



TEXAS CHEMICAL COUNCIL

1402 Nueces Street • Austin, Texas 78701-1586 • (512) 646-6400 • Fax (512) 646-6420

June 17, 2022

Office of Rulemaking
Division of Corporate Finance
Securities and Exchange Commission (SEC)
100 F Street N.E.
Washington, D.C. 20549

Via Electronic Submission to rule-comments@sec.gov

RE: Texas Chemical Council Comments on Proposed Enhancements and Standardization of Climate-Related Disclosures for Investors (File Number S7-10-22), 87 Fed Reg. 21334 (April 11, 2022)

To Whom it May Concern:

The Texas Chemical Council (TCC) appreciates the opportunity to comment on the Security and Exchange Commission's (SEC or Commission's) "Proposed Enhancements and Standardization of Climate-Related Disclosures for Investors" (File Number S7-10-22).

TCC is a statewide trade association of chemical manufacturing facilities in Texas. Our 70 member companies produce vital products for our way of life, and provide direct employment and career opportunities for more than 75,000 Texans at over 200 manufacturing and research facilities across the state, and sustains nearly a half-million industry related jobs for Texans. The chemical products manufactured in Texas account for over \$40 Billion in state exports each year.

TCC supports a company-specific, principles-based approach to climate-related information reporting, building off existing climate change frameworks and guided by materiality to focus on disclosures that are relevant and material to investors and shareholders without impeding the competitive marketplace.

TCC agrees with the American Chemistry Council (ACC) that the proposed rule would undermine, rather than advance, the Commission's mission and stated goals and recommends that the Commission withdraw the Proposal or designate it as an Advanced Notice of Proposed Rulemaking (ANPR) and work with the registrant community and investors to review and address the hundreds of questions raised in the preamble. At a minimum, TCC urges the SEC to extend the comment period to 180 days to allow additional direct consultation with affected industries and traditional investors.

Lastly, TCC supports the comments of the ACC and agrees with ACC's recommendations should the SEC decide to proceed with the Proposal and does not extend the comment period to 180 days.

Thank you for the opportunity to submit these comments.

Chris Noonan
Director of Government Affairs
Texas Chemical Council

