

**Dominic Emery**

**Priority international civil society organisations - group engagement strategy and framework**

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The purpose of this note is to refresh the existing framework for BP's group-level engagement with NGOs. The framework is intended to clarify accountabilities for the management of strategic, proactive and reactive NGO relationships in both the environmental and social domains. It is not intended to make the case for a new approach to NGO engagement. The note reflects Management of Change processes in Societal Issues and Relationships and the recent elaboration of S&OR's Environmental NGO Engagement Plan, which aligns with this proposed framework.

Your approval is sought for this framework and for group-level NGO engagement consistent with it, led by Group Policy and Societal Issues and Relationships. It remains the responsibility of individual BP entities to decide how they engage with NGOs at the regional or local level; this proposed framework is not concerned with shaping such activity.

**Context**

In the period since Deepwater Horizon, BP has kept group-level engagement with international NGOs (INGOs) to a minimum. We have, throughout that period, maintained a consistent presence in multi-stakeholder initiatives (MSIs) - notably the EITI, Voluntary Principles on Security and Human Rights, from which we derive continued strategic, operational and reputational value. Nevertheless, beyond these and other MSIs in the environmental domain, the approach at group level has focussed on maintaining dialogue with a relatively narrow set of NGO interlocutors and securing strategic relationships with a view to rebuilding trust in the company and repairing reputational damage through dialogue on safety, operational risk and near-term performance issues.

Over the same period, INGO activity – on environmental, social and corporate accountability issues – has increased in level and sophistication. INGOs remain active and influential in multilateral fora such as the UN and in shaping expectations of corporate performance in areas of intensifying scrutiny, such as human rights. NGOs are moving from single-issue, mission-focussed activity to more collaborative and tactically complex campaigns, which engage on a broad front – including increasingly through social media – to raise the risk profile of a particular project or hydrocarbon province. In this context, coordinated campaign activity at site or business unit level has significant potential to produce group-level reputational or strategic impacts.

There is also evidence of closer strategic and tactical collaboration between INGOs and SRIs. This may take the form of coordinated market campaigns (such as the SRI-NGO campaigns against Shell's Arctic programme and for a "no-go" into World Heritage sites commitment from Total and Tullow), coordinated single-issue advocacy on specific areas of policy-making relating to corporate accountability (such as the UK Modern Slavery Act or carbon disclosure) or coordinated direct engagement with companies to leverage investor and reputational pressure with the aim of establishing frameworks for corporate accountability on strategic issues (such as the "Aiming for A" coalition on climate issues).

### **Rationale**

This changing context suggests that the potential impact of INGOs on BP's strategy and activities may increase over time, particularly where INGO campaigning and advocacy expertise is aligned with structured SRI engagement and/or national NGO activity directed at local licence or permission to operate. It further suggests that BP should seek to deploy existing resources, leverage existing relationships, better coordinate its group-level NGO engagement activity and improve its contact management information-sharing to deepen its understanding of emerging trends in NGO activity and enhance its ability to identify risks and opportunities. Given constrained resources in relevant functions, this updated framework does not envisage the development of new strategic relationships with NGOs or other civil society organisations. Nor does it provide for deeper or more proactive engagement within the existing set of relationships across the group. It corresponds closely to our existing range of NGO relationships and activities and is proposed as a structure for clarified and coordinated engagement along existing



lines. Existing proactive relationships in some domains – notably security and human rights – are brought into this framework for the first time, to clarify relationship management accountabilities and the thematic scope of current engagement activities.

This framework thus aims to guide and coordinate existing group-level engagement with those NGOs which have the potential to have a material impact on BP's ability to deliver its business strategy and/or on our reputation. Mutually productive relations with influential NGOs can play an important part in broader efforts to rebuild trust post-Deepwater Horizon, manage risks to strategic projects and maintain our reputation.

