



June 8, 2021

The following letter is presented by the Felician Sisters of North America in response to an invitation for comment on climate change disclosures by SEC Acting Chair Allison Herren Lee to be submitted by June 14, 2021.

The Felician Sisters of North America submit this comment letter in support of a rulemaking by the SEC on mandatory climate change disclosures. We believe that disclosure of the material and systemic risks of climate change will help companies and investors to understand, price, and manage climate risks and opportunities.

The Felician Sisters of North America are part of an international organization of religious women founded over 160 years ago in Poland and currently serving in various ministries. The North American province includes the United States and Canada. Our engagements with companies focus on the areas of human rights, human right to water, and climate change. Our current AUM is \$585M. We are members of the Interfaith Center on Corporate Responsibility (ICCR), a 50-year old coalition of more than 300 faith and values based institutional investors who engage with corporations on their environmental and social impacts. ICCR members have been engaging for decades with companies on the risks posed by climate change and understand the value of comparable, consistent, and reliable climate-related information. The Felician Sisters of North America believe that climate disclosures are critical for effective investment decision -making.

Climate change bears significant risks to corporations as it can affect physical assets, have business impacts, and drive economic instability. Company actions and operations can directly impact climate risk which can affect the health and well-being of the people located in their areas of operation. This can be a catalyst for reputational damage that is detrimental to any company. Transparent disclosure is key for investors and the public. Yet, to be useful, disclosure needs to be set in a consistent and comparable manner so that investors and consumers can better judge a company's impact otherwise it is just useless data. Current disclosures are not in a manner that can be easily used to compare companies in an efficient way. Consistent and mandatory reporting would enable investors to better monitor the progress of companies and encourage companies to take concrete actions to achieve measurable progress on the goals they have set.

The climate crisis requires immediate and effective action to lessen economic effects, protect communities and protect the environment. We urge the SEC to act urgently in its climate disclosure rulemaking process.

Thank you for the opportunity to participate in the SEC's request for information and for your willingness to consider comments.

Sincerely,

SM Jean Sliwinski  
Provincial Sustainability Coordinator  
Felician Sisters of North America