Group of 200+ investors, 250+ companies and NGOs

Statement of Essential Principles for Mandatory Climate Disclosure Rulemaking

We are investors with over $4 trillion in assets under management and advisement (as of June 16, 2022), corporations, and non-profit organizations who support climate change disclosure rulemaking by the U.S. Securities and Exchange Commission. We believe that disclosure of the material and systemic risks of climate change will help companies and investors to understand, price, and manage climate risks and opportunities. These activities are at the core of efficient securities markets and are essential to ensuring a just and thriving economy that works for all people and communities.

Climate change poses a systemic risk to the economy. The impacts of the climate crisis on our lives and our livelihoods are worsening at a dramatic rate. These include physical risks to real assets from climate-fueled weather events and transition risks posed by regulatory, technology, economic, and litigation changes during the shift to a net-zero economy. The risks can combine in unexpected ways, with serious, disruptive impacts on asset valuations, global financial markets, and global economic stability.

Furthermore, climate change poses a variety of material risks to companies of all sizes in all industries across our nation. The costs to companies of inaction may be dire in the medium and long term, and many of those impacts, such as those from floods, fires, droughts, and hurricanes, are already being incurred in the short term. While there will be a cost for compliance with SEC climate disclosure rules, it is far less costly to companies and their investors than ignoring the risk.

Climate risk disclosure would bring significant benefits to investors and companies. They need access to consistent, comparable, and reliable information at scale to fully assess their risk exposure and to navigate the path to a net-zero future. The current state of climate change disclosure does not meet our needs. Companies and investors need comprehensive, decision-useful data from all enterprises facing material climate change risks.

We also call on the SEC to take into consideration the broader impacts of climate change as a part of the rulemaking process, including the physical and transition impacts of the climate crisis on communities, human rights implications, and the connection between climate, water, food, and forests.

We appreciate the SEC’s proposed rule, called, Enhancement and Standardization of Climate-Related Disclosures for Investors. We believe that climate change disclosure rules from the SEC should, at minimum, include the following elements:

- Based on the TCFD: The SEC’s work should be based on the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) which has been endorsed by hundreds of companies and investors globally.
- Industry-specific metrics: SEC rulemaking should include industry-specific metrics because material climate risks manifest in different ways by industry. These metrics should build on existing standards in common use by investors and companies. Identifying such industry-specific metrics would also allow for comparable disclosures.
• Governance and strategy disclosure: Disclosure rules should provide insights into companies’ climate risk exposure, strategies, and scenario planning.
• Emissions disclosure: Disclosure rules should include Scope 1, 2, and 3 greenhouse gas emissions, which are needed to assess the full range of climate change risks facing companies.
• Inclusion in financial filings: Material climate disclosures, including discussion on risk exposure and business opportunities, impacts on strategy, and emissions reporting and management, should be included in annual, quarterly, and other appropriate SEC filings.
• Regular updates: Climate change impacts, scientific consensus around climate impacts and capital market responses to climate risks are rapidly evolving. SEC rules should be updated regularly in response to these developments, and they should include the development or adoption of new metrics.

The undersigned organizations and individuals support SEC climate disclosure rulemaking in alignment with these principles, to ensure consistent, comparable, and decision-useful information. We sincerely appreciate the Commission’s consideration of our views, and we look forward to working with you. We urge the SEC to act urgently in response to the growing threats of the climate crisis to markets and the economy.

Signatories of the Statement of Essential Principles for the SEC Climate Change Disclosure Rulemaking:

