

4/4/2022

Vanessa A. Countryman, Secretary
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549-1090

Re: File Number S7-10-22

To Whom It May Concern:

Align Impact writes in support of the proposed rules put forth by the U.S. Securities and Exchange Commission (“the Commission”) to enhance and standardize climate-related corporate disclosures. If finalized, the proposal will improve corporate accountability and promote transparency for investors.

Align Impact is an impact investment advisory firm managing more than \$200m on behalf of individuals and families who wish to align their portfolios with their values, with an additional \$2bn under advisement as we work with other RIAs and family offices to help build out their ESG and impact investment capabilities. The proposed climate-related disclosures are in step with the Align’s mission to ensure the world works for all of humanity’s 7.8 billion people and the planet, by deploying capital to help solve the world’s greatest challenges. The proposal is also responsive to investor and public demands and lays the groundwork for alignment with global regulatory peers who have made strides toward mandated, standardized climate-related financial disclosures.

Climate change poses significant and systemic risks to financial stability and the capital markets¹. Accordingly, investors require access to clear, timely and comparable climate data, and businesses are increasingly recognizing the importance of measuring and disclosing their impacts on a broad set of stakeholders. We are supportive of the proposal’s inclusion of disclosures on companies’ Scope 1, 2 and 3 greenhouse gas emissions, all of which are necessary for investors to understand the full extent of a company’s exposure to climate risks.

For decades, the rules and regulations governing the financial markets have constrained American economic innovation and competitiveness by hampering investors’ consideration of long-term factors and systemic risk. The proposal represents a momentous step forward in better enabling businesses and investors to account for climate-related risks, impacts and opportunities in a transparent and meaningful way.

Thank you for the opportunity to provide comment. We look forward to engaging with the Commission throughout the rulemaking process to ensure a strong final rule.

Sincerely,

Align Impact

¹ Report on Climate-Related Financial Risk, Financial Stability Oversight Council, 2021, <https://home.treasury.gov/system/files/261/FSOC-Climate-Report.pdf>