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Comments to the Securities Exchange Commission (SEC) published its proposed rule titled "*The Enhancement and Standardization of Climate-Related Disclosures to Investors*,"

To address concerns that existing disclosures of climate-related risks do not adequately protect investors, please consider these suggestions to add more specificity to the rules and broaden the rules to include active and documented risk avoidance measures.

#### **Fact Sheet:**

**Bullet 1:** change *likely* material impacts to *probable* material impacts (to indicate the **known** potential risk).

**Bullet 2:** after, *relevant risk management processes*, insert *including documented risk avoidance measures* (to indicate active risk avoidance measures are included in the process of risk management since in the Background paragraph, lines 5-8 state, "Investors also have expressed a need for more consistent, comparable and reliable information about how a registrant has addressed climate-related risk when conducting its operations and developing its business strategy and financial plan.")

**Bullet 5:** after *Information about climate-related targets and goals* add a period to end the sentence. (As written, climate-related targets and goals AND the transition plan could be interpreted as optional when included before the (*, if any*).

Add as **Bullet 6:** *Information about a transition plan, if any.* as an independent bullet, (#6)

#### **Content of the Proposed Disclosures**

**Bullet 2:** regarding...identified by the registrant to have had or *are likely* to have a material impact... Replace *are likely* with *are more likely than not* to have had a material impact (to indicate a commitment to discover, disclose and manage known risks that may manifest over the short-, medium- or long-term)

**Bullet 4:** after...managing climate-related risks and whether any such processes --*insert to avoid or mitigate risk* are integrated into the registrant's overall risk management plan.

**Bullet 11:** Why would this Bullet start with "If" and why wouldn't the climate-related targets and goals be public? Restructure sentences to read: *Registrant climate-related targets and goals must include about:*