

Public Comment on CA SB 261

Dear California Air Resources Board,

On behalf of Trillium Flow Technologies, we are writing to respectfully request a reconsideration of the current January 1, 2026, compliance deadline for Senate Bill 261 (SB 261). This letter is submitted in response to the feedback opportunity provided during the recent CA SB 253 and 261 workshop. We support the objectives of SB 261 and the critical importance of addressing climate-related financial risk disclosures. However, we urge the California Air Resources Board to consider a delay in the deadline to allow companies adequate time to prepare for these significant reporting requirements, which are not yet finalized.

Due to the anticipated delay in the release of final regulatory guidance and definitions under SB 261, companies such as ours are currently operating under a high level of uncertainty. This lack of clarity creates significant challenges in assessing our scope, obligations, and the appropriate preparatory actions required for compliance. Without sufficient regulatory specificity, we risk allocating considerable resources—both time and financial—towards preparatory measures that may ultimately prove misaligned or unnecessary should we be deemed out of scope once definitions are finalized.

Given these circumstances, a postponement of the January 1, 2026, deadline would provide companies the necessary time to meaningfully and efficiently align internal processes with the finalized regulatory framework. This would ensure that reporting is both accurate and reflective of the regulation's intent and would support a more orderly and effective implementation across the business community.

We thank you for your leadership in advancing climate-related transparency and for your consideration of this request.

Trillium Flow Technologies