

March 31, 2022

Re: RIN 3235-AM87, The Enhancement and Standardization of Climate-Related Disclosures for Investors

I am writing in support of the Securities and Exchange Commission's proposal to require publicly-traded companies to make climate-related disclosures in their filings and reports. I believe it is important for investors and consumers to have clear, consistent and reliable information about companies' greenhouse gas emissions and their plans to protect the environment in deciding whether to support them – either through investment or purchase of the goods and services they provide.

As a high school student, I am very concerned about climate change and what it means for my generation. The United Nations reports that, over the last 40 years, global warming has been increasing at an alarming rate – the global annual temperature has risen by 0.18 degrees Celsius or 0.32 degrees Fahrenheit, every decade. (United Nations "Climate Change"). The Intergovernmental Panel on Climate Change, part of the United Nations, concluded that we must limit global warming to 1.5 degrees Celsius by 2040 in order to avoid irreversible damage. (Sixth Assessment Report, 2021). While many companies have committed to reducing their greenhouse gas emissions to help slow climate change, it is very difficult to find clear, consistent and reliable information about their existing emissions and whether they are meeting those targets. The rules proposed by the Commission would significantly help to address that problem, particularly for direct (Scope 1) and indirect (Scope 2) emissions. I urge the Commission to consider expanding the companies that would be required to report Scope 3 emissions as well.

For my science fair project this year, I studied how the profits of big oil and gas corporations correlate with increasing pollution in our earth's atmosphere, measured by the amount of greenhouse gas emissions they produce. One of the challenges I faced was that there is no consistent and reliable source for emissions data. While most companies include this information in their sustainability reports, the information is not reported clearly or consistently and was often hard to find. In addition, because emissions data currently is not required to be reported publicly, there is no guarantee that the information presented is accurate. These challenges were particularly true for Scope 3 emissions data, which by far accounts for most of the emissions by these companies.

Emissions data and reduction targets are too important to be buried at the back of company reports, where it is difficult for investors and consumers to find and use to make decisions. The SEC's proposed rules are a huge step towards ensuring corporate accountability by requiring companies to provide clear, consistent and reliable information about their greenhouse gas emissions. I urge the Commission to promptly adopt its proposal, along with a rigorous implementation timeframe. This is particularly true for Scope 3 emissions data, which is essential to provide an accurate assessment of a company's pollution.

Thank you for your consideration and for your efforts to ensure corporate accountability in tackling climate change.

Regards,

Anne Sullivan, Alexandria City High School