



Climate Council of Australia

Submission to: Australian Competition and Consumer Commission,
[Environment and Sustainability Claims - Draft Guidance for Business](#)

Addressed to: EnforcementCoordination@acc.gov.au

Submission from: Climate Council of Australia Ltd
PO Box 1267, Potts Point 2011
Tel: 02 9356 8528
Email: info@climatecouncil.org.au

15 September 2023

About the Climate Council

The Climate Council is Australia's own independent, evidence-based organisation on climate science, impacts and solutions.

We connect decision-makers, the public and the media to catalyse action at scale, elevate climate stories in the news and shape the conversation on climate consequences and action, at home and abroad.

We advocate for climate policies and solutions that can rapidly drive down emissions, based on the most up-to-date climate science and information.

We do this in partnership with our incredible community: thousands of generous, passionate supporters and donors, who have backed us every step of the way since they crowd-funded our beginning as a non-profit organisation in 2013.

To find out more about the Climate Council's work, visit www.climatecouncil.org.au.

Introduction and context

Australians are in the midst of a climate crisis. From megafires to megafloods, heatwaves and drought, unnatural disasters and extreme weather events are happening more often, and becoming more severe.

This is climate change, and it's caused by burning fossil fuels. Coal, oil and gas are the largest contributors to the climate crisis, accounting for almost 90% of global carbon dioxide emissions from human activities (IEA 2019). This has dramatically raised the concentration of greenhouse gases in our atmosphere, rapidly warming our climate by around 1.2 degrees Celsius (°C).

Decisions made today will determine whether we are able to hold this warming as close as possible to 1.5°C, or tip into escalating climate disasters as temperature rises breach 2°C or even 3°C. To prevent further and potentially catastrophic harm from climate change, all policy-makers, businesses, and industries must start pulling in the same direction: towards deep and rapid cuts to our greenhouse gas emissions this decade. Australian businesses can and must be a part of the solution, but need the right incentives and regulatory frameworks in place to kickstart a genuine energy transformation. The fossil fuel industry, in an effort to stop this from happening, uses widespread greenwashing tactics to actively delay the market shift away from their harmful products. This must stop.

The draft guidance on [Environmental and sustainability claims](#), issued by the Australian Competition and Consumer Commission (ACCC) in July 2023, provides an important and much-needed opportunity to strengthen and clarify the obligations Australian businesses have when making claims about their environmental impact. As noted in the guidance, greenwashing can lead to substantial economic and environmental harm. It is the Climate Council's view that regulatory action should prioritise ensuring that high polluting industries are not engaging in greenwashing, or making unsubstantiated environmental claims that downplay the outsized role these companies play in fuelling the climate crisis.

Serious and systemic greenwashing from high-polluting industries does real harm. It can confuse and mislead individual consumers, who may be unaware they are being presented with inaccurate information. It leaves businesses who are making genuine efforts to reduce their emissions at a disadvantage to their competitors, who get to benefit from making the same environmental claims without putting in the work. And as Australia responds to the urgency of the climate crisis, it delays and diverts critical investment away from the sectors and projects that will actively reduce emissions, and create thriving, new, clean energy industries.

It is therefore the Climate Council's recommendation that the draft guidelines issued by the ACCC be substantially strengthened to explicitly address and enforce accuracy in climate-related claims from high-polluting industries. This should include sending a clear message to high-polluting industries, and in particular the fossil fuel industry, that they must not:

- Make environmental claims about net zero when they are in the process of opening up new fossil fuel projects

- Make environmental claims that rely on extensive use of offsets rather than genuine emissions cuts
- Make environmental claims that do not consider the full lifecycle emissions of their product.

This submission explains how claims such as these are right now being used by the fossil fuel industry to obscure their ongoing contribution to climate change and gain a commercial advantage through ongoing social and political licence. This is unjustified in light of their actual business actions.

As global temperatures rise and communities all over the world live through the escalating impacts of the climate crisis, coal, oil and gas corporations use unsubstantiated environmental and sustainability claims to make their products seem less harmful to the environment than scientific consensus clearly shows they are. This practice is inconsistent with the intent of Australian consumer law - which is to ensure businesses provide clear and accurate representation of their goods and services to the community and markets.

