



# Communicating carbon pricing

Sharing the experience of Royal Dutch Shell plc



**David Hone**

Chief Climate Change Adviser, Shell International Ltd.

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# Shell has a long history in this space



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June 24, 2009

The Honorable Nancy Pelosi  
Speaker of the House  
U.S. House of Representatives  
Washington, DC 20515

Dear Madam Speaker,

Shell Oil Company has long supported a market-based approach to addressing the critical issue of climate change. We are encouraged that The American Clean Energy and Security Act of 2009 (ACESA) is based on such an approach and we support the continued momentum of this legislation in the House of Representatives.

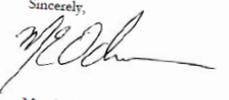
Shell is pleased that this legislation is part of the Waxman and the efforts of the USCA Partnership (USCAP), of which we are a member. In our view, the bill provides notable improvements over the Waxman and the efforts of the USCA Partnership and the removal of an offset program and the creation of a new offset program and the creation of a new offset program.

We appreciate the collaborative progress, but not enough, equal protection of energy do not cover our process allocated to protect the support addressing this. Finally, we need transparent and-trade program and the

Marvin Odum Letter to The Honorable Nancy Pelosi  
June 24, 2009  
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Shell is committed to helping the 111<sup>th</sup> Congress enact a fair and effective cap and trade program at the lowest possible cost to consumers and the economy. We recognize the value of such a program and we support the continued momentum of this legislation in the House of Representatives.

ACESA is a step in the right direction. We will continue our efforts to improve this legislation and we support the continued momentum of this legislation in the House of Representatives.

Sincerely,  


Marvin E. Odum  
President  
Shell Oil Company

## Waves of change

### CLOUD THE ISSUE OR CLEAR THE AIR?

#### The Role of Emissions Trading within Europe

The climate change debate has moved from the international stage of frameworks and protocols to the reality of finding practical solutions that work. Business wants to see systems that deliver environmental improvements in an efficient and economic way.

**A Solution at Hand**  
Investment prospers in a stable regulatory environment and conversely, is threatened by uncertainty and constant change. Investment decisions on the table now are dependent on such a stable environment in the lead up to and throughout the period governed by the Kyoto Protocol. So, the Kyoto Protocol and the constraints it imposes are real issues for business right now. The need to reduce greenhouse gas emissions has introduced a degree of uncertainty into Europe's future. How will it be achieved? What is required? Will it be very expensive? Will today's policies deliver the results in years to come? One solution to these issues is for governments to allocate a fixed number of emission allowances to industry covering the period 2005 to 2012, together with the right to trade these allowances. Such a move would have far-reaching consequences. With mandatory participation, it would give governments the confidence that the sector would deliver its share of the Kyoto burden and put an industry viewpoint, a clear and understandable business environment would exist for many years into the future. Concerns targets could be put to one side, allowing business to meet investment and growth.

**Investment and Trading**  
The right to trade allowances is not just a mechanism to ensure targets are met at the end of each year. Since commodity trading began, producers have sold their goods at fixed prices for into the future to ensure a return on their capital investment. Similarly, a technology to reduce emissions, which in turn would support business growth. Such a market cannot exist though, without allocation now for the years to come. Allocation on a piecemeal basis would be self-defeating, undermining the very reason for limiting participation in the market to emitters only would have a similar self-defeating effect. Commodity markets depend on similar volume or liquidity to succeed, particularly in the further out years. This could be achieved by encouraging non-emitting parties to enter such as banks or investment funds.

**Allocation is the Issue**  
Setting the emissions start and end points for a facility establishes historical emissions that will be allocated to it. Measuring end point is mainly set by the total reduction required by the sector. For a given facility either could be adjusted to account for an emissions reduction scheme could have a higher end point than one that isn't. The end point would not include a business growth and this undermines the overall environmental integrity. Growth is made way for by investing in emission reductions or purchasing additional allowances. Allowances should be granted free of charge. A charge will reduce the funds available for investment to reduce emissions. Even a scheme that "recycles" any charges back to industry, will impact medium term cash flow, and hence investment, because of the considerable lag between collection and redistribution. Governments should maintain an allowance reserve for allocation to new entrants and special circumstances, such as allocation to cover emission increases in the industrial sector which result in larger emission decreases for the wider economy.

