Everence

Everence Financial
1110 North Main Street
Post Office Box 483
Goshen, IN 46527
www.everence.com

Toll-free: (800) 348-7468
T: (574) 533-9511

Via email to rule-comments@sec.gov

June 15, 2022

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

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

Dear Ms. Countryman:

On behalf of Praxis Mutual Funds and Everence Financial, I welcome the opportunity to provide this comment letter in response to the Notice of Proposed Rulemaking "The Enhancement and Standardization of Climate-Related Disclosures for Investors" (File No. S7-10-22) ("Proposal").

We support this Proposal as an important step in providing investors with the comparable and reliable information they need to assess public companies' climate-related financial risks. According to the US SIF Foundation's 2020 *Report on US Sustainable and Impact Investing Trends,*[1] climate change has emerged as the single largest ESG issue among asset managers that disclose the specific ESG issues they consider. In 2020, asset managers reported that they analyzed climate concerns across $4.2 trillion in assets.

Praxis is the mutual fund family of Everence Financial, a faith-based financial services firm with more than $5 billion of assets under management. We serve tens of thousands of shareholders who desire to integrate their values into their investments while planning for their financial future.

Praxis integrates ESG concerns, including climate change, into our investment management. We also practice corporate engagement, using the rights and privileges of our ownership in securities to promote positive corporate change.

We believe the natural environment is a finite resource, the inheritance of future generations, and a gift from God. As stewards of Creation, we expect companies to respect the limits of our natural resources and to work toward environmental sustainability. We also expect companies to act on the basis of shared prosperity, recognizing the value and contributions of all stakeholders in creating and sustaining economic success. On behalf of our clients, we seek a more sustainable and just future for all.

Voluntary climate disclosures have not met the needs of investors.[2] Investors' experience with the results of the SEC's 2010 climate guidance to publicly traded companies is instructive. Despite many

[1] https://www.ussif.org/trends
[2] https://www.iosco.org/news/pdf/IOSCONEWS594.pdf

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firms reporting some data, the 2010 SEC climate disclosure guidance has not successfully met the needs of investors because it essentially allows firms to self-determine which climate risks are material.

We support the Proposal's inclusion of narrative and quantitative disclosure around companies' climate risk management, strategies, and governance in line with the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD). In addition, we support the audited reporting of Scopes 1 and 2 greenhouse gas emissions (GHG) and reporting of Scope 3 emissions by the largest companies.

Praxis and other responsible investment managers need quality, comparable ESG data both to make informed investment decisions and to better understand company performance on ESG issues for corporate engagement purposes. A robust and standardized reporting framework will be particularly useful.

To ensure that the proposal creates a robust reporting framework when finalized, we recommend the following considerations:

- Remove the materiality test for Scope 3 reporting by the largest companies (large-accelerated and accelerated filers.) Relying on companies to make their own determinations of what is a material Scope 3 emission may lead to incomplete or inconsistent reporting.
  - If the materiality provisions are not removed, the SEC must provide clear guidance to companies about their Scope 3 reporting obligations.
- Scope 3 assurance for large-accelerated and accelerated filers should be phased in in the future. Reporting of Scope 3 emissions has already greatly improved in recent years. It is not unreasonable to believe that this will continue to improve over time. The SEC should use the existing assurance framework for assurance of Scopes 1 and 2 by phasing in limited assurance to the more robust reasonable assurance standard.
- Companies should report the methodologies used by third-party firms that provide their disclosure assurance. In addition, the SEC should provide guidance on standards for third-party verifiers who are not accredited with the Public Company Accounting Oversight Board (PCAOB).
- The SEC should maintain the reporting and assurance phase-in timelines in the Proposal. The climate crisis is urgent and further delay in action by companies and investors could have serious consequences.

The SEC should move quickly to strengthen this framework and finalize, implement, and enforce detailed disclosure requirements for public companies.

Thank you for considering these comments.

Sincerely,

Mark A. Regier

Mark A Regier
Vice President of Stewardship Investing
Praxis Mutual Funds and Everence Financial