



14 June 2021

*The following letter is presented by Figure 8 Investment Strategies in response to an [invitation for comment](#) on climate change disclosures by SEC Acting Chair Allison Herren Lee to be submitted by June 14th, 2021.*

Figure 8 Investment Strategies submits 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. These activities are not only at the core of efficient securities markets but are also essential to ensuring a just and thriving economy that works for all people and communities.

As an independent Registered Investment Advisor based in Boise, Idaho, Figure 8 Investment Strategies provides comprehensive financial planning, advice, and investment management to values-aligned clients across the U.S. We specialize in integrating ESG considerations across our investment disciplines and we currently manage approximately \$130 million across 100 households.

In addition, Figure 8 is a member 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 hundreds of corporations on their environmental and social impacts. ICCR members have been engaging for decades with companies on the risks posed by climate change and therefore deeply understand the value of **comparable, consistent, and reliable** climate-related information. Figure 8 Investment Strategies believes climate disclosures are critical for effective investment decision-making.

The continual growth of climate change poses systematic and physical risks that drive economic instability. The disruptive impacts associated with these risks will continue unless companies become transparent with their disclosures on climate change.

Reporting of climate risk will allow investors like us to have reliable information to make smarter investments. ESG reporting has improve reporting quality between organizations and we should keep it that way.

We believe that changes have to be made sooner rather than later, as inaction will eventually lead to disastrous medium and long term effects economically and physically.

The climate crisis requires immediate action to mitigate the growing threats to financial markets and the economy, as well as to the people and communities that exist within them; therefore, we ask the SEC to act urgently in its



climate disclosure rulemaking process. We appreciate the opportunity to participate in the SEC's request for information and thank you for your consideration of our comments.

Sincerely,

Lisa Cooper, CFA®, CFP®

President, Figure 8 Investment Strategies

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