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July 29, 2026

Vanessa A. Countryman
Secretary
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Re: Comment on SEC Proposal to Rescind Climate-Related Disclosure Rules
Release No. 33-11421; 34-105572; File No. S7-2026-19

Dear Secretary Countryman:

The Union of Concerned Scientists (UCS) puts rigorous, independent science to work to solve our planet's most pressing problems. On behalf of our half a million supporters and network of over 26,000 scientists, **UCS strongly opposes the proposal to rescind the Commission's 2024 rule** titled The Enhancement and Standardization of Climate-Related Disclosures for Investors.

UCS researches and educates the public about the dangers of climate change and advocates for building resilience through actions taken at every level of government, as well as within the U.S. financial system. We are also an institutional investor and active member of several networks of sustainable investors.

UCS has publicly supported robust climate risk disclosure for many years because we believe the serious financial risk posed by climate change demands action at the administrative, legislative, and regulatory levels. UCS' comment on the Commission's 2024 rule noted that it falls squarely within the agency's mandate by providing investors with information necessary for managing the costs of climate change.[1] These costs are growing exponentially: The global insurance provider Swiss Re calculated that losses from natural catastrophes like hurricanes Milton and Helene reached $318 billion in 2024 alone and are

[1] Cleetus, Rachel, Kathy Mulvey, and Laura Peterson. 2022. Union of Concerned Scientists Comment on the Enhancement and Standardization of Climate-Related Disclosures for Investors. June 17. Online at https://www.sec.gov/comments/s7-10-22/s71022-20132134-302620.pdf

set to increase around 6 percent annually.[2] Munich Re's Chief Climatologist Tobias Grimm pointed out in a recent report that the past 12 years have been the warmest on record and that a warming world makes extreme weather disasters more likely. "The warning signs persist," Grimm states. "Indeed, under the prevailing circumstances climate change can worsen further."[3]

Research by UCS and others in the rapidly growing field of attribution science strengthens evidence of climate change-related risk to companies, investors, communities, and the economy.[4] A July 2026 report on extreme event attribution by the National Academies of Science cited studies that "identified billions of dollars of additional economic damages that can specifically be attributed to climate change effects on extreme weather events."[5] Such information helps investors understand risk, measure responsibility, and assess damages, thereby increasing competitiveness. This is why investors have begun citing attribution science in their engagements with companies.[6]

Climate change is shaping the economy in myriad other ways, for example by creating opportunities for companies that provide repairs and resilience while squeezing consumer spending by raising costs for insurance, energy and disaster response.[7] Rescinding the 2024 rule would deprive investors and the public of information about these trends while insulating high-emitting industries from accountability.

UCS has endorsed statements from other commenters addressing the proposal's many problems, including legal inconsistency, faulty cost-benefit analysis, and biased interpretation of investors' role in determining materiality. This comment will specifically address the proposal's impact on scientific integrity and freedom of information.

Companies and investors recognize the value of standardized climate disclosure

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[2] Banerjee, Chandan, Lucia Bevere, Michael Ewald, Erik Lindgren, and Mahesh H Puttaiah. 2025. *Natural Catastrophes: Insured Losses on Trend to USD 145 Billion in 2025.* Zurich, Switzerland: Swiss Re Institute. April 29. Online at https://www.swissre.com/institute/research/sigma-research/sigma-2025-01-natural-catastrophes-trend.html

[3] Munich Re. 2026. Climate Change Presses on: Devastating Wildfires and Intense Thunderstorms Exacerbate Losses for Insurers. January 13. Online at https://www.munichre.com/en/company/media-relations/media-information-and-corporate-news/media-information/2026/natural-disaster-figures-2025.html

[4] Union of Concerned Scientists. 2025. *What is Attribution Science?* March 18. Online at https://www.ucs.org/resources/attribution-science

[5] National Academies. 2026. (Callahan & Mankin, 2025; Newman & Noy, 2023). *Attribution of Extreme Weather and Climate Events and Their Impacts.* p, 129. Washington, DC: National Academies of Science. Online at https://www.nationalacademies.org/read/28590/chapter/8#129

[6] As You Sow. 2025. *Chubb Ltd: Disclose Strategy to Reduce Climate-Related Risk.* November 28. Online at https://www.asyousow.org/resolutions/2025/11/26-chubb-reduce-climate-related-risk

[7] Kane, Eric, and Andrew John Stevenson, 2025. *The Climate Economy, 2025 Outlook: $18.5 Trillion Disaster Spending Adds Alpha Across Industries.* New York, NY: Bloomberg Intelligence. June 16.

The 2024 rule was promulgated because previous guidance on climate disclosures did not produce the comparable, consistent, and decision-useful information investors need. The vast majority of the more than 20,000 commenters on the 2024 rule said requiring companies to disclose standardized information in annual reports is highly material.[8] An analysis of institutional investor responses to the 2024 rule found that commenters overwhelmingly wanted disclosure of companies' climate-related targets, carbon emissions, transition plans and other climate-related information to inform investment decisions and risk management.[9]

Companies are already required to disclose this information in many jurisdictions around the world, negating the SEC's new argument that compliance would be excessively costly. More than 20 jurisdictions accounting for around 75% of global market capitalization outside the US have or are in the process of adopting similar standards, according to the International Sustainability Standards Board, making reporting mandatory for US multinationals.[10] Here in the United States, thousands of companies will begin reporting their carbon emissions this year under laws passed by California in 2023. Several other states, including New York and New Jersey, are considering nearly identical requirements.

