

Joe Ellis

Vice President and Head of U.S. Government Affairs



March 16, 2020

The U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

BP America, Inc
1101 New York Ave. NW
Suite 700
Washington, D.C. 20005

Reference: File Number S7-24-19

Subject: BP America's Comments on the Securities and Exchange Commission's Proposed Rule (13q-1) "Disclosure of Payments by Resource Extraction Issuers"

Dear Sir/Madam,

BP has over a 150 year history in America and is committed for the long-term. In the United States, BP has a larger economic footprint than it does in any other country. BP invested more than \$125 billion in the U.S. between 2005 and 2019 and our operations contributed \$100 billion to the national economy in 2018 alone. We employ more than 13,000 people across the country and support more than 200,000 additional American jobs through our operations and activities.

BP's purpose is to reimagine energy for people and our planet, and we have an ambition of becoming a net-zero company by 2050 or sooner and help the world get to net zero. This ambition is underpinned by ten aims, one of which is particularly relevant: to be recognized as an industry leader for the transparency in our reporting. At BP, we believe that transparency is the currency of credibility and we support transparency in revenue flows from oil and gas activities to governments.

BP has had a long-standing commitment to transparency of payments to foreign governments and has been reporting global payments at a contract-level under the European Union's regulations since 2015. As a global energy business with wide reach across the world's energy system, we have worked with governments and civil society to help develop disclosure standards that are workable, proportionate and effective in improving accountability, transparency and credibility for our company and industry.

BP is a member of the Extractive Industries Transparency Initiative (EITI), the global standard to promote the open and accountable management of extractive resources. In 2019, EITI introduced the standard for countries implementing the EITI. The EITI Standard embodies a global consensus - negotiated between governments, civil society and companies - on a consistent and workable approach to the disclosure of material payments (and other relevant data) with respect to extractive activities.

BP's Position

BP supports transparency in revenue flows from oil and gas activities to governments. Good governance, the rule of law and positive relationships with local stakeholders help build trust and credibility in the regions where we operate. BP believes that the adoption of 13q-1 should go as far as possible to seek alignment with E.U. and Canadian rules, and consistency with the EITI Standard to the greatest extent possible by law.

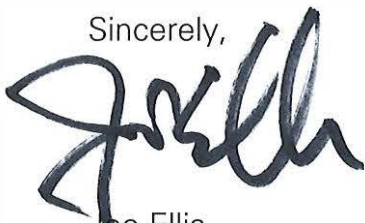
Regulatory alignment on the approach to contract-level reporting already enshrined in the E.U. and Canada reporting requirements and the EITI Standard would be the most effective means of producing high-quality and comparable data. In particular, we would welcome a standard definition of a "project" for the purposes of disclosing contract-level payments. Defining extractive projects consistently across all countries to the greatest extent possible would foster improved transparency and support accountability in practice. This would provide meaningful, material data across the different reporting jurisdictions, in a manner that avoids commercial harm to companies, and would improve the quality and comparability of the information provided for the user of these data.

BP supports the proposed approach to alternative reporting that would allow issuers to meet the requirements once the SEC has determined the alternative reporting regime satisfies the transparency objectives of 13q-1. Once 13q-1 is finalized, BP encourages the SEC to review the E.U., U.K. and Canadian reporting requirements to determine the appropriate equivalence mechanism.

We commend the SEC for progressing transparency by re-issuing the proposed rule 13q-1. Thank you again for the opportunity to comment on the SEC's efforts to increase transparency in the natural resource sector. BP looks forward to further engagement with the SEC, stakeholders, and the public regarding ways we can support the United States' fight against global corruption and goal to hold governments accountable for the wealth generated by natural resource extraction.

Should you have any questions or comments, please contact me or Lance Williams at joell@bp.com.

Sincerely,



Joe Ellis
Vice President and Head of U.S. Government
Affairs