



June 16, 2022

Ms. Vanessa A. Countryman
Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-0609J

Submitted via email to rule-comments@sec.gov.

Re: SEC Release Nos. 33-11042; 34-94478; File No. S7-10-22 concerning the Enhancement and Standardization of Climate-Related Disclosures for Investors

Dear Ms. Countryman:

World Gold Trust Services, LLC (the "WGTS") is the sponsor of the SPDR® Gold Trust, a New York investment trust ("GLD"). WGC USA Asset Management Company, LLC ("WGCAM" and together with WGTS, the "Sponsors") is the sponsor of the SPDR® MiniSharesSM Gold Trust, a series of the World Gold Trust, a Delaware statutory trust ("GLDM" and together with GLD, the "Trusts"). The Trusts are two of the largest commodity-backed exchange traded funds with combined assets of over \$67 billion.

We are pleased to provide comments to "The Enhancement and Standardization of Climate-Related Disclosures for Investors," Release Nos. 33-11042, 34-94478 (March 21, 2022) (the "Proposed Rules") on behalf of the sponsors of the Trusts and hope our views assist you as you consider public comments and the rulemaking process.

The Trusts are large accelerated filers that will be subject to the Proposed Rules if adopted and implemented. The Proposed Rules do not distinguish between operating companies and exchange traded funds like the Trusts. As passive investment vehicles that do not have any physical operations or employees, it would be impracticable for the Trusts to calculate their Scope 1 and 2 emissions. Nor would such information, if calculable, be useful to the investing public. Accordingly, we believe that the Trusts should be distinguished from an operating company and be excluded from any final rulemaking.

A handwritten signature in black ink, appearing to read "Ann Pace".

Ann Pace
Head of Legal, US

cc: Joseph R. Cavatoni, Principal Executive Officer