BMW GROUP

August 4, 2026

Ms. Sydney Vergis
Assistant Division Chief – Industrial Strategies Division
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re.: SB 253 – Comments on SB 253 Corporate Greenhouse Gas Reporting Workshop

Dear Ms. Vergis,

BMW Group appreciates the opportunity to provide feedback following CARB's latest workshop on implementation of SB 253, the Climate Corporate Data Accountability Act. BMW Group supports transparent, comparable greenhouse gas ("GHG") emissions disclosure and encourages CARB to implement the program in a manner that is practical, globally aligned, and avoids duplicative reporting obligations.

For global manufacturers already subject to international climate reporting regimes, the most effective SB 253 framework will be one that recognizes existing governance, calculation, and assurance processes under the GHG Protocol, ESRS, IFRS S2, and comparable standards.

BMW Group respectfully recommends that CARB align SB 253 implementation with the GHG Protocol, ESRS, IFRS S2, and other equivalent frameworks. California-specific methodologies should be avoided unless required by statute, as they would increase burden, reduce comparability, and require duplicative reporting systems.

CARB should also allow companies to rely on emissions data, methodologies, consolidation approaches, and assurance processes developed under equivalent global regimes where those processes satisfy the substantive requirements of SB 253. Recognizing existing reporting systems will help ensure that California's program produces consistent, comparable information without requiring companies to rebuild established global controls for a California-only process.

BMW Group recommends that the use of primary data remains voluntary, recognizing that such data can be difficult to obtain, particularly across complex global supply chains and third-party data sources. CARB should allow companies to rely on reasonable estimates, secondary data, and established calculation methodologies where primary data is unavailable or impracticable to collect.

BMW Group requests clarification regarding the treatment of data exclusions described on slide 19 of CARB's workshop presentation, which states:

"Reporting entities may exclude GHG emissions sources, activities, Scope 3 categories, or other information where the omission, misstatement, or obscuring could not be reasonably expected to influence the decisions, assessments, or understanding of users of the disclosure regarding the reporting entity's GHG emissions inventory, climate-related risks, opportunities, or impacts."

BMW Group understands this language to reflect a materiality-based approach to data exclusions. CARB should clarify whether this approach allows reporting entities to determine which of the five recommended Scope 3 categories they will report based on whether each category is material to the entity's emissions inventory, climate-related risks, opportunities, or impacts.

BMW Group further recommends a practical approach to methodological disclosures. CARB should not require quantitative uncertainty metrics or overly granular source-level disclosures. Companies should be permitted to describe methodologies, data sources, and key assumptions at an appropriate level of aggregation consistent with established reporting frameworks.

For Scope 3 emissions, CARB should maintain a phased, materiality-based approach. Companies should be allowed to prioritize material categories and exclude immaterial categories or sources based on reasonable, entity-specific thresholds, with appropriate disclosure of the basis for exclusion.

CARB should permit aggregate CO_2e reporting and should not require reporting by individual greenhouse gas or source type. Requiring source-type reporting would diverge from established global reporting practices and add unnecessary complexity without improving the decision-usefulness of the disclosure.

CARB should also align treatment of biogenic emissions, methodology changes, and prior-year recalculations with ESRS and the GHG Protocol, including materiality-based recalculation thresholds. Maintaining consistency with these frameworks will improve comparability and reduce the risk of conflicting reporting obligations. Under ESRS 2.0, beginning in 2027, separate reporting of biogenic emissions for Scope 2 and Scope 3 will no longer be required.

Finally, BMW Group appreciates CARB's extension of the 2026 Scope 1 and Scope 2 reporting deadline to November 10 and recommends maintaining that date in future years. CARB should also recognize group-level assurance where it covers the relevant emissions data under accepted assurance standards.

BMW Group respectfully urges CARB to implement SB 253 through a flexible, globally interoperable framework that delivers transparent and decision-useful emissions information while minimizing unnecessary administrative burden. BMW Group appreciates CARB's continued engagement and welcomes the opportunity to work with staff as the program is finalized.

BMW GROUP

Respectfully,

Linda White
Director Government & External Affairs

BMW of North America

BMW Group in the U.S.
BMW Group began operations in the U.S. over 50 years ago. In addition to the sales, marketing, and distribution of BMW, MINI, Rolls-Royce, and BMW Motorrad vehicles, BMW Group's business in the U.S. spans 30 locations in 12 states including BMW Group Financial Services, BMW Manufacturing, Designworks, BMW Technology Office USA, and BMW i Ventures. The company's U.S. plant in South Carolina is the largest single BMW production facility in the world and the global center of competence for BMW Sports Activity Vehicles. The BMW Group sales organization is represented by a nationwide network of 355 BMW retailers, 147 BMW motorcycle retailers, 104 MINI passenger car dealers, and 38 Rolls-Royce Motor Car dealers. Taken together, BMW Group's business activities in the U.S. provide and support over 120,000 jobs and contribute more than $43.3 billion to the U.S. economy annually. For more information about BMW Group's business and products in the U.S., please visit: PressClub USA.

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