse gas emissions to reduce the use of fossil fuels.”
— Website of the Nuclear Energy Institute (NEI 2012)

“The U.S. nuclear energy industry supports the goal of reducing greenhouse gas emissions by 80 percent by 2050 in a way that minimizes negative impact on the economy and consumers of electricity.”
— Nuclear Energy Institute statement on Boxer/Kerry climate legislation (NEI 2009a)

“The nuclear energy industry welcomes the inclusion of provisions promoting greater use of clean-energy technologies, including nuclear energy, as part of the American Clean Energy and Security Act. . . . As deliberations on this legislation proceed, the Nuclear Energy Institute looks forward to working with Congress to improve these clean-energy provisions further. The existing limits on financial support for any single technology will hinder the . . . administration’s ability to make available clean technologies as quickly and efficiently as possible.”
— Alex Flint, vice president for government affairs at the Nuclear Energy Institute (NEI 2009b)
Edison Electric Institute (EEI) on Climate Science and Policy

Accepts the Science

Yes

Voices Support for Significant Climate Action

Yes

Backs Specific Policy Proposals

Yes

“Global climate change presents one of the biggest energy and environmental policy challenges this country has ever faced.”
— Website of the Electric Edison Institute (EEI 2012)

“EEI member companies are committed to addressing the challenge of climate change and support an 80 percent reduction in greenhouse gas emissions by 2050.”
— Website of the Electric Edison Institute (EEI 2012)

“EEI congratulate the House leadership on today’s passage of H.R. 2454.”
— Press release of the Edison Electric Institute (EEI 2009)
American Wind Energy Association (AWEA) on Climate Science and Policy

Accepts the Science

Yes

Voices Support for Significant Climate Action

Yes

Backs Specific Policy Proposals

Yes

“We generally trust what the [U.N. Intergovernmental Panel on Climate Change (IPCC)] puts out. We don’t have a particular separate view on the science.”
— Tom Vinson, senior director of federal regulatory affairs at the American Wind Energy Association (Kelley and Vinson 2012)

“[A]t the highest level, we support a climate protection regime that reduces emissions in line with what the . . . IPCC calls for. There are different ways to get there.”
— Tom Vinson, senior director of federal regulatory affairs at the American Wind Energy Association (Kelley and Vinson 2012)

“The wind energy industry is very grateful for the leadership of Chairmen Waxman and Markey in bringing this legislation to the House floor, and we support its passage.”
— Denise Bode, CEO of the American Wind Energy Association (AWEA 2009)

“On behalf of the clean- [and] renewable-energy companies we represent, we are writing to oppose S. 3072, which would delay for at least two years any Environmental Protection Agency action under the Clean Air Act involving global warming pollution from stationary sources.”
— Letter to Senator John D. Rockefeller signed by the American Wind Energy Association (US CAN 2010)
### Solar Energy Industries Association (SEIA) on Climate Science and Policy

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“Most of our members, frankly, believe climate change is occurring, believe it’s occurring due to human action, [and] believe that emissions need to be dramatically reduced.”
— Dan Adamson, vice president for regulatory affairs at the Solar Energy Industries Association (Adamson 2012)

“We look forward to working with Chairman Waxman and Ranking Member Barton on swift House passage of this historic energy and climate bill.”
— Rhone Resch, president and CEO of the Solar Energy Industries Association (Solar Industry 2009)

“On behalf of the clean- [and] renewable-energy companies we represent, we are writing to oppose S. 3072, which would delay for at least two years any Environmental Protection Agency action under the Clean Air Act involving global warming pollution from stationary sources.”

