

**COUNCIL OF DEFENSE AND SPACE INDUSTRY ASSOCIATIONS**  
**4401 Wilson Boulevard, Suite 1110**  
**Arlington, Virginia 22203**  
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**CODSIA Case – 2022-002**

December 1, 2022

Sent via the Federal eRulemaking Portal: <https://www.regulations.gov>

Federal Acquisition Regulatory (FAR) Council  
Attn: Ms. Jennifer Hawes  
General Services Administration  
1800 F St., NW  
Washington, DC 20006  
[Jennifer.hawes@gsa.gov](mailto:Jennifer.hawes@gsa.gov)

**Subject:** Request 30-day Extension for Public Comments on FAR Case 2021-015, Disclosure of Greenhouse Gas Emissions and Climate-Related Financial Risk – RIN 9000-AO32

Dear Ms. Hawes:

On behalf of the members of the Council of Defense and Space Industry Associations (CODSIA)<sup>1</sup>, I write to request that the FAR Council provide an additional 30 days for public comment for the proposed rulemaking entitled “Federal Acquisition Regulation: Disclosure of Greenhouse Gas Emissions and Climate-Related Financial Risk,” FAR Case 2021-015, 87 FR 68312, RIN 9000-AO32 published in the Federal Register on November 14, 2022. The comment deadline for this proposed rule is January 13, 2023.

Given the major impact this FAR Case would have on how federal suppliers engage with the government in fulfillment of Executive Order (EO) 14030, *Climate-Related Financial Risk*, CODSIA believes this rule requires extensive review. Since our process for reviewing, analyzing, drafting, and revising comments requires the opportunity for inputs from our member companies, in excess of 10,000, it would be significantly difficult to properly address all parts of the rule in the amount of time currently allocated.

The current deadline—which falls shortly after many will be returning from holiday vacations— provides an insufficient opportunity for our associations’ respective

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<sup>1</sup> CODSIA was formed in 1964 by industry associations with common interests in federal procurement policy issues at the suggestion of the Department of Defense. CODSIA consists of eight associations – Aerospace Industries Association (AIA), American Council of Engineering Companies (ACEC), Associated General Contractors (AGC), Computing Technology Industry Association (CompTIA), Information Technology Industry Council (ITI), National Defense Industrial Association (NDIA), Professional Services Council (PSC), and U.S. Chamber of Commerce. CODSIA’s member associations represent thousands of small and large government contractors nationwide. The Council acts as an institutional focal point for coordination of its members’ positions regarding policies, regulations, directives, and procedures that affect them.

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members to fully engage in the comment drafting process. Additionally, given the impact the proposed rule would have on wide swaths of the supplier base, we need sufficient time to adequately engage our respective stakeholders and for them to engage their respective supply chains in order to provide the federal government with comprehensive information on how to best meet the goals set forth in EO 14030.

For these reasons, we respectfully request that the FAR Council provide an additional 30 days for public comments on FAR Case 2021-015, “Federal Acquisition Regulation: Disclosure of Greenhouse Gas Emissions and Climate-Related Financial Risk,” 87 FR 68312, RIN 9000-AO32, extending the comment due date to February 12, 2023.

If you have any questions or request additional information, please contact me by email at [codsia@codsia.org](mailto:codsia@codsia.org) or by phone at +1 (703) 927-1116.

On behalf of CODSIA,

David A. Drabkin  
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cc by email:  
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