The J.M. Smucker Company (Steve Walker)

We ask CARB to consider allowing annual emissions reporting based on the calendar year even if it differs from the reporting entity's fiscal year. This would avoid a duplication of effort for entities that are already reporting their emissions on a calendar year basis, which would result in more timely emissions reporting for some entities. In addition, for entities that report progress since a base year, base year emissions would not need to be revised to reflect the fiscal year, which would be a challenging task for entities with a reporting boundary that has changed significantly since the base year. Furthermore, for entities with reporting boundary changes, we suggest requiring recalculation of the entity's selected base year and calculation of the current reporting year only, rather than requiring recalculation of the years in between the two.

The J.M. Smucker Co. voluntarily reports Scopes 1, 2, and 3 greenhouse gas emissions annually on a calendar year basis, rather than based on the fiscal year, which ends on April 30. Reporting based on the calendar year has allowed us to report emissions to CDP the following summer and include emissions in our Corporate Impact Report, which is generally made available in the fall. To ensure the completeness and accuracy of our emissions, we follow a robust process that includes internal reviews of the data utilized in the calculations, the involvement of a third-party expert, and third-party assurance. If we were required to report emissions on a fiscal year basis, the information we would provide would be less timely. For example, our 2024 Corporate Impact Report included calendar year 2023 emissions. If we needed to report on fiscal year emissions, due to the time required to complete our process, we would have instead reported on fiscal year 2023 (May 1, 2022-April 30, 2023), data that is eight months older than the calendar year 2023 data.

In 2020, we set emissions reduction goals for Scopes 1, 2, and 3. The base year used to measure our progress is calendar year 2019. Converting calendar year 2019 emissions to reflect fiscal year 2019 would be time-consuming and challenging due to a significant acquisition since 2019 and multiple divestitures, all of which resulted in a change to our organizational boundary.

In closing, permitting emissions reporting on a calendar year basis even if it differs from the entity's fiscal year would avoid a duplication of effort and rework for certain organizations, and should not result in emissions that are significantly different from fiscal year emissions. Providing this flexibility would allow all organizations to choose the timeline that works best within their various reporting cycles and would better support accurate emissions disclosed on a timely basis.