

THE  
*Episcopal*  
CHURCH

June 14, 2021

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

Re: Request for Comment on Climate Change Disclosures

Dear Chairman Gensler,

The Episcopal Church writes to express our support for the Securities and Exchange Commission's (SEC) rulemaking on mandatory climate disclosures. We recognize the significant benefits climate risk disclosures will bring to investors and companies as they manage climate risk in the short and long-term. Climate change is intertwined with human rights and issues of justice, and the risks posed by climate change not only threaten the economy, but also devastate communities and threaten survival for the most vulnerable. The worst of these impacts are borne by low-income communities, communities of color, and much of the developing world.

The Episcopal Church recognizes the role that investors must play in responding to urgent environmental and justice issues that have an impact on people across the globe. Forty-seven years ago, the Episcopal Church was the first institutional investor to file a shareholder resolution on a moral issue – apartheid – under the rules of the Securities Exchange Commission. The Presiding Bishop and Primate of The Episcopal Church, the Most Reverend John E. Hines, attended the General Motors annual meeting in person to voice his support for the resolution previously filed by the Church and called on General Motors to stop doing business in South Africa. That initiative was the first of many actions taken by individuals, organizations, companies and governments across the United States and around the world focused on ending apartheid. We continue our commitment to speak on issues that impact us as investors and as those who seek to build a more loving, liberating, and life-giving world.

The Episcopal Church is a long-time member of the Interfaith Center of 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. The Episcopal Church believes climate disclosures are critical for effective investment decision-making.

We also support the comments submitted by the PRI, the Interfaith Center on Corporate Responsibility and Ceres. In addition, we support the comments submitted by Public Citizen regarding disclosure of corporate lobbying and political spending activities, which are key to understanding how a company is managing climate risk.

Respectfully,

Rebecca Blachly  
Director of Government Relations  
The Episcopal Church

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