North American Investors

1. Adrian Dominican Sisters, Portfolio Advisory Board
2. Aquinas Associates
3. Arabesque Asset Management
4. Ariel Investments
5. As You Sow
6. Asterra Partners
7. AUM Consulting, LLC
8. Avaron Asset Management
9. Avera Health
10. Bailard, Inc.
11. Boston Common Asset Management
12. Boston Trust Walden
13. Builders Vision
14. Buoyant Ventures
15. California Public Employees' Retirement System (CalPERS)
16. California State Controller’s Office
17. California State Teachers Retirement System (CalSTRS)
18. Calvert Research and Management
19. Canada Post Corporation Pension Plan
20. Capricorn Investment Group
21. Centered Wealth
22. Change Finance
23. Chicory Wealth
24. Christian Brothers Investment Services, Inc.
25. Clean Energy Ventures (CEV)
26. ClearBridge Investments
27. Connecticut Office of the State Treasurer
28. Corporate Governance
29. Dana Investment Advisors
30. Domini Impact Investments
31. Dominican Sisters ~ Grand Rapids
32. Douglass Winthrop Advisors
33. DSC Meridian Capital LP
34. East Bay Municipal Utility District Employees' Retirement System
35. Ecofi
36. Ecofin
37. EcoLogical Solutions /// Saunders Hotel Group
38. Employees' Retirement System of the State of Hawaii
39. Epoch Investment Partners
40. Ethical Partners Funds Management
41. Everence and the Praxis Mutual Funds
42. Evergreen Climate Innovations
43. First Affirmative Financial Network
44. First Sentier Investors
45. Friends Fiduciary Corporation
46. Green America Endowment
47. Green Century Funds
48. Ground Effect
49. Hannon Armstrong
50. Illinois State Treasurer Michael Frerichs
51. Interfaith Center on Corporate Responsibility (ICCR)
52. Inherent Group
53. Investor Advocates for Social Justice
54. JBQ Trust
55. JSA Sustainable Wealth Management
56. Kachuwa Impact Fund
57. Lombard Odier Investment Managers ("LOIM")
58. Macroclimate LLC
59. Maitri Asset Management
60. Maryknoll Sisters of St. Dominic
61. Mennonite Education Agency
62. Mercy Investment Services, Inc.
63. Metrus Energy
64. Miller/Howard Investments, Inc.
65. Minerva Ventures, LLC
66. Minnesota State Board of Investment
67. NEI Investments
68. Nephila Capital Ltd
69. Neumeier Poma Investment Counsel, LLC
70. New Forests Advisory, Inc.
71. New York City Office of the Comptroller
72. New York State Common Retirement Fund
73. Nth Power LLC
74. Nugent Properties
75. Obvious Ventures
76. Office of the Vermont State Treasurer
77. Oregon State Treasury
78. Pacific Community Ventures
79. Prentiss Smith & Company
80. Progressive Investment Management
81. Province of Saint Joseph of the Capuchin Order
82. Refugee Investment Network
83. Region VI Coalition for Responsible Investment
84. Reynders, McVeigh Capital Management LLC
85. Rockefeller Asset Management
86. School Sisters of Notre Dame Cooperative Investment Fund
87. Seattle City Employees' Retirement System
88. Sema4, Inc.
89. Seventh Generation Interfaith Inc
90. SHARE
91. Sisters of Bon Secours USA
92. Sisters of St. Dominic of Caldwell, NJ
93. Sisters of the Humility of Mary
94. Sisters of the Presentation of the BVM of Aberdeen SD
95. Stance Capital, LLC
96. Steinberg Asset Management, LLC
97. Sunwealth
98. Sustainable Insight Capital Management
99. Terra Alpha Investments LLC
100. The Episcopal Church (DFMS)
101. The Facilities Group
102. The Sustainability Group of Loring, Wolcott & Coolidge
103. Tiemann Investment Advisors, LLC
104. Toniic Institute
105. Tortoise Capital Advisors, LLC
106. Total Impact Capital
Transformative Wealth Management, LLC
Trillium Asset Management
Trinity Health
Vancity Investment Management (VCIM)
Vanderbilt /dba Greenvest
Veris Wealth Partners
Vermont Pension Investment Committee
Vert Asset Management
Vine Associates
Volery Capital Partners
Wespath Benefits and Investments
Zevin Asset Management

Foundations

21 Acres Center
Beneficial State Foundation
Bullitt Foundation
Climate Emergency Fund
ClimateWorks Foundation
David and Lucile Packard Foundation
Green2Gold
Hartfield Foundation
Heising-Simons Foundation
Manaaki Foundation
Sant Foundation
Skoll Foundation
Solutions for Climate Change Network
Summit Foundation
The Educational Foundation of America
The Kresge Foundation
Tidwell Idaho Foundation, Inc.
Wallace Global Fund
William and Flora Hewlett Foundation

