Union of Concerned Scientists (Laura Peterson)

I'm Laura Peterson, Senior Analyst for the Climate Accountability campaign at the Union of Concerned Scientists. UCS is a US-based membership organization with 39K active supporters in California that conducts research and organizes scientists in service of a healthy, safe, and just future.

UCS has backed the Climate Corporate Data Accountability Act and the Climate-Related Financial Risk Act since they were introduced in the Senate and continues to support their implementation. This must ensure the laws achieve their aim of providing standardized, reliable, and mandatory disclosure of carbon emissions to enable companies to make informed business decisions and provide critical information about the impact of a company's practices on California's economy. We continue to support the legislation's use of the Greenhouse Gas Protocol—the globally recognized emissions accounting and reporting standard—as the framework for corporate emissions accounting and reporting.

UCS does take issue, however, with the proposed regulation's exemption of insurance companies from SB 253 reporting. As stated in a February 9 letter to the Board signed by UCS along with 39 other public interest organizations with significant California membership, insurance companies are clearly corporate entities with reportable revenue that transact directly with California consumers. This exemption is inconsistent with the statute and allows a dangerous information asymmetry to persist between insurers, policymakers, and Californians that imperils both the state's long-term climate planning and jeopardizes homes and businesses in the nearer-term.

Records show the insurance industry has lobbied heavily against climate risk oversight in California and around the world. The industry's central role in driving the climate crisis through its underwriting of and investment in fossil fuels while abandoning markets hit by extreme weather, as in the Palisades and Eaton Fire, is further reason not to exempt this industry. If allowed, it will not only undermine the legislation's effectiveness but encourage other industries to pursue similar exemptions. Corporate accountability and the public safety it creates must remain the driving force behind these laws.

We appreciate CARB advancing these crucial regulations and look forward to working with you to ensure their effectiveness. Thank you.