Targeted engagement, within the limits established by this framework and in alignment with the S&OR Environmental NGO Engagement Plan (which provides a parallel framework for relationships and technical cooperation with key environmental NGOs) delivers a number of benefits to the group:

- A small number of strategic relationships with key civil society interlocutors helps protect long-term value and maintain BP's reputation as a responsible operator;
- Beyond those strategic partnerships, structured and managed dialogue with a targeted cohort of civil society organisations, commensurate with the strategic benefit to the group, helps restore trust amongst societal actors, maintain our reputation, minimize risks to strategic projects and enhance our ability to identify and manage emerging material societal issues;
- Finally, monitoring and reactive engagement of low-priority NGOs is critical to the effective management of proximate risks presented by NGO interventions or campaigns to BP businesses' or projects' permission to operate. Monitoring can also help us to gain insight into emerging societal expectations and likely future areas of campaigning activity which may present risks to current or future operations' or projects' permission to operate.

At all levels of engagement, dialogue will allow us to continue to raise awareness amongst influential societal stakeholders of how we manage environmental and social impacts and meet our commitment to operate in a safe and responsible manner.

A clearer framework, developed in parallel with the environmental NGO strategy and plan, confers a number of advantages – alignment of

language and style between the social and environmental domains, clarification of relationship accountabilities and enhanced visibility of the range of issues on which we currently engage – which will allow progress at group level towards enhanced coordination of activity, messaging and management of information. Systematic and coordinated internal intelligence-sharing and improved clarity and visibility of group-level relationships will, over time, enhance the accessibility of expertise and support available to BP operations and projects, as and when they may face more proximate NGO-related risks.

Progress on these fronts will be important in enhancing our ability to identify and manage risks to both the group's reputation as a safe and responsible operator and to operations and projects' permission or licence to operate, arising in an external environment characterised by more sophisticated and collaborative NGO monitoring of our activities, corporate engagement, policy advocacy and campaigning.

## **Objectives**

The proposed framework, which is set out in Annex 1, aims to bring improved consistency and coordination to our existing NGO engagement activity at Group level. It is intended to capture and structure existing relationships within the environmental and social domains, clarify engagement themes and individual responsibilities and serve as the basis for improved coordination of activity and messaging. An improved, central system for NGO contact management – developed in parallel – will provide a shared platform for improved internal intelligence-sharing and issue/risk identification.

Based on our existing approach, this refreshed framework identifies:

- Those NGOs we consider to be of strategic importance;
- Other priority NGOs for engagement to meet Group needs;
- The style and scope of our engagement in each case, including where we do so from a defensive posture
- Group-level accountability for relationship management consistent with the S&OR Environmental NGO Engagement Plan.

It is not the intent of this framework to increase the range or depth of our engagement with NGOs, environmental or social. Rather, we are proposing to clarify the thematic scope of our engagement and the responsibility at Group level for maintaining relationships as they are. We are not proposing the development of strategic or proactive relationships with NGOs or coalitions, in either the environmental or social domain, where these do not already exist.

As such, this framework is structured by reference to existing modes of engagement: firstly, a small number of deep, longer-term relationships with influential international civil society organisations with whom we can consult and actively engage as appropriate on Group-level technical issues and risks. These strategic partnerships are based on a formal agreement with the NGO concerned. The enduring objective in each case is the maintenance of a mutually beneficial relationship which protects the long-term value and reputation of BP as a responsible operator by allowing for engagement with a trusted partner, focussed on our strategic themes.

Secondly, a cohort of NGOs with which we engage pro-actively, but on clearly-delineated thematic terrain. Our relationship in each case, whilst not formalised through a partnership agreement, is intended to allow us to gain access to technology, data or local knowledge and experience relevant to BP activities and useful to the management of Group-level technical issues and risks. Good faith engagement and dialogue also affords us the opportunity to communicate to a constructive audience our approach to managing social and environmental impacts and risks.

