Environmental Defenders Office

31 October 2022

Ad Standards

PO Box 5110

BRADDON ACT 2612

Complaint Lodged via website at adstandards.com.au

Complaint about Shell Australia on behalf of Comms Declare

1. We act for Comms Declare. Comms Declare is a not-for-profit group of communications professionals dedicated to climate action.

2. We are writing on their behalf to ask that you investigate whether statements made by Shell Australia Pty Ltd, a subsidiary of Shell PLC, on its website are misleading or deceptive. Specifically, Comms Declare are concerned that Shell PLC's representations around its plan to reach net zero by 2050 are seeking to capitalise on consumer preferences for climate friendly and renewable products when Shell has no intention of significantly altering its business plans as a fossil fuel company.

The Representations

3. Shell makes a number of representations relating to its net zero plan on its "The Energy Future" page on its website (Found at **Annexure A**). In essence, these representations are as follows:

    i. Shell is aiming to become a net-zero emissions energy business by 2050 or sooner;

    ii. Shell provides energy in a responsible way, helping the world move towards a future in which the energy used causes minimal impact on the planet;

    iii. Shells climate targets support the ambitious goal of the United Nations Paris Agreement, which is to limit the global rise of temperature to 1.5 degrees;

T +61 2 9262 6989
E sydney@edo.org.au
F +61 2 9264 2414
W edo.org.au
Suite 8.02, Level 8, 6 O'Connell Street Sydney, NSW 2000
ABN: 72002 880 864

iv. We (Shell) are reducing emissions from our operations and other energy products we sell to our customers;

v. We are transforming our business to meet our target, providing more low-carbon energy such as hydrogen, electricity generated by solar power and investing in carbon farming;

vi. Shell will reduce emissions from our owner operations, including the production of oil and gas, addressing energy efficiency over time, and capturing or offsetting unavoidable greenhouse gas emissions (GHG).

4. Individually these representations lead to the following imputations about the nature of Shell's operations:

    i. Shell genuinely intends to become a net zero business by 2050;

    ii. It aims to take appropriate steps to comply with the Paris Agreement and to conduct its business to keep temperature rises below 1.5 degree;

    iii. It will reduce its emissions;

    iv. It will transform its business model to adopt renewable energy (**the imputations**);

5. These representations and imputations are misleading or deceptive for the following reasons:

    i. Shell is continuing to explore new oil and gas projects which is not consistent with the Paris Agreement;

    ii. Shell is still primarily an oil and gas company and is not transitioning significant portions of its business into renewable or low-carbon energy;

    iii. Shell has no intention of implementing its net zero business plan according to evidence presented to the US House of Representatives;

    iv. Shell's climate targets deliberately exclude the petrochemical and trading parts of their business;

    v. Shell's net zero plan relies heavily on Carbon Capture, Utilisation and Storage (CCUS) and offsets (**misleading claims**);

Misleading or Deceptive Conduct under the Environmental Claims Code

6. Section 1 of the Environmental Claims Code relates to misleading or deceptive conduct in relation to environmental claims. Clause 1 of the Code requires environmental claims in advertising or marketing communication to not be misleading or deceptive or likely to mislead or deceive, to display disclaimers or important limitations and qualifications prominently and represent the attributes or extent of environmental benefits or limitations in a way that can be clearly understood by a consumer. Clause 2 also requires environmental claims to be relevant and explain the significance of the claim, not overstate the claim, or imply the product is more socially acceptable overall.

7. Comms Declare are concerned that the representations made on Shell's website overstate Shells commitment to addressing climate change. The overall conduct of reproducing these representations creates the impression to consumers and investors that Shell is taking responsibility for its environmental impact. It is misleading as far as it suggests that Shell is actively taking steps, that are appropriate given the size, scope, and nature of their impact, to reduce their emissions across their business in a way which is consistent with the Paris Agreement, when this is not the case. We have outlined below how we believe Shells claims breach these provisions of the Code.

Claim 1: Shell is continuing to explore new oil and gas projects which is not consistent with Paris Agreement

8. Despite Shell's representations that it is working towards net zero by 2050 it continues to actively expand gas projects through Australia and has no plan to reduce the overall amount of oil and gas it produces by 2030.[1] This is despite the latest findings by the Intergovernmental Panel on Climate Change (IPCC) about the impacts of fossil fuels and reductions needed to stay on a path to 1.5°C.

