



March 21, 2025

Chair Liane Randolph
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Response to Climate Disclosure Information Solicitation, December 16, 2024

Dear Chair Randolph:

I am submitting this letter on behalf of Thai Union Group (“Thai Union”) in response to California Air Resources Board’s (CARB) December 16, 2024, solicitation of public feedback on the implementation of California’s pending greenhouse gas emissions and climate risk disclosure laws.¹

About Thai Union

Thai Union is one of the world’s leading seafood producers and the largest producer of shelf-stable tuna products. The Company has a global workforce of more than 44,000 and is recognized across the globe as a leader in sustainability and innovation. The Company’s selection of shelf-stable, chilled, and frozen foods is known to consumers through well-known brands across North America, Europe, Asia, and the Pacific, including Chicken of the Sea® and Van Camps®. Thai Union North America’s frozen division, Chicken of the Sea Frozen Foods, is based in El Segundo, California; the shelf-stable division, Chicken of the Sea International, has offices in Pittsburgh, Pennsylvania.

With a commitment to “Healthy Living, Healthy Oceans,” Thai Union is proud to be a member of the United Nations Global Compact, a founding participating company of the International Seafood Sustainability Foundation (ISSF), and current Chair of Seafood Business for Ocean Stewardship (SeaBOS). Thai Union has been listed on the Dow Jones Sustainability Indices (DJSI) for ten consecutive years, a positive recognition of the Company’s unwavering commitment to sustainable and responsible business practices. Thai Union also partners with international leaders such as the Aquaculture Stewardship Council, IDH Sustainable Trade Initiative, Sustainable Fisheries Partnership, and The Nature Conservancy to extend the Company’s sustainability commitments across the industry.

Thai Union welcomes the opportunity to provide the below insight based on our efforts on a global scale to advance our climate transparency along our value chain.

¹ https://ww2.arb.ca.gov/sites/default/files/2024-12/ClimateDisclosureQs_Dec2024.pdf



Response to Climate Disclosure Information Solicitation

Executive Summary of Suggested Amendments

Thai Union supports targeted amendments to SB 253 and SB 261 to enhance efficiency and accuracy in climate reporting for global companies already subject to international disclosure requirements. To align compliance efforts and reduce redundancies, we propose the following modifications to the pending legislation:

1. **Clarify Applicability** – Narrow parameters defining which businesses operating in California are subject to compliance,
2. **Allow Global Standards & Biennial Reporting** – Permit the submission of globally recognized assurance standards and adopt a biennial reporting cycle to streamline efforts.
3. **Provide Flexible Implementation** – Introduce a phased, adaptable reporting approach to address industry-specific challenges, especially in Scope 3 Emissions, in the early stages of compliance.
4. **Encourage Ongoing Collaboration** – Maintain an open dialogue with companies to refine reporting methodologies and enhance risk assessments over time.

These amendments will ensure that SB 253 and SB 261 align with international best practices while maintaining compliance effectiveness for globally operating businesses. Given California's unique requirements, such as mandatory Scope 3 reporting, third-party assurance, and no materiality threshold, companies already adhering to international standards will face additional administrative and compliance burdens and such duplicative obligations ultimately divert resources away from substantive initiatives.

I. General: Applicability

SB 253 and 261 both require an entity that “does business in California” to provide specified information to CARB, but what it means to “do business in California” does not have a statutory definition. We encourage CARB to provide a clear and consistent definition of “doing business in California” to ensure that international companies with indirect or limited business activities in the state understand their compliance obligations. A threshold-based approach—such as revenue, physical presence, or emissions footprint within California—would help establish meaningful applicability criteria. Additionally, we suggest CARB declare that if a subsidiary meets the definition, then any national or global reports prepared by parent companies in compliance with widely recognized standards should be allowed to be submitted on behalf of the subsidiary. This will streamline disclosure and avoid potential confusion by duplication.

II. General: Standards in Regulation

We support CARB's efforts to align its reporting requirements with well-established global frameworks to enhance efficiency and reduce administrative burdens. Harmonizing CARB's regulations as appropriate with the widely recognized standards identified below would minimize duplication and facilitate a more consistent reporting process for multinational companies.