**The Cost of Kyoto?**  
The cost of meeting the Kyoto obligations is a prime consideration. There is the transparent cost of emission reduction through, for example, energy efficiency measures and there is the hidden cost of the process chosen to achieve the result. Ongoing policy change and continuous one-on-one negotiation with governments will be a high cost route to Europe's goal. Utilising the market and allowing trade to flourish is a low or even zero cost undertaking. Active markets are typically self-funding with a natural tendency to drive any direct costs downwards over time.

An established market will allow participants to seek the lowest cost emission reduction opportunities and make the important decision of "invest directly or buy allowances". Today, the important taxes, negotiated agreements and early policy implementation burdens some parts of Europe with effective carbon costs of well over \$20 per tonne of carbon dioxide. Such levels are well necessary to achieve widespread reductions. Shell's experience in 1990 levels by 2002, suggests that costs can be kept considerably lower when companies are given the flexibility to widely seek the discussion in Europe today is well suited to this task.

An emissions trading system, if based on the principles of absolute caps, mandatory participation and free and fair allocation, will give rise to an investment environment which will deliver, at minimum cost, the greenhouse gas reductions that industry needs to play its role in finding solutions to climate change.

We welcome your input. Contact us on the internet at [www.shell.com/climate](http://www.shell.com/climate)  
Our climate change team in London is on +44-20-7934 6012 and at Shell International Limited, Shell Centre, York Road, London, SE1 7NA, UK.

# FINANCIAL TIMES

WORLD BUSINESS NEWSPAPER

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The threats to the software group's mobile success - PAGE 19

Mauvaises vacances  
A French writer's critique of her country's long holiday culture - PAGE 11

Why this war?  
Even Libya's soldiers cannot make sense of the conflict - PAGE 9

Injured Kerry bows out of Iran talks

John Kerry, the US secretary of state, has cancelled the remainder of his European diplomatic tour after breaking his right knee in a bicycle crash yesterday near Geneva, where he had been holding negotiations with French foreign minister Michel Barthod. The crash, which occurred on the way to the US Embassy in Paris, was the result of a negotiation between a small plane and the sides working to seal a deal on the Iran nuclear deal. Kerry, who is recovering from the crash, is expected to return to Washington on Tuesday, but it is unclear whether he will be able to complete his tour.

European energy groups seek UN backing for carbon pricing system

Six companies include Shell and BP • US oil majors shun push for global mechanism

European energy groups are seeking UN backing for a carbon pricing system, but US oil majors are shunning the push for a global mechanism. The groups, including Shell and BP, are seeking UN backing for a carbon pricing system, but US oil majors are shunning the push for a global mechanism. The groups, including Shell and BP, are seeking UN backing for a carbon pricing system, but US oil majors are shunning the push for a global mechanism.

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China's real estate sales surge in April