> "*Estimates of future CO2 emissions from existing fossil fuel infrastructures already exceed remaining cumulative net CO2 emissions in pathways limiting warming to 1.5°C with no or limited overshoot (high confidence). Assuming variations in historic patterns of use and decommissioning, estimated future CO2 emissions from existing fossil fuel infrastructure alone are 660(460-890) GtCO2 and from existing and currently planned infrastructure 850 (600-1100) GtCO2. This compares to overall cumulative net CO2 emissions until reaching net zero CO2 of 510 (330-710) GtCO2 29 in pathways that limit warming to 1.5°C with no or limited overshoot, and 890 (640-1160) GtCO2 in 3 pathways that likely limit warming to 2°C (high confidence). While most future CO2 emissions from existing and currently planned fossil fuel infrastructure are situated in the power sector, most remaining fossil fuel CO2 emissions in pathways that likely limit warming to 2°C and below are from non-electric energy – most importantly from the industry and transportation sectors (high confidence). Decommissioning and reduced utilisation of existing fossil fuel installations in the power sector as well as cancellation of new installations are required to align future CO2 emissions from the power sector with*

[1] https://www.theguardian.com/business/2021/feb/11/shell-grow-gas-business-energy-net-zero-carbon.

projections in these pathways (high confidence).[2]

9. Despite the IPCC findings, Shell's investment and fossil fuel production have not undergone any meaningful change. Shell still maintains stakes in the Gorgon and North-West Shelf gas projects (which it has no intention of decommissioning) and has recently invested in the new Crux Project, yet another gas project off the north-west coast of Australia.[3] The final investment decision for this proposal was made in May 2022, several months after the dissemination of Shell's net zero 2050 plan.[4] The proposal involves the construction of five new wells and the first production of gas is not expected until 2027.[5]

10. In addition, Shell aims to expand its capacity to export Liquid Natural Gas (LNG) by another 7 million tonnes a year by 2025.[6] Part of this will be acquired through 145 new gas wells built in Queensland over the next three years. Shell Australia Chairman Tony Nunan has been quoted as saying that "gas will be crucial to the energy transition" and that the investment in these projects marked the "next phase" of onshore gas in QLD which will boost the country's "reputation as a global LNG supplier".[7]

11. Globally, Shell continues to seek out and participate in new gas projects including as a partner to QatarEnergy in the North Field East expansion project which will be the single largest project in the history of the LNG industry.[8]

12. The Investor Group on Climate Change (IGCC**)** has provided a guide that assists in determining key matters that it should examine in any net zero or transition plan.[9] It also refers to the need to provide immediate goals to decarbonise, stating "restricting temperature increases to 1.5 degrees requires action to halve emissions by 2030". International research in The Production Gap undertakes an analysis of the decline of coal, gas and oil production needed to stay consistent with 1.5 degrees set out by the IPCC.[10] It emphasises the need for an immediate decline in global fossil fuel production to be consistent with 1.5 degrees. To be consistent with 1.5-degree pathways there is a need for an average decline of 11% for coal, 4% for oil, and 3% of gas between 2020 and 2030. Climate 100 benchmarks suggest that Shell's current targets are not aligned with the goal

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[2] IPCC AR6 Working Group III, Technical Summary, pg. TS-26 Figure TS.8; {2.7.2, 2.7.3, Figure 2.26, Table 37 2.6, Table 2.7.
[3] https://www.shell.com.au/about-us/projects-and-locations/joint-ventures.html.
[4] https://www.shell.com.au/about-us/projects-and-locations/the-crux-project/project-overview.html.
[5] https://www.offshore-energy.biz/shell-seeking-approval-for-development-drilling-on-gas-project-off-australia/; https://www.shell.com.au/about-us/projects-and-locations/the-crux-project/_jcr_content/par/relatedtopics_1767396225.stream/1645524028533/7ac43a52eacd2a24574bcb79b70257c093244a8a/crux-drilling-ep-factsheet-final-feb.pdf.
[6] https://www.theguardian.com/business/2021/feb/11/shell-grow-gas-business-energy-net-zero-carbon.
[7] https://www.smh.com.au/business/companies/shell-s-next-phase-in-australia-includes-drilling-145-new-gas-wells-20220208-p59upu.html.
[8] https://www.shell.com/media/news-and-media-releases/2022/shell-to-participate-in-qatars-lng-expansion.html.
[9] Corporate Climate Transition Plans: A Guide To Investor Expectations.
[10] The Production Gap, Special Report 2020- pg. 15.

of limiting global warming below 1.5 degrees as set out in the Paris Agreement and by the IPCC because their production is not reducing by 4% per year.

