June 3, 2022

To the Securities and Exchange Commission and SEC Chair Gensler:

The Climate Reality Project: Chicago Metro Chapter applauds the recent SEC proposal to standardize climate change reporting and greenhouse gas (GHG) emissions reporting in SEC filings.

All investors, both expert and non-expert, seek comparable information about public companies’ vulnerability to climate change, their current greenhouse gas (GHG) emissions, and their specific plans to manage climate risks and execute their public climate commitments. No more “greenwashing,” please!

We strongly object to the current practice of permitting companies to voluntarily choose what and how they want to report. We are open to industry-specific reporting, but not to have those industries be the deciding voice in setting the content of those standards.

We support the Securities and Exchange Commission (SEC)'s recent proposal (87 FR 21334; File No: S7-10-22) to require public companies to make standardized, mandatory disclosures about their climate-related financial risks within annual SEC filings.

We support the inclusion of Scope 1 (business operations) and Scope 2 (purchased energy) GHG emissions reporting, in absolute and intensity terms. In addition, we believe that Scope 3 GHG emissions (e.g., product and supply chain emissions) should also be a required disclosure from all large registrants. This would present a full picture of a large company’s climate risks and activity.

This proposal is a much-needed step forward to fix a system of inadequate, not comparable, voluntary climate risk disclosure. It will inform investors, encourage retirement investment, increase transparency, and provide market participants with the climate-related information they need to accurately price climate risk in their investment decisions.

The Climate Reality Project: Chicago Metro Chapter
Thomas Coleman
Thomas Coleman, Chapter Chair