*Shell’s response re Publish What You Pay’s open letter*

*06 March 2020*

*Business & Human Rights Resource Centre invited Shell to respond to Publish What You Pay’s (PWYP) open letter urging companies committed to the principles of the Extractive Industries Transparency Initiative (EITI) to comment on the U.S. Securities and Exchange Commission’s (SEC) recently proposed rule to implement Section 1504 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.*

*Shell sent us the following response:*

*Shell has been a long standing member of EITI. We have worked within the EITI framework to help develop the standards, and we support these standards, including the EITI standard’s definition of project-level reporting. The implementation of EITI standards is a government-led process, with multi-stakeholder support, and we encourage countries to join EITI.*

*Shell is subject to the UK requirements regarding the detailing of payments to governments in relation to our extractive activities. These include references to project-reporting which are similar to the EITI standard.*

*We believe that close alignment in reporting standards is beneficial to all stakeholders, and we support countries in implementing their transparency ambitions. To the extent that such alignment is not possible, we believe an equivalence clause is helpful.*