

Environment

“Comerica’s approach to the environment and corporate sustainability reflect our Core Value — The Bigger Possible. We strive to be part of the bold solutions necessary to create a more sustainable world with a greening and thriving economy. Our relentless curiosity can enable all of us, including our customers, colleagues and partners, to play vital roles in addressing climate change — a key pillar of our Corporate Responsibility Platform.”

Scott Beckerman

Senior Vice President,
Director of Corporate Sustainability

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Environment

We understand that protecting and preserving the environment is important to the health and well-being of the people, businesses and communities we serve. As a bank, Comerica is uniquely positioned to help address one of the world’s greatest challenges — combating climate change — and more broadly supporting sustainability initiatives across our entire value chain.

We recognize the impact we have through our customer relationships, and we believe the best way to meet the needs of a greening economy is to work with our customers. Comerica is committed to helping them adapt to a changing business and planetary climate in support of their own sustainability goals. We are also committed to reducing our environmental footprint and were one of the first U.S. regional banks to pledge to become operationally net zero.¹³ Beyond our own and our customers’ operations, we have several programs in place to drive sustainability awareness of our suppliers and colleagues.

Climate Change

Comerica’s Corporate Responsibility Platform includes a commitment to address climate change because we understand that a changing climate is increasingly creating conditions that impact our organization and our customers.

Stakeholders are increasingly identifying climate change as a significant risk and are seeking to better understand how companies, including banks, are assessing these risks. We recently formalized our key climate-related priorities, which are composed of both inward- and outward-facing aspects, to build on the 15 years of progress of our sustainability program.

<p>Supporting Customers</p> <p>We are committed to working with our customers to meet their evolving needs in a greener economy.</p>	<p>Integrating Climate</p> <p>We will work to integrate climate matters into our strategy, lines of business and approach to risk management.</p>	<p>Reducing Our Emissions Footprint</p> <p>We continue working to reduce Comerica’s associated GHG emissions.</p>
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¹³ When Comerica’s 2050 operational emissions reduction goal was initially set, it was to become operationally net zero (100% reduction of our Scope 1 and 2 real estate-related GHG emissions from 2012 to 2050), which covered 99% of our Scope 1 and 2 GHG emissions. In 2021, we extended our goal to include our Scope 1 travel GHG emissions so that all Scope 1 and 2 GHG emissions are included.

Climate-Related Commitments and Reporting

We have a long history of transparent climate-related disclosures, starting with the development of an [Environmental Policy Statement](#) in 2008, issuance of our first CDP Climate Change Response in 2009 and our first disclosure of green lending in 2010.

Environmental Policy Statement Commitments:



Climate

- Measure, report and reduce our greenhouse gas (GHG) emissions
- Evaluate climate-related risks
- Increase awareness of climate-related matters with customers, suppliers and colleagues
- Seek profitable opportunities to provide climate-related products and services
- Support public policy approaches that harness the power of markets to create and implement cost-effective climate solutions



Resource Conservation

- Implement initiatives to reduce, reuse, recycle and rethink processes to decrease use of natural resources and generation of waste
- Reduce energy, paper and water consumption
- Construct new banking centers in ways consistent with our commitment to environmental stewardship
- Seek profitable opportunities to provide financial products and services to customers that promote energy conservation and efficiency, water conservation, waste reduction and other environmentally beneficial business practices
- Promote awareness among customers, colleagues and suppliers of opportunities to minimize use of natural resources and generation of waste



Transparency and Accountability

- Provide colleague awareness training to ensure policy is implemented throughout company
- Establish systems and procedures to track and assess performance and publish external reports
- Periodically engage with external stakeholders for feedback on our sustainability performance

Inaugural TCFD Report

In 2022, we published our first Taskforce on Climate-related Financial Disclosures ([TCFD Report](#)). Consistent with the framework recommended by the TCFD, we provide detailed disclosures about our Governance, Strategy, Risk Management and Metrics & Targets related to climate change impacts.