Claim 2: Shell is still primarily an oil and gas company and is not significantly transitioning its business into renewable energy

13. Shell is primarily an oil and gas company. Between 2010 and 2018, Shell was estimated to have dedicated just 1% of its long-term investments to sources of low-carbon energy like wind and solar, and in 2015-2017 only 0.4% of its revenue to low-carbon technology R+D.[11]

14. In Australia, Shell is yet to introduce Electric Vehicle (EV) charging. Shell Australia Chair, Tony Nunan said that "Shell was continuing to search for the right opportunities locally to expand its offering into EV charging stations."[12]

15. Shell's total capital expenditure for 2019 was listed as $22.9 billion, and for 2020 was $16.5 billion. Shell's 2020 Annual Report lists its near-term investment priorities as including $2-3 billion per year in its 'Renewables and Energy Solutions' low-carbon business. Integrated Gas, Chemicals and Products and Upstream fossil fuels are slated to receive a total of around $17 billion.

16. According to the Climate Action 100+ Benchmark Assessments, whilst Shell does have "ambitions" to reach net zero by 2050 it has not aligned its capital allocation (investments) with its targets. This highlights a more prominent issue with Shell's plans, specifically that it only partially meets the criteria in terms of its decarbonisation strategy. For example, Shell does identify the actions it intends to take but it does not quantify them. In addition, Shell does not specify the role of "green revenues" and does not show any intent to increase the share of green revenues in its overall sales.

17. Shell's carbon targets for the next 14 years are based upon the "carbon intensity" of its energy. In effect, this allows Shell to meet these targets without any reduction in absolute emissions, relying entirely on an increase in sales of clean energy alternatives to lower the intensity of energy overall.[13]

18. Shell has stated in its Emissions Explainer that "scope 3 emissions are out of Shell's operational control."[14] Their Powering Progress Strategy therefore makes no claim that they will stop selling products that contribute to scope 3 emissions such as oil and gas. Instead, their strategy relies heavily upon offering additional low and zero-carbon

[11] https://www.clientearth.org/projects/the-greenwashing-files/shell/
[12] https://thedriven.io/2021/03/25/shell-searching-for-right-opportunities-for-australian-ev-charging-and-hydrogen/.
[13] https://www.theguardian.com/business/2021/feb/11/shell-grow-gas-business-energy-net-zero-carbon.
[14] https://fourleafdigital.shell.com/webapps/climate_ambition/downloads/EmissionsExplainer.pdf.

products, into which they have so far invested little, with a goal to "encourage" decarbonisation through shifting demand away from fossil fuel-based products.[15]

Claim 3: Shell has no intention of implementing its net zero business plan according to evidence presented to the US House of Representatives

19. The Congress of the United States, House of Representatives, Committee on Oversight and Reform released a Memorandum in September 2022 on the investigation of fossil fuel industry misinformation.[16] The Committee's investigation has shown that, rather than outright deny global warming, the fossil fuel industry has "greenwashed" its record through deceptive advertising and climate pledges—without meaningfully reducing emissions.[17] Shell has touted its "Sky scenario" as an ambitious path to achieve net zero emissions, but internal emails emphasize this is "not a Shell business plan" and has "nothing to do with our business plans."[18] Internal Shell messaging guidance—which was developed to "insulate Shell" from lawsuits about "greenwashing" and "misleading investors" on climate change—called on employees to emphasize that net-zero emissions is "a collective ambition for the world" rather than a "Shell goal or target." The guidance urges Shell employees, "Please do not give the impression that Shell is willing to reduce carbon dioxide emissions to levels that do not make business sense."[19]

20. Shell divests carbon-intensive assets by selling them to other fossil fuel companies "to enhance our operations' average energy intensity...[but] has no immediate plans to move to a net-zero emissions portfolio."[20] Shell's "Sky scenario" for reaching net-zero emissions—which relies in part on widespread implementation of unproven carbon capture and storage technology—is "not a Shell business plan, but a technically possible, although challenging scenario for how global society might meet the goals of the Paris Agreement."[21]

21. In 2018, after releasing Shell's Sky scenario, Shell made disclaimers "While we seek to enhance our operations' average energy intensity through both the development of new projects and divestments, we have no immediate plans to move to a net-zero emissions portfolio over our investment horizon of 10-20 years. Although, we have no immediate plans to move to a net-zero emissions portfolio, in November of 2017, we announced our ambition to reduce our net carbon footprint in accordance with society's implementation

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[15] Ibid.