When high polluting corporations - particularly those in the fossil fuel industry - obscure their real impact on climate change and their efforts to tackle this, it substantially harms other clean energy and clean industry businesses, misleads consumers about what real climate action looks like, and disrupts fair market principles which enable the efficient allocation of capital. In this context, stronger regulation of environmental and sustainability claims made by high polluting corporations should be a priority focus for the ACCC - starting with strong and clear guidance to the industry through the Commission's final guidelines.

Opportunities to strengthen ACCC draft guidelines

“The ACCC considers a business will be engaging in greenwashing where they use any claim that makes a product, service or business seem better or less harmful for the environment than it really is” (ACCC, 2023)

Net Zero pathway claims

Australians are already bearing the brunt of harmful climate change. From catastrophic bushfires and worsening flood disasters to more powerful storms and deadly heatwaves, we are living with the impacts of a changing climate on our communities, our economy and the environment around us. These impacts will worsen in the years ahead, but we can substantially limit future harms through stronger action now to rapidly move beyond fossil fuels.

HOW DO FOSSIL FUELS CAUSE CLIMATE CHANGE?

The burning of coal, oil and gas is by far the largest contributor to climate change,

accounting for over 75 percent of global greenhouse gas emissions and nearly 90 percent of all carbon dioxide emissions (IEA 2019). Every day, fossil fuels like coal and gas are burned to generate power, travel from A to B, and for other purposes like heavy industrial manufacturing. This releases massive amounts of carbon dioxide and other greenhouse gases into the atmosphere. Greenhouse gases - including carbon dioxide, methane, ozone and nitrous oxide - act like a blanket. As a result, the Earth retains some of the heat that reaches us from the sun. This is known as the 'greenhouse effect' and is one of the basic processes that underpins life on Earth.

The relentless burning of fossil fuels has raised the concentration of greenhouse gases in our atmosphere dramatically, rapidly heating our climate, playing havoc with our weather, and upsetting the relatively stable conditions that have enabled human societies to flourish.

While there is no safe level of global warming, holding the global average temperature rise well below 2 degrees Celsius - and striving to limit it to 1.5 degrees Celsius in the long term - is considered essential to avoid far more severe and irreversible changes to our climate.

The most comprehensive assessment of the science ever undertaken, the Intergovernmental Panel on Climate Change, has shown that we must act far more quickly to phase out fossil fuels than our current pace if we are to secure a liveable future. (IPCC 2023). The International Energy Agency (IEA) has concluded there can be no new coal, oil and gas projects if we are to have a chance at limiting warming to 1.5 degrees Celsius (IEA 2021).

Put simply, all countries - including Australia - have an obligation to get their emissions plummeting by moving swiftly beyond fossil fuels to renewable energy (Climate Council 2021c, WMO 2022, IPCC 2023).

In the context of the clear link between fossil fuels and harmful climate change, it's evident that there are a number of ways in which the fossil fuel industry regularly makes environmental claims that can be considered false, misleading, and inaccurate. One of the most important is the inherent inconsistency between a fossil fuel company making claims about net zero or carbon neutrality, while actively pursuing the development of new fossil fuel projects.

Net zero or emission-related claims from the fossil fuel industry often break several of the ACCCs key principles, not the least of which is the very first: *make accurate and truthful claims*. In 2022, the United Nations (UN) established a High Level Expert Group of scientific, economic and public policy experts from 16 countries, to look at the net zero pledges and determine global best practices for net zero claims from non-state actors. In its report, the Expert Group was unambiguous: **non-state actors cannot claim to be net zero while continuing to build or invest in new fossil fuel supply** (UN, 2022).

However, there are multiple large, multinational fossil fuel companies operating in Australia which are doing just that. These 10 companies – Chevron, Woodside, AngloAmerican, Santos, BHP, Glencore, Inpex, Shell, ConocoPhillips and Esso Australia – have all made a public commitment, to consumers and financial markets, to achieve net zero emissions by 2050 or sooner (a summary of these commitments is provided in Appendix A). At the same time, all are

pursuing the development of new or expanded fossil fuel production. These companies collectively produced at least 54.5 million tonnes of CO₂e Scope 1 emissions in 2021-22 alone – equivalent to the emissions of 2.8 million Australians (Clean Energy Regulator, 2023). New and proposed fossil fuel projects could add billions more tonnes of emissions, contributing to untold further environmental damage.

The clear weight of scientific knowledge and expert evidence consensus confirms the only way to avoid catastrophic climate change is to urgently phase down the use of fossil fuels. Expanding coal and gas production at this time therefore raises serious questions about the genuine intent of fossil fuel corporations to support and participate in the transformation of our energy system to achieve net zero emissions.