We discuss the following key topics:

- Key milestones on our climate and sustainability journey since 2008
- Oversight by our Board of Directors, management and cross-functional committees
- Example transition and physical risks and the related time horizons
- Climate-related opportunities
- Planned climate-related actions in the short term

We encourage you to read our TCFD Report to learn more about our approach to managing the impacts of climate change

CDP Disclosure

Since 2009, Comerica has participated in the disclosure of environmental information through CDP. As a global organization committed to compiling and comparing comprehensive datasets on corporate and city actions to affect change in their impacts to the environment, CDP provides a means for us to disclose and track our progress.

Recent CDP Score History

YEAR	CLIMATE CHANGE SCORE	SUPPLIER ENGAGEMENT RATING
2022	B	A
2021	B	A-
2020	A-	A
2019	B	A-

Reducing GHG Emissions

In 2011, we announced our first GHG emissions reduction goal, and in 2018, we were one of the first U.S. regional banks to pledge to become operationally net zero with respect to Scope 1 and 2 emissions.

Reducing energy consumption is key to minimizing our GHG emissions footprint since the majority of our direct GHG emissions are related to energy used to operate our buildings. Efficiently managing our energy use is also important to our bottom line as energy is a significant operating expense.

Reduction of GHG Emissions and Energy Impacts

GHG GOAL PROGRESS

As of 2022 year end, we have achieved a **57%** reduction against our 2030 goal and have already exceeded our 2025 goal.



GHG GOALS

65% reduction of 2012 base year GHG emissions by 2030 (includes Scope 1 and 2 location-based emissions)

100% reduction of 2012 base year GHG emissions by 2050 (includes Scope 1 and 2 location-based emissions)

To guide our environmental strategy and help us reduce Comerica's carbon footprint, we have established the above quantifiable and measurable goals.

Our Corporate Real Estate team, along with their external partners, manages our operational Scope 1 and 2 GHG emissions goals and energy use. Real estate-based energy consumption is our most significant contributor to our operational Scope 1 and 2 GHG emissions, accounting for approximately 98% of total Scope 1 and 2 GHG emissions. The remaining 2% comes from travel-related Scope 1 emissions.

In 2022, we continued to take the following key actions toward achieving our goal to reduce our Scope 1 and 2 GHG emissions:

- Actively managed building heating and cooling throughout the year to maximize the use of natural conditions and minimize mechanical heating and cooling
- Added high-efficiency lighting to more buildings
- Increased efficiency of HVAC equipment in low-performing buildings with optimization technology

Recognition of Energy Efficiency Efforts

In 2022, two of Comerica's retail banking centers in Michigan received ENERGY STAR Recognition Awards. These awards are based on building energy efficiency performance compared with their peers. Banking centers in Grass Lake, MI and Brooklyn, MI scored 92 out of 100 and 93 out of 100, respectively. These scores are based on 12 months of actual energy use data while considering physical attributes, hours of operation and how occupants use the space.

Comerica Bank Center in Detroit also received an honorable mention at the 2022 Detroit Energy Challenge Awards.



For more details on our Scope 1, 2 and 3 emissions progress, review our [current GHG emissions verification declaration](#), the [Environment Key Metrics Table](#) and our [most recent CDP Response](#).

Industry Partnerships

In 2020, Comerica was one of the first U.S. regional banks to join the Partnership for Carbon Accounting Financials (PCAF), a financial services industry-led partnership of more than 350 financial institutions working to facilitate a consistent and transparent approach and framework to assess and disclose GHG emissions associated with loans and investments. This partnership supports our progress in developing approaches and methodologies for calculating financed emissions and is intended to improve the availability of industry data for all participants. Comerica also co-chairs the external PCAF business loans workgroup.

In joining PCAF, we committed to reporting on our finance-related GHG emissions within three years. We are on track to share our first financed emissions disclosure in 2023.

Our Environmental Services Department also partners with associations and nonprofits such as The Coalition for Renewable Natural Gas and the Environmental Research and Education Foundation to advance sustainability and improve industry practices.

Reducing Paper, Waste and Water Impacts

In addition to GHG emissions and energy reductions, our operational environmental sustainability efforts include water, paper and waste reduction.



Paper Goal:
50% reduction in office copy paper usage (2012-2020); **achieved in 2019**

Progress: As of 2022 year end, we have achieved a **79%** reduction from our 2012 base year.

