



Vanessa Countryman, Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-0609

20 April 2022

Dear Ms. Countryman,

**File No. S7-10-22 on The Enhancement and Standardisation of Climate-Related Disclosures for Investors**

Aviva Investors warmly welcomes and supports the SEC's proposals for the enhancement and standardisation of climate-related disclosures for investors.

We are a global asset manager with over US\$343 billion in assets under management that is committed to the robust management of climate-related risk on behalf of our clients. We are also part of the Aviva plc Group, which includes the UK's leading savings, retirement, investments and insurance business. We have long supported the work of the Taskforce on Climate-Related Financial Disclosures (TCFD), of which we are proud to be a part and Aviva has published TCFD reports since 2016. We have made and supported calls for consistent and decision-useful climate related disclosures from companies to be made mandatory by securities regulators around the world. This information is essential to allow risk-informed allocation of capital as the world transitions to a more sustainable economy and as we seek to implement our own ambition to become a net zero asset manager by 2040 and support the wider Aviva Group in its net zero 2040 ambition.

We therefore support the SEC's proposals for rules to require US registrants to provide climate-related information in their registration statements and annual reports, including information about their climate related financial risks and metrics in their financial statements. This information is essential to allow assessment of the full range of risks faced by and opportunities open to companies, including those relating to climate change, the effects of which are one of the most significant financial risks facing the global economy.

We support the SEC in its assessment that the mandating of the disclosure of this information is necessary and appropriate to the public interest and protection of investors, given the potential for climate related risks to have a material impact of the value of securities, particularly in the long term. In our annual letter to the chairs of companies that we invest in on behalf of our clients, which included companies affected by the proposed rule, we called for key disclosures of their emissions and the potential impact of climate related risks and opportunities. Some companies have begun to disclose this information voluntarily, but to maintain a level playing field and promote fair competition, it is right that mandatory disclosure now be required.

I wish you and the whole of the SEC success in the implementation of these important proposals.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Mark Versey".

Mark Versey  
CEO Aviva Investors

**Aviva Investors is a business name of Aviva Investors Global Services Limited**

Registered in England No. 01151805

Tel +44 (0)20 7809 6000 Fax +44 (0)20 7809 7940 Email [information.uk@avivainvestors.com](mailto:information.uk@avivainvestors.com) [www.avivainvestors.com](http://www.avivainvestors.com)

Registered Office: St Helen's, 1 Undershaft, London, EC3P 3DQ.

Authorised and regulated by the Financial Conduct Authority.

Telephone calls may be recorded for training and monitoring purposes.