June 16, 2022

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

RE: The Enhancement and Standardization of Climate-Related Disclosures for Investors [File Number S7-10-22]

Dear Ms. Countryman,

We write in support of proposed rules related to the enhancement and standardization of climate-related disclosures by the Securities and Exchange Commission (SEC). If finalized, we believe that these rules will enhance corporate accountability and provide transparency for investors on the most pressing issue facing society today: climate change.

Based in San Diego, California, Geno is remaking everyday products and materials with more sustainable, high performance ingredients from renewable sources like plants rather than fossil fuels. We deliver sustainable materials at scale so brands can meet consumers' growing demands for responsibly made products. For example, our innovative fermentation process enables greenhouse gas emissions savings of up to 90 percent.

As companies continue to play a critical role in combating the climate crisis, new rules are needed to hold businesses accountable to investors, shareholders and the general public. Geno strongly supports SEC rulemaking to require both internal oversight and governance of climate-related risks as well as disclosure of Scope 1 and Scope 2 emissions information to create a level playing field and greater transparency. Further, we urge SEC to similarly require disclosure of Scope 3 emissions rather than carving out a safe harbor and other exemptions for this challenging, yet critical component of companies' climate targets.

The Greatest Emission Reduction Opportunities Lie with Scope 3 Emissions

Many forward-thinking companies today have already made great strides in tracking and reducing Scope 1 and Scope 2 emissions. However, measuring and reducing emissions from a company's supply chain and users of their product (Scope 3) is more difficult and remains challenging even for socially responsible businesses. Current Scope 3 emissions measurements can be difficult to obtain and the results are often inconsistent and incomplete. Yet, the danger of only requiring Scope 1 and Scope 2 emissions is that companies who pursue ambitious climate targets may simply push carbon emissions downstream to suppliers, thereby circumventing the aim of this rulemaking.

Geno recognizes that companies need time to prepare for Scope 3 emissions disclosure, whether it is taking time to trace their supply chain, evaluating different suppliers or giving downstream suppliers notice that their practices must change to reflect more climate resilient policies. A phase-in approach for Scope 3 emissions is an appropriate way to allow companies time to assess their supply chain and make changes necessary to fulfill the requirements of this rulemaking.

We believe that climate change is one of the biggest risks facing our economy and radical transparency is needed for investors to make accurate and timely investments whose impacts affect generations to come. Geno strongly supports SEC's action to ensure that investors and the public have access to the important information impacting these investment decisions and appreciate the opportunity to provide comments to this landmark rulemaking.

Sincerely,

Christophe Schilling
Founder and CEO, Geno