



April 8, 2022

Honorable Gary Gensler
Chairman
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549

RE: S7-10-22 Enhancement and Standardization of Climate-Related Disclosures for Investors

Dear Chairman Gensler,

I write today on behalf of Progressive Investment Management, a registered investment advisory firm that specializes in the field of social and environmental investing and is based in Portland & Eugene, Oregon. As of 12/31/21, we managed over \$600 million in client assets.

We strongly agree with the Securities and Exchange Commission (SEC) on Proposed Rule S7-10-22: Enhancement and Standardization of Climate-Related Disclosures for Investors.

To prevent the worst effects of climate change, the world must hold warming to just 1.5 degrees Celsius, and this requires nations to collectively reduce their greenhouse gas emissions by 43% by 2030 and to stop adding carbon dioxide to the atmosphere by the early 2050s. This data is from a recent Intergovernmental Panel on Climate Change report. These effects include wildfires, hotter temperatures, severe storms, and increased drought. Unfortunately, current emissions reduction targets worldwide do not allow us to achieve this 2030 goal, and on our current path, climate change poses significant risks to our economic and financial systems. As a result, companies must disclose information to help investors analyze their climate-related risks.

Public companies have a significant impact on our world and have an important role in lessening the effects of climate change. As investors, we demand consistent and comparable climate-related information from all companies as climate change risks are material. Today, this data is difficult to compare, and many companies do not report this information which is problematic for investors analyzing the risks of a company. The SEC has a vital role in mandating that companies disclose their carbon emissions and climate-related risks in a consistent presentation to help protect investors. We see strong demand for this information from the clients we represent and our encouraged by this proposal.

We respectfully ask the SEC to continue with the proposed rule change for the above reasons. Thank you for allowing us this opportunity to provide our input.

Sincerely,
Bryceson Charlton, CFA