Global Investors

Aargauische Pensionskasse (APK)
ATISA Personalvorsorgestiftung der Tschümperlin-Unternehmungen
Bâtirente
Bernische Lehrerversicherungskasse
Bernische Pensionskasse BPK
Caisse Cantonale d'Assurance Populaire - CCAP
Caisse de pension du Comité international de la Croix-Rouge
145. Caisse de pension Hewlett-Packard Plus
146. Caisse de pensions de l'Etat de Vaud (CPEV)
147. Caisse de pensions du CERN
148. Caisse de pensions du personnel communal de Lausanne (CPCL)
149. Caisse de pensions ECA-RP
150. Caisse de prév. des Fonctionnaires de Police & des Etablissements Pénitentiaires
151. Caisse de Prévoyance de l'Etat de Genève CPEG
152. Caisse de Prévoyance des Interprètes de Conférence (CPIC)
153. Caisse de prévoyance du personnel communal de la ville de Fribourg
154. Caisse de prévoyance du personnel de l'Etat de Fribourg (CPPEF)
155. Caisse de prévoyance du personnel de l'Etat du Valais (CPVAL)
156. Caisse intercommunale de pensions (CIP)
157. Caisse paritaire de prévoyance de l'industrie et de la construction (CPPIC)
158. CAP Prévoyance
159. Cathay Financial Holdings
160. Church of Sweden
161. CIEPP - Caisse Inter-Entreprises de Prévoyance Professionnelle
162. DWS Group
163. Etablissement Cantonal d'Assurance (ECA VAUD)
164. Ethos Foundation, Switzerland
165. Fondation de la métallurgie vaudoise du bâtiment (FMVB)
166. Fondation de prévoyance Artes & Comoedia
167. Fondation de prévoyance du Groupe BNP PARIBAS en Suisse
168. Fondation de prévoyance professionnelle en faveur de AROMED
169. Fondation de prévoyance Romande Energie
170. Fondation Interprofessionnelle Sanitaire de Prévoyance (FISP)
171. Fondation Leenaards
172. Fondation Patrimonia
173. Fonds de Prévoyance de CA Indosuez (Suisse) SA
174. Fonds interprofessionnel de prévoyance (FIP)
175. Gavi Alliance
176. Gebäudefersicherung Luzern
177. Gebäudefersicherung St. Gallen
178. Gestion FÉRIQUE
179. Hexavest
180. Le Regroupement pour la Responsabilité Sociale des Entreprises (RRSE)
181. Luzerner Pensionskasse
182. Nest Sammelstiftung
183. North East Scotland Pension Fund
184. Pensionskasse Römisch-katholische Landeskirche des Kantons Luzern
185. Pensionskasse AR
186. Pensionskasse Bank CIC (Schweiz)
187. Pensionskasse Basel-Stadt
188. Pensionskasse Bühler AG Uzwil
189. Pensionskasse Caritas
190. Pensionskasse der Stadt Frauenfeld
191. Pensionskasse der Stadt Winterthur
192. Pensionskasse Pro Infirmis
193. Pensionskasse Schaffhausen
194. Pensionskasse SRG SSR
195. Pensionskasse Stadt Luzern
196. Pensionskasse Stadt St. Gallen
197. Pensionskasse Unia
198. Personalvorsorgekasse der Stadt Bern
199. Prévoyance Santé Valais (PRESV)
200. prévoyance.ne
201. Profelia Fondation de prévoyance
202. Prosperita Stiftung für die berufliche Vorsorge
203. Raiffeisen Pensionskasse Genossenschaft
204. Rentes Genevoises
205. RP - Fonds institutionnel
206. Secunda Sammelstiftung
207. Spida Personalvorsorgestiftung
208. St. Galler Pensionskasse
209. Stiftung Abendrot
210. SVA Zürich
211. Terre des hommes Schweiz
212. Unfallversicherungskasse des Basler Staatspersonals
213. Université de Genève (UNIGE)
214. Verein Barmherzige Brüder von Maria-Hilf (Schweiz)
215. Vorsorge SERTO

