

March 26, 2024

The Honorable Lloyd J. Austin III
Secretary of Defense
U.S. Department of Defense
1000 Defense Pentagon
Washington, DC 20301-1000

The Honorable Bill Nelson
Administrator
NASA
300 Hidden Figures Way SW
Washington, DC 20546

The Honorable Robin Carnahan
Administrator
General Services Administration
1800 F Street NW
Washington, DC 20405

Dear Secretary Austin, Administrator Carnahan, and Administrator Nelson,

We write on behalf of a diverse coalition of foreign policy, peace, and grassroots organizations to express our strong support for finalizing the proposed *Federal Supplier Climate Risks and Resilience Rule* in a timely manner.¹ This rule will establish a solid foundation to inform and strengthen the federal government’s carbon emissions mitigation efforts in line with President Biden’s whole-of-government effort to combat the climate crisis.² We applaud your efforts to improve federal contractor transparency, taxpayer oversight, and national and global security by prioritizing effective, publicly-supported action to address the climate crisis. In keeping with your proposal, we look forward to seeing this rule finalized expeditiously.

The adverse effects of climate change, which are already being felt, pose significant challenges to national and global security. According to U.S. Secretary of Defense Lloyd Austin, “Today, no nation can find lasting security without addressing the climate crisis. We face all kinds of threats in our line of work, but few of them truly deserve to be called existential. The climate crisis does.”³ To avoid the worst effects of a warming planet, the consensus within

¹ Department of Defense (DoD), General Services Administration (GSA), and National Aeronautics and Space Administration (NASA), Federal Register Notice, “Federal Acquisition Regulation: Disclosure of Greenhouse Gas Emissions and Climate-Related Financial Risk,” November 14, 2022, <https://www.federalregister.gov/d/2022-24569>.

² The White House, “Biden-Harris Administration Commits on Climate Change – Creating Jobs, Building Infrastructure, and Delivering Environmental Justice,” January 27, 2021, <https://www.whitehouse.gov/briefing-room/statements-releases/2021/01/27/fact-sheet-president-biden-takes-executive-actions-to-tackle-the-climate-crisis-at-home-and-abroad-create-jobs-and-restore-scientific-integrity-across-federal-government/>

³ Vergun, D. (2021, April 2). Defense Secretary Calls Climate Change an Existential Threat. Department of Defense. <https://www.defense.gov/news/news-stories/article/article/2582051/defense-secretary-calls-climate-change-an-existential-threat/>.

scientific and security communities is clear: we must take urgent action to significantly reduce global greenhouse gas emissions, the ultimate drivers of climate change.⁴

The proposed *Federal Supplier Climate Risks and Resilience Rule* would advance this goal by requiring the largest federal contractors to disclose their Scope 1, 2, and 3 greenhouse gas emissions, their climate-related risk assessments, and their science-based emissions reduction targets. Improved disclosure and standardization of greenhouse gas emissions reporting is critical to mitigating the federal government's carbon footprint, and military emissions in particular. The Pentagon is the world's largest oil consumer, accounting for approximately 80 percent of federal energy use.⁵ The top defense contractors, together, are estimated to emit even more carbon pollution than the Pentagon but are not currently required to comprehensively disclose their emissions.⁶ Defense contractors are also the largest recipients of federal procurement spending - totaling more than \$466 billion in 2023.^{7,8} While greater action must be taken to reduce the military's overall ecological impact, closing the gap in military emissions reporting is a critical first step to adopting a meaningful climate change mitigation strategy for a more secure and resilient future.⁹

In addition to the Pentagon's own interests in tracking and reducing greenhouse gas emissions among defense contractors, the American public overwhelmingly supports greater climate action.¹⁰ Two-thirds of adults say large businesses and corporations are doing too little to reduce the effects of climate change and 56 percent believe federal government action on climate change is insufficient.¹¹ Accordingly, public comments on the *Federal Supplier Climate Risks and Resilience Rule* were overwhelmingly positive.¹² Diverse comments from the private and

⁴ Sixth assessment report — IPCC. (n.d.). IPCC. <https://www.ipcc.ch/assessment-report/ar6/>.

⁵ Crawford, N. C. & Boston University. (2019). Pentagon fuel use, climate change, and the costs of war. <https://watson.brown.edu/costsofwar/files/cow/imce/papers/Pentagon%20Fuel%20Use%2C%20Climate%20Change%20and%20the%20Costs%20of%20War%20Revised%20November%202019%20Crawford.pdf>

⁶ Crawford, Neta C. (2022). *The Pentagon, Climate Change, and War: Charting the Rise and Fall of U.S. Military Emissions*. The MIT Press.

