

February 26, 2026

Office of the Clerk
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Proposed California Corporate GHG Reporting and Climate-Related Financial Risk Disclosure Initial Regulation

Dear Chair Sanchez and Members of the Board:

On behalf of Biocom, the world's largest life science organization, representing biotechnology, pharmaceutical, medical device, genomics and diagnostics companies of all sizes, research universities and institutes, clinical research organizations, investors and service providers, we appreciate the opportunity to submit this written comment regarding the Proposed Initial Regulation for the implementation of SB 253 and SB 261.

Life science activity in California is the second largest industry in the state, generating approximately \$395.7 billion in total business output for California and contributed approximately \$125.7 billion in salaries and sole proprietor income (2024). Our ecosystem includes a large presence of small, emerging companies alongside established, mature firms. Together, these companies develop, manufacture, and distribute the technologies, devices, diagnostic tests, and health information systems that are transforming healthcare through earlier disease detection and more effective treatments to improve the human condition.

As the Board considers initial regulations, and prepares for the subsequent rulemaking phases, we must reiterate that the complexities of Scope 3 emissions present a unique hurdle for the medical technology and biotechnology sectors. These emissions encompass the downstream processing, transportation, distribution, consumer use, and end-of-life treatment of products after they are sold, as well as the upstream supply chain investments our companies rely on (but do not own or oversee). The sheer volume of these data points, combined with the likelihood of double counting and the necessary reliance on secondary data, makes assessing Scope 3 emissions with accuracy incredibly difficult.

To avoid duplicative reporting and prevent capturing these emissions multiple times, we urge CARB to align its implementation and future reporting requirements with existing federal and international reporting standards.

Maintaining alignment with recognized global standards will streamline the logistical burden for our companies, ensure that emissions are reported accurately, and, most importantly, allow for the continued, on-time production and delivery of essential medical technologies to patients who depend



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on them.

We appreciate the opportunity to provide these comments for the official record and look forward to working collaboratively with CARB throughout the implementation process. Please feel free to contact me at GLara@biocom.org or our lobbyist Moira Topp at Moira@ToppStrategies.com with any questions.

Sincerely,

Gilbert Lara
State Government Affairs Manager