US companies appreciate the utility of standardized climate information beyond facilitating compliance with these regimes. Evidence can be found in the many comments by companies and trade groups asking the US Environmental Protection Agency (EPA) to maintain its Greenhouse Gas Reporting Program (GHGRP).[11] Though the GHGRP serves a different law, the underlying premise is the same: Registrants—and therefore investors—need consistent, comparable, reliable climate reporting to facilitate investment, trade, and supply-chain emissions accounting.

Opposition to the SEC's proposed disclosure system was driven by high-emitting industries that fear disclosing this information in financial regulatory findings makes them vulnerable

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[8] US Securities and Exchange Commission. 2024. *SEC Adopts Rules to Enhance and Standardize Climate-Related Disclosures for Investors.*" Washington DC. March 6. Online at https://www.sec.gov/newsroom/press-releases/2024-31

[9] Rothstein, Steven. 2022. *Analysis Shows That Investors Strongly Support the SEC's Proposed Climate Disclosure Rule.* Boston, MA: Ceres. October 11. Online at https://www.ceres.org/resources/news/analysis-shows-that-investors-strongly-support-the-secs-proposed-climate-disclosure-rule

[10] IFRS Foundation. 2024. *Jurisdictions representing over half the global economy by GDP take steps towards ISSB Standards.* London, UK: International Financial Reporting Standards Foundation. May 28. Online at https://www.ifrs.org/news-and-events/news/2024/05/jurisdictions-representing-over-half-the-global-economy-by-gdp-take-steps-towards-issb-standards/

[11] Unmacht, Eric. 2026. "Businesses Push Back on Trump's Plan to Scrap GHG Reporting." *Sustainable Views*, July 8. https://www.sustainableviews.com/businesses-push-back-on-trumps-plan-to-scrap-ghg-reporting-f8951d03/

to litigation.[12] These entities successfully lobbied the Commission to remove mandatory reporting of Scope 3 emissions—which includes those from use of a company's products—from the 2024 rule. The final rule requires companies to disclose only if they include Scope 3 emissions in their climate targets or otherwise consider them material.[13] These facts demonstrate the intent behind the proposed recission—protecting corporate polluters at the expense of investors, market participants, and public health.

The political context of the Commission's proposal is impossible to ignore. The oil and gas industry became a heavy donor to Trump's presidential campaign, reportedly in exchange for promises of favorable tax and regulatory treatment.[14] An August 2024 briefing book from the American Exploration & Production Council—an oil and gas trade association that counts virtually all major US oil and gas corporations as members—specifically names revocation of the SEC rule and a related executive order on climate-related financial risk as top policy priorities.[15] President Trump revoked the Order on his first day in office, and two months later the SEC announced it would not defend the 2024 rule in court.

The proposal furthers political efforts to undermine scientific integrity

Annual financial filings provide data used by economists, financial analysts, and scientists to produce research that informs investors, policymakers, and financial institutions. Examples include physical risk analysis for companies and sectors, energy transition risk assessment, and supply chain/logistics trend mapping.

As UCS highlighted in our recent comment on the Commission's proposed weakening of Regulation S-K, conducting high-quality longitudinal research requires that disclosure requirements remain consistent.[16] A standardized regime for climate-related disclosures would also facilitate richer, more detailed analysis and performance information that

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[12] Merner, Delta, Kathy Mulvey, Laura Peterson, and Seth Shulman. 2025. *Decades of Deceit: The Case Against Major Fossil Fuel Companies for Climate Fraud and Damages*. Washington DC: Union of Concerned Scientists. Online at https://www.ucs.org/resources/decades-deceit

[13] Harty, Declan. 2024. "SEC Signs off on Landmark Climate Rule as Legal Backlash Looms." *POLITICO*. March 6. Online at https://www.politico.com/news/2024/03/06/sec-set-to-launch-landmark-climate-rule-sparking-legal-blitz-00145323

[14] Whoriskey, Peter. 2025. "SEC rule suspension is early gift for Trump's oil and gas supporters." *Washington Post*. February 17. Online at https://www.washingtonpost.com/climate-environment/2025/02/17/trump-climate-sec-rule-suspended-oil-donors/

[15] American Exploration and Production Council (AXPC). 2024. *Board Book*. Online at https://www.documentcloud.org/documents/25196783-axpc-board-book-aug-9-2024.
Accessed July 24, 2026.

[16] Peterson, Laura. 2026. Union of Concerned Scientists Statement on reforming Regulation S-K. April 13. Online at https://www.sec.gov/comments/CLL-15/cll15-749708-2316455.pdf

would serve not only investors and scientists but entrepreneurs, product developers and other generators of economic growth.

Yet the Commission seems intent on stalling rather than facilitating this growth. The move to rescind a rule that had already undergone perhaps the most intensive engagement process in the agency's history aligns with the Trump administration's attacks on science generally, and climate science specifically. From undermining the GHGRP to withdrawing from the Intergovernmental Panel on Climate Change, from attempting to shut down the National Center for Atmospheric Research to promoting a sham climate science report commissioned by an Energy Secretary whose former company filed a lawsuit against the 2024 rule, this administration is deploying scorched-earth tactics to dismantle federally-funded scientific institutions and instruments that produce data about our changing climate, often in contravention of Congressional mandate.[17] Rescinding the 2024 rule would clearly serve this strategy.

The Commission should withdraw the proposal and allow the 2024 rule to stand.

Sincerely,

Laura Peterson
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Union of Concerned Scientists

Kathy Mulvey
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Union of Concerned Scientists

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[17] Phillips, Carly. 2026. "As Trump's Attacks on Science Escalate, Big Oil Moves to Avoid Legal Accountability." *Climate Home News*, March 17. Online at https://www.climatechangenews.com/2026/03/17/as-trumps-attacks-on-science-escalate-big-oil-moves-to-avoid-legal-accountability/