⁷ A snapshot of Government-Wide contracting for FY 2022. (2023, August 8). U.S. GAO. <https://www.gao.gov/blog/snapshot-government-wide-contracting-fy-2022#:~:text=In%20Fiscal%20Year%202022%2C%20the%20federal%20government%20spends%20contracting%20dollars.>

⁸ Forecast International & About Forecast International. (2024, March 1). Top 100 Defense Contractors 2023. Defense Security Monitor. <https://dsm.forecastinternational.com/2024/03/01/top-100-defense-contractors-2023/>.

⁹ World Peace Foundation. (2023, March 13). The challenge of demilitarizing the response to climate change - reinventing peace. Reinventing Peace.

<https://sites.tufts.edu/reinventingpeace/2023/03/13/the-challenge-of-demilitarizing-the-response-to-climate-change/>

¹⁰ Tyson, A. (2023, August 9). What the data says about Americans' views of Climate Change. Pew Research Center.

<https://www.pewresearch.org/short-reads/2023/08/09/what-the-data-says-about-americans-views-of-climate-change/>

¹¹ Pew Research Center. (2023, August 9). Americans' views of climate change in 8 charts | Pew Research Center.

<https://www.pewresearch.org/short-reads/2023/08/09/what-the-data-says-about-americans-views-of-climate-change/>

¹² Ceres Accelerator for Sustainable Capital Markets. (2023, March 30). Supplemental Comment in FAR Case 2021-015, 87 Fed. Reg. 68312 - Analysis of Comments on Federal Supplier Climate Risk & Resilience Proposal. <https://www.ceres.org/sites/default/files/Ceres%20Analysis%20of%20Comments%20on%20Supplier%20Climate%20Risk%20%26%20Resilience%20Proposal.pdf>

public sectors show that the proposed rule will help the federal government address informational gaps on climate-related financial risk and plan against threats to economic and national security posed by global warming. The comments highlight the rule's long-run cost savings for taxpayers and the perils of ignoring the environmental transition risks of climate change in the federal procurement process. Attorneys general from 17 states and the District of Columbia, as well as legal experts in academia and various non-governmental organizations, affirm the rule's strong legal basis. In contrast, opposition to the rule is being driven primarily by corporations and trade associations representing carbon-intensive industries, including the American Petroleum Institute and American Fuel and Petrochemical Manufacturers, who face reputational risks from enhanced climate disclosure requirements. We must not allow these firms to further jeopardize our collective health and security in order to maintain their own short-sighted profitability.

The fossil fuel and defense industries should not overrule public interest, scientific consensus, and security expertise by dictating government policy. Contractors who seek lucrative deals with government agencies must advance our climate, economic, and national security interests - not undermine them. This rule signifies progress towards achieving President Biden's goal of reaching a net-zero emissions economy by 2050, in keeping with the Paris Agreement, and the Administration's commitment to "meeting the moment" by taking urgent action to address the climate crisis both at home and abroad.^{13,14} We therefore urge you to finalize and publish the *Federal Supplier Climate Risks and Resilience Rule* in a timely manner.

Signed,

350.org
American Friends Service Committee
Center for International Policy
Climate Crisis & Militarism Project, Veterans For Peace
Climate Generation
Climate Hawks Vote
Common Defense
Elders Climate Action

¹³ Kerry, J., McCarthy, G., United States Department of State, & United States Executive Office of the President. (2021). The Long-Term Strategy of the United States. In *The Long-Term Strategy of the United States*. <https://www.whitehouse.gov/wp-content/uploads/2021/10/US-Long-Term-Strategy.pdf>.

¹⁴ House, W. (2021, April 22). FACT SHEET: President Biden sets 2030 greenhouse gas pollution reduction target aimed at creating Good-Paying Union jobs and securing U.S. leadership on clean energy technologies. The White House. <https://www.whitehouse.gov/briefing-room/statements-releases/2021/04/22/fact-sheet-president-biden-sets-2030-greenhouse-gas-pollution-reduction-target-aimed-at-creating-good-paying-union-jobs-and-securing-u-s-leadership-on-clean-energy-technologies/#:~:text=On%20Day%20One%2C%20President%20Biden.by%20no%20later%20than%202050.>

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