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On behalf of IETA's 300+ member organizations, we appreciate this opportunity to provide feedback to CARB on the proposed initial regulation to support the Corporate Greenhouse Gas Reporting and Climate-Related Financial Risk Disclosure programs.

Please refer to the attached document for our response.

9 February 2026

IETA Comments on CARB’s Public Hearing to Consider the Proposed California Corporate Greenhouse Gas Reporting and Climate-Related Financial Risk Disclosure Initial Regulation (Fee Regulation)

For more than 25 years, IETA has been the leading global business voice on robust market solutions to tackle climate change while driving clean finance at scale. Our organization represents a broad and diverse group of 300+ businesses, including those with clean assets, exposure and operations across California and the globe. IETA's expertise is regularly called upon to inform carbon market solutions that deliver measurable climate outcomes while addressing economic competitiveness and affordability concerns.

As in all jurisdictions, IETA supports practical and robust regulation to aid in climate-related transparency and reward corporate climate action while limiting bad actors. We recognize the need for CARB to collect fees from covered entities to implement the applicable statutes (SB 261, SB 253) and regulations, and we agree with the methodology to establish and collect a flat fee from all entities on an annual basis while encouraging CARB to carefully monitor the program for potential cost savings throughout implementation. Accordingly, we encourage CARB to complete rulemaking as soon as possible and finalize the regulation at the February 26 Board meeting. This will enable CARB to move forward with other rulemakings related to SB 253 and/or SB 261.

As future rulemakings are conducted, **IETA urges CARB to continue closely tracking evolving international carbon accounting, reporting and disclosure frameworks**. As several jurisdictions bring forward similar legislation – all while major existing voluntary standards undergo updates¹ – we remain concerned about growing global fragmentation of disclosure rules and the challenges of interoperability across jurisdictions.

¹ The Greenhouse Gas Protocol is undergoing revisions across its suite of standards and frameworks, as well as an ongoing harmonization process with ISO. IETA recently submitted comments to the GHG Protocol in response to its proposed updated Scope 2 Guidance: <https://www.ieta.org/ieta-comments-to-greenhouse-gas-protocol-scope-2-guidance>

To ensure CARB's regulations meet California-specific needs while remaining aligned with evolving external standards, it is critical **that reporting obligations are clearly defined, focused and allow for harmonized reporting that does not layer unnecessary compliance burden**. This can include, in part, by relying on established standards, practices, and methodologies that provide flexibility and avoid duplication.

With a global membership comprising a collective deep expertise in carbon markets and carbon accounting, IETA welcomes the opportunity to provide market insights and technical expertise to support CARB as the process continues.

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