Companies

216. 17 Communications A
217. 3Degrees B
218. Advanced Communications Company A
219. Agboost Tech Consultancy
220. AJF Financial Services
221. Aldik Home A
222. Allbirds B
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224. Alter Eco B
225. Amicus Solar Cooperative B
226. AppHarvest, Inc
227. Artisan Dental B
228.  Aspiration  B
229.  Avocado Green Brands  A
230.  Back to the Roots  B
231.  Baliose Asset Management AG
232.  Banyan Botanicals  B
233.  Benson Hill
234.  BHP  B
235.  BigFoot for Good
236.  Biotic Brands  B
237.  Birdcall LLC  B
238.  Blended Capital Group
239.  Boldly Go Philanthropy
240.  Bon Secours Mercy Health
241.  Brewer Science, Inc.  B
242.  BTN  A
243.  c | change  B
244.  C. Wolfe Software Engineering  A
245.  Camilla O. McRory Attorney at Law
246.  Canyonlights Photography  A
247.  CarCar, Inc.  A
248.  Case Medical, Inc.  A
249.  Catalyst Partners  B
250.  CauseLabs, PBC  B
251.  Center for Global Consciousness  B
252.  Charles Wolfe Consulting
253.  Chrysalis Farm  A
254.  Citizen Yard LLC  B
255.  Citizens Energy Corporation
256.  Civekps Co-Living  A
257.  Climate Positive Consulting  A, B
258.  Comeback Farm Organic Produce  A
259.  Compose[d]  B
260.  CONTEMPL8 T-SHIRTS LLC  A
261.  Cooperative Coffees  B
262.  Council Fire  B
263.  Creative Energies
264.  Cultivating Capital  B
265.  Danone North America  B
266.  Deltec Homes  B
267.  DLC  A
268.  Do Good Well Consulting  B
269.  Dogwood Consulting
270.  Dr. Bronner's  B
271. EcoAdvisors
272. Ecodeo
273. EDP - Energias de Portugal
274. Eighty2degrees
275. Emzingo Group LLC
276. Encore Editorial Services
277. Enel North America, Inc.
278. Engage Strategies
279. Equiterra Regenerative Design Inc
280. ESG Strategies
281. Ethical Markets Media
282. Evergreen Sustainability, LLC
283. Everlane
284. Evolution Marketing, LLC
285. Fine Tune Expense Management
286. Flashfood
287. Full Circle Brands
288. Future Nexus
289. Garnant Computer Services
290. Garten
291. Generate Capital
292. Geni LLC
293. GloryBee
294. GMB Rentals, LLC
295. Gold Coast Doulas, LLC
296. Goodee
297. Grain
298. Green Circle Ideas
299. GreenHer Earth
300. Green Hammer
301. Green Retirement, Inc.
302. GreenSeed Contract Packaging
303. GreenStep Solutions, Inc.
304. GreenWeaver Landscapes
305. Grove Collaborative
306. Gryphon Solutions, LLC
307. Guayaki Yerba Mate
308. Guru
309. Habitus Incorporated
310. Healthy Way Market
311. Herbal Healing
312. HigherRing
313. Hive Brands
314. HJKessler Associates, Inc. A
315. Home Rental
316. Hua Nani Partners
317. Imperfect Foods B
318. Inclusivv B
319. In the Cause of Peace Productions
320. Intex Solutions, Inc. A
321. Jarmusz & Associates A
322. JB Media Group, LLC B
323. Kathryn Blume, International A
324. Keap Co. A, B
325. Kent Mollohan Designs A
326. Kuli Kuli B
327. Laboratoires Expanscience USA B
328. Lafe’s
329. Lamey-Wellehan Shoes
330. Laurie Allan & Associates
331. Law Office of Lara Pearson Ltd, PBC B
332. Legacy Vacation Resorts B
333. Lemonade B
334. Leonie Lacouette Clocks A
335. Living Giving Enterprises, LLC B
336. LOACOM B
337. LolitaMoon Productions A
338. Lost Grove Brewing, LLC B
340. Mark Hewitt Pottery
341. Mark J. Guay, PC
342. Matt Sheridan Dog Walking A
343. MCSF
344. Meaningful Organizational Design, Inc. A, B
345. Measure Meant Consulting B
346. MedicareForAll.us A
347. Meliora Cleaning Products B
348. Mendelsohn, Gittleman & Associates, LLC
349. Metis Consulting Group B
350. Michael W Graineys Consulting LLC
351. Miel Design Studio B
352. Mightybytes B
353. MMercer Consulting B
354. Molo Constituency Forest Association
355. Montanya Distillers A, B
356. M&J Cleaning Service A
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<td>SharePower Responsible Investing ▲</td>
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400. Shift Group A
401. Shifting Patterns Consulting B
402. Shinka Sustainability Consultants, LLC
403. Simple Switch B
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406. Skyline Video Pros
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408. Social Impact Consulting & Coaching A
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410. Solar Energy Industries Association
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437. The Gatto Agency
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439. The Myers-Briggs Company B
440. The Paula Gordon Show A
441. The Spencer Group, Ltd.
442. THG Energy Solutions, LLC
thinkPARALLAX
Tonient
Tony Israel Photographer
TOTAGO
Trace Genomics
TradeLanes
Transcend, The Fearless Company
Transformative Wealth Management, LLC
Transition Services, Inc.
Trip Zero
Triple Ethos
Two Octobers
TypeWell
Unity Technologies
Urban Turbines, LLC
Verdani Partners
Veritable Vegetable
Vianova
Vista Global Coaching & Consulting
Vital Plan
Vode Lighting
VR & Associates
Walk Your Talk Production
Watershed
Wauters Design Group
Weil Aquatronics, Inc
WHATiF 88 LLC
Williams-Sonoma, Inc.
Wiltse Kitchen
Wolf + Associates
Yin Yan Naturals
Yulu Public Relations
Zero Waste Strategies LLC

