Statement of Essential Principles for SEC Climate Change Disclosure Rulemaking

We are investors with over $2.7 trillion in assets under management and advisement (as of June 9), corporations, non-profit organizations, and individuals who support climate change disclosure rulemaking by the Securities and Exchange Commission. 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. These activities are at the core of efficient securities markets and are essential to ensuring a just and thriving economy that works for all people and communities.

Climate change poses a systemic risk to the economy. The impacts of the climate crisis on our lives and our livelihoods are worsening at a dramatic rate. These include physical risks to real assets from climate-fueled weather events and transition risks posed by regulatory, technology, economic, and litigation changes during the shift to a net-zero economy. The risks can combine in unexpected ways, with serious, disruptive impacts on asset valuations, global financial markets, and global economic stability.

Furthermore, climate change poses a variety of material risks to companies of all sizes in all industries across our nation. The costs to companies of inaction may be dire in the medium and long term, and many of those impacts, such as those from floods, fires, droughts, and hurricanes, are already being incurred in the short term. While there will be a cost for compliance with SEC climate disclosure rules, it is far less costly to companies and their investors than ignoring the risk.

Climate risk disclosure would bring significant benefits to investors and companies. They need access to consistent, comparable, and reliable information at scale to fully assess their risk exposure and to navigate the path to a net-zero future. The current state of climate change disclosure does not meet our needs. Companies and investors need comprehensive, decision-useful data from all enterprises facing material climate change risks.

We also call on the SEC to take into consideration the broader impacts of climate change as a part of the rulemaking process, including the physical and transition impacts of the climate crisis on communities, human rights implications, and the connection between climate, water, food, and forests.

We appreciate the SEC’s Request for Information on climate change as it allows for comprehensive input about the issues the SEC must resolve to meet the needs of all market participants. We believe that climate change disclosure rules from the SEC should, at minimum, include the following elements:
Based on the TCFD: The SEC’s work should be based on the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) which has been endorsed by hundreds of companies and investors globally.

Industry-specific metrics: SEC rulemaking should include industry-specific metrics because material climate risks manifest in different ways by industry. These metrics should build on existing standards in common use by investors and companies. Identifying such industry-specific metrics would also allow for comparable disclosures.

Governance and strategy disclosure: Disclosure rules should provide insights into companies’ climate risk exposure, strategies, and scenario planning.

Emissions disclosure: Disclosure rules should include Scope 1, 2, and 3 greenhouse gas emissions, which are needed to assess the full range of climate change risks facing companies.

Inclusion in financial filings: Material climate disclosures, including discussion on risk exposure and business opportunities, impacts on strategy, and emissions reporting and management, should be included in annual, quarterly, and other appropriate SEC filings.

Regular updates: Climate change impacts, scientific consensus around climate impacts and capital market responses to climate risks are rapidly evolving. SEC rules should be updated regularly in response to these developments, and they should include the development or adoption of new metrics.

The undersigned organizations and individuals support SEC climate disclosure rulemaking in alignment with these principles, to ensure consistent, comparable, and decision-useful information. We sincerely appreciate the Commission’s consideration of our views, and we look forward to working with you. We urge the SEC to act urgently in response to the growing threats of the climate crisis to markets and the economy.

Sincerely,

KERAMIDA, Inc.

