Comment on SEC Climate Disclosure Rule

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Hello,

I am a student at the University of Colorado Boulder currently studying operations with an appreciation for sustainability. Business reporting practices as sanctioned by law are vital to setting a framework of not only transparent, but also equitable development across the business landscape.

This rule is one which makes me optimistic about the future of our planet. While there will be some pushback (often ostensibly couched as “evidence-based"), the general scientific consensus is of an understanding that our world needs to be cared for significantly better than it has been in the past else we are doomed to irreparably damage it. Even from an anthropocentric perspective, the failing of our climate syllogistically leads to the demise of our species.

Having not read through this proposal in its entirety, I do have a general comment that we must ensure a level of accountability can be upheld in company reporting. The most obvious example is the supply chain. While in the proposition there is a mention of scope 1 and 2 impacts always being reported, and scope 3 impacts being disclosed by companies that have already set GHG emissions goals that include scope 3 or if this impact is material to the business, reports must be able to be held accountable. Without an ability to “fact-check” reports by comparing them to the realities within company supply chains, this system can and will be abused. Sure it requires extra resources to hold companies accountable, which is why they must self-report, but a system of accountability must exist nonetheless.