

March 21, 2025

Steven Cliff
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: California Climate-Disclosure Information Solicitation

As associations representing the life sciences industry both in California and around the country, we appreciate the opportunity to comment on the information solicitation for the implementation of the Climate Disclosure legislation SB 253 and SB 261. Each of our organizations was active throughout the legislative process and appreciate the current opportunity to provide feedback on the regulatory process.

AdvaMed, Biocom CA and California Life Sciences represent thousands of life sciences companies in pharmaceutical, biotechnology, medical technology, and academic sectors throughout California. Medtech is a \$32.6 billion dollar industry in the state of California which includes a large presence of small, emerging companies along with established, mature companies. Our companies develop, manufacture, and distribute technologies, devices, equipment, diagnostic tests, and health information systems that are transforming health care through earlier disease detection, less invasive procedures, and more effective treatments.

As communicated throughout the legislative process, the reporting requirements in SB 253 place a logistical burden on our companies. Specifically, the bill requires companies to track emissions not only for their California sites or products but also tracking of emissions from distant upstream and downstream supply chains that are seldom owned or overseen by the same company throughout the supply chain.

Further at this time scope 3 emissions include the downstream processing, transportation, distribution, consumer use, and end-of-life treatment of any products after they're sold by the company. Scope 3 emissions also include investments in other companies and the emissions in the supply chain a company relies on upstream of its own operations. These many data points along with the likelihood of double counting and reliance on secondary data make assessing scope 3 emissions data with accuracy difficult.

In order to avoid duplicative reporting and prevent capturing scope 3 emissions multiple times due to the national and international reporting standards in place,

we recommend that the California Air Resources Board (CARB) align their reporting requirements with existing federal and international reporting requirements. This would streamline the logistical burden for our companies, ensure that emissions are being reported in an accurate way, and allow the continued-on time production and delivery of essential medical technologies to patients.

We appreciate the opportunity to provide comments and look forward to working with CARB on the rulemaking process.

Sincerely,



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