



June 14, 2021

The Honorable Gary Gensler, Chair
The Honorable Hester M. Peirce, Commissioner
The Honorable Elad L. Roisman, Commissioner
The Honorable Allison Herren Lee, Commissioner
The Honorable Caroline A. Crenshaw, Commissioner
U.S. Securities and Exchange Commission
100 F Street NE
Washington, DC 20548-1090

Re: Public Input on Climate Disclosure

Dear Commissioners:

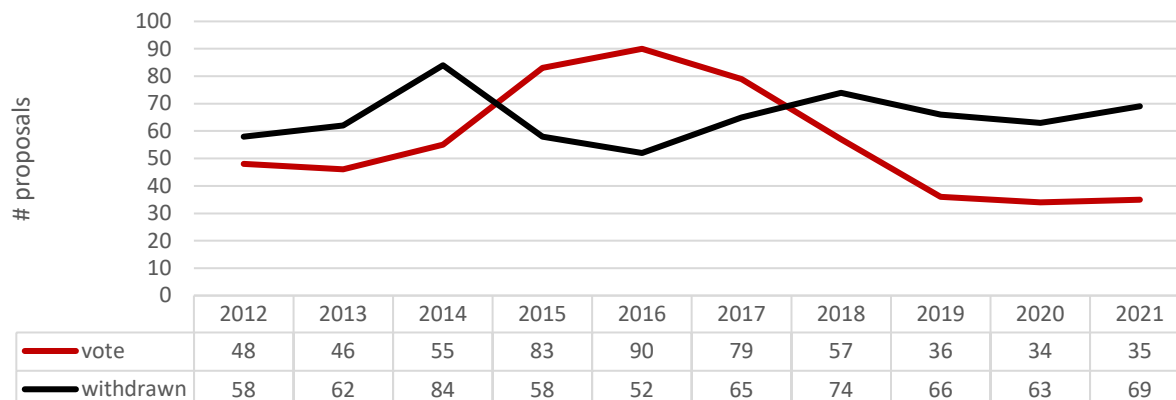
I am submitting information that may be of interest as you consider the merits of requiring more climate change disclosures in issuers' securities filings.

I lead the Sustainable Investments Institute (Si2), a non-profit research firm that provides impartial analysis of social and environmental shareholder proposals for institutional investors. We closely follow these proposals and report for subscribing clients, the press, and the public on trends but we do not make voting recommendations. We maintain a detailed database to track the nature and status of shareholder resolutions, from when they are filed until their final disposition. This database shows the extraordinary increase in support from investors at large for more climate-related disclosure. Data in this letter is current as of June 14, 2021.

Outcomes: Figure 1 illustrates the gradual drop since 2016 in the number of proposals that have gone to votes and a steady stream of proposals withdrawn by proponents—nearly always because shareholder proponents have reached agreements with issuers.

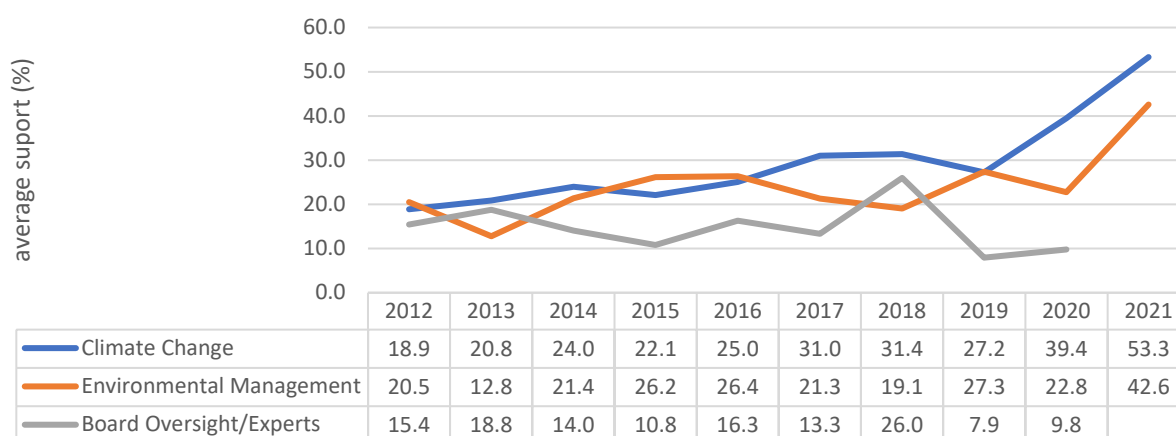
Increasing support: Figure 2 shows average support levels for all climate-related proposals. Some address climate change directly; some ask about connected environmental management issues such as waste, plastics and water; and some ask for specific types of board oversight or expertise. As illustrated below, proposals specifically about climate change have averaged more than 50 percent support in 2021, more than twice the level of 10 years ago (it was 20 percent in 2012). Environmental management requests also have seen growing support, reaching about 43 percent on average in 2021, while support for specific types of board committee and experts has fluctuated. (Votes include only shares cast in favor as a percentage of those cast for and against, excluding abstentions.)

Types of requests with high support—The climate-related proposals noted above are varied, displaying the range of information requested by investors. Shareholders have given strong support, exceeding 40 percent, for nearly 100 proposals considered from 2012 to 2021, as shown in Figure 3.

Figure 1: Shareholder Proposals Related to Climate Change

Excludes 19 not voted for other reasons. As of 6-14-21.

Source: Sustainable Investments Institute (Si2)

Figure 2: Average Support for Climate Change Shareholder Proposals

Source: Sustainable Investments Institute (Si2). As of 6-14-21

Figure 3: Climate-Related Proposals With Strong Support, 2012-2021

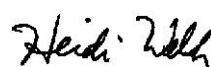
Proposal	Vote Bands/# of Proposals		Total
	>50%	40-49%	
Publish sustainability report	10	18	28
Report on 2-degree analysis and strategy	6	14	20
Adopt GHG reduction targets	3	5	8
Report on hydraulic fracturing/shale energy risks		6	6
Report on methane emissions/reduction targets	2	4	6
Report on coal risks	1	3	4
Report on supply chain deforestation impacts	3		3
Report on Paris-compliant plan to cut carbon footprint	3		3
Report on climate-related extreme weather impacts	1	1	2

Figure 3: Climate-Related Proposals With Strong Support, 2012-2021			
Proposal	Vote Bands/# of Proposals		Total
	>50%	40-49%	
Issue audited annual climate transition plan		2	2
Report on coal ash risks	1	1	2
Report on net-zero GHG goals	1	1	2
Report on climate-related transition plan	1		1
Reduce Scope 3 GHG emissions	1		1
Report on water impacts and policy		1	1
Report on packaging		1	1
Report on plastics pollution	1		1
Adopt board oversight of climate change		1	1
Report on stranded carbon asset risks		1	1
Report on GHG emissions targets		1	1
Report on climate change impacts		1	1
Report on high carbon financing		1	1
Report on distributed energy		1	1
Grand Total	34	63	97

Should the Commission be interested in further information about trends in shareholder support for climate-related shareholder proposals, we would be happy to provide additional comments.

Thank you for the opportunity to comment.

Sincerely,



Heidi Welsh
Executive Director
Sustainable Investments Institute