Vicky Keramida, Ph.D.
CEO & Chief Technical Officer
North American Investors

1. California State Teachers Retirement System (CalSTRS)
2. New York State Common Retirement Fund
3. Oregon State Treasury
4. Minnesota State Board of Investment
5. Connecticut Office of the State Treasurer
6. Illinois State Treasurer Michael Frerichs
7. Canada Post Corporation Pension Plan
8. Adrian Dominican Sisters, Portfolio Advisory Board
9. Aquinas Associates
10. Ariel Investments
11. As You Sow
12. Asterra Partners
13. AUM Consulting, LLC
14. Avaron Asset Management
15. Avera Health
16. Boston Common Asset Management
17. Boston Trust Walden
18. Capricorn Investment Group
19. Centered Wealth
20. Change Finance
21. Chicory Wealth
22. Christian Brothers Investment Services, Inc.
23. Clean Energy Ventures (CVA)
24. ClearBridge Investments
25. Dana Investment Advisors
26. Domini Impact Investments
27. Dominican Sisters ~ Grand Rapids
28. DSC Meridian Capital LP
29. East Bay Municipal Utility District Employees' Retirement System
30. Ecofi
31. Ecofin
32. EcoLogical Solutions /// Saunders Hotel Group
33. Employees' Retirement System of the State of Hawaii
34. Epoch Investment Partners
35. Everence and the Praxis Mutual Funds
36. First Affirmative Financial Network
37. Friends Fiduciary Corporation
38. Green America Endowment
39. Green Century Funds
40. Ground Effect
41. Hannon Armstrong
42. Interfaith Center on Corporate Responsibility (ICCR)
43. Inherent Group
44. Investor Advocates for Social Justice
45. JBQ Trust
46. JSA Sustainable Wealth Management
47. Lombard Odier Investment Managers ("LOIM")
48. Macroclimate LLC
49. Mennonite Education Agency
50. Mercy Investment Services, Inc.
51. Metrus Energy
52. Miller/Howard Investments, Inc.
53. NEI Investments
54. Nephila Capital Ltd
55. Neumeier Poma Investment Counsel, LLC
56. New Forests
57. Nugent Properties
58. Pacific Community Ventures
59. Progressive Investment Management
60. Province of Saint Joseph of the Capuchin Order
61. Refugee Investment Network
62. Region VI Coalition for Responsible Investment
63. Reynders, McVeigh Capital Management LLC
64. Rockefeller Asset Management
65. School Sisters of Notre Dame Cooperative Investment Fund
66. Seattle City Employees' Retirement System
67. Sema4, Inc.
68. Seventh Generation Interfaith Inc
69. SHARE
70. Sisters of Bon Secours USA
71. Sisters of St. Dominic of Caldwell, NJ
72. Sisters of the Humility of Mary
73. Sisters of the Presentation of the BVM of Aberdeen SD
74. Stance Capital, LLC
75. Sunwealth
76. Sustainable Insight Capital Management
77. Terra Alpha Investments LLC
78. The Episcopal Church (DFMS)
79. The Sustainability Group of Loring, Wolcott & Coolidge
80. The Facilities Group
81. Tiemann Investment Advisors, LLC
82. Toniic Institute
83. Tortoise Capital Advisors, LLC
84. Trillium Asset Management
85. Vanderbilt /dba Greenvest
86. Vermont Pension Investment Committee
87. Vert Asset Management
88. Vine Associates
89. Volery Capital Partners
90. Wespath Benefits and Investments

Foundations

1. Bullitt Foundation
2. Climate Emergency Fund
3. ClimateWorks Foundation
4. David and Lucile Packard Foundation
5. Gavi, The Alliance
6. Green2Gold
7. Harfield Foundation
8. Manaaki Foundation
9. Sant Foundation
10. Skoll Foundation
11. Summit Foundation
12. The Educational Foundation of America
13. Wallace Global Fund
14. William and Flora Hewlett Foundation

Global Investors

1. DWS Group
2. Ethos Foundation, Switzerland
3. Lombard Odier Investment Managers ("LOIM")
4. Aargauische Pensionskasse (APK)
5. ATISA Personalvorsorgestiftung der Tschümperlin-Unternehmungen
6. Bâtirente
7. Bernische Lehrerversicherungskasse
8. Bernische Pensionskasse BPK
9. Caisse Cantonale d'Assurance Populaire - CCAP  
10. Caisse de pension du Comité international de la Croix-Rouge  
11. Caisse de pension Hewlett-Packard Plus  
12. Caisse de pensions de l'Etat de Vaud (CPEV)  
13. Caisse de pensions du CERN  
14. Caisse de pensions du personnel communal de Lausanne (CPCL)  
15. Caisse de pensions ECA-RP  
16. Caisse de prévoyance des Fonctionnaires de Police & des Etablissements Pénitentiaires  
17. Caisse de Prévoyance de l'Etat de Genève CPEG  
18. Caisse de Prévoyance des Interprètes de Conférence (CPIC)  
19. Caisse de prévoyance du personnel communal de la ville de Fribourg  
20. Caisse de prévoyance du personnel de l'Etat de Fribourg (CPPEF)  
21. Caisse de prévoyance du personnel de l'Etat du Valais (CPVAL)  
22. Caisse intercommunale de pensions (CIP)  
23. Caisse paritaire de prévoyance de l'industrie et de la construction (CPPIC)  
24. CAP Prévoyance  
25. Church of Sweden  
26. CIEPP - Caisse Inter-Entreprises de Prévoyance Professionnelle  
27. Etablissement Cantonal d'Assurance (ECA VAUD)  
28. Fondation de la métallurgie vaudoise du bâtiment (FMVB)  
29. Fondation de prévoyance Artes & Comoedia  
30. Fondation de prévoyance du Groupe BNP PARIBAS en Suisse  
31. Fondation de prévoyance professionnelle en faveur de AROMED  
32. Fondation de prévoyance Romande Energie  
33. Fondation Interprofessionnelle Sanitaire de Prévoyance (FISP)  
34. Fondation Leenaards  
35. Fondation Patrimonia  
36. Fonds de Prévoyance de CA Indosuez (Suisse) SA  
37. Fonds interprofessionnel de prévoyance (FIP)  
38. Gebäudeversicherung Luzern  
39. Gebäudeversicherung St. Gallen  
40. Gestion FÉRIQUE  
41. Hexavest  
42. Le Regroupement pour la Responsabilité Sociale des Entreprises (RRSE)  
43. Luzerner Pensionskasse  
44. Nest Sammelstiftung  
45. North East Scotland Pension Fund  
46. Pensionskasse Römisch-katholische Landeskirche des Kantons Luzern  
47. Pensionskasse AR
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**Companies (A = American Sustainable Business Council member, B = B Corporation)**

