



CENTER FOR CAPITAL MARKETS
COMPETITIVENESS

Evan Williams
DIRECTOR

1615 H STREET, NW
WASHINGTON, DC 20062-2000
(202) 725-5923
EWilliams@USChamber.com

August 23, 2021

Ms. Vanessa Countryman
Secretary
Securities and Exchange Commission

Washington, DC 20549

Re: Request for Information on Climate Change Disclosure

Dear Ms. Countryman:

The U.S. Chamber of Commerce (“the Chamber”) appreciates the Securities and Exchange Commission’s (“SEC” or “Commission” or “agency”) ongoing work to review the viewpoints of stakeholders expressed in response to the agency’s request for information on climate change disclosure.¹ Attached are the results of a survey the Chamber recently conducted with a host of other organizations to better understand the practices and sentiments of public companies on climate change and environmental, social, and governance (ESG) disclosure.

The survey was conducted between June and July of 2021 and elicited responses from 436 individual companies. The survey polled a diverse range of companies in industry and size, with 67% of survey respondents representing companies under \$5 billion in market capitalization. The purpose of the study was to better understand disclosure challenges and opportunities from the public company perspective.

Chief among the findings of the survey, 82% of companies agreed that they should be afforded the flexibility to determine how ESG issues apply to them and what information they should be required to disclose. Further, companies overwhelmingly support tailoring climate change and ESG disclosures: 89% of survey respondents support scaling disclosure for companies based on a metric of size and 74% support a phase-in for new requirements for all public companies.

¹ <https://www.sec.gov/news/public-statement/lee-climate-change-disclosures>

We trust the Commission will take account of issuers' perspectives as it weighs any new mandates related to climate change and ESG topics. The Chamber looks forward to continued conversations with the SEC and will work to provide resources, like the attached survey, to ensure the Commission has timely and relevant information as it considers proposals and subsequent action related to climate change and ESG topics.

Sincerely,

A handwritten signature in black ink, appearing to read "Evan Williams". The signature is fluid and cursive, with a large initial "E" and "W".

Evan Williams
Director
Center for Capital Markets Competitiveness