Thirdly, the framework includes a larger number of NGOs with which we engage only reactively, on a broad range of issues. There is considerable variance in the level of mutual trust between BP and individual NGOs within this third category. With the majority of these interlocutors, our relationship is generally positive, albeit that we engage only infrequently with their representatives. With a minority (identified in Annex 1), we have generally adversarial relations and tend to engage from a defensive posture, albeit that it will be at the discretion of the relationship manager to decide the style of engagement most appropriate to any particular contact/context<sup>1</sup>.

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<sup>1</sup> This may vary in relation to which individual, national branch or team within a particular organisation is seeking dialogue (particularly in the case of federated or chaptered INGOs such as WWF and Amnesty, or NGOs with dedicated corporate engagement/collaboration functions), or which issue is

Appropriate reactive engagement at this third tier nevertheless allows us to gain insights into societal expectations of us as a responsible operator and to identify emerging issues which may affect our ability to deliver our strategy. Monitoring of activity at this level may also play a role in managing risks to projects' or operations' licence or permission to operate, by early identification and management of risks of NGO campaigns or disruptive activity.

**Recommendation**

- Approve the framework set out in Annex 1.

**Nick Allen**

26<sup>th</sup> February 2016

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at hand (in dialogue with some development NGOs, for instance, we may instinctively assume a defensive posture if engaged on issues relating to climate change, but may welcome dialogue on human development issues relating to a current or prospective BP geography).

## Annex 1 – Proposed NGO engagement framework

### Non-governmental organisations

	NGO	Relationship manager <sup>2</sup>	Core issues/comments
<b>Strategic partnerships</b> (strategic and technical engagement)	Fauna and Flora International	Kathrina Mannion, Group Policy Liz Rogers, S&OR	Partner in Conservation Leadership Programme Strategic biodiversity and ecosystems services (BES) issues BES business strategy development & implementation
	Wildlife Conservation Society	Kathrina Mannion, Group Policy	Partner in Conservation Leadership Programme Country-regional or project-level engagement on managing BES issues, especially field surveys and monitoring
	Birdlife International	Kathrina Mannion, Group Policy	Partner in Conservation Leadership Programme Country, regional or project-level engagement on managing BES issues
	UNEP - World Conservation Monitoring Center (WCMC)	Liz Rogers, S&OR	Protected area and biodiversity data and mapping International biodiversity policies Proteus partnership.

<sup>2</sup> \*The **relationship manager**'s role is to maintain the relationship with the NGO in line with the desired level of the relationship. He/she is the central coordinating point for the relationship but does not act as gatekeeper. Each organisation can have several working relationships with BP, as long as the relationship manager is aware of each project. Individuals providing support to the relationship manager and/or with a significant interest and engagement in the management of relationship are given in italics.

<b>Proactive relationships</b> (Tactical alignment on issues may be possible; <b>those NGOs with which we more often engage from a defensive posture are identified by coloured shading.</b> )	Amnesty International	Nick Allen, Societal Issues & Relationships (SI&R)	UN Guiding Principles implementation Grievance mechanisms Southern Corridor risk management
	Anti-Slavery International	Nick Allen, SI&R <i>Nili Safavi, S&amp;OR</i>	Human rights – esp. forced labour and human trafficking - risk identification and management
	Verité	Nili Safavi, S&OR <i>Nick Allen, SI&amp;R</i>	Human rights – esp. forced labour and human trafficking - risk identification and management
	Institute for Human Rights and Business	Nick Allen, SI&R	UN Guiding Principles implementation Human rights benchmarking, reporting and policy
	Danish Institute for Human Rights	Elizabeth Wild, S&OR	UN Guiding Principles implementation guidance and technical assistance Engagement through IPIECA e.g. on integrating human rights into impact assessments
	International Institute for Environment and Development	Nick Allen, SI&R	Community engagement and consultation, FPIC BTC and Southern Corridor risk management
	Carbon Disclosure Project	Liz Rogers, S&OR Paul Jefferiss, Group Policy	Carbon reporting
	The Nature Conservancy	David van Hoogstraten, BP America	Country-regional or project-level engagement on managing BES issues, especially restoration, offsets and landscape issues
	Center for Climate & Energy Solutions (C2ES)	David van Hoogstraten, BP America Paul Jefferiss, Group Policy	Climate change policy development (market based; emissions trading)

