Public Comment period for Raw Materials Sourcing in Apparel project

- **Question 1:** Does the proposed change to the “priority raw materials” definition in the qualitative metric (CG-AA-440a.1) improve (1) alignment with common industry practices and guidance, (2) cost of implementation for companies, and (3) usefulness of disclosures? I think it is useful but still hard to measure – see comments below.

- **Question 2:** Do you agree with the rationale to structure metrics by priority raw material (e.g., cotton, leather, etc.) versus by another component such as sourcing region or environmental/social factor (e.g., water scarcity, animal welfare, etc.)? I think it would be better to define it by sourcing region (given what’s going on in Xinjiang now) or environment/social factor vs raw material. That seems more aligned with what investors view as key risks.

- **Question 3:** Do the proposed changes to the quantitative metric (CG-AA-440a.2) improve the comparability, completeness, and usefulness of disclosures? Yes – but would look to define as described in question 2.

- **Question 4:** The Board considered two approaches to revise the list of certifications/standards included in metric CG-AA-440a.2. Do you have a preference between the two approaches, and if so, why? What principles would you consider when evaluating the credibility and/or selection of third-party certifications/standards? There should be consistency across companies providing standards/certifications across all companies – hard for investors to say if company A has more stringent requirements than company B.

- **Question 5:** Do you agree with the Board’s conclusion to not expand the scope of the Raw Materials Sourcing disclosure topic to include materials used for packaging? No I disagree – materials for packaging are just as important especially given the growth prospects/size of e-commerce.

- **Question 6:** Do the proposed changes improve the usefulness of disclosures for companies identified in the industry scope (companies involved in design, manufacturing, wholesaling, and retailing)? Yes increased disclosure is useful across a broad set of companies but I would recommend changes noticed above.