September 19, 2023

Dr. Márcia Balisciano
RELX Group plc
1-3 Strand
London, WC2N 5JR

Dear Dr. Balisciano,

We appreciate your reply to the petition we sent to your organization on March 21, 2023. It is clear from your response that RELX/Elsevier is making progress in reducing its own corporate emissions. However, we think it also shows that RELX/Elsevier is turning a blind eye to its activities that enable other entities to remain high emitters.

Based on the concerns we detail below, we find that the company is falling short of meeting the clear standards set in its pledges. As stated in our original petition, we recognize our right to pursue a grievance mechanism and will be exploring our options for doing so.

Race to Zero pledge

Claim: "RELX has reduced Scope 1 and 2 emissions by 74% since 2010 [and…is] advancing our Scope 3 supply chain efforts."

Broader context: RELX has made progress on its corporate Scope 1 and 2 emissions over the last 13 years. However, during that time, the company has also aided a growth in fossil fuel reserves despite scientific calls for exactly the opposite. The continued provision of research and data that facilitate growth in this realm runs counter to the pledge and, in the real world, offsets Elsevier's corporate emissions reductions, albeit by an unknown amount.

Claim: "We are committed to supporting a global science-based, just transition."

Broader context: The science is clear that the continued installation of unabated fossil fuel-based infrastructure will lock in higher emissions that are not consistent with the goal of limiting warming to 1.5°C – indeed, that temperature target may already be out of reach thanks to recent installations. Furthermore, while some focus on carbon dioxide removal (CDR) and carbon capture and sequestration (CCS) will be needed to try to limit future warming to below 1.5°C, the role of CDR and CCS technologies (in contrast to nature-based options) is expected at best to represent a small fraction of the full emissions reductions "pie." At present, CCS represents one of the most expensive and least effective ways to limit or reduce carbon concentrations in the atmosphere, particularly when compared with known, immediately implementable renewable energy technologies, energy saving measures, and nature-based CDR options. The primary focus of companies aiming to rapidly reduce greenhouse gas emissions—a goal articulated in RELX's Climate Change Statement—and to hold warming to 1.5°C therefore needs to be on rapidly phasing out fossil fuels.

With this in mind, the Race to Zero pledge requires members to restrict the "facilitation of new fossil fuel assets" in line with "appropriate scenarios…created by the IPCC or IEA," which clearly state the need for "no new oil and gas fields."

Here again, then, we think Elsevier's words do not match up with its actions.

Elsevier R&D

Claim: Geofacets "is now solely focused on helping companies seek clean energy solutions so geoscientists and engineers can understand the best carbon storage sites, identify optimal locations to install wind farms and/or help with the discovery of critical minerals necessary for wind, solar, geothermal power, electric cars and energy storage infrastructure that will be necessary to achieve a 1.5°C future."

Rebuttal: We do not see how this can be correct as a look at the publicly accessible areas of the Geofacets website at the time of your reply revealed the following:

1. partner organizations, which include:
    a. American Association of Petroleum Geologists. AAPG promotes narratives that "oil isn't going anywhere" and publishes books specifically dedicated to petroleum exploration activities and unconventional hydrocarbons in the Global South.
    b. C&C Reservoirs. Geofacets "integrates field locations from C&C Reservoirs'" database into its product. C&C Reservoirs states plainly on its website that its database documents "the world's most important oil and gas fields and reservoirs." They provide this intelligence to many of the world's largest fossil fuel companies, including ExxonMobil, which promotes continued investment in expanding fossil fuels, and Chevron, which advertises its plans to boost production in the coming years. Such activities are in clear opposition to what the science says is needed.
    c. Indonesian Petroleum Association. IPA's mission is to "be the voice of the upstream oil and gas industry in Indonesia and…to promote the industry" for a variety of audiences. The organization further promotes its expectations of increasing production from the oil and gas sector, albeit pairing those expectations with a goal of reducing sector-wide emissions.
2. the special "Millennium" editions of Geofacets offered to members of society partners, including the Society of Exploration Geophysicists. The February 2023 issue of SEG's *Interpretation* journal included a special section on understanding "unconventional hydrocarbon reservoirs." The January 2023 issue included one article on "promising areas to search for new petroleum accumulations," another on fracture prediction ("an important and active area of research for oil and gas exploration in fractured unconventional reservoirs"), and many more aimed at understanding petroleum reservoirs.
3. Petrel, software for which Geofacets provides a connector. Petrel and Studio are software products owned by oil giant Schlumberger, which aims for "enhanced levels of productivity for the Petrel [exploration and production] software platform."