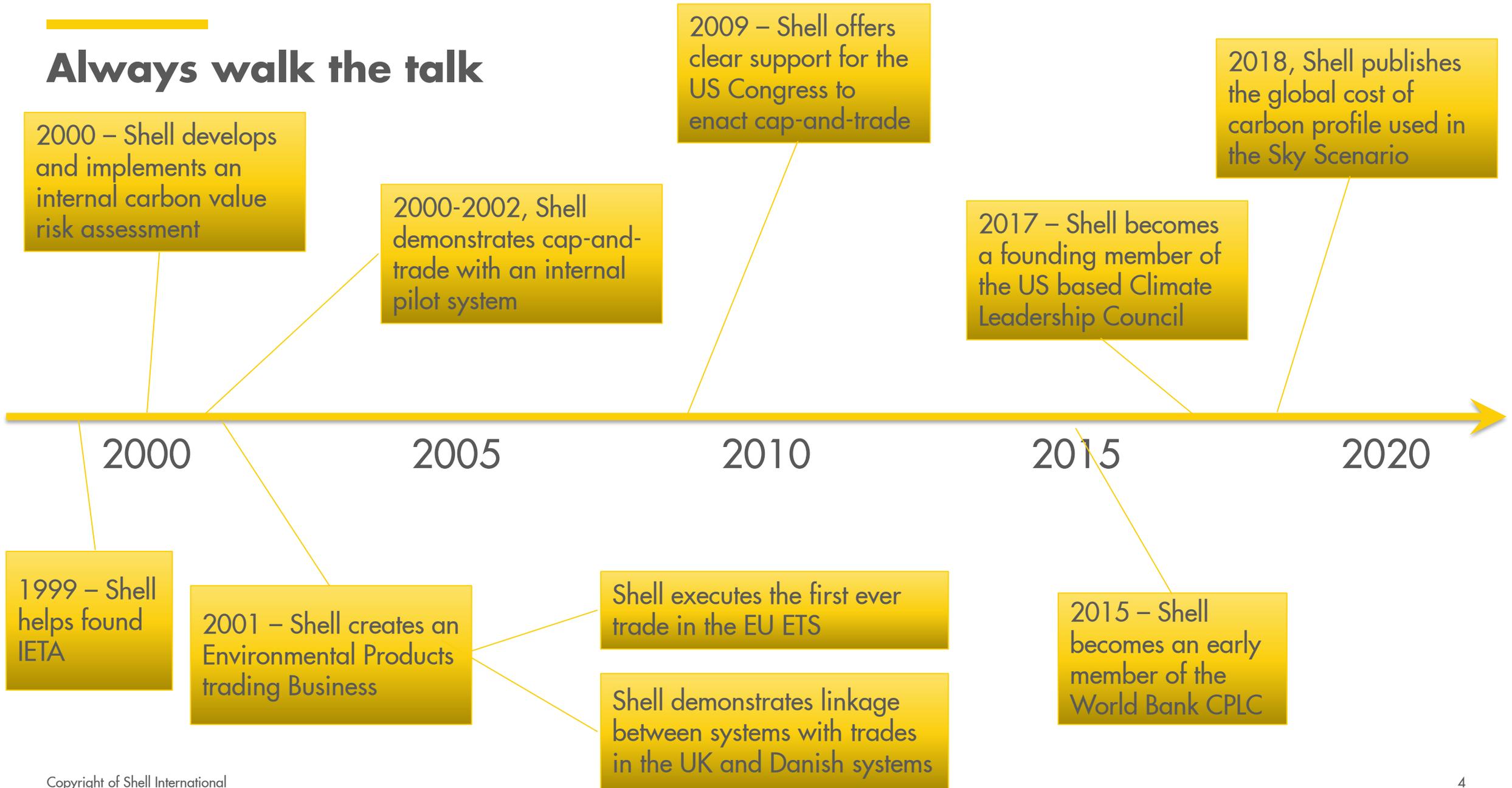
China's real estate sales surged in April, with new home sales rising 10.1% from a year earlier. The surge was driven by a combination of factors, including a loosening of credit controls and a rise in home prices. However, the surge was also driven by a combination of factors, including a loosening of credit controls and a rise in home prices.

US oil majors shun push for global mechanism

US oil majors are shunning the push for a global mechanism. The groups, including Shell and BP, are seeking UN backing for a carbon pricing system, but US oil majors are shunning the push for a global mechanism.