<b>Proactive relationships</b> (Tactical alignment on issues may be possible; <b>those NGOs with which we more often engage from a defensive posture are identified by coloured shading.</b> )	Environmental Defence Fund	David van Hoogstraten, BP America	Climate change policy development (market based; emissions trading)
	Resources for the Future	David van Hoogstraten, BP America Paul Jefferiss, Group Policy	Economic assessment of environmental policy development and climate change
	Student Conservation Association (SCA)	David van Hoogstraten, BP America <i>Tom Wolf, BP America</i>	BP-sponsored conservation projects in Whiting/Chicago SCA partnership supporting US DoI 21 <sup>st</sup> Century Conservation Corps
	WWF international	Liz Rogers, S&OR Paul Jefferiss, Group Policy	Global or country-level engagement on global biodiversity issues, marine mammals and seismic, protected areas and watershed management
	Fund for Peace	Helen Simpson, Intelligence, Security & Crisis Management (ISC) <i>Nick Allen, SI&amp;R</i>	Voluntary Principles on Security and Human Rights Business in conflict-affected areas
	International Alert	Helen Simpson, ISC <i>Nick Allen, SI&amp;R</i>	Voluntary Principles on Security and Human Rights Business in conflict-affected areas Southern Corridor risk management
	Partners for Democratic Change International	Helen Simpson, ISC <i>Nick Allen, SI&amp;R</i>	Voluntary Principles on Security and Human Rights Business in conflict-affected areas
	Partnership Africa Canada	Helen Simpson, ISC <i>Nick Allen, SI&amp;R</i>	Voluntary Principles on Security and Human Rights Business in conflict-affected areas



	Pax	Helen Simpson, ISC <i>Nick Allen, SI&amp;R</i>	Voluntary Principles on Security and Human Rights Business in conflict-affected areas
	Search for Common Ground	Helen Simpson, ISC <i>Nick Allen, SI&amp;R</i>	Voluntary Principles on Security and Human Rights Business in conflict-affected areas
	Transparency International UK	Andy McClarron, E&C	ABC policy development In-country corruption risk management
<b>Reactive relationships</b> (monitoring and replying to queries only). <b>Those NGOs with which we more often engage from a defensive posture are identified by coloured shading.</b>	ActionAid	Nick Allen, SI&R	Revenue transparency policy development Tax Justice campaign
	Carbon Disclosure Project	Liz Rogers, S&OR Paul Jefferiss, Group Policy	Carbon reporting
	Carbon Tracker	Paul Jefferiss, Group Policy	Climate change and stranded assets
	Center for Clean Air Policy (CCAP)	Paul Jefferiss, Group Policy David van Hoogstraten, BP America	Climate change policy development (market based; emissions trading) BP membership under review
	Children's Investment Fund Foundation	Paul Jefferiss, Group Policy	Climate change and human development
	Climate Action Network	Peter Mather, UK and Europe Regions	Global network of NGOs Climate change policy

