



May 20, 2022

Ms. Vanessa Countryman
Secretary
Securities and Exchange Commission
100 F Street N.E.
Washington, D.C. 20549

Re: File No. S7-10-22: The Enhancement and Standardization of Climate-Related Disclosures for Investors

Dear Ms. Countryman,

Cedar Street Asset Management LLC welcomes the opportunity to respond on File No. S7-10-22: The Enhancement and Standardization of Climate-Related Disclosures for Investors (“Proposed Rule”). We commend the Commission for its Proposed Rule aimed at providing investors with climate-related financial information from issuers of public securities.

Cedar Street Asset Management LLC (“CSAM”) was founded on April 1, 2016, by Jonathan Brodsky as an employee-owned investment management firm with a sole focus on managing non-U.S. small cap value equities, in both developed markets and emerging markets.

Firm Highlights include:

- Disciplined and consistent value investment philosophy in which we have steadfast conviction.
- Portfolio management team with successful track record, dating back to 2006, building both investment businesses and investment products focused on the non-US small cap value equity markets.
- Founded in mid-2016 as an 100% employee and family-owned firm with significant participation of portfolio management team in Cedar Street investment products.
- Purpose built cross disciplinary team combined with best-in-class external service providers.
- Sophisticated client base, including public pension plans, foundations, family offices, high net worth individuals and intermediaries such as consultants, RIA’s and fund of funds.
- Sole sub-advisor for Harbor International Small Cap Fund (“HAISX”); Morningstar 4 and 5-star rated fund during tenure.
- In-house Chief Compliance Officer, Chief Operating Officer and external Advisory Board.

- SEC Registered, GIPS Verified, ERISA Qualified, PRI Signatory and Firm-Level DEI and ESG Policies.

The Commission's Proposed Rule marks a change in the quality and comparability of climate disclosures that is essential to an efficient market response to climate change and ESG-related risks. While most companies report sustainability information in some form, the content and type of disclosures vary significantly. To better interpret and utilize climate-related information, consistent, reliable and comparable disclosures by companies are a top priority for investors. In the absence of standardized disclosures, investors seeking climate-related information have had to collect this data from numerous sources, including companies' voluntary disclosures that are unverified and often difficult to compare.

Therefore, we support the SEC's Proposed Rule requiring all public companies to file climate-related financial information with the Commission, to have this information appear alongside financial information, and to present narrative and quantitative information in XBRL tagged form. This will make climate-related financial information more useful to investors seeking to understand the risks and opportunities presented by climate change.

The Proposal's alignment with recommendations by the TCFD (Taskforce on Climate-Related Financial Disclosures) and the Greenhouse Gas Protocol ensures market efficiencies, a key focus for investors. The TCFD recommendations are widely used across the largest capital markets, with 2,600 supporters globally. Furthermore, regulators have begun mandating TCFD-aligned reporting in the UK, Brazil, the EU, Hong Kong, Japan, New Zealand, Singapore, and Switzerland.

The IFRS Foundation, which sets accounting standards used in over 140 nations, recently released its own proposal for climate-related disclosures via its International Sustainability Standards Board (ISSB). The ISSB proposal similarly uses the TCFD recommendations as a baseline and has significant similarities to the SEC's proposal. Coherence with future ISSB standards will reduce the burden of compliance on issuers as many of the largest US issuers are global companies and will likely fall under the disclosure requirements of a jurisdiction following ISSB standards. Furthermore, globally coherent disclosure requirements will lead to better comparability of data for investors.

The SEC's decision to mandate climate-related financial disclosures by US public companies will help companies prepare and plan for the transition to a low-carbon economy and protect investors and US competitiveness in the economies of the future. It is important for investors to understand how companies are managing climate risks and following through on public statements via action towards set goals. The Proposed Rule also includes safe harbor provisions for forward looking information and Scope 3 emissions, and a reporting phase-in period based on the registrant's filer status, which aims to address issuers' concerns about compliance. The Proposed Rule could also ease the burden on companies that are currently providing this information in numerous formats in response to various investor questionnaires on climate information and shareholder proposals calling for this information.

In our opinion, the Proposed Rule strikes the right balance between investors' needs for climate related information and issuers' ability to collect and report this information.

For further discussion or questions, please contact:

Sandy Pavlik
Chief Operating Officer
Cedar Street Asset Management LLC



A handwritten signature in black ink, appearing to read "Sandy Pavlik".