[16] https://oversight.house.gov/sites/democrats.oversight.house.gov/files/2022.09.14%20FINAL%20COR%20Supplemental%20Memo.pdf

[17] House of Representatives, 117th Congress of the United States (2021-2022) Committee on Oversight and Reform. Memorandum: Investigation of the Fossil Fuel Industry (24 September 2022). https://oversight.house.gov/sites/democrats.oversight.house.gov/files/2022.09.14%20FINAL%20COR%20Supplemental%20Memo.pdf p. 1-2.

[18] Ibid, pg. 3.

[19] Ibid, pg. 3.

[20] Ibid, pg. 7.

[21] Ibid, pg. 12.

of the Paris Agreement's goal of holding global average temperature to well below 2°C above pre-industrial levels".[22]

22. Internal messaging guidance obtained by the Committee set out Shell's efforts to keep the Sky scenario and the company's climate pledges vague and to avoid making commitments to reduce emissions.[23] For example, in company emails an executive, Ms. Powers replied that other colleagues were already preparing material for the rollout of Shell's "Net Zero Emissions ambition"—in other words, Shell's climate plan. Ms. O'Connor explained in response: "[T]he brand campaign focused on Shell's climate ambition is a different topic to the U.S. Net Zero Emissions 2050 thought-leadership material … I don't think I want to link the two in the same post or article because one impacts Shell's business portfolio and one is a scenario and so nothing to do with our business plans, but if we're not careful we could easily confuse external stakeholders if we start ta[l]king about both together."[24]

23. An internal Shell email discussing carbon capture, utilization, and storage (CCUS) warned an executive, "We want to be careful to not talk about CCUS as prolonging the life of oil, gas or fossil fuels writ large."[25]

Claim 4: Shell's climate targets do not include all aspects of their business and exclude petrochemical and trading parts of their business

24. The Climate Action 100+ Net Zero Company Benchmark found that Shell only meets some of the Benchmark's targets criteria – Shell does not have both an ambition to reach 'net-zero' and net zero-aligned short, medium, and long-term GHG reduction targets, which cover all its relevant emissions. Its emissions targets do not include its petrochemical operation. Shell's targets are limited to its own 'Net Carbon Footprint' metric. Despite the massive climate impacts of petrochemicals used for plastics, Shell's Scope 3 net-zero target is limited to energy products – and entirely excludes its petrochemicals business, which supplies 17 million tonnes of chemicals per year. The company also opts not to count some of its large fossil fuel trading operations.

Claim 5: Shell's net zero plan relies heavily on CCUS and offsets

25. Shell says it plans significant growth in CCUS and 'nature-based offsets,' including through planting trees, alongside continued fossil fuel production. This goes against industry

[22] House of Representatives, 117th Congress of the United States (2021-2022) Committee on Oversight and Reform. Memorandum: Investigation of the Fossil Fuel Industry (24 September 2022). https://oversight.house.gov/sites/democrats.oversight.house.gov/files/2022.09.14%20FINAL%20COR%20Supplemental%20Memo.pdf pg. 16.
[23] Ibid, pg. 16.
[24] Ibid, p. 19.
[25] Ibid, pg. 2.

guidance, which states that offsets should not be used as an alternative to absolute reductions, but only for residual or unavoidable emissions. The Science-based Targets initiative, for instance, under its Net Zero Standard, does not accept the use of offsets to contribute towards near-term emissions reduction targets, with credits only being accepted in relation to the neutralisation of residual emissions or to finance additional climate mitigation beyond absolute reduction targets.[26] Similarly, the investor group IGCC states that *"over-reliance on offsets and nature-based solutions potentially delays efforts to abate emissions within a company's value chain and may not account for the limited land and space available to host additional tree coverage or overestimates carbon storage potential."*[27]