<b>Reactive relationships</b> (monitoring and replying to queries only). <b>Those NGOs with which we more often engage from a defensive posture are identified by coloured shading.</b>	ChristianAid	Nick Allen, SI&R	Revenue transparency policy development Tax Justice campaign
	CORE	Nick Allen, SI&R	UN Guiding Principles implementation Corporate accountability, human rights reporting
	Conservation International	Liz Rogers, S&OR	Country, regional or project-level engagement on managing biodiversity, protected areas and water issues
	Earthwatch	Peter Mather, UK and Europe Regions	Conservation BP is a former funder of Earthwatch
	Friends of the Earth UK	Peter Mather, UK and Europe Regions	Country-specific issues, including project/operational risk management
	Global Witness	Nick Allen, SI&R <i>Dominic Emery, Long-Term Planning and Policy (LTP&amp;P)</i>	Revenue transparency policy development Member of EITI Board
	Greenpeace UK	Peter Mather, UK and Europe Regions Nick Allen, SI&R Liz Rogers, S&OR	General environmental responsibility issues Arctic issues
	Human Rights Watch	Nick Allen, SI&R	UN Guiding Principles implementation Voluntary Principles on Security and Human Rights Azerbaijan/Southern Corridor risk management
	International Corporate Accountability Roundtable	Nick Allen, SI&R	UN Guiding Principles implementation Transparency, accountability, human rights policy

<b>Reactive relationships</b> (monitoring and replying to queries only). <b>Those NGOs with which we more often engage from a defensive posture are identified by coloured shading.</b>	International Union for the Conservation of Nature (IUCN)	Liz Rogers, S&OR <i>Paul Jefferiss, Group Policy</i>	Marine biology, protected areas and natural capital Country/regional engagement (or project-level where independent technical advice is needed)
	Natural Resources Defence Council	David van Hoogstraten, BP America	Climate change/transport energy policy Biofuels Business License to Operate State environmental issues, carbon policy, heavy crude
	The Ocean Conservancy	Liz Rogers, S&OR <i>Paul Jefferiss, Group Policy</i>	Group or country-level engagement on marine issues and oceans governance
	Oxfam	Nick Allen, SI&R	General social responsibility issues (indigenous peoples) Revenue transparency issues
	Platform	Nick Allen, SI&R	Southern Corridor/Azerbaijan, Egypt, Arctic, UK
	Publish What You Pay	Nick Allen, SI&R <i>Dominic Emery, LTP&amp;P</i>	Revenue transparency policy development Member of the EITI Board
	Union of Concerned Scientists	Paul Jefferiss, Group Policy	Climate change, lobbying
	We Mean Business	Paul Jefferiss, Group Policy	Climate change, business sustainability and resilience
	Wildlife Habitat Council	David van Hoogstraten, BP America	Site management issues, including verification or certification of site-specific wildlife management plans - US focus

<b>Reactive relationships</b> (monitoring and replying to queries only). <b>Those NGOs with which we more often engage from a defensive posture are identified by coloured shading.</b>	World Oceans Council	Liz Rogers, S&OR <i>Paul Jefferiss, Group Policy</i>	Ocean policy Marine environment
	World Resources Institute	Paul Jefferiss, Group Policy David van Hoogstraten, BP America	WRI severed their formal relationship post-DWH; informal, reactive relationship on water and BES issues ongoing BPA considering proactive engagement on climate policy
	WWF UK	Peter Mather, UK and Europe Regions	General environmental responsibility issues, including Arctic
	WWF US	David van Hoogstraten, BP America	Climate change policy development (BP America considering proactive engagement in future on climate policy)
	Wetlands International	Liz Rogers, S&OR <i>Paul Jefferiss, Group Policy</i>	Technical engagement on issues relating to projects or operations which may affect wetlands, in particular those designated as being of international importance

### Other organisations to note

UN bodies			
	Organisation	Relationship manager <sup>3</sup>	Purpose
<b>Strategic relationship</b>	Sustainable Development Solutions Network	Paul Jefferiss, Group Policy	BP Chairman is a member of the network
<b>Reactive relationship</b>	UN Working Group on the Issue of Human Rights and Transnational Corporations	Nick Allen, SI&R Nili Safavi, S&OR	Implementation of the UNGPs
<b>Reactive relationship</b>	UN Environment Programme (UNEP)	Liz Rogers, S&OR <i>Paul Jefferiss, Group Policy</i>	Global environmental policies and sustainable development
<b>Reactive relationship</b>	UNESCO	Liz Rogers, S&OR	World Heritage sites and protected areas

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