



February 09, 2026

California Air Resources Board

1001 I St.

Sacramento, CA 95814

Submitted electronically

RE: Proposed California Corporate Greenhouse Gas Reporting and Climate-Related Financial Risk Disclosure Initial Regulation

The undersigned organizations represent covered and reporting employers in the goods movement, logistics, retail, and maritime industries. Thank you for the opportunity to comment on California Air Resources Board's (CARB) Proposed California Corporate Greenhouse Gas Reporting and Climate-Related Financial Risk Disclosure Initial Regulation.

Covered Entities Need Flexibility for Reporting Deadlines

We appreciate CARB proposing an initial reporting deadline of August 10th and further strongly recommend CARB consider the following:

- **Create an extension request process**

Data availability will vary greatly depending on the reporting entity, the complexity of their operations and value chain, and the level to which data is available internally or must be obtained from a third-party, such as utility providers. Reporting entities are reliant upon the speed at which these third-parties process and provide the data necessary to calculate emissions. CARB must take into consideration not only when

data is available to support reporting, but the variable time entities need to process data, calculate emissions, and undergo verification.

A broad array of reasons outside of a covered entity's control could delay this process. For instance, the regulations will likely increase the demand for verification services, which will create bottlenecks in what is already a months-long process.

If there is an anomaly during data review, this could also add an unexpected delay to a covered entity's verification timeline. Entities should be granted the necessary time to appropriately validate all data.

Accordingly, we strongly recommend CARB create a process to allow covered entities to request an extension of their reporting deadline if an entity can demonstrate that assurance or data collection is still ongoing.

- **Provide all covered entities a minimum 12 months to report**

Allowing up to 12 months after the close of a fiscal year provides needed flexibility to covered entities if they are not calculating their emissions inventory under optimal conditions, which will not be the case for every entity every year. Optimal conditions include that the entity has an experienced reporting team, data was readily available and received in a timely manner from internal teams and third parties, their operations were similar to the prior year, data availability and recommended calculation methodologies did not change, and prior years did not require restatements.

Additionally, providing companies with 12 months to submit emissions data under the rules would prevent entities that already voluntarily report emissions data from having to produce a second, duplicative report for CARB or dramatically accelerate their reporting timeline, which could negatively impact the quality of data and a report.

Proactively moving the initial reporting deadline to December 31st will further deter the need to request an extension in the deadline unless unprecedented circumstances occur. Moving the reporting deadline further reduces the administrative burden on CARB to review and process such requests, and minimize entities' reporting incomplete, rushed data. Though we strongly encourage CARB to issue both an extension process for unforeseen circumstances and move the initial deadline to December 31st to submit data for fiscal year periods ending in 2025.

Creating a rolling 12 month submission deadline for future reporting years would also reduce anticipated bottlenecks in assurance providers which most observers believe will be induced by adhering to a single reporting deadline.

Transparency and Fairness in Fee Setting

We appreciate CARB including forecasted program costs and approved positions in the Initial Statement of Reasons.

The proposed fee framework would divide total required revenue in a given fiscal year by the number of reporting entities. Given the uncertainty around the number of covered entities under each program and who will report, we are concerned that reporting entities will be held accountable for paying fees for entities that are covered by the regulations but have not reported. CARB should establish a clear process for ensuring that regulated entities are not unfairly held accountable for shortfalls due to noncompliance.

The proposed fee framework also allows for 60 days to pay fees after receipt of notice from CARB. Because the fees are variable and are not finalized at this time, we are concerned that entities cannot budget fully for these unknown fees and may need additional time to allocate funding beyond the proposed 60-day time period. Also, processing fees through corporate accounting systems can take significant time, especially when paying a fee for the first time. Extending the payment period to a period of no less than 90 days would better allow corporations to perform the necessary accounting processes needed.

Furthermore, CARB should be fully transparent about any future changes in program funding needs and staffing levels, especially any proposed increases, by bringing proposed changes to the Board as informational items and providing reporting entities the opportunity for public comment and review.

Thank you for the opportunity to submit these comments. If you have any questions, please contact Sarah Wiltfong at sarah@supplychainfederation.com

American Trucking Associations
California Business Roundtable
California Retailers Association
California Trucking Association
NAIOP SoCal Chapter
Pacific Maritime Shipping Association
Supply Chain Federation