



BritishAmericanBusiness

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**Allison Herren Lee
Acting Chair
The Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549**

Subject: BritishAmerican Business Input on Climate Change Disclosures

BritishAmerican Business is the leading transatlantic trade association incorporating the British-American Chamber of Commerce in the US and the American Chamber of Commerce in the UK. As such, it is committed to strengthening the economic corridor between the United States and the United Kingdom by supporting policies and actions that protect and enhance the environment for transatlantic trade and investment on behalf of our members. A part of this mission is a concern for promoting policies and business practices that promote a sustainable transatlantic business environment.

In her letter of March 15, 2021, Securities and Exchange Commission (SEC) Acting Chair Allison Herren Lee encouraged '[o]riginal data from respondents, including academics, data providers, and other organizations, [which] may assist in assessing the materiality of climate-related disclosures, and the costs and benefits of different regulatory approaches to climate disclosure.' The following is the response of BritishAmerican Business and takes the form of qualitative data in the form of comment. These responses, numbered below, address the **fourth**, **fifth** and **sixth** questions posed in the Acting Chair's letter.

1. BritishAmerican Business welcomes, and is supportive of, the efforts of the SEC to evaluate its regulation of climate change disclosures. The views expressed here reflect that support, but in their detail do not supersede the individual views of, and any responses that may be offered by, the individual members of BritishAmerican Business.

2. Markets, domestic and international, offer their greatest contribution to long-run economic growth when they are both coherent and large; market scale is an advantage. It is important to recognize that climate change is a systemic concern because the actions of one industry affect another and vice versa. Establishing different climate change reporting standards for different industries should acknowledge the economic realities of each specific sector but only as much as it is absolutely necessary. A reporting framework which results in a fragmentation of standards by industry will only reduce the comparability and utility of any subsequent data that is produced. We also suggest that some cross-industry comparative methodology might also be developed to address any differences in reporting that are unavoidable. Industries must be able to review their

performance in the context of the wider economy and learn best practices both horizontally (across industries with a common yardstick) and vertically (with bespoke data sets).

3. We also believe that efficiencies can be gained from the adoption of existing standards. For example, the adoption of the exact reporting requirements or the principles used in the Task Force on Climate-Related Financial Disclosures (TCFD), in particular, would be of mutual benefit to both the SEC and the members of BritishAmerican Business.

4. Climate change affects all aspects of society and the economy, and data-led, pragmatic and collaborative attitude - between business and government, and between individual jurisdictions - might best inform not just the reiteration of climate-related disclosure but also future domestic and international efforts to assess, mitigate and meet the challenges of climate change. To this end, BritishAmerican Business advocates, and remains available for, engaged and firm collaboration between business, the SEC and other regulatory and government agencies to meet climate-related issues.

We appreciate the opportunity to provide input on this issue and stand ready to support further as needed.

Sincerely,
Duncan Edwards

A handwritten signature in blue ink that reads "Duncan Edwards". The signature is written in a cursive, flowing style.