

April 13, 2022

Mr. Elliot Staffin  
Special Counsel, Office of Rulemaking  
US Securities and Exchange Commission  
100 F Street NW  
Washington, DC 20549

**RE: IMA-NA Request for Extension of Comment Period for Securities and Exchange Commission (SEC)'s Proposed Rule "The Enhancement and Standardization of Climate-Related Disclosures for Investors" (S7-10-22)**

Mr. Staffin,

The IMA-NA is a nonprofit trade association representing industrial minerals producers throughout the United States, Canada, and Mexico. IMA represents a diverse set of member companies engaged in mining and processing of ball clay, barite, bentonite, borates, calcium carbonate, diatomite, feldspar, industrial sand, kaolin, lithium, mica, perlite, potash, quartz, salt, soda ash, sodium bicarbonate, talc, wollastonite, and other minerals across North America. Industrial minerals are an absolutely vital component to the manufacturing processes for many, if not all, of the products we use every day. They are used in the production of batteries, protective masks, dialysis machines, semiconductors, solar panels, all glass, ceramics, paper, plastics, rubber, detergents, insulation, pharmaceuticals, cosmetics, in foundry cores and molds used for metal castings, paints, filtration, metallurgical applications, refractory products, and specialty fillers. Every sector of industry relies on a variety of industrial minerals to generate their end products, making a robust and stable supply chain critical for the continued growth and success of our economy as well as our national security.

We are particularly interested in this rulemaking given the potential impact to our member companies. We are concerned that given the potential impact of this rule, that a May 20 for comments is far too short. The rule would require information about a company's climate-related risks that are reasonably likely to have a material impact on its business, results of operations, or financial condition. The required information about climate-related risks would also include disclosure of a company's greenhouse gas emissions. In addition, under the proposed rules, certain climate-related financial metrics would be required in audited financial statements.

The combined scope, complexity, and cost of the rule require more time than the allotted comment period in order for IMA-NA's members to assess how the rule may affect them and respond accordingly. Many IMA-NA members are already facing a plethora of logistical,

financial, and supply chain challenges, and this rule represents yet another factor they must account for going forward. Therefore, based on the rule's potential impact to the industrial minerals sector – and by extension virtually every other sector of the American economy - we believe the comment period should be extended by at least an additional 90 days. This will ensure that IMA-NA and our members can provide the substantive and thorough comments the SEC needs in order to have a truly meaningful engagement with affected stakeholders.

If you have any questions, please let me know: [chrisgreissing@ima-na.org](mailto:chrisgreissing@ima-na.org) or 202-457-0200 ext. 2.

Sincerely,

Chris Greissing  
President, IMA-NA  
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