Coal, oil and gas corporations who make environmental claims on the basis of their net zero ambitions, cannot honestly do so if they are also pursuing new or expanded fossil fuel production. If they do, they are being neither accurate, or truthful; they are directly misleading consumers about the ongoing environmental impacts of their products. This is greenwashing, and a practice that should explicitly be presented as false and misleading under stronger guidelines issued by the ACCC.

Given the extent to which high polluting industries are currently seeking to greenwash their real environmental impact and forward plans, it is not enough to ask these companies to be 'extra careful' when making environmental statements. Further, Australian consumers should not be required to parse the specific, individual 'net zero' or 'carbon neutral' claims of companies to make choices about the services and products they buy or invest in. Fossil fuel companies in Australia should instead have a clear legal obligation not to lie, mislead or obfuscate about their climate impact.

It is our recommendation that the ACCC guidelines should provide clearer guidance for high-polluting industries than currently drafted. These should clearly state that businesses which make net zero claims while planning and/or developing new fossil fuel projects are likely to be considered to be engaging in misleading or deceptive conduct. These guidelines should also enable others to make honest, accurate and truthful environmental claims that are backed in by evidence and transition plans, and do not mislead consumers.

Incomplete emissions reduction and accounting claims

In addition to forward-looking net zero claims, other emissions-related claims from high polluting industries are also likely to breach several of the key principles outlined in the ACCC's draft guidance. This is particularly evident in relation to three key issues:

- The extensive use of carbon offsets to meet publicly-announced emissions reductions targets;
- An over-reliance on unproven technology like carbon capture and storage;
- Failure to declare and make plans to address the full lifecycle emissions of their products.

Full life cycle emissions

In 2021, Australia's fossil fuel exports - mainly coal and gas - accounted for 1.2 billion tonnes of carbon pollution (DCCEEW 2022). This is more than double the total greenhouse emissions we produce within Australia, and means that the extraction and export of fossil fuels is Australia's biggest contribution to harmful global warming.

The 10 companies listed above collectively produced 54.5 million tonnes of Scope 1 emissions in 2021-22, but this figure is dwarfed in comparison to the combined total of their Scope 3 emissions, produced when their products are exported, used and consumed around the world. Australian gas giant Woodside, for example, has made a public commitment to reduce its direct emissions by 30 per cent by 2030 (Woodside, 2020). This emissions reduction goal does not include the company's Scope 3 emissions – produced when their products are burned overseas for energy – which Woodside's own Climate Report estimated to comprise over 91 percent of the company's total emissions (Woodside, 2022). Woodside has no current plans to address these emissions, and instead only focuses its emissions reductions efforts on the significantly smaller portion produced from the company's own sources (Scope 1) and energy emissions (Scope 2). This means Woodside is making broad environmental claims about its emissions reduction efforts, while failing to address the majority share of their overall contribution to harmful climate change.

Every fossil fuel corporation is playing an outsized role in fuelling climate change around the world, and when these companies greenwash and obscure their environmental impact, they receive an unfair commercial advantage over those seeking to do the right thing. High-polluting companies that make environmental claims which ignore Scope 3 and the full lifecycle emissions of their products, are benefitting from a false and misleading impression that their business will have a positive impact on the environment. This skews the playing field against companies and industries who are making genuine efforts – and likely incurring significant costs – to transform their business models and cut emissions.

Reliance on offsets and unproven emissions reduction technologies

Carbon offsets have also become a popular way for high-polluting industries, like fossil fuel companies, to claim they are taking action to tackle climate change. However, the UN Expert group report also highlighted that environmental claims which rest on extensive use of offsetting lack integrity, and it is the Climate Council's view that claims like these should be considered misleading.

In Australia, there are currently no restrictions on what offsets companies can use, or how many of them they can buy when making voluntary environmental commitments and claims. There are no obligations, or incentives, for a fossil fuel company to prioritise genuine emissions reduction over offsets. But it is simply not possible to fully offset billions of tonnes of greenhouse gas

emissions from burning fossil fuels, by regrowing forests or increasing the amount of carbon sequestered in soil.

