

June 17, 2022

Vanessa A. Countryman
Secretary
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549-1090

Re: File No. S7-10-22; Release Nos. 33-11042, 34-94478; *The Enhancement and Standardization of Climate Related Disclosures for Investors*

Dear Ms. Countryman:

I am writing on behalf of the Michigan Manufacturers Association (MMA) and its members to submit comments regarding the Securities and Exchange Commission (SEC) on File No. S7-10-22, the Commission's proposed rule to enhance and standardize climate-related disclosures by public companies.

MMA has served manufacturers and related industries for nearly 120 years. Our membership represents approximately 1,700 small, medium, and large manufacturers located in every corner of the state. Manufacturing represents Michigan's largest economic sector. It drives Michigan's economy and provides livelihoods for more than 635,000 Michigan citizens and their families. Manufacturing generates nearly 20 percent of the state GDP. Through our work, MMA and its members share a common goal to be good neighbors to the communities we support and where we work.

Throughout our history, MMA has worked collaboratively with the Michigan Department of Environment, Great Lakes, and Energy to address important environmental issues. In doing so, our goal has been to increase economic competitiveness on a global scale while protecting the environment in which we live. We also work closely with our national organization, the National Association of Manufacturers (NAM) to represent our interests at the federal level. We appreciate and support their extensive comments reflecting the current practice of climate disclosures undertaken by manufacturers nationwide. Likewise, we endorse NAM's specific and targeted suggestions to enhance and standardize climate disclosures as prudent approaches to achieve the SEC's intent of the proposed rule.

Given the extent to which Michigan's economy is based on the manufacturing sector, our state stands to be disproportionately impacted by broad, sweeping disclosure requirements. This not only includes public companies to which the rules directly apply, but also private companies serving as up- and downstream suppliers under Scope 3 greenhouse gas emissions (GHGs). As we overcome challenges posed by the pandemic, supply chain disruption, economic upheaval, and workforce shortages, additional compliance requirements should balance the cost and benefit to all stakeholders. Michigan companies have been leaders in voluntarily reporting

GHGs and recognizing the importance of climate-related sustainability goals. These practices should not be disincentivized as we work together toward addressing climate-related risks and building a safe, resilient economy.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Caroline Liethen". The signature is fluid and cursive, with a large initial "C" and a stylized "L".

Caroline Liethen
Director of Environmental and Regulatory Policy
Michigan Manufacturers Association