26. Shell also relies heavily on CCUS in its Plans. The IPCC has confirmed that CCUS involves risks in its recent reports, stating that "*Implementation of CCS currently faces technological, economic, institutional, ecological-environmental and socio-cultural barriers. Currently, global rates of CCS deployment are far below those in modelled pathways limiting global warming to 1.5°C or 2°C."*[28] The IGCC has also stated that "*The economic and technological challenges posed by CCUS are significant. Simply put, if CCUS cannot be commercialised and used at scale, gas demand may drop further as alternatives like green hydrogen and/or renewables with storage mature.*[29] The International Energy Association (IEA) CCUS tracking report states that in 2021, *"only one commercial power plant equipped with CCUS...[remained]... in operation". Moreover, the IEA tracking report states that "[b]ased on projects currently in early and advanced deployment, the potential capture capacity of all CCUS deployment in power is projected to reach 60 Mt C02 in 2030 – well short of the 430 Mt CO2 per year in the Net Zero Emissions by 2025 Scenario."*[30]

27. Shell's published pathway for the world to meet the Paris 1.5C goal also includes a continued significant role for fossil fuels even in 2100 and relies on massive CCS use and planting trees over an area roughly the size of Brazil.

International actions brought against Shell

28. In May 2021, a court in the Netherlands ruled that Shell must reduce its emissions. Specifically, Shell must cut its CO2 emissions by 45% compared to 2019 levels across both emissions from its own operations and emissions from the use of the oil it produces. It

[26] SBTI, Does SBTi accept all approaches to reducing emissions? https://sciencebasedtargets.org/faqs#does-the-sbti-accept-all-approaches-to-reducing-emissions.
[27] IGCC, Corporate Climate Transition Plans: A guide to investor expectations. https://igcc.org.au/wp-content/uploads/2022/03/IGCC-corporate-transition-plan-investor-expectations.pdf, pg. 8.
[28] IPCC, Sixth Working Group- Climate Change 2022-Mitigation of Climate Change,https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_SPM.pdf, pg. 32, C4.6

[29] Investor Group on Climate Change, A changing climate for Australian Gas- a new 1.5°C scenario analysis of new Australian gas projects, pg. 22
[30] https://www.iea.org/reports/ccus-in-power.

found that:

> *the CO2 emissions which RDS (Royal Dutch Shell) can be held responsible by their nature pose a very serious threat with a high risk of damage to Dutch residents and the inhabitants [of] the Wadden region and with serious human rights impacts. This applies to both current and future generations. A characteristic feature of dangerous climate change is that every emission of CO2 and other greenhouse gases, anywhere in the world and caused in whatever manner, contributes to this development. In turn, each reduction of greenhouse gas emissions positively contributes to countering dangerous climate. After all, each reduction means that there is more room in the carbon budget. RDS is able to effectuate a reduction by changing its energy package. This all justifies a reduction obligation concerning the policy formation by RDS for the entire, globally operating Shell group.*[31]

29. The Dutch Advertising Standards also ruled on a Shell advertisement that claimed that it was "the driver of energy transition" and "we're changing." It found:

> *The Commission considers it plausible that the average consumer will interpret the contested statement in such a way that Shell is currently undergoing a process of change in which it is changing its core strategic activity, also known as its core business, and is already investing to a significant extent in renewable energy at the expense of fossil fuels. After all, the announcement that Shell is turning into one of the biggest drivers of the energy transition implies that this process has already started and that a real change in the core business is taking place. However, as acknowledged, it has been established that, in addition to investing in transition projects, Shell is currently maintaining its investments in fossil fuels and is only phasing out very slowly. In that situation, the Commission considers it unjustifiable for Shell to refer to itself as "one of the biggest drivers of the energy transition", giving the impression that it is an initiator and accelerator of the transition.*[32]

30. Similar decisions have been observed by the Ad Standards Authority (ASA) in the United Kingdom, specifically in relation to Shell's "Drive Carbon Neutral" campaign.[33] The ad proposed that by paying a small amount extra per litre on fuel you could offset your emissions using carbon credits. The UK Ad Standards found the advertisement misleading because a listener would believe a fuel for which Shell would offset the carbon emissions related to that fuel purchase such that the customer could "Drive carbon-neutral" when this was not the case as it related to joining a loyalty program. More generally, the UK ASA

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[31] District Court of The Hague, *Milieudefensie et al. v Royal Dutch Shell PLC* (26 May 2021) C/09/571932/HA ZA 19-379, English Version (*Milieudefensie v RDS*) para 4.4.54.