This is because the carbon dioxide released by burning fossil fuels is fundamentally different to the way carbon is stored above ground in trees, wetlands and soil. When we burn fossil fuels, we release carbon locked away in the Earth's crust for millions of years, pumping vast new volumes of carbon into the atmosphere and altering the balance of carbon in the Earth system. Planting trees does not permanently lock this carbon away again. Instead, the introduced fossil carbon remains part of the active carbon cycle; this is what is heating the planet and driving the climate crisis (Morgan, 2023). To make the problem worse, much of the carbon stored in land-based offsets does not stay stored. Forests can be destroyed by fire, disease, floods and droughts, all of which are increasing with climate change. So the carbon that has been stored in offsets, can literally go up in smoke.

Offsets, therefore, do not accurately constitute or improve a high-polluting company's emissions reduction efforts, and should not be used as an alternative to genuine emissions reduction pathways. There is a small role for offsets to play in hard-to-abate industries such as cement and steel-making, but in the context of fossil fuel companies, over-reliance on offsets can mislead consumers by significantly exaggerating the environmental benefits of continued coal and gas production. For high-polluting industries, offsets and carbon credits should not be the sole basis for making 'net zero', emissions-related or environmental claims. Fossil fuel companies that do rely on offsets to account for the massive and ongoing production of harmful carbon pollution, despite clear scientific evidence that one cannot cancel out the other, are guilty of greenwashing.

Similarly, fossil fuel companies often state plans to reduce emissions that rest heavily on the successful development of carbon capture and storage technology. Oil and gas giant Chevron has made a public commitment to achieve net zero emissions by 2050 (Chevron, 2021). Its largest source of emissions is the Gorgon gas project, which emitted more than 8.3 million tonnes of harmful pollution in 2021-22 (Clean Energy Regulator, 2023), and includes the world's largest operating carbon capture and storage facility. The project has a mandated goal of storing 80% of CO₂ emissions produced, but this target has not been met in any year since the facility was commissioned (Paul, 2022; Milne 2021). Meaning, Chevron has failed to successfully capture and store significant amounts of the harmful pollution produced by its highest-emitting facility, but still benefits from the ability to make environmental claims about its emissions reduction pathway.

Carbon capture and storage technology remains unproven and unsuccessful in a range of other contexts and other fossil fuel projects internationally, and it is unclear how corporations that rely on technology like this to substantiate their environmental claims, can honestly claim to have genuine plans to deliver their commitments.

To address these important issues, Climate Council recommends the below clearer guidance and additional case studies be included in the ACCC guidelines to clarify how existing consumer law can be applied to high polluting corporations.

Example – Net Zero claims which are likely to be false and misleading

A major multinational gas company has made a public commitment to reduce its direct emissions by 30 percent by 2030, and achieve net zero emissions by 2050. The company's advertisements and public statements prominently use phrases such as "Towards a Net Zero Future" and "Leaders in Carbon Neutrality."

At the same time, the company is pursuing the development of several large new gas extraction projects. These projects have been estimated to add billions more tonnes of carbon emissions to the atmosphere, further fuelling climate change, and will extend the use of fossil fuels in Australia's energy system well into the second half of the century.

It is inconsistent with global expert consensus and scientific evidence for non-state actors - including commercial entities - to claim to be, or be pursuing, net zero while continuing to invest in new fossil fuel supply, such as gas. The company's exploration of new gas reserves is likely to be incongruent with its net zero promise.

Following the ACCC guidelines, emissions-related claims must be clearly and transparently conveyed. The gas company has not provided detailed information on how new gas exploration aligns with its net zero commitment, thus potentially misleading consumers and stakeholders.

The unqualified claims about reaching net zero emissions by the gas company may be perceived as greenwashing, as these claims could confuse consumers and other stakeholders about the company's real environmental impact.

The gas company should:

- Clearly articulate how the pursuit of new gas exploration projects interacts with any environmental goals for emissions reduction.
- Refrain from making net zero claims while it is continuing to invest in new gas exploration, extraction or processing projects.

A more accurate claim could be: "We have committed to reducing the emissions intensity from our gas operations by X% by 2040. However, we are also continuing to develop new gas projects as part of our current business model."

This revised claim offers a more transparent and honest portrayal of the company's activities, in alignment with the ACCC guidelines. It avoids the potential of misleading net zero or carbon neutral claims.