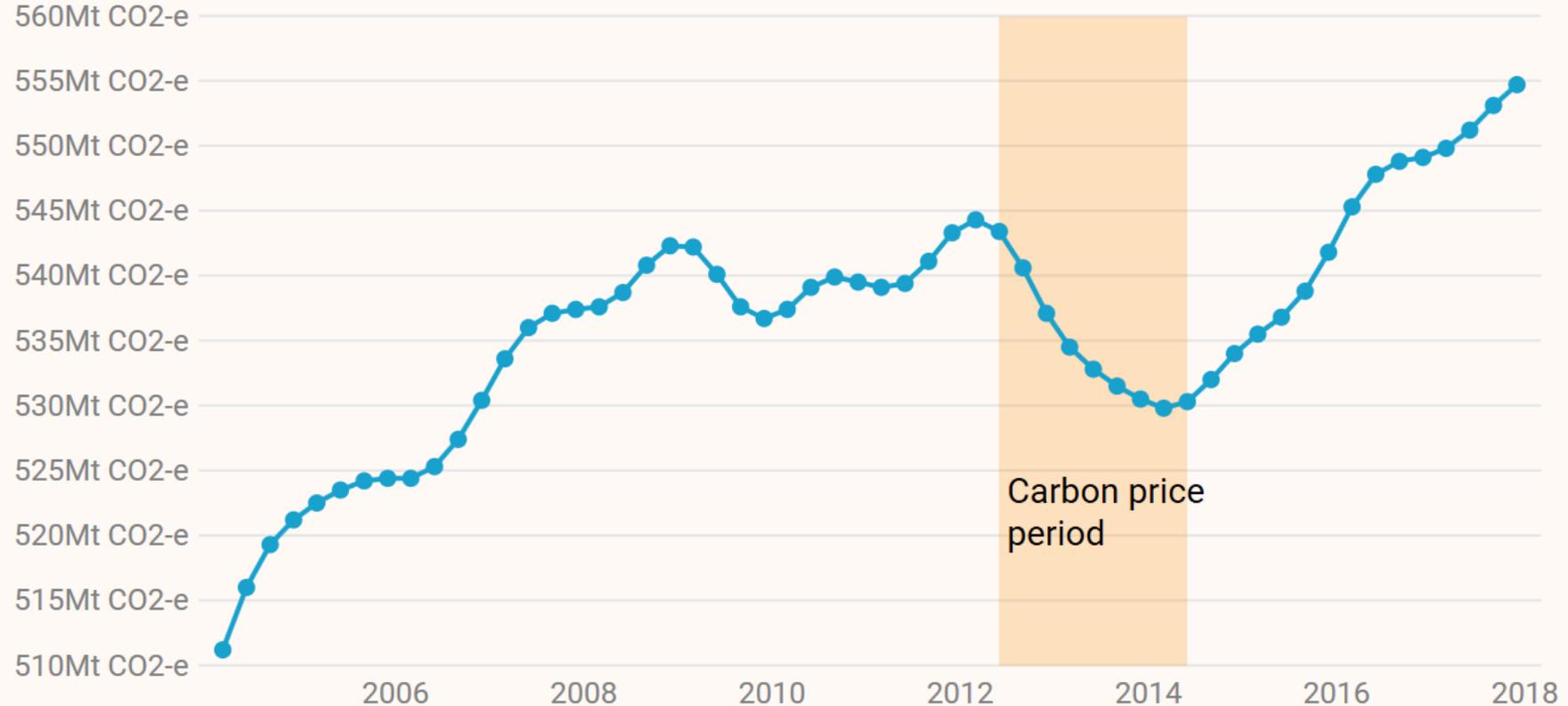
# Always walk the talk



## Use powerful examples to demonstrate impact

### Carbon pricing policy implementation in Australia Total annual greenhouse gas emissions (excl LULUCF)

LULUCF = Land Use, Land Use Change, and Forestry



# Don't confuse external policy with internal risk management

The term 'carbon pricing' is used interchangeably to describe both;

- ❑ The prevailing price in a government implemented system, such as a carbon tax;
- ❑ The carbon value used internally by a company to assess risk on projects operating under existing or anticipated government implemented systems.

These are not the same thing. It can lead to confusion, for example;

- ❑ That companies have an internal 'carbon tax system'.
- ❑ That companies drive change on the basis of risk assessment (only partly true in some circumstances).

Better to differentiate;

- ❑ Government led / Government implemented carbon pricing systems.
- ❑ Internal carbon value (for risk assessment)

# Always follow anti-trust guidelines (1)

Whilst you should obtain your own legal advice, it is generally legitimate to discuss with other industry participants and share genuinely public domain information to support the adoption and effective operation of government regulated carbon pricing programs and systems, including;

- ❑ The use, or not, of a government led carbon price and costs/benefits of same.
- ❑ Impact of carbon pricing at a very high level on the industry's ability to innovate and offer new products.
- ❑ Impact of government led carbon pricing on the industry's transition to clean energy.
- ❑ Experience and views on mechanisms to reduce carbon emissions.
- ❑ Efforts to influence governments to adopt carbon pricing mechanisms.

A broader and more in-depth discussion can be held with government representatives.

## Always follow anti-trust guidelines (2)

Whilst you should obtain your own legal advice, participants must not discuss or agree on any competitively sensitive matters relating to carbon pricing in any industry in which they compete.

- ❑ Profits, margins, premiums, prices, surcharges, discounts on specific products or services, including the impact of carbon pricing and / or the use of internal carbon screening.
- ❑ Unit/variable costs (but not carbon costs) associated with specific products or services.
- ❑ Whether and at what level (percentage or absolute value) to incorporate the cost of carbon in setting prices for products they sell.
- ❑ Specific investment decisions (e.g., to build a new plant) and competitive strategies and the impact of carbon pricing on such decisions.

A broader and more in-depth discussion can be held with government representatives.