While Elsevier's intention may very well be to focus Geofacets on helping companies seek clean energy solutions, its partners, and particularly data partners, make clear that Elsevier continues to include data in Geofacets that facilitates oil and gas exploration and exploitation. Moreover, publications by at least one of the organizations for which Elsevier provides a special edition of Geofacts routinely includes research articles that enable new and unconventional oil and gas recovery.

Elsevier R&D also touts Knovel as one of its "R&D Solutions for Net Zero," one that it markets to the oil and gas industry as a tool to scale up operations and increase productivity. Elsevier offers access to data

and technical resources, including content from the Society of Exploration Geophysicists (SEG), that enable customers to analyze resource potential, inform exploration, and develop new reservoirs. Despite being a partner in a network that pledges to use data "to achieve the Sustainable Development Goals" that are dependent on an end to new oil and gas, Elsevier R&D leverages its "deep expertise in data, science and technology" to "empower exploration teams to make more effective interpretations that reduce risk, enhance recommendations and ultimately improve exploration strategies and success rates." The company boasts that, through products like Knovel, ScienceDirect, and Scopus, it helps 60% of Fortune 500 oil & gas companies and 65% Forbes top 25 global exploration and production companies find "E&P opportunities" and "drive discovery."

Journals and other publications

Claim: "We are actively decreasing the number of journals focused on hydrocarbon science. Only six of Elsevier's 2,800 journals currently focus on this topic – one of them will be closed by the end of this year; the others have updated their scope and aims to focus on topics such as renewable energy, and carbon capture and storage. We are also reviewing their editorial boards to ensure they include expertise in these areas and a greater representation from the Global South."

Rebuttal: It may be the case that Elsevier is reducing the number of journals focused on hydrocarbon science, but a non-exhaustive search of the company's thousands of journal offerings brings up at least nine such journals.[1] Moreover, Elsevier publishes hundreds of articles per year on the topic of oil exploration and development alone. A search of articles including the terms "oil" and "exploration and development" published in Elsevier journals with "petroleum" in the journal title shows over 1,000 such articles published between 2021 and 2023 alone. During 2022, the company published more such articles than during any year going back to 1999, which indicates a worrisome trend.

Additionally, while Elsevier may have changed the stated aims of its energy journals, they continue to inform new oil and gas development, which is inconsistent with those aims. For example, *Unconventional Resources* indicates a move from covering "advances associated with the known or proposed unconventional resource plays worldwide" (2022) to a "focus on energy transition and achieving net-zero emission targets," (2023) but continues to publish significant content that maps "promising" and "potential hydrocarbon reservoir areas" of "high-quality" for continued "oil and gas exploration." Similarly, the *Journal of Petroleum Science and Engineering* was rebranded in 2023 as *Geoenergy Science and Engineering* with that same stated "focus on energy transition and achieving net-zero emission targets," but it continues to extensively inform "future discoveries" with insights for "oil exploration" and identifying "potential favorable exploration targets." Again, there is no scientific basis for claiming this activity can be associated with a just transition or net zero targets.

[1] These include:
1. Petroleum Science
2. Geoenergy Science and Engineering
4. Egyptian Journal of Petroleum
5. Petroleum
6. Petroleum Exploration and Development
7. Journal of Natural Gas Geoscience
8. Gas Science and Engineering
9. Upstream Oil and Gas Technology

Further, it's misleading to imply Elsevier only promotes the expansion of fossil fuel development in energy journals, when such content can be found in many other journals focused on engineering, computer science, ocean and marine research, physics, business, geochemistry, geology and more. It is disturbing to note that papers across Elsevier's portfolio cover tools, technologies, workflows, drilling strategies, and geographical hydrocarbon analyses to "promote hydrocarbon exploration activities" and "future exploration with high certainty." This is being done by Elsevier at a crucial point for humanity at which we know most known reserves must remain in the ground for the sake of minimizing climate harms.

For its books, Elsevier's 'Energy with Purpose' mission to support an energy transition by "aligning with our journal colleagues" is insufficient given the company's stance on the facilitation of new fossil fuels, to which this pledge makes no mention. Despite an IEA report calling for a halt to all new oil and gas fields as of 2021 that's cited in the UN Race to Zero guidance, Elsevier continues to publish many books that can facilitate fossil fuel expansion. It is difficult if not impossible to square the company's facilitation of new fossil fuel development with its claim that it is scaling "progress on the SDGs, including SDG 13, Climate Action" or with RELX's Global Environment Policy that states the company is "minimising its contribution to climate change, in line with the scale of action deemed necessary by science."