[32] https://verbiedfossielereclame.nl/shell-may-not-call-itself-driver-of-the-energy-transition-rules-dutch-ad-watchdog/.

[33] https://www.asa.org.uk/rulings/shell-uk-ltd-g20-1049869-shell-uk-ltd.html.

has reviewed many environmental claims and identified several issues for follow up action including:

> *Aspirational claims about advertisers' intentions to transition to net zero by particular dates (for example, 2030 or 2050), and the appropriate evidence needed to back up such claims.*
>
> *Claims by high-emitting companies, which focus on narrow environmentally beneficial aspects of their businesses but may not provide a complete picture of their overall environmental impact.*[34]

31. In the United Kingdom, ClientEarth has recently brought legal action against Shell's Board of Directors on the basis that it has put the long-term value of the company at risk by failing to adequately prepare for its transition to net zero.[35] ClientEarth's claim asserts that by mismanaging foreseeable climate risks the Board of Directors is in breach of its legal duties. ClientEarth cites the overreliance upon the 'carbon intensity' of energy, the failure to address scope 3 emissions and continued investment in fossil fuels as issues with Shell's Energy Transition Plan which bring into question the long-term viability of the company. By focusing on these issues, it is possible to see that there is a disconnect between Shell's public climate commitments and Shell's business plans. ClientEarth's claim argues that this disconnect opens Shell up to market and societal shifts (which Shell are trying to avoid through greenwashing) which could cause limitations on its operations. Furthermore, it exposes Shell to potential legal issues in the future and ensures that Shell fail to capitalise on opportunities presented by renewable energy projects.

32. In the United States, the state of New Jersey has filed a lawsuit against Shell and four other major oil companies.[36] The lawsuit alleges that the companies have known about the impact of fossil fuels on the climate for decades. Despite this the oil majors have intentionally withheld this information and engaged in campaigns of misinformation. The lawsuit ultimately seeks monetary penalties for the environmental damage that the defendants have caused to the climate and in particular the state of New Jersey.

Harm associated with the conduct

33. Greenwashing causes harm on multiple fronts. As established above, the conduct engaged in by Shell is misleading and deceptive. Moreover, the representations both explicitly and implicitly overstate Shell's positive impact on addressing climate change by supposing that they are actively meeting their net zero by 2050 target. This gives the false impression to its audience that Shell's products are meeting the "growing demand for cleaner energy." The latest scientific information about the impact of fossil fuels on global

[34] https://www.asa.org.uk/news/asa-statement-on-world-environment-day.html.
[35] https://www.clientearth.org/redirecting-shell/.
[36] http://climatecasechart.com/wp-content/uploads/sites/16/case-documents/2022/20221018_docket-MER-L-001797-22_complaint.pdf.

warming highlights how this kind of conduct can be so damaging. The IPCC has found that emissions from fossil fuels are the dominant cause of global warming and must be reduced by 45% from 2010 levels by 2030 if global warming is to be limited to 1.5 degrees (in line with the Paris Agreement).[37] This 1.5-degree limit is based upon the scientific understanding that warming beyond this range risks sea levels rising and an increase in extreme weather events, biodiversity loss and species extinction, as well as food scarcity, worsening health and poverty for millions of people worldwide.[38] Shell plays a particularly important role in this process given that its emissions account for 1.6% of the global carbon budget and it is one of the top 10 emitters in the world.[39]

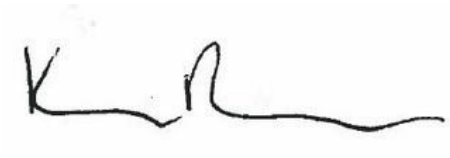
34. In addition, misleading net zero claims provide consumers with the impression that purchasing Shell products is socially acceptable on the basis that it is undertaking steps to improve its business operations and investing significantly in less emissions intensive and renewable energy, when this is not the case. In this way, Shell is capitalising on green steps it was not prepared to take thus potentially increasing its revenue and its environmental harm.