1. Danone North America \(^B\)
2. Enel North America, Inc.
3. Patagonia \(^B\)
4. Solar Energy Industries Association

5. 17 Communications \(^A\)
6. 3Degrees \(^B\)
7. Advanced Communications Company
8. AJF Financial Services
9. Aldik Home
10. Allbirds
11. Alliance for Sustainability
12. Alter Eco
13. Amicus Solar Cooperative
14. AppHarvest, Inc
15. Arabesque
16. Artisan Dental
17. Avocado Green Brands
18. Baloise Asset Management AG
19. Banyan Botanicals
20. BHP
21. BigFoot for Good
22. Biotic Brands
23. Bon Secours Mercy Health
24. BTN
25. C | change
26. C. Wolfe Software Engineering
27. Camilla O. McRory Attorney at Law
28. Canyonlights Photography
29. CarCar, Inc.
30. Case Medical, Inc.
31. CauseLabs, PBC
32. Charles Wolfe Consulting
33. Chrysalis Farm
34. Citizens Energy Corporation
35. Civekps Co-Living
36. Climate Positive Consulting
37. Comeback Farm Organic Produce
38. CONTEMPL8 T-SHIRTS LLC
39. Cooperative Coffees
40. Deltec Homes
41. DLC
42. Dr. Bronner's
43. EcoAdvisors
44. Ecodeo
45. EDP - Energias de Portugal
46. Eighty2degrees
47. Encore Editorial Services
48. Engage Strategies
49. Ethical Markets Media
50. Evergreen Sustainability, LLC
51. Evolution Marketing, LLC
52. Future Nexus
53. Garnant Computer Services
54. Generate Capital
55. GMB Rentals, LLC
56. Green Retirement, Inc.
57. GreenStep Solutions, Inc.
58. Gryphon Solutions, LLC
59. Guayaki Yerba Mate
60. Guru
61. Habitus Incorporated
62. HigherRing
63. HJKessler Associates, Inc.
64. Home Rental
65. Hua Nani Partners
66. In the Cause of Peace Productions
67. Intex Solutions, Inc.
68. Jarmusz & Associates
69. JB Media Group, LLC
70. Kathryn Blume, International
71. Keap Co.
72. Kent Mollohan Designs
73. Laboratoires Expanscience USA
74. Lamey-Wellehan Shoes
75. Laurie Allan & Associates
76. Legacy Vacation Resorts
77. Lemonade
78. Leonie Lacouette Clocks
79. Living Green Enterprises, LLC
80. LolitaMoon Productions
81. Luke's Lobster
82. Mark Hewitt Pottery
83. Mark J. Guay, PC
84. Matt Sheridan Dog Walking
85. Meaningful Organizational Design, Inc.
86. MedicareForAll.us
| 87. | Mendelsohn, Gittleman & Associates, LLC |
| 88. | Mightybytes B |
| 89. | MMercer Consulting B |
| 90. | Molo Constituency Forest Association |
| 91. | Montaya Distillers A, B |
| 92. | M&J Cleaning Service A |
| 93. | Namaste Solar B |
| 94. | Namu Baru Inc. A |
| 95. | National Foundry Products A |
| 96. | Natura & Co B |
| 97. | Net Impact A |
| 98. | NLGC, LLC |
| 99. | Numi Tea B |
| 100. | Otherwild A |
| 101. | Pearson, PLC |
| 102. | Pirelli Tire North America A |
| 103. | Planet+Purpose Solutions A |
| 104. | Provoc B |
| 105. | Pure Strategies B |
| 106. | R | K Invest Law, PBC A |
| 107. | r.Cup A |
| 108. | Real Pickles Cooperative A |
| 109. | ReCIRC B |
| 110. | Rescue Agency B |
| 111. | Riverwater Partners B |
| 112. | RONJOE’S A |
| 113. | Rosebud Agency A |
| 114. | Salt Palm Development B |
| 115. | Sanderson Sustainable Design A |
| 116. | SecondMuse B |
| 117. | Sema4, Inc. |
| 118. | SharePower Responsible Investing A |
| 119. | Shift Group A |
| 120. | Shifting Patterns Consulting B |
| 121. | SIMPLI A |
| 122. | Simply Straws B |
| 123. | Soap Alchemy A |
| 124. | Social Impact Consulting & Coaching A |
| 125. | Software Business Advisors A |
| 126. | Solar Energy Industries Association |
**Religious Organizations**

