

Total Group's individual commitments to act4nature international

Total is a broad energy company, which produces and markets fuels, natural gas and low-carbon electricity. Our 100,000 employees are committed to energy that is better, more affordable, safer, cleaner and accessible to as many people as possible. Present in more than 130 countries, our ambition is to become the responsible energy major.

Aware of the need to protect nature, on which humanity depends, Total seeks to ensure that biodiversity is taken into account across all its activities. This ambition has been reflected in the Group's biodiversity policy since 2005.

In 2016, the Group made a commitment to contribute to the success of the United Nations' Sustainable Development Goals (SDGs), including those related to biodiversity.

In 2018, Total became a signatory of the act4nature initiative promoted by the Association Française des Entreprises pour l'Environnement (EpE).

In 2020, the Group is extending its ambition in consideration of the United Nations' Global Biodiversity Framework preparation, which aims to protect global biodiversity. The Group also published its climate ambition to achieve carbon neutrality (<https://www.total.com/media/news/total-adopts-new-climate-ambition-get-net-zero-2050>).

Thus:

1 Total does not conduct oil and gas exploration or extraction activities at natural sites included on the UNESCO World Heritage List at December 31, 2019* (i.e. voluntary exclusion zones representing 3.6 million km²). An internal Atlas describing these sites is updated annually and distributed internally

* The reference date is updated annually after verification between July 31 of the current year and January 31 of the following year. In the event of a posteriori geographic interaction, i.e. when a site enters the UNESCO heritage inventory after an exploration-production license is issued, the interaction is publicly declared.

2 Total does not carry out any exploration activity for oil fields in arctic sea ice*. A map showing the Group's licenses in the Arctic sea ice zone is published and updated every year (for 2019 https://www.sustainable-performance.total.com/sites/g/files/wom-pnd1016/f/atoms/files/total_licences_in_arctic_april_2019.pdf).

* The selected area is the average extent of the pack ice, reference: National Snow and Ice Data Center (USA) Sea Ice Polar Stereographic North, maximum extent from 1979 to 2019 and then updated.

3 A biodiversity action plan (BAP) is developed for sites located in the most sensitive protected areas, that is IUCN I to IV or Ramsar protected areas. In addition, for projects in IUCN I-II or Ramsar area, the BAP is designed with a biodiversity Net Gain outcome, confirmed by a third-party institution. In all cases, the BAP is implemented, at the latest, at the time of commissioning of the site and its progress is published each year. The number of biodiversity action plans implemented or under preparation are published each year.

4 For our environmentally significant sites* which are ISO 14001:2015 standard certified (77 sites in 2019), Total will implement biodiversity action plans over the period of 2022-2030. This program is broken down into three stages: 1) inventory / diagnosis, 2) design of the action plan, 3) implementation of the action plan and communication of results. Each step is taken during ISO 14001 re-certifications. Awareness raising of biodiversity issues, within teams on each site is carried out during this process. The progress of the program and the results of the stages are communicated publicly, locally and on the [Total.com](https://www.total.com) website.

* All operated exploration-production sites in production, all refineries, petrochemical and polymer sites, and all gas-fired power plants.

5 Total supports the sharing of its biodiversity data, collected as part of its environmental studies, with the scientific community and the general public. The amount of data uploaded to the international biodiversity data sharing platform Global Biodiversity Information Facility (GBIF, www.gbif.org) is published each year (number of data uploaded and number of scientific citations). The Group's objective is to share data from a minimum of 5 projects or sites per year from 2021.

6 Total is committed, within the framework of the Climate, Coastlines and Oceans program of the Total Foundation (minimum annual expected expenditure € 5 Million), to support action to raise awareness and youth education about biodiversity and research actions concerning oceans and coastal environments. The Group is committed to offering our employees dedicated workdays for civic engagement in favour of biodiversity resulting in raised awareness on these topics. Each year, the list of projects supported, and partners funded, in France and internationally, as well as their results are published, along with performance indicators.

In addition, projects conducted by the Total Nature Based Solutions (NBS) Business Unit, dedicated to natural carbon sinks (planting activities, sustainable forest management, agroforestry, agriculture and conservation of remarkable species) will generate co-benefits for biodiversity. Total will publicly communicate the results of these biodiversity co-benefits.

For information, the methods of supplying the Bio-Raffinerie de La Mède are published on the site: <https://www.lamede.total.fr/nos-priorites/un-appvisionnement-en-matieres-premieres-100-durable>

Notice of dissent from NGOs (IUCN, Noé, WWF France) on TOTAL group individual Commitments

Under the French framework of voluntary biodiversity commitments from international companies, act4nature international, the NGO board members of the Steering Committee of the initiative (the «COPIIL») consider that the individual commitments from the TOTAL Group insufficiently address the SMART criteria for the following reasons which have been communicated after the Steering Committee of September 11 2020.