Example: Emissions reduction claims that are likely to be false and misleading

A major fossil fuel company in Australia is claiming to have cut their emissions by 20%, and are on track to cut them by a further 20% by 2030. In their transition plan, it's clear that they have excluded their Scope 3 emissions when making and reporting on this claim, and that these emissions - which make up the largest share of total company emissions - have continued growing. Additionally, the company is relying on the purchase of carbon offsets to account for emissions reductions to date, and are assuming new carbon capture technologies, which do not currently work at scale, will be available to reduce their future emissions.

Through this approach, the fossil fuel company is making inaccurate claims about their efforts to reduce emissions, and misleading consumers about the true environmental impact of their products.

To promote real sustainability, and clear, accurate emissions reductions goals, companies must:

- transparently acknowledge the full extent of their products' emissions throughout their lifecycle
- not make emissions reductions or environmental claims that rest primarily or exclusively on the purchase of offsets or unproven technology like carbon capture and storage

A more accurate claim from the fossil fuel company could be: "We have purchased enough carbon offsets to account for a 20% reduction in our direct emissions since 2010, and are planning to use emerging technologies like carbon capture and storage to further reduce our direct emissions by 20% by 2030. However, these efforts do not currently include emissions associated with the use of our products, which represents the largest share of emissions related to our business".

This revised claim offers a more transparent and honest portrayal of the company's activities, in alignment with the ACCC guidelines. It avoids the potential of misleading environmental or emissions-reductions claims that rest on unproven technology, or prioritise offsets over genuine emissions reductions pathways.

Conclusion

Everything, everywhere, all at once: this is the strategy for climate action needed now if we are to have any hope of avoiding catastrophic climate change, and holding global warming as close as possible to 1.5°C, and well below 2°C. This includes governments at all levels, in Australia and around the world. It means communities and individuals implementing solutions where they can. But it also requires policy-makers, regulators, and businesses big and small, to all be pulling in the same direction: towards deep emissions cuts this decade.

When high polluting companies make false claims about their net zero goals, emissions reductions efforts, or climate action plans, they are deliberately misleading consumers over the environmental impact of their products, and attempting to obscure what scientific evidence has made abundantly clear: we must urgently phase down the production and use of fossil fuels. As a result, consumers are unable to make informed choices based on accurate and evidence-based information. Companies that greenwash receive an unfair commercial advantage over those that are seeking to do the right thing. And investment is misdirected – away from clean energy industries, and towards future stranded assets which are fuelling further climate change.

We believe that, with stronger guidelines on making environmental and sustainability claims, the ACCC can clearly signal to consumers and the Australian business community that greenwashing from high-polluting industries will not be tolerated. To achieve this, the Climate Council recommends the ACCC strengthen its proposed draft guidance to set a clear standard, and rule out the kind of egregious greenwashing claims which are currently routine from large fossil fuel corporations. Stronger final guidance from the ACCC which includes these recommendations will help to direct investment and consumer spending to where it can do the most good, and decarbonise our economy. This in turn will create a fairer marketplace, and cleaner future, for all.

Appendix A: Net zero commitments of major fossil fuel corporations operating in Australia

Corporation	Public commitment	Proposed expansion/extension of fossil fuel projects
Chevron	Achieve net zero by 2050 for Scope 1 and 2 emissions	North West Shelf and Carnarvon Basin - https://australia.chevron.com/our-businesses/exploration
Woodside	Reduce emissions by 30% by 2030; net zero by 2050	Scarborough gas project - https://www.woodside.com/what-we-do/growth-projects/scarborough Browse gas fields - https://www.woodside.com/what-we-do/developments-and-exploration/browse
Anglo American	Carbon neutral by 2040	Moranbah South longwall coal mine - https://australia.angloamerican.com/about-us/what-we-do
Santos	Net zero by 2040	Barossa gas project - https://www.santos.com/news/santos-announces-fid-on-the-barossa-gas-project-for-darwin-lng/
BHP	Reduce operational GHG emissions by at least 30% on 2020 levels by 2030; net zero operational emissions GHG emissions by 2050	Peak Downs coal mine - https://www.mining.com/web/bhps-plan-to-keep-coal-mine-open-for-93-years-delusional/
Glencore	Net zero by 2050	Glendell coal mine expansion - https://www.glencore.com.au/operations-and-projects/coal/projects/glendell-continued-operations-project
Inpex	Net zero carbon emissions by 2050	Ichthys LNG expansion - https://territorygas.nt.gov.au/Knowledge-Centre/latest-news/2022/inpex-commits-to-lng-expansion
Shell Australia	Reduce absolute emissions by 50% by 2030; reduce net carbon footprint by 100% by 2050	QGC Western Downs gas expansion - https://www.shell.com.au/media/2022-media-releases/shell-qgc-business-develops-next-phase-of-gas.html

