Todd Snyder

As a stakeholder, I demand the removal of the exemption for insurance companies that you added to the implementation of SB 253, before you send the final rule to the Office of Administrative Law.

This carveout weakens the rule and limits its effectiveness. Bill author Sen. Weiner has explained that SB 253 was designed to ensure that major corporations disclose their greenhouse gas emissions, providing transparency into climate-related financial risk, and that insurance companies are within the intended scope of the law.

Insurance companies insure fossil fuel projects and infrastructure and also invest heavily in carbon-intensive industries. Excluding them leaves out a major source of emissions-linked financial activity. Californians deserve to know if their insurance companies are driving up climate costs that affect their insurance premiums.

The public record reflects strong opposition to this exemption. Thousands of written comments and extensive public testimony at the February hearing called for full inclusion of insurers. Former California Insurance Commissioner Dave Jones also testified in support of including insurance companies in the regulation.

The current status quo of relying on voluntary disclosure from insurance companies has not produced consistent or reliable data and it is not a suitable replacement for SB 253 because participation remains uneven, and there are no enforceable standards to ensure compliance. Even if voluntary reporting were to improve, the law must still require emissions reporting to CARB to ensure proper review and enforcement from everyone.

Allowing this insurance industry carveout limits transparency, weakens accountability, and reduces the effectiveness of the law.

I urge you to reverse this decision, remove the insurance exemption, and finalize a rule that applies equally to all covered corporations.