Commitments 1 and 2:

Also, the IUCN global position on protected areas and mining activities, approved in 2000 via recommendation 2.82, prohibits mining activities within the protected areas category I to IV of IUCN, and impose strict and limited conditions in the protected areas of category V and VI. Furthermore, recommendation 6.102, adopted in 2016, on protected areas and other important areas for biodiversity in the context of industrial activities and environmentally harmful infrastructure development, call the private sector to respect all categories of protected areas listed by the IUCN and for which it is prohibited to develop environmentally harmful industrial activities and infrastructure development, as well as to give up current activities conducted in those area and not to conduct any future activities within the protected areas. Yet, TOTAL group, in its commitment n°1 indicates that only oil & gas exploration or extraction activities won't be conducted (and mention only exploration activities in the commitment n°2), under the scope of natural sites registered under the UNESCO world heritage list. Indeed, it would have been necessary to add other activities of the group (such as refinement), and the fact that «those activities won't be conducted including protected areas and especially in the category I to IV of IUCN» for the commitment to be considered as additional and realistic.

Commitments 3 and 4:

Regarding the commitment n°3, its «realistic» component could have been recognised if it concerned existing sites that are in operation, as for the IUCN there shouldn't be mining activities in protected areas, especially in category I to IV (see previous comment). Consequently, it should have been specified «existing sites already in operation». Furthermore, it would have made sense that the company also implement biodiversity action plans with «net gain» on the sites located nearby protected areas, that is a certain number of sites included in the commitment n°4, that may affect them through their activities. The notion of proximity should have been added to confirm the «realistic» nature of the commitment. From the moment the activity of an industrial site has an impact on a PA (no matter the distance), the company must put in place a biodiversity action plan with «net gain» for biodiversity. This clarification should therefore be added in commitment 3, namely «for existing sites already in operation, located in or near protected areas».

Besides, it has not been possible for the NGOs to assess the extent to which biodiversity action plans are SMART, in particular biodiversity action plans with a «net gain» for biodiversity, since there is no methodology documentation that would help confirm the «measurable» nature of the commitment.

In addition, for the «time based» criteria to be compliant, it would have been necessary to complete commitment n°3 by including a timeline.

For commitment n°3 in particular to comply with the «measurable» criteria, the number of sites concerned (number or %) should be specified because the achievement of the commitment must be measurable, with the identification of quantified objectives and relevant monitoring indicators appropriate for the commitment.

Likewise, for commitment n°4 to comply with the «measurable» and «realistic» criteria, the number of sites after 2019 and the different milestones must be specified because the 2030 deadline is very distant and therefore not proportionate.

Lastly, to meet the «specific» and «realistic» criteria, it seems important to the NGO board that TOTAL Group make a commitment relevant to pollution control because it is a major issue with regard to the company's activities.

Total's answer

Total has endeavoured to formulate commitments that meet SMART criteria as required by Act4nature international. These commitments will be the subject of a detailed annual reporting starting the first quarter of 2021. This reporting will also specify the number of sites included for each commitment.

Total's teams were proud to develop these commitments under the leadership of Total's Executive Committee leadership, which is resolutely committed to this initiative in favour of biodiversity. Total is open to collaborating with the Act4Nature international steering committee's NGO members in a process of dialogue and continuous improvement.

More specifically, in response to certain objections raised by certain NGOs :

- Commitments 1 and 2 are not limited to a simple statement, since the reference date of the exclusion zones is updated annually. They therefore cover an area which increases each year. Moreover, these commitments are not time-bound, which is why they are written in the present tense and thus do not include a target date.
- By their nature, exploration-production activities are those that are most likely to encroach on UNESCO World Natural Heritage areas; therefore, our commitment relates specifically to these activities. We are ready to extend this commitment to all the Group's industrial activities: exploration-production, refineries, petrochemical and polymer sites, gas-fired power plants.
- IUCN recommendation 2.82 on extractive activities in IUCN I-IV zones is addressed to member States and is not for direct application to businesses.
- Commitment 3 is written in the present tense because it is not time bound. For 'net gain' biodiversity action plans, their progress will be measured through a third-party institution certification. The involvement of institutions like IUCN, will be sought.
- The number of sites located in IUCN I-IV and Ramsar zones, linked to the biodiversity action plans commitment, is of 9 at the end of 2019. The publication of biodiversity action plans in fact planned and the «Measurable» SMART criteria is therefore covered.
- The sites covered by commitment 4 are covered by a program over the 2022-2030 period. The first milestone, in 2022, is therefore very near. The 3-step process is clearly defined and its implementation will be measurable in the planned reporting.