

March 14, 2016

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

Re: Carbon emissions disclosure by the bioenergy sector

Dear Chair White,

Today, many publicly traded companies are promoting the climate change benefits of their operations. As investors, we are concerned that the lack of effective enforcement of the Commission's climate disclosure guidelines may lead to disclosures which exaggerate climate benefits of companies' products and services, and therefore lead to misguided investment decision-making.

Particular vigilance is needed in the renewable energy sector, where technologies intended to reduce greenhouse gas emissions are experiencing explosive growth. The biomass energy sector is especially in need of scrutiny, as this industry is prone to distorted disclosures that may lead investors to conclude that wood burning power plants, which in fact have substantial greenhouse gas emissions, provide equivalent climate benefits as far less polluting technologies like solar and wind power.

The enclosed case study of the single largest producer of wood pellets as fuel for electricity generators, Enviva Partners LP (NYSE: EVA. IPO: April 2015; market cap \$350 million, October 2015) illustrates how companies can mislead investors on the environmental and climate benefits of their products, and demonstrates the need for the Commission to be more proactive.

In order to ensure that investors have the necessary and accurate information, we request that the SEC more closely monitor companies' climate benefit claims, and establish and *enforce* clear guidelines applicable to companies that may be claiming climate benefits. Instead of simply declaring that their carbon emitting products or services are beneficial for the climate, companies should also be required to disclose the assumptions and contingencies that underlie such claims. To support such scrutiny, we also request that the climate disclosure guidance be updated to (a) include requirements to disclose carbon accounting contingencies where they underlie statements in SEC filings and (b) include all assumptions going into such accounting that are necessary to ensure that such disclosures are not misleading.

We urge you to examine the enclosed report, and protect investors by revising and enforcing the climate guidance.

Sincerely,

Natasha Lamb, Director of Research & Shareholder Engagement, **Arjuna Capital**

Danielle Fugere, President, **As You Sow Foundation**

Steven Heim, Director of ESG Research/Shareowner Engagement, **Boston Common Asset Management**

Stu Dalheim, Vice President, Shareholder Advocacy, **Calvert Investments**

Steven Viederman, Chair, Finance Committee, **Christopher Reynolds Foundation**

Shelley Alpern, Director of Social Research & Advocacy, **Clean Yield Asset Management**

Sally Ann Brickner, OSF. Justice, Peace, and Integrity of Creation Coordinator, **Congregation of Sisters of St. Agnes**

Duane Roberts, Director of Equities, **Dana Investment Advisors**

Mark Regier, Vice President of Stewardship Investing, **Everence Asset Management**

Holly A. Testa, Director, Shareowner Engagement, **First Affirmative Financial Network**

Jeffrey W. Perkins, Executive Director, **Friends Fiduciary Corporation**

Leslie Samuelrich, President, **Green Century Capital Management**

John Harrington, President and CEO, **Harrington Investments**

Christine Jantz, President, **Jantz Management**

Peter Krull, President, **Krull and Company**

Mary Minette, Director of Shareholder Advocacy, **Mercy Investment Services**

Barbara Jennings, CSJ. Coordinator, **Midwest Coalition For Responsible Investment**

Luan Steinhilber, Director of Operations and Shareholder Advocacy, **Miller/Howard Investments, Inc.**

Julie N.W. Goodridge, CEO, **NorthStar Asset Management, Inc.**

Judy Byron, OP, Director, **Northwest Coalition for Responsible Investment**

Julie Gorte, PhD., Senior Vice President for Sustainable Investing, **Pax World Management Corp.**

Rob Fohr, Committee on Mission Responsibility Through Investment, **Presbyterian Church U.S.A.**

Michael H. Crosby, OFM Cap. Corporate Responsibility Office, **Province of St. Joseph of the Capuchin Order**

Jo Marie Chrosniak, HM, Coordinator, **Region VI Coalition for Responsible Investment**

Ethel Howley, Social Responsibility Resource Person, **School Sisters of Notre Dame Cooperative Investment Fund**

Michael Crosby, Executive Director, **Seventh Generation Coalition for Responsible Investment**

Joy Peterson, PBVM, Sinsinawa Shareholder Committee, Sinsinawa Dominican Shareholder Action Committee, **Sinsinawa Dominican Sisters**

Nora. M. Nash, OSF, Director, Corporate Social Responsibility, **Sisters of St. Francis of Philadelphia**

Anna Falkenberg, PhD, Executive Director, **Socially Responsible Investment Coalition**

Allan Pearce, Shareholder Advocate, **Trillium Asset Management**

Patricia A. Daly, Executive Director, **Tri-State Coalition for Responsible Investment**

Timothy Brennan, Treasurer & CFO, **Unitarian Universalist Association**

Katie McCloskey, Director, Social Responsibility, **United Church Funds**

Sonia Kowal, President, **Zevin Asset Management, LLC**