LexisNexis

Claim: "The 2015 white paper cited was not from our Risk business and was withdrawn from circulation."

Rebuttal: The white paper was produced by LexisNexis, which continues to provide guidance for the industry to "carry out oil and gas exploration and production," including legal resources for licensing, insurance, commercial agreements, joint ventures, and "contracts that are available for use throughout the oil and gas industry." The point is not the existence of a single white paper, but LexisNexis' decision to aid fossil fuel expansion after 2021.

RX Conferences

Claim: "We discontinued the Brasil Offshore event in 2020 and are working to transition the two remaining Australian exhibitions to focus on the products and services vital to the mining sector's role in decarbonisation technology. The upcoming Aimex show will include a Decarbonisation Pavilion to showcase innovation and best practice for smarter, safer and more sustainable products to support the transition of the mining sector."

Rebuttal: We are pleased to learn that RELX has ended one of its events focused on fossil fuels. We note, however, that although the AIMEX mining conference promotes "the sector's transition to a net zero future," the event showcases partners that are lobbying to significantly expand coal mining, including one project that will generate an additional 1.1 billion tonnes of greenhouse gases over the next 27 years. We also note that at least two of RELX's renewable energy conferences - and another offshore conference organized by a professional association with a mission to support oil and gas exploration and production - have fossil fuel sponsorship and vendors. Maintaining financial ties and relationships to such companies indicates an unwillingness to acknowledge that fossil fuel production must be essentially phased out rapidly in the coming decades to meet RELX's stated climate goals. It should be noted that many fossil fuel companies grossly overstate their investment in renewable energy technologies. Indeed, RELX can be seen to be amplifying the disinformation of oil major customers that

say they are becoming carbon neutral "energy companies" that are "in step with society" when in fact their decarbonization scenarios overshoot the 1.5°C limit of the Paris Agreement by a significant margin.

UN Guiding Principles and UN Global Compact

Claims: "We consider the UN Guiding Principles on business and human rights in all our activities," and "We embed the ten principles of the UN Global Compact in our Code of Ethics…"

Reality: If this were the case, Elsevier would be "discontinuing activities with potentially adverse climate change-related human rights impacts" as per the UNGP. Similarly, UNGC Principle 2 states that "[A company should] identify and prevent or mitigate the human rights risks with which the company may be involved *through links to its products, operations or services*." Climate lawsuits around the world assert that fossil fuel actors have violated human rights through their continued production of planet-warming products and their disinformation-laden communications practices.

Elsevier would also be taking action "where there are threats of serious or irreversible damage" as per the UNGC and "ensuring that their business activities, including activities conducted in partnership with the private sector, contribute to mitigating and adapting to climate change" as per the UNGP. By continuing to provide services that have potentially adverse impacts on human rights and continuing business activities that worsen rather than mitigate climate change, we think that Elsevier's commitments here fall short.

Finally, the RELX Code of Ethics and Business Conduct requires that representations of the company "must be accurate and not misleading." Given the disconnect between your company's public claims and its practices, we are concerned that RELX/Elsevier is not living up to its ethical commitments.

We respectfully request a response to the above points and answers to the following questions by October 25, 2023, so that signatories and other stakeholders can best consider how to proceed:

1. *How does RELX/Elsevier justify marketing its commitments to the Paris Agreement, net zero, and a safe energy transition while still facilitating fossil fuel expansion past the point the scientific community has declared it's safe to do so?*

2. *By the end of 2023, will the company withdraw from the market products and services that facilitate new fossil fuel projects, and cancel any contracts and partnerships with individuals, companies, and organizations engaged in the exploration and development of new fossil fuels that grant them access to tools, information, and resources used to aid those efforts? Additionally, will the company remove and cease generating messaging which misleads the public about the company's fossil fuel industry customers and partners?*

3. *Elsevier has previously cited ethical considerations to constrain commercial activities. Given company pledges, should the company's stated commitment to "editorial independence" and "freedom of academic communication" be constrained by any ethical considerations regarding the dissemination of content that negatively impacts human health and the wellbeing of the planet?*

4. *If the signatories of this petition and other stakeholders choose to enter into a grievance mechanism, does the company agree to follow its UNGP pledge to "participate in effective*

operational-level grievance mechanisms that can remediate climate and environmental concerns raised by affected persons" and to "participate in good faith, and not undermine, proceedings before legal or non-legal tribunals that promote accountability for climate harms," with "all those seeking to access or interact with grievance mechanisms…able to do so without fear of reprisal"?

Best Regards,

Kristina Dahl (Union of Concerned Scientists) and
Stuart Parkinson (Scientists for Global Responsibility)