In an interview with the Union of Concerned Scientists, SEIA leaders explained that in terms of addressing climate change, they are open to “whatever can move the ball forward” on the goal of “significant emissions reduction.”
— Dan Adamson, vice president for regulatory affairs at the Solar Energy Industries Association (Adamson 2012)

The “SEIA supports comprehensive climate and energy legislation, and [it] is opposed to any legislation that would weaken the Clean Air Act.”
— Website of the Solar Energy Industries Association (SEIA 2012)
Assessing Trade and Business Groups’ Positions on Climate Change

Chapter 4
Research Summary

Through a range of approaches, at the state, national, and even international levels, trade and business associations play a large role in the public policy discussion around climate change. These associations influence how policy makers and the public perceive climate change and the need to address it.

Overall, our results suggest that a majority of U.S. trade and business associations have accepted climate science (see the table on p. 20). Almost a third of the groups assessed go further; they play a constructive role in the debate around climate policy—providing accurate science-based information to policy makers and the public—and they declare support for broad science-based policy solutions. Both the American Wind Energy Association and Solar Energy Industries Association, for instance, have strongly supported comprehensive climate legislation at the national and international levels and have even sent delegates to United Nations climate negotiations (Adamson 2012; Kelley and Vinson 2012).

Other associations, however, take a different path, continuing to cite long-refuted misinformation about climate science in order to justify opposition to climate policy proposals. For example, the American Coal Council and the American Petroleum Institute have repeatedly misrepresented climate science in their materials and public statements. Such activities harm the ability of the public and policy makers to make evidence-based decisions about climate policy. Moreover, these groups claim to support policy action on climate change, but the significant qualifiers they impose severely constrain this support. The U.S. Chamber of Commerce, for example, claims to support emissions reductions but only if doing so “does not harm the economy, recognizes that the problem is international in scope, and aggressively promotes new technologies and efficiency” (U.S. Chamber of Commerce 2012). Such sweeping limitations give these groups the grounds for opposing virtually any climate policy proposed, now or in the future, as no policy will be perfect. For some of the groups in this category, there may never be a meaningful climate policy they would support. In other words, they seemingly seek to block any broad policy for actually addressing climate change.

The remaining groups we analyzed (also about a third) fall between the two above-discussed positions. They accept climate science and choose only to debate climate policy based on the interests of their member companies. For example, the Biomass Thermal Energy Council says it would support federal climate policy that “recognize[d] the enormous potential of carbon-neutral biomass thermal energy” (BTEC 2012). Despite such qualifiers, groups in this category generally declare they are supportive of strong national climate policy and thus do not create barriers to progress on its development.

Misrepresentations of climate science harm the ability of the public and policy makers to make evidence-based decisions about climate policy.
Where Trade and Business Associations Stand on Climate Change

<table>
<thead>
<tr>
<th>Misrepresents climate science; shows limited policy support</th>
<th>Accepts climate science; shows limited policy support</th>
<th>Accepts climate science; shows significant policy support</th>
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The 14 associations analyzed in this report can be classified into the three categories shown. While the majority of these groups accept climate science, a third of them continue to misrepresent it in their materials and public statements.

While none of the 14 associations in our sample publicly expressed opposition to all policy actions on climate change, our results show that much work remains to be done in motivating the greater business community in the United States to help advance real solutions. Fortunately, there are several things companies can do, as described in Chapter 5, to encourage their trade and business associations to help the country and the world move forward.

There are several things companies can do to encourage their trade and business associations to help the country and the world move forward.
Company Actions on Climate Change

While this report focuses on trade and business associations, individual companies are also active participants in conversations on climate change. Our previous report, *A Climate of Corporate Control*, explored the roles that 28 major corporate actors played prior to and during the discussions of several important climate change policy proposals in 2009 and 2010 (UCS 2012). That analysis revealed that while some American companies have taken laudable and consistent actions in support of climate science and policy, others have consistently and aggressively worked to undermine them.

Notably, some companies have created confusion by taking contradictory actions across different venues. Even while projecting a climate-concerned image in public settings, these corporations have sown doubt about climate science both directly, such as by challenging climate science in government filings, and indirectly, such as by supporting politicians, think tanks, and trade and business groups that misrepresent the scientific consensus on climate change and oppose actions to address climate change. This powerful subset of companies has been tremendously influential in dictating how the public understands (or misunderstands) climate science and how the national discussions on climate policy have progressed, or not.

