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660 Pennsylvania Avenue S.E. Suite 302; Washington, DC 20003

fdnEarth.org

September 15, 2015

The Honorable Mary Jo White, Chair
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Re: Mandatory Corporate Ecological Impact Disclosure

Dear Chair White,

We write to express our support for Mandatory Corporate Ecological Impact Disclosure to substantially foster your mission to protect investors. We have attached a detailed working paper describing this idea. We urge the Securities and Exchange Commission (SEC) to move ahead with rapid consideration and implementation of this approach.

The initiative would require public companies to disclose to their shareholders and the public at large how their business activities impact planetary life support systems. This would bring much needed accountability to shareholders and transparency to corporate behavior. Such an approach is consistent with the SEC's requirement for public companies to disclose meaningful financial and financially related information to the public.

Because shareholders are the true owners of a corporation, a public company should be required to disclose to its owners how the company's activities affect the ecology and life support systems nationally, continentally, and globally. This information is crucial for investors because they need a healthy, viable planet for economies to flourish.

We note that the SEC has received more than 1 million public comments in favor of political contribution disclosure including those from both investment managers and the investing public. A number of State Treasurers have weighed in supporting this type of disclosure, as they have "an obligation to make sure the public funds are invested responsibly and accountably."¹ In addition, 70 foundations wrote to the SEC in support of types of disclosure in addition to financial disclosures in order to "know whether companies in which [they] invest are making questionable or controversial political expenditures."²

Notably, we are joined in our support for non-financial rulemaking by former SEC Chairmen Arthur Levitt and William Donaldson and former Commissioner Bevis Longstreth. In the letter they sent to you at the end of May, they highlighted the fact that the SEC's failure to act "flies in the face of the primary mission of the Commission, which has since 1934 been the protection of investors."³

¹ State Treasurers Janet Cowell (NC), Seth Magaziner (RI), James McIntire (WA), Beth Pearce (VT), and Ted Wheeler (OR) letter to the SEC, <https://www.sec.gov/comments/4-637/4637-2960.pdf>.

² Tim Devaney, "Investors urge corporate political spending disclosure," The Hill, Regulation, 20 May 2015, <http://thehill.com/regulation/business/242655-investors-push-sec-to-disclose-dark-money-in-politics>.

³ Former SEC Chairmen William Donaldson and Arthur Levitt and former SEC Commissioner Bevis Longstreth letter to the SEC, May 27, 2015, <https://www.sec.gov/comments/4-637/4637-3105.pdf>.

We ask that you make this rulemaking a top priority for the SEC and hope you would calendar it to the SEC's regulatory agenda. We would welcome the opportunity to present to you and your staff some of the background information we have developed on Mandatory Corporate Ecological Impact Disclosure.

Sincerely,

Randy Hayes
Executive Director

Brent Blackwelder
Board, Vice-Chair

Attached: [Mandatory Corporate Ecological Impact Disclosure](#): A Working Paper (75pps)

CC: United States Senators with expressed interest in mandatory disclosure (partial list):

Tammy Baldwin

Richard Blumenthal

Barbara Boxer

Maria Cantwell

Thomas R. Carper

Michael F. Bennet

Cory A. Booker

Sherrod Brown

Benjamin L. Cardin

Robert P. Casey

Christopher A. Coons

Dianne Feinstein

Kirsten E. Gillibrand

Heidi Heitkamp

Tim Kaine

Amy Klobuchar

Edward J. Markey

Robert Menendez

Barbara A. Mikulski

Richard J. Durbin

Al Franken

Martin Heinrich

Mazie Hirono

Angus S. King Jr.

Patrick Leahy

Claire McCaskill

Jeffrey A. Merkley

Christopher S. Murphy

Patty Murray

Bill Nelson

Gary C. Peters

Harry Reid

Jack Reed

Bernard Sanders

Charles E. Schumer

Brian Schatz

Jeanne Shaheen

Debbie Stabenow

Jon Tester

Tom Udall

Mark R. Warner

Sheldon Whitehouse

Elizabeth Warren

Ron Wyden