1. Congregation of Sisters of St. Agnes
2. Congregation of St. Joseph
3. CRI office - Province of Saint Joseph of the Capuchin Order
4. Daughters of Charity, Province of St. Louise
5. Jesuit Committee on Investment Responsibility
6. Sisters of Bon Secours USA
7. Sisters of the Humility of Mary
8. Sisters of the Presentation of the BVM of Aberdeen SD
10. Sisters of St. Dominic of Caldwell, NJ
11. Sisters of St. Francis
12. Sisters of Saint Joseph of Chestnut Hill, Philadelphia, PA
13. Unitarian Universalist Association
14. USA East Province of the Society of Jesus

**Nonprofit Organizations**

1. Ceres
2. Alliance to Save Energy
3. American Sustainable Business Council
4. B Lab
5. Business for Social Responsibility
6. Center for Climate and Energy Solutions
7. E2 (Environmental Entrepreneurs)
8. Earth Action, Inc.
9. Environmental Defense Fund
10. Environmental Protection Network
11. Governance Institute
12. Green America
13. Innovation Network for Communities
14. Institute for Market Transformation (IMT)
15. Natural Resources Defense Council
16. Publish What You Pay-United States
17. RMI
18. Union of Concerned Scientists
19. World Business Council for Sustainable Development

20. 1worker1vote
21. 350 New Orleans
22. 350PDX
23. Acadia Center
24. Adrian Dominican Sisters, Portfolio Advisory Board
25. Association of Geophysicists and Environmentalists of Serbia
26. Atlantic Coast Conference Climate Justice Coalition
27. BlueHub Capital
28. Boma Global
29. Bon Secours Mercy Health
30. Case Medical, Inc.
31. Catholic Divestment Network
32. Center for Community Based Enterprise
33. China Water Risk
34. Climate Emergency Fund
35. Citizens Energy Corporation
36. Climate Justice at Boston College
37. Connecticut Citizen Action Group
38. Earthday.org
39. Earth Economics
40. Environmental League of Massachusetts
41. Extinction Rebellion Boston
42. Florida for Good
43. Fossil Fuel Divest Harvard
44. Jesuit Committee on Investment Responsibility
45. Kiss The Ground
46. Mass Audubon
47. New Jersey Sustainable Business Council
49. Northeast Clean Energy Council
50. One Step Closer
51. Project on Organizing, Development, Education, and Research (PODER)
52. Reward Value Foundation
53. Slow Money NC
54. Solutions for Climate Change Network
55. Texas Campaign for the Environment
56. Tonient
57. Trinity Human Rights Group
58. United Nations Foundation
59. We Are Neutral
Leaders & Elected Officials

1. Betty T. Yee, California State Controller
2. Honorable Paul G. Kirk, Jr, retired U.S. Senator from Massachusetts
3. Elizabeth A. Pearce, Vermont State Treasurer
4. Alicia Seiger, Stanford University Sustainable Finance Initiative, Managing Director
5. Tim Wirth, retired U.S. Senator from Colorado and Board Member for the UN Foundation and Winslow Foundation

Professors

1. Frank Engert, University of Maine Farmington, Professor
2. Rebecca Henderson, Harvard University, John and Natty University Professor
3. Thomas Lyon, University of Michigan, Dow Professor of Sustainable Science, Technology and Commerce
4. Garrett Stoll, University of Colorado, Researcher
5. Ryan Johnson, Arizona State University, School of Sustainability, Executive Director of Continuing & Professional Education