The resulting delay and defeat of policy efforts to address climate change have huge negative implications for government, the economy, people’s well-being, and the planet. But a major step in the right direction is greater transparency—encouraged by policy makers, investors, consumers, and the media—in corporate activities. Such accountability would illuminate the influence, both positive and negative, that corporations have on climate change discussions and lead us toward a policy debate that prioritizes peer-reviewed science over special interests.
The problem of climate change demands serious policy actions aimed at major reductions in heat-trapping emissions. Trade and business associations, being private-sector leaders, can facilitate progress toward such policies through their own engagement, dialogue, and support of evidence-based decision making, but many of these groups could use some prodding from their member companies.

Companies have the right and responsibility to weigh in on the climate-related positions that their trade and business associations take. First, climate change poses serious risks for companies. It can have adverse implications, for example, on how they obtain their materials, where they place their facilities, how they generally do business, and ultimately their bottom line (Calvert Investments, Ceres, and Oxfam America 2012). Moreover, because associations are publicly seen as representing their member companies, the latter should be conscious of such affiliations’ effects on their reputations. In some cases, companies have chosen to disengage with associations because of dissatisfaction with the groups’ positions on climate change. NIKE, Inc., for example, vocally resigned from the board of directors of the U.S. Chamber of Commerce in 2009, citing Chamber actions that were “inconsistent with our view that climate change is an issue in need of urgent action” (Korosec 2009). Finally, companies owe it to their shareholders, their consumers, and the public to openly state whether they agree or disagree with the policy positions of their trade and business associations. Public companies, in particular, should reveal to their shareholders how they are supporting the political activities of their associations.

Companies that belong to an association, especially those that have a seat on its board of directors, can help steer the group away from misrepresentations of science and toward science-based policy positions. Although company-specific economic concerns will make overall consensus difficult in large trade and business associations, when it comes to working with associations with which a company disagrees, “the key to sound policy formation is broad engagement and open dialogue,” says Kevin Anton, vice president and chief sustainability officer of Alcoa Inc. (Anton 2012). At the very least, companies can help ensure that their associations are not standing in the way of a comprehensive national framework to address global warming.

Companies should:

- Insist that their associations accept climate science
- Urge their associations to adopt policy goals that reflect this acceptance
- Push their associations to take stronger and more public positions in support of policies that will result in meaningful greenhouse gas emissions reductions
- Disclose whether they agree or disagree with their associations’ policy positions
References


Anton, K. 2012. Letter from Kevin Anton, vice president and chief sustainability officer at Alcoa Inc., to Calvert Investments Management.


Gant, P. 2012. Personal communication, December 6. Paula Gant is the vice president of regulatory affairs at the American Gas Association.


Trade and business associations have represented commercial interests in the United States since before the American Revolution, and they have helped build the nation's industries. Over the past three decades national trade and business associations have increasingly focused on government relations. In 1970, fewer than 20 percent of them were headquartered in Washington, DC, but today the majority have a significant presence there. Many trade and business associations consider government relations to be their primary purpose.

The regulation of heat-trapping gases, as well as the physical effects of climate change, could significantly affect the private sector—both positively and negatively. In view of the business community’s vested interest in policy debates on how to address climate change, many associations now actively engage in climate policy discussions.

To help companies understand where their associations stand, we assessed the positions that 14 U.S. trade and business associations have taken on climate science and policy in the United States between 2007 and 2012. The wide range of association stances shown in our results reveals that promising steps have been taken but much work remains to be done in motivating the greater business community in the United States to help advance real solutions.

Companies that belong to an association or, especially, those that have a seat on an association’s board of directors, can help steer it away from misrepresentations of science and toward science-based policy positions. Through active engagement, companies can help ensure their trade and business associations are not standing in the way of a comprehensive national framework to address global warming.