

I am in favor of the required disclosure of Scope 3 emissions. I am in favor of them being recorded for 2023 (filed in 2024), without an additional phase in period.

We cannot truly fight climate change without understanding emissions along each step of supply chains. It is therefore urgent that Scope 3 emissions be disclosed as soon as possible.

The emissions from a company's supply chain are “on average **11.4 times** higher than its operational emissions” (CDP, “[Engaging the Chain](#)”, p. 3). For many companies, [over 80% of GHG impacts](#) occur in Scope 3. A firm may have low emissions on its own (Scope 1) and from energy consumption (Scope 2), but still sit on a supply chain with incredible emissions (Scope 3). By knowing Scope 3 emissions, an organization is able to make better choices selecting suppliers. Critical for the SEC, investors are more informed as well.

For example, Scope 3 disclosures should confirm what U.N. already knows: animal agriculture – approximately 80 billion animals globally in factory farms, 10x the amount of people on earth – produces disproportionately large amounts of GHG along its supply chain. The [United Nations](#) finds animal agriculture contributes 14.5% of GHG, about as much as all road transportation according to [Our World Data.Org](#). This is due to A) animal gasses, B) the emissions from transporting heavy live and dead animals/meat around the world and C) growing grains to feed 80 billion animals, and the deforestation it causes, which is often up the supply chain (Scope 3). The United Nation’s Animal research ([GLEAM](#)) includes the supply chain because it is necessary to understanding the big picture.

The supply chain information helps everyone make the right choice for the planet and climate. Continuing the example above, growing food animals generates over 6.5% of global emissions, and so instead of growing grains for animals and then feeding people from animals, people can choose to support companies that use grains (food with protein and fiber) directly for people. In doing so, we would reduce the out-of-control GHG levels.

[The free online tool from the Green House Gas Protocol](#) provides Scope 3 emissions measures right now. There is no reason to companies need to wait. The SEC's Proposal's safe-harbor disclosures already give companies relief if disclosures are not fully accurate, so there should be no issue in using reports from this free tool that estimates Scope 3, in lieu of a phase-in period, provided the inputs to the reports are certified as being accurate by companies. Any phase-in should instead apply to more comprehensive analyses of Scope 3 that make fewer assumptions and are more accurate than the free tool.

Scope 1 and 2 disclosures are a great start, but the real opportunity for impact and lowering emissions is in tracking and reporting the emissions in the supply chain: Scope 3. We need these disclosed in 2024.