Individuals

1. Aaron Ucko
2. Reverend Allan B. Jones
3. Alan Bernstein, Community Development Venture Capital Alliance, Managing Director
4. Alan Peterson, PSR, MD
5. Alison Edwards, Stewardship Index for Specialty Crops
6. Alex Wilson, Ceres, Digital Associate
7. Alexander Blum, Applied Bioplastics, Chief Impact Officer
8. Alexandra Fowler
9. Alice Collins, Retired Lawyer
10. Alisa Gravitz, Green America, CEO
11. Alison Edwards, SISC
12. Alison Mason, SunJuice Solar, Principal
13. Allen White, Tellus Institute, Senior Fellow
14. Alys Campagne, Engage Strategies, Principal
15. Amara Jones, Youth Emergency Auxiliary Service-Sierra Leone (YEAS-SL)
16. Amy Sterling-Bratt LICSW
17. Amy Williams-Derry, Attorney
18. Annie Agle, Cotopaxi, Senior Director of Impact and Sustainability
19. Arel Meister-Aldama, Sprout Health Group
20. Austin Hinkel
22. Bernardo Alayza Mujica, coasap
23. Brian Cady
24. Charles Lynd, Ohio Sustainable Business Council, Board Member
25. Chet Atkins, Tremont Strategies Group, Partner
26. Cigdem Capan
27. Cindi Darling
28. Clark Williams-Derry, Broadview Research
29. Cliff Owens-Leech, The COL AGENCY, General Agent
30. Dan Weintraub, Evergreen Sustainability, LLC, Certified Environmental Sustainability Advisor and Master Recycler
31. David Buchanan
32. David Leathers, Retired CEO
33. David Schreiber, Vanderbilt/dba Greenvest, Investment Advisory & Financial Planner
34. David Smernoff, HelioBioSys, Inc. CTO
35. Derek Gendvil, Transition Services, Inc, Janitor
36. Dita Škalič
37. Dudley and Candace Campbell
38. Elias Witman, Business for Social Responsibility, Sustainability and Technology Manager
39. Ellen Wasfi
40. Emily Foster
41. Eva Degel, Doctor
42. Fielding Norton, Norton-Sommer Revocable Trust, Trustee
43. Frank Gibney, Advocate for K-12 Sustainability Education
44. Graham Stevens, Atmospheric Industries LTD, Artist
45. Harold Watson
46. Holly Nahar, AJF Financial Services, Shareholder Advocate
47. Ian Wade, ASI, Director
48. James McRitchie, CorpGov.Net, Shareholder Advocate/Publisher
49. Janet Neihart
50. Jessica Herandez, Texas Vista Medical Center, CNA/MHT
51. Jim Frazin, Communitas Financial Planning, Financial Planner
52. Jim Loveland
53. Joan Beckta
54. Joe Burgess, Southern Energy Management, Building Energy Services Tech
55. Joe Day
56. John McGarry, Citizens Climate Lobby and MI League of Conservation Voters
57. Jon Spar, Medical Doctor
58. Joshua Sneiderman, Everyday Superheroes
59. Katelyn Lyster, Grounded, Chief of Staff
60. Kathleen Doyle, Investor
61. Ken DeBacker, STM3AII
62. Kenneth Robertson
63. Kristel Dorion, Energetix, LLC, Manager
64. Larry Ruttman, American author
65. Lana Sherrad
66. Laura Draucker, The Nature Conservancy, Senior Manager
67. Laura Matz
68. Lauren Bender
69. Lawrence Garwin
70. Lawrence Melander
71. Lesley Chillcott, Grommit, Inc, President
72. Lily Niska
73. Linda Beitz, Solutions Through Dialogue, LLC, Leadership Development Coach & Facilitator
74. Linda Pleiman, Sisters of the Precious Blood, Treasurer
75. Lionel Krupka
76. Marie Mainil, Entrepreneur
77. Maureen O’Neal
78. Michael Friedman, Center for Community Based Enterprise, Operations & Project Oversight
79. Michael LaBuda, Dolphin Blue, COO
80. Mindy Maxwell
81. Montie VanNorsand
82. Nancy Donohue
83. Nora Nash, Sisters of St. Francis of Philadelphia, Director Corporate Social Responsibility
84. Norman Slawsky, Investor
85. Paul Fisk
86. Paul Kirshen
87. Peter Meyer
88. Peter Warui, Molo Constituency Forest Association, Founder
89. Petya Miteva, ISS, Sustainability Advisory
91. Rebekah Helzel, HK LP, Partner
92. Richard Morrison
The sign-on process for the statement remains open to interested investors, companies, non-profit organizations, and individuals because the SEC rulemaking process has just begun. Feel free to contact Randi Mail, Director of Campaigns at the Ceres Accelerator for Sustainable Capital Markets ( ) with any questions or for more information.