



We are a group of Certified B Corporations that, in partnership with Ceres, support climate change disclosure rulemaking by the U.S. Securities and Exchange Commission. Certified B Corporations meet the highest standards of social and environmental performance, accountability, and transparency.

As Certified B Corporations, 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 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,

B Corp Signatories:

3Degrees

Allbirds

Alter Eco

Amicus Solar

Cooperative

AppHarvest, Inc.

Artisan Dental

Avocado Green Brands

Banyan Botanicals

BHP

Biotic Brands

Boston Common Asset

Management

c | change

Capricorn Investment  
Group

CauseLabs, PBC

Change Finance

Chicory Wealth



Climate Positive Consulting	JB Media Group, LLC	ReCIRC
Cooperative Coffees	Keap Co.	Rescue Agency
Cotopaxi	Laboratoires	Riverwater Partners
Danone North America	Expanscience USA	Salt Palm Development
Deltec Homes	Legacy Vacation Resorts	SecondMuse
Dr. Bronner's	Lemonade	Shifting Patterns Consulting
EcoAdvisors	Living Green	Simply Straws
Ecodeo	Enterprises, LLC	South Pole
Ethical Markets Media	Lombard Odier	StraightUp Solar
Evolution Marketing, LLC	Investment Managers	Tentree
First Affirmative	Luke's Lobster	thinkPARALLAX
Financial Network	Meaningful	Transcend, The
Green Retirement	Organizational Design	Fearless Company
GreenStep Solutions	Mightybytes	Trillium Asset Management
Guayaki Yerba Mate	MMercer Consulting	Trip Zero
Guru	Montanya Distillers	Veritable Vegetable
Habitus Incorporated	Namaste Solar	Vista Global Coaching & Consulting
HigherRing	Natura	Vital Plan
Inherent Group	Numi Tea	Yulu Public Relations
Intex Solutions	Patagonia	
	Pure Strategies	

### **About B Lab**

B Lab is a nonprofit that serves a global movement of people using business as a force for good. B Lab's initiatives include B Corp Certification, administration of the B Impact Management programs and software, and advocacy for stakeholder-based governance structures like the benefit corporation. B Lab's vision is an equitable, just and regenerative future for all people and the planet. Visit <https://bcorporation.net> for more information.

B Lab and Ceres partner to enable B Corporations to engage in meaningful climate advocacy and to work in collaboration to support and advance policies that incentivize meaningful climate solutions and inclusive and sustainable economic behavior to secure the wellbeing of all people and our home planet for future generations. The US B Corporation community, represented by climate-leading B Corps engaged in the [B Corp Climate Collective](#), a volunteer group of B Corp leaders driving bold climate ambitions,



have a joint statement of climate policy principles that guide their climate policy advocacy.

### **About Ceres**

Ceres is a national sustainability nonprofit organization that works with the most influential investors and companies to build leadership and drive solutions throughout the economy. Through powerful networks and advocacy, Ceres tackles the world's biggest sustainability challenges, including climate change, water scarcity and pollution, and human rights abuses. The record of leadership demonstrated by members of the Ceres Investor, Company, and Policy (BICEP) Networks proves that positive action on sustainability is not only possible, but also good for the bottom line, the economy, and the planet.

### **About the Cerees BICEP Network**

The BICEP Network is a coalition of Fortune 500 and other companies and institutions representing different sectors of the economy taking collective action to advocate for policies that will move the US toward a low-carbon economy.