

June 11, 2021

Via Electronic Mail

The Honorable Gary Gensler
Chair
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, D.C. 20549

Re: Request for Public Input on Climate Change Disclosures

Dear Chair Gensler:

Alphabet, Amazon, Autodesk, eBay, Facebook, Intel, and Salesforce are jointly responding to the request for public input regarding climate change disclosures, issued by Acting Chair Allison Herren Lee on March 15, 2021.¹ As leading technology companies, with demonstrated commitments around climate action, and who already regularly report on environmental performance, we believe it is critically important to share perspectives based on experience, with hopes of helping the SEC develop impactful climate change disclosure proposals.

Commitment to Climate Action and Reporting

We recognize that climate change is an urgent global challenge that demands collective action. We are committed to taking bold steps within our operations, supply chain, products, technology and public engagement. We believe that climate disclosures are critical to ensure that companies follow through on stated climate commitments and to track collective progress towards addressing global warming and building a prosperous, resilient zero-carbon economy.

Collectively, today we purchase more than 21 gigawatts of clean energy and many of us are members of the UN Race to Zero and America is All In campaigns, while each company has an individual goal to procure 100% renewable energy. The impact of these efforts are substantial, considering our role as job creators with nearly 1.7 million employees (as of last fiscal year end).

We support regular and consistent reporting of climate-related matters to complement the significant actions we each are taking to address climate change, and we each already voluntarily report our Scope 1, 2, and 3 greenhouse gas emissions footprints. We believe that it is critical to regularly measure and report on our progress towards our climate commitments and to share updates with investors and other stakeholders. We believe that in order for such disclosures to be meaningful and comparable, they should leverage widely recognized frameworks and standards when possible.

We welcome the SEC's leadership on climate action and support this important and timely inquiry. We are encouraged by the Commission's open and transparent process in proactively seeking early input

¹ U.S. Securities and Exchange Commission (SEC), "Public Input Welcomed on Climate Change Disclosures," Public Statement (March 15, 2021).

from a broad community of participants in the capital markets. Investors need clear, comprehensive, high-quality information on the impacts of climate change for market participants. Climate change is an urgent global challenge that requires broad action, and the SEC has sought appropriate input on how companies can disclose climate-related impacts and convey the meaningful steps they are taking towards reducing greenhouse gas emissions.

Key Principles for SEC Climate Disclosure Initiatives

We encourage the SEC to incorporate certain key principles in its climate change disclosure proposals, as outlined below.

- **Principles-based framework** – Reliance generally on a principles-based framework, guided by SEC’s longstanding definition of materiality, and designed for climate reporting is the most effective way to achieve meaningful and lasting improvement in climate disclosures. This could align with frameworks that have widespread support from investors now or in the future, such as the Task Force on Climate-Related Financial Disclosures (TCFD). A principles-based framework is flexible and provides a basis for companies to report the relevant and important information for their industry and their stakeholders, without need for continuous updating of the framework.
- **Include relevant greenhouse gas emissions information and reflect recognized global standards** – Disclosures should include relevant greenhouse gas emissions information that enables effective and comprehensive assessment of a company’s emissions footprint. To the extent that there are recognized global standards for required metrics, such as the World Resources Institute GHG Protocol, these standards should be reflected in climate reporting frameworks.
- **Leverage existing frameworks and standards** – The extensive work that has already been done to establish and harmonize frameworks and standards for climate reporting should be leveraged in the SEC’s initiatives in order to minimize duplication of efforts, increase consistency and comparability, reduce reporting burden, and quickly propose and implement disclosure requirements. While any proposals would be subject to SEC due process, including a public comment period, many existing frameworks have already been subject to review processes and thereby decrease the need for substantive redeliberations.
- **Reporting location, frequency, and timing** – Proposals should allow for new climate related disclosures to be provided outside of annual, quarterly, and other documents filed with the SEC. We recommend these disclosures be furnished via separate climate reporting to the SEC. Given that climate disclosures rely on estimates and assumptions that involve inherent uncertainty, it is important not to subject companies to undue liability, including from private parties. Also, reporting deadlines should allow sufficient time for companies to gather and validate information obtained from third-party providers.

Conclusion

Thank you for the opportunity to provide our collective thoughts on this important initiative. We look forward to constructive engagement with the SEC as you consider potential future rulemaking on climate change disclosures.

Respectfully submitted:

Alphabet Inc.
Amazon.com Inc.
Autodesk, Inc.
eBay Inc.
Facebook, Inc.
Intel Corporation
Salesforce.com, Inc.

cc:

The Honorable Caroline A. Crenshaw
Commissioner
Securities and Exchange Commission

The Honorable Allison Herren Lee
Commissioner
Securities and Exchange Commission

The Honorable Hester M. Peirce
Commissioner
Securities and Exchange Commission

The Honorable Elad L. Roisman
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John C. Coates
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