(A = American Sustainable Business Council member, B = B Corporation)

Nonprofit Organizations
1worker1vote
350 New Orleans
350PDX
Acadia Center
Adrian Dominican Sisters, Portfolio Advisory Board
Alliance to Save Energy
482. American Sustainable Business Council
483. Association of Geophysicists and Environmentalists of Serbia
484. Atlantic Coast Conference Climate Justice Coalition
485. B Lab
486. Best Friends Animal Society
487. BlueHub Capital
488. Boma Global
489. Bon Secours Mercy Health
490. Business for Social Responsibility
491. Case Medical, Inc.
492. Catholic Divestment Network
493. Center for Climate and Energy Solutions
494. Center for Community Based Enterprise
495. Ceres
496. China Water Risk
497. Climate Emergency Fund
498. Climate Neutral
499. Climate Reality Project
500. Citizens Energy Corporation
501. Climate Justice at Boston College
502. CommonSpirit Health
503. Connecticut Citizen Action Group (CCAG)
504. E2 (Environmental Entrepreneurs)
505. Earth Action, Inc.
506. Earthday.org
507. Earth Economics
508. Environmental Defense Fund
509. Environmental League of Massachusetts
510. Environmental Protection Network
511. Extinction Rebellion Boston
512. Florida for Good
513. Food for Climate League
514. Fossil Fuel Divest Harvard
515. Governance Institute
516. Green America
517. Innovation Network for Communities
518. Institute for Market Transformation (IMT)
519. Jesuit Committee on Investment Responsibility
520. Kiss The Ground
521. Lewis & Clark College
522. Mass Audubon
523. Natural Resources Defense Council
524. New Hampshire Business for Social Responsibility
525. New Jersey Sustainable Business Council
526. North Carolina Business Council
527. Northeast Clean Energy Council
528. One Step Closer
529. Project on Organizing, Development, Education, and Research (PODER)
530. Publish What You Pay-United States
531. Reward Value Foundation
532. RMI
533. Slow Money NC
534. Solutions for Climate Change Network
535. Texas Campaign for the Environment
536. The B Team
537. Tonient
538. Trinity Human Rights Group
539. Union of Concerned Scientists
540. United Nations Foundation
541. U.S. Impact Investing Alliance
542. US Partnership for Education for Sustainable Development
543. US SIF: The Forum for Sustainable and Responsible Investment
544. We Are Neutral
545. World Business Council for Sustainable Development North America (WBCSD)

Religious Organizations

546. Congregation of Sisters of St. Agnes
547. Congregation of St. Joseph
548. CRI office - Province of Saint Joseph of the Capuchin Order
549. Daughters of Charity, Province of St. Louise
550. Jesuit Committee on Investment Responsibility
551. Sisters of Bon Secours USA
552. Sisters of the Humility of Mary
553. Sisters of the Presentation of the BVM of Aberdeen SD
554. Sisters of St. Dominic of Blauvelt, New York
555. Sisters of St. Dominic of Caldwell, NJ
556. Sisters of St. Francis
557. Sisters of Saint Joseph of Chestnut Hill, Philadelphia, PA
558. Unitarian Universalist Association
559. USA East Province of the Society of Jesus