35. Overall, greenwashing serves to reduce consumer trust in green products as it becomes difficult to differentiate between genuine and bogus claims. As such, there is a broader public policy benefit to be had from strict enforcement of green claims.

If you have any further queries, please do not hesitate to contact me by email on Kirsty.ruddock@edo.org.au or by phone at (02) 7229 0031.

Yours faithfully

Environmental Defenders Office



Kirsty Ruddock

Managing Lawyer

Safe Climate (Corporate and Commercial)

[37] IPCC, Special Report: Global Warming of 1.5 degrees -Summary for Policymakers C.1 https://www.ipcc.ch/sr15/chapter/spm/.
[38] IPCC, Special Report: Global Warming of 1.5 degrees -Summary for Policymakers- https://www.ipcc.ch/sr15/chapter/spm/.
[39] https://www.theguardian.com/environment/2019/oct/09/revealed-20-firms-third-carbon-emissions.

Annexure A – Shell Website Advertisement

The Energy Future

Date	Document Name	Relevant Extracts	Target Audience (Assumed)	Link
Accessed September 2022	The Energy Future (Australian Website)	"Our climate target. Shell is aiming to become a net-zero emissions energy business by 2050 or sooner." "We Intend to meet our customers' demand for cleaner energy, keeping in pace with society." (Exhibit 1)	Investors in Australia Customers and the Community	Energy and Innovation/The Energy Future
Accessed September 2022	Sustainability and Environment (Australian Website)	"Shell provides energy in a responsible way, helping the world move towards a future in which the energy used causes minimal impact on the planet." (Exhibit 2)	Investors in Australia Customers and the Community	Sustainability and Environment
5 August 2022	The Energy Future: A Journey (Australian Website) Posted on Shell Youtube Page	"Becoming a net-zero emissions energy business by 2050 in-step with society. Nice words, you say, but what does it actually mean? Well, it means net-zero emissions when we produce and process energy, and net-zero emissions when people use the energy we sell. This is the target at the heart of our Powering Progress strategy, and it supports the more ambitious goal of the United Nations Paris Agreement, which is to limit the global rise of temperature to 1.5 degrees Celsius above pre-industrial levels." (Exhibit 3)	Customers and the Community	How is Shell Working Towards Net Zero Video

Accessed September 2022	The Energy Future: A Journey (Australian Website)	"Becoming a net-zero emissions energy business means that we are reducing emissions from our operations, and other energy products we sell to our customers. It also means capturing and storing any remaining emissions using technology or balancing them with offsets." (Exhibit 1)	Investors in Australia Customers and the Community	Energy and Innovation/The Energy Future
Accessed September 2022	The Energy Future: A Journey (Australian Website)	"We are transforming our business to meet our target, providing more low-carbon energy such as hydrogen, electricity generated by solar power and investing in carbon farming. We are also working with our customers as they make changes too, including in sectors that are difficult to decarbonise such as aviation, shipping, road freight and industry. It is going to take a lot of work. We are on a journey and recognise the need to change." (Exhibit 1)	Investors in Australia Customers and the Community	Energy and Innovation/The Energy Future
Accessed September 2022	The Energy Future: Our Approach (Australian Website)	"Shell will reduce emissions from our own operations, including the production of oil and gas, addressing energy efficiency over time and capturing or offsetting unavoidable greenhouse gas emissions. Most GHG emissions come from our customers' use of our products. So we are also looking for ways to help customers cut these emissions." (Exhibit 1)	Investors in Australia Customers and the Community	Energy and Innovation/The Energy Future

Exhibits

Exhibit 1:

Exhibit 2:

ENVIRONMENT

Shell provides energy in a responsible way, helping the world move towards a future in which the energy used causes minimal impact on the planet.

Shell recognises that sustainability and public engagement must underpin energy sector development. As one of the world's leading energy companies, Shell is committed to publicly reporting on our Health, Safety, Security and Environment and Social Performance outcomes.

Before Shell begins substantial work on major projects or existing facilities, regulatory, environmental and social impacts are assessed, alongside commercial and technical considerations. This process includes environmental, social and health impact assessments to help understand and manage risks and opportunities. We also consider the potential cost of a project's CO_2 emissions in all major investment decisions.

Exhibit 3:


How is Shell
accelerating
to net zero?