



**BEFORE THE
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C.**

In the matter of:

**The Enhancement and Standardization
of Climate-Related Disclosures for
Investors**

**Docket No. SEC-2022-0494-0001
File No. S7-10-22**

COMMENTS OF THE INTERNATIONAL AIR TRANSPORT ASSOCIATION

The International Air Transport Association (IATA) appreciates the opportunity to provide comments in response to the U.S. Securities and Exchange Commission (SEC)'s proposed rules on climate risk disclosure, *The Enhancement and Standardization of Climate-Related Disclosures for Investors*.¹

IATA is the trade association for the world's airlines, representing some 290 carriers based in 120 countries. Our airline members are committed to ensuring that flying is sustainable and have committed to achieving net zero emissions by 2050 so that future generations will be able to sustainably explore, learn, trade, build markets, appreciate cultures, and connect with people around the world over.

We fully endorse the comments submitted by Airlines for America on this rulemaking and would like to take this opportunity to supplement their comments herein.

IATA believes that reporting on environmental, social, and governance (ESG) and adhering to disclosure requirements are paramount for the sustainable growth of the aviation industry. However, the lack of agreement on a conceptual framework for what ESG or responsible investing means or how it should be incorporated into investment decisions represents a challenge for an international sector such as aviation.

While the proposed rules properly refrain from adopting or mandating any particular greenhouse gas accounting methodology, IATA supports alignment with the International Sustainability Standards Board's requirements to ensure the development of globally-harmonized sustainability reporting. Such global harmonization would set a recognized standard and ensure that new practical challenges are not created for international companies captured by the scope of the proposed SEC rule.

¹ 87 Fed. Reg. 21334 (April 11, 2022).

Thank you for your consideration of these comments.

Sincerely,

Handwritten signature of Douglas E. Lavin in black ink.

Douglas E. Lavin
Vice President, Member and External Relations – North America