- The European Sustainability Reporting Standards (ESRS)



- The Task Force on Climate-related Financial Disclosures (TCFD)
- The Global Reporting Initiative (GRI) Standard 2021
- The Greenhouse Gas Protocol (GHG Protocol)
- The International Sustainability Standards Board (ISSB) standards (IFRS S1 and S2)
- The United Nations Sustainable Development Goals (SDGs)

Thai Union, as a global company with a European footprint, is subject to the Corporate Sustainability Reporting Directive (CSRD), EU Deforestation Regulation (EUDR), and will have to report according to European Sustainability Reporting Standards (ESRS). The ESRS refers to The Task Force on Climate-related Financial Disclosures (TCFD) and the Global Reporting Initiative (GRI) Standard 2021 as standards with which it wants to align in order to prevent duplicate disclosure. Considering many multinational companies that operate in California also will be reporting in Europe, we strongly encourage CARB to take a similar approach and state its alignment with RCFD and GRI.

Thai Union has committed to taking climate action and aligning our GHG emission reduction targets with the critical climate target of limiting temperature increase to 1.5⁰C above pre-industrial temperatures by 2030² for both the company's near-term and long-term targets and to become net-zero by 2050 across the value chain. These goals were approved by the Science Based Targets initiative (SBTi) in 2023. We are driving our climate strategy framework through three key strategic pillars:

- Transition to a low-carbon organization,
- Engage with our value chain, and
- Manage climate risks and opportunities.

Thai Union anticipates achieving a 42% reduction in greenhouse gas (GHG) emissions across the Company's end-to-end production process (Scopes 1, 2, 3) by 2030. We are committed to responsibly balancing our business growth with our environmental and social impacts, and encourage CARB to align its recommendations with the international associations that support sustainable growth in economic, environmental, and social dimensions like those listed above.

SB 253: Climate Corporate Data Accountability Act

Thai Union prepares our annual reports in accordance with Global Reporting Initiative Standard 2021, International Sustainability Standards Board (ISSB) standards (IFRS S1 and S2), the Task Force on Climate-related Financial Disclosures (TCFD), and the United Nations Sustainable Development Goals (SDGs). Additionally, we report annually to the Carbon Disclosure Project (CDP) on our climate impact. Our reporting timeline follows an annual cycle, with publication in June or July for the previous year.

Thai Union supports the use of globally recognized assurance standards such as the International Assurance Engagements (ISAE 3000) and AA1000 Assurance Standard to ensure credibility in climate

²Intergovernmental Panel on Climate Change, Special Report: Global Warming of 1.5 C <https://www.ipcc.ch/sr15/>



disclosures for businesses operating in California. The Independent Assurance for our 2023 annual report was conducted by LRQA, which has global experience in assurance accreditation. Additionally, we recommend a proportional assurance approach, meaning reasonable assurance for Scope 1 and 2 emissions, given the higher level of data control, and limited assurance for Scope 3 emissions in initial reporting phases, allowing companies time to develop robust data collection mechanisms, as well as flexibility in reporting methodologies in a way that recognizes industry-specific challenges and ongoing improvements in emissions tracking.

SB 261: Climate Related Financial Risk Disclosure

To further demonstrate our commitment to climate action, we have embarked on our Task Force on Climate-Related Financial Disclosures (TCFD) journey, sharing how we identify, manage, and respond to the financial challenges and opportunities posed by climate change. We continually seek to improve our climate risk and opportunity management in line with TCFD recommendations and global best practices.

Thai Union is actively working to strengthen its climate reporting framework and integrate comprehensive GHG emissions tracking into our sustainability strategy. We are making significant progress in securing assured Scope 1, 2, and 3 data and remain committed to transparent and accurate reporting. We encourage CARB to provide flexibility for companies still in the process of securing verified emissions data as well as opportunities for dialogue and collaboration to refine reporting best practices. Additionally, given the complexity of assessing climate-related financial risks, we encourage CARB to align biennial reporting requirements with existing sustainability and financial reporting cycles. A phased approach to climate risk disclosures would enable companies to refine their methodologies and enhance the quality of risk assessments over time.

In Conclusion

Beyond the feedback I have included in this letter, I would like to draw your attention to SeaChange® 2030, Thai Union's global sustainability plan to dramatically reshape the seafood industry, specifically, the impact area focused on Climate Action. This is the area in which Thai Union is leading the seafood industry in decreasing seafood's carbon footprint across species and supply chain players beyond Company employees.

I appreciate the opportunity to provide information on CARB's efforts to successfully implement California's climate disclosure regulations. Please do not hesitate to contact me should you have any questions or require more information.

Sincerely,

/s/ Adam Brennan /s/

Adam Brennan

Group Director

Sustainability and Corporate Communications

Thai Union Group