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California Air Resource Board Industrial Strategies Division
1001 I Street
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climatedisclosure@arb.ca.gov

Re: California Air Resource Board (CARB) Corporate Greenhouse Gas (GHG) Reporting: Climate Corporate Data Accountability Act (§ 38532) and Climate-Related Financial Risk (CRFR) Disclosure Programs (§ 38533)

Dear All,

We appreciate the opportunity to provide the following comments on California Air Resource Board (CARB) Corporate Greenhouse Gas (GHG) Reporting: Climate Corporate Data Accountability Act (§ 38532) and Climate-Related Financial Risk (CRFR) Disclosure Programs (§ 38533).

Trane Technologies (Trane) is a climate innovation company with well-known brands such as Trane and Thermo King, which are global leaders in stationery and transport heating ventilation & air conditioning as well as transport refrigeration solutions. Trane Technologies is well known for its global leadership in transitioning away from today's high global warming potential (GWP) refrigerants. Trane began transitioning its global high-performance chiller portfolio in 2015 and Thermo King began transitioning its EU transport refrigeration products in 2014, long before regulations began taking shape and has committed to reduce customer emissions by one gigaton (1 billion metric tonnes) CO₂e between 2020 and 2030. Trane Technologies reports annually on progress towards this and other [sustainability commitments](#).

Trane Technologies greatly appreciates CARB's staff efforts to harmonize the GHG reporting requirements for Climate Corporate Data Accountability and Climate-Related Financial Risk with existing voluntary and soon-to-be mandatory reporting requirements around the world, especially within this limited timeframe.

Trane Technologies asks CARB to confirm that companies may use existing 2024 sustainability reports to satisfy TCFD Framework reporting requirements.

Trane Technologies has reported Scope 1, 2, and 3 GHG emissions for over 5 years in our [Sustainability Reports](#), in accordance with existing GHG protocols and validated by 3rd party verifiers. Trane Technologies includes a "TCFD content index" in its 2024 Sustainability Report, referring readers to appropriate sections in the document that satisfy the TCFD disclosure requirements. We know that we are in good company

with the hundreds of stakeholders that have also used this structured approach to disclose climate-related risks and opportunities.

In order to meet CARB's ambitious reporting timeline, it will be most efficient and least burdensome for all companies to comply if CARB allows the use of existing reporting. This will also ensure consistent GHG emissions monitoring for ambitious companies working to reduce their emissions.

Trane Technologies appreciates the efficiency and supports the CARB proposal for companies to report as a parent company, encompassing multiple subsidiaries that "do business in California."

Trane Technologies believes that consolidated reporting at the parent company level will result in the most efficient and complete information for CARB, with the lowest burden for CARB staff in reviewing reports.

Trane Technologies encourages CARB to allow ISAE 3000 as an acceptable Assurance Standard.

Trane Technologies and many other companies have successfully used ISAE 3000 for several reporting cycles as a reliable Assurance Standard. This standard considers the use of sampling plans, reviews of data management systems, data checks, conformance checks, review of process documentation, review of error logs/corrections and a statement of conclusion as stipulated in CARB's assurance requirements. To meet CARB's ambitious reporting timeline, it will be most efficient and least burdensome for CARB to allow continued use of ISAE 3000 as an Assurance Standard in addition to those previously identified.

ISAE 3000 includes all the reporting features required by CARB. Companies do not receive deliverables on all aspects, they are conducted in the limited assurance audit process.

Here is an example of a 5 stage Assurance Approach which can be mapped to CARB's requirements.

- Sampling plans are developed as we prepare our assurance protocols in Phase 1
- Reviews of the reporting entity's data management systems are conducted in Phase 2 when we conduct "SME Interviews" and update our understanding of the reporting systems
- Limited data checks, conformance checks and review of process documentation is conducted in Phase 3 with our desk-based review as well as virtual site visits.

Trane Technologies greatly appreciates CARB's staff extensive stakeholder engagement and their efforts to harmonize the GHG reporting requirements for Climate Corporate Data Accountability and Climate-Related Financial Risk with existing voluntary and soon-to-be mandatory reporting requirements around the world, especially within this limited timeframe.

Please feel free to reach out with any questions or for further information.

Sincerely,

Helen Walter-Terrinoni

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