ConocoPhillips	Reduce greenhouse gas intensity by 40-50% by 2030; net zero emissions by 2050	Otway basin gas field development - https://www.ogj.com/general-interest/article/14284570/conocophillips-moves-toward-second-otway-basin-farmin
Esso Australia	"Greenhouse gas plans consistent with goals of Paris Agreement"	Gippsland Basin Kipper field gas project - https://www.exxonmobil.com.au/news/newsroom/news-releases-and-alerts/2022/esso-australia-to-expand-gas-development-in-the-gippsland-basin

References

Australian Competition and Consumer Commission (2023), *Environment and Sustainability Claims - Draft Guidance for Business*, Accessed: https://www.accc.gov.au/system/files/Environmental%20and%20sustainability%20claims%20-%20draft%20guidance%20for%20business_web.pdf

Chevron (2021), *Climate change resilience: advancing a lower carbon future*. October 11, 2021. Accessed: <https://www.chevron.com/-/media/chevron/sustainability/documents/2021-climate-change-resilience-report.pdf>

Clean Energy Regulator (2023). *Safeguard facility reported emissions 2021-22*. Accessed: <https://www.cleanenergyregulator.gov.au/NGER/The-safeguard-mechanism/safeguard-data/safeguard-facility-reported-emissions/safeguard-facility-reported-emissions-2021-22#Downloadable%20version%20of%20the%20data%20table>

Climate Council (2021) *Aim High, Go Fast: why emissions need to plummet this decade*. Accessed: <https://www.climatecouncil.org.au/resources/net-zero-emissionsplummet-decade/>

DCCEEW (Department of Climate Change, Energy, the Environment and Water) (2022) *National Greenhouse Gas Inventory Quarterly Update: June 2022*. Accessed: <https://www.dcceew.gov.au/climate-change/publications/national-greenhouse-gas-inventory-quarterly-updatejune-2022>

International Energy Agency (IEA) (2019), *CO2 Emissions from fuel combustion 2019*. Accessed: <https://doi.org/10.1787/2a701673-en>

IPCC (2023) *AR6 Synthesis Report: Climate Change 2023*. Accessed: <https://www.ipcc.ch/report/sixth-assessmentreport-cycle/>

Milne, Peter (2021). 'Chevron's five years of Gorgon carbon storage failure could cost \$230 million', Sydney Morning Herald, 11 November 2021. Accessed: <https://www.smh.com.au/environment/climate-change/chevron-s-five-years-of-gorgon-carbon-storage-failure-could-cost-230-million-20211110-p597uf.html>

Morgan, Wesley (2023) 'A tonne of fossil carbon isn't the same as a tonne of new trees: why offsets can't save us', The Conversation, 10 March 2023. Accessed: <https://www.climatecouncil.org.au/why-offsets-cant-save-us/>

Paul, Sonali (2022). 'Chevron says world's largest carbon capture project has 'a ways to go' to meet goals', Reuters 17 May 2022. Accessed: <https://www.reuters.com/markets/commodities/chevron-says-worlds-largest-carbon-capture-project-has-a-ways-go-meet-goals-2022-05-16/>

Woodside (2020). *Better is a lower carbon future – Supporting net zero: Woodside’s climate strategy*, November 2020, Accessed:

[https://www.woodside.com/docs/default-source/sustainability-documents/climate-change/part-of-a-lower-carbon-future-\(november-2020\).pdf](https://www.woodside.com/docs/default-source/sustainability-documents/climate-change/part-of-a-lower-carbon-future-(november-2020).pdf)

Woodside (2022). *Climate Report 2022*. Accessed:

[https://www.woodside.com/docs/default-source/investor-documents/major-reports-\(static-pdfs\)/2022-climate-report/climate-report-2022.pdf?sfvrsn=240783fc_16](https://www.woodside.com/docs/default-source/investor-documents/major-reports-(static-pdfs)/2022-climate-report/climate-report-2022.pdf?sfvrsn=240783fc_16)

World Meteorological Organization (WMO) (2022) *United in Science 2022: a multi-organization high-level compilation of the most recent science related to climate change, impacts and responses*. Accessed:

https://library.wmo.int/index.php?lvl=notice_display&id=22128#.ZDT6a-xBxH2