

April 19, 2022

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

Re: File Number S7-10-22

To Whom It May Concern:

The undersigned organizations write in support of the proposed rules put forth by the U.S. Securities and Exchange Commission (“the Commission”) to enhance and standardize climate-related corporate disclosures. If finalized, the proposal will improve corporate accountability and promote transparency for investors.

The signatories of this letter include members of the Coalition on Inclusive Economic Growth, representing businesses, investors and nonprofits, all of whom are dedicated to prioritizing a set of commonsense yet transformative recommendations for government action to refocus our economy so that it works for all Americans. Many of the undersigned organizations will also submit individual comments offering more technical recommendations, including places where the SEC could improve upon and strengthen the proposed rule.

The proposed climate-related disclosures are in step with the Commission’s mandate to protect investors, maintain fair and efficient markets and facilitate capital formation. The proposal is also responsive to investor and public demands and lays the groundwork for alignment with global regulatory peers who have made strides toward mandated, standardized climate-related financial disclosures.

Climate change poses significant and systemic risks to financial stability and the capital markets.¹ Accordingly, investors require access to clear, timely and comparable climate data, and businesses are increasingly recognizing the importance of measuring and disclosing their impacts on a broad set of stakeholders. We are supportive of the proposal’s inclusion of disclosures on companies’ Scope 1, 2 and 3 greenhouse gas emissions, all of which are necessary for investors to understand the full extent of a company’s exposure to climate risks.

For decades, the rules and regulations governing the financial markets have constrained American economic innovation and competitiveness by hampering investors’ consideration of long-term factors and systemic risk. The proposal represents a momentous step forward in better enabling businesses and

¹ Financial Stability Oversight Council, [“Report on Climate-Related Financial Risk,”](#) 2021.

investors to account for climate-related risks, impacts and opportunities in a transparent and meaningful way.

Thank you for the opportunity to provide comment. We look forward to engaging with the Commission throughout the rulemaking process to ensure a strong final rule.

Sincerely,

Coalition on Inclusive Economic Growth Members:

1worker1vote

B Lab US & Canada

The B Team

Case Impact Network

Coalition for Inclusive Capitalism

Common Future

Confluence Philanthropy

Florida For Good

Global Impact Investing Network

Green America

Impact Capital Managers, Inc.

Intentional Endowments Network

JUST Capital

Lincoln Institute of Land Policy

National Community Investment Fund

Opportunity Finance Network

Pacific Community Ventures

PolicyLink

Predistribution Initiative

Toniic

U.S. Impact Investing Alliance

Other Field Leaders:

Abacus Wealth Partners

Align Impact

ASU Enterprise Partners

Breckinridge Capital Advisors

Brewer Science, Inc

Chicory Wealth

The Coconut Traveler

Compose[d]

The David and Lucile Packard Foundation

David Rockefeller Fund
Dietel and Partners
Evolution Marketing, LLC
Fine Tune Expense Management
The Global Steering Group for Impact Investment (GSG)
Green Alpha Advisors, LLC
Guayaki Yerba Mate, S.P.C.
Hampshire College
HigherRing
Integrated Capital Investing
Legacy Vacation Resorts
LongView Asset Management LLC
The MBA in Sustainability at Bard College
Merck Family Fund
Mightybytes
Nia Impact Capital
The Ocean Foundation
Regenrus
Roadhouse Brewing Company
The Rockefeller Brothers Fund
The Russell Family Foundation
Salt Palm Development
San Francisco State University Foundation
Sensiba San Filippo LLP
Sierra Club Foundation
Sustainable Development Investment Finance Partnership for New York
Troop
Wallace Global Fund
We Are Neutral
Westfuller