June 17, 2022

The Honorable Gary Gensler
Chairman
Securities and Exchange Commission
100 F Street, NE
Washington, D.C. 20549

RE: S7-1022 Proposal on Climate-Related Disclosures for Investors

Dear Chair Gensler,

Recent years of abundant energy and food supplies, extended periods of peace, easy monetary policy, frequent fiscal stimulus, and a strong bull market perhaps created an environment that encourages or at least made room for luxury beliefs to emerge—or at least amongst those in the upper income brackets of western countries who have reaped a disproportion share of the spoils. A luxury belief as defined by Rob Henderson as an "idea and opinion that confer status on the upper class while often inflicting costs on the lower classes." [1]

And so it is with the dominating agendas pushed by those who believe that catastrophic climate change is upon us while nearly three billion people around the world still heat and cook with solid fuels (wood, charcoal, and dried dung). In addition to the time burdens of collecting the daily fuels and tending open fires which fall primarily on women and children, fine particulate (PM2.5) emissions inhaled cause 3.8 million premature deaths every year.[2] Meanwhile, deaths resulting from non-optimal high temperatures total 0.3 million annually (for additional context, low temperature deaths total 1.6 million annually).[3] Policy makers need to stay focused on appropriately prioritized risks that face populations around the world today much less the future.

Additionally, the SEC would be wise to pause and observe the world as it traverses through what appears to be new bear market and an environment where energy and food supply chains have been compromised by military conflict and the new practice of climate-driven capital allocation which has constricted reinvestment in industries such as fossil fuels and agriculture.

While the core elements of ESG are worthy of pursuit. So much of ESG is myopically focused on GHG emissions and pinning them all on suppliers of products and fuels that enable modern civilization. What capacity do those suppliers have to compel consumers to purchase those products or affect the consumer's elected use of those products once purchased? Zero. Therefore, any disclosure of Scope 3 emissions as currently defined is ludicrous. I am a resident of a mountain community in Colorado and a frequent and grateful participant in all form of winter recreation. Should oil and gas companies be responsible for car emissions resulting from a clogged I-70 west of Denver that results in a six-hour drive

[1] Rob Henderson: https://robkhenderson.substack.com/about
[2] World Health Organization: https://www.who.int/health-topics/air-pollution#tab=tab_3
[3] Institute for Health Metris and Evaluation (IHME): Global Burden of Disease database

to and from Vail on a peak weekend? Or should Vail Resorts be allocated the vast majority of those emissions? Why else would anyone endure that drive and produce those emissions if not to ski the back bowls in knee-deep powder? The private and commercial jet traffic in and out of Eagle County Regional Airport and the many other critical uses of modern fuels and hydrocarbon-based materials that enable life and recreation in harsh mountain environments only compounds this question.

The above is a bit of a departure from mountains of documents you will have to review—yet, it is a puzzling real-world example of climate disclosure being contemplated. Hopefully, it allowed for a brief respite from the many dense and over-lawyered arguments for and against.

But make no mistake, you should reject this rule in its entirety.

Sincerely,

Ryan Zorn
Principal
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