Paper

Our Corporate Purchasing department tracks paper purchases quarterly across the company on a quarterly basis, including office copy paper, envelopes, rolled paper, statements, letterhead, marketing brochures and business cards. Our focus continues to be on implementing a variety of technology enhancements and educating colleagues about ways to reduce their paper consumption.

In 2022, we took the following actions to reduce paper consumption:

- Restricted printing to in-office only
- Continued messaging to reduce paper use as colleagues returned to office

At Comerica, we have worked to reduce our consumption of all paper types dramatically over time. We continue to make efforts to both continue paper reduction efforts across all areas of the bank and increase the percentage of recycled and Forest Stewardship Certified (FSC)-certified paper purchased.



Waste Goal:
20% reduction in waste to landfill (2012-2020); **achieved in 2015**

Progress: As of 2022 year end, we have achieved a **38%** reduction from our 2012 base year.

Waste

Our Corporate Real Estate team, along with their external partner, tracks landfilled and recycled general office waste through our corporate-wide waste vendor, who provides updates/figures on an annual basis. Annual data is also gathered from our vendors that handle the recycling of electronics, paper and universal wastes.

Comerica's waste reduction continued to improve in 2022. While many colleagues remained working from home in 2022 to some extent, colleagues also began returning to the office more frequently.

We also help support out communities with our Comerica Shred Days, supporting identify theft protection, recycling and support for local hunger reduction programs.

COMERICA SHRED DAYS (Dallas, Houston, Phoenix, metro Detroit)	2022
Number of vehicles serviced	4,990
Paper securely shredded (pounds)	470,206
Food donations (pounds)	16,796
Food donations (\$)	51,305
Total meals donated based on quantity of food and monetary donations	193,592
Electronics recycled (pounds)	17,731

2022 WASTE AND RECYCLING METRICS

1,285 tons

of office paper recycled

78 tons

of electronic equipment recycled or repurposed

54%

of total waste diverted from the landfill



Water Goal:
30% reduction in water consumption (2012-2020); initially **achieved in 2019**

Progress: As of 2022 year end, our progress dropped to **29%** from our 2012 base year.

Water

Water stewardship is important as we operate in water-stressed regions as well as those with an abundance of water. Our approach continues to focus on efficiently using this important resource and closely monitoring consumption and costs. Comerica’s water usage is split between domestic (interior) water use and landscape irrigation activities. Our Corporate Real Estate team, along with their external partner, tracks water consumption through our metered utility bills.

In 2022, we saw a 15% increase in water usage from 2021, primarily due to leaks in irrigation systems at leased properties.

Comerica and our real estate partner have already taken several steps to improve in this area by:

- Training field teams to look for and identify irrigation leaks
- Working with landscape providers to be more vigilant and reduce irrigation water use
- Increasing oversight of water billing to identify leaks

We track our water consumption by evaluating water bills for any anomalies in consumption or spend, which may indicate leaks or theft. At times, this is difficult due to limitations in the billing frequency from local utilities and delays in actual meter readings. This consumption data is added to our energy and environmental management system, which we use to evaluate data trends quarterly. The trend data helps us understand weather-related impacts on our water consumption, impacts associated with water efficiency measures and impacts resulting from system leaks.

Comerica Shred Days Support Privacy, Recycling and Food Banks

Comerica's Shred Days support our local communities by collecting paper records and sensitive documents and shredding them securely as well as collecting food and donations. These free events help reduce fraud and identify theft, recycle hundreds of tons of paper and address hunger in our communities. Our highly visible and successful events provide us an opportunity to enhance our brand awareness, educate the public and engage with our colleagues and the communities we serve.

Working with event partner Iron Mountain at Shred Day events in Dallas and Houston, Texas, metro Detroit, Michigan and Phoenix, Arizona, we securely destroyed and recycled more than 470,000 pounds of paper in 2022 while gathering donations for local food banks. In 2022, we also partnered with Information Systems Resources to support electronic waste recycling at the metro Detroit event, bringing more than 17,700 pounds of electronics for recycling. Since 2008, we have securely shredded approximately 6.2 million pounds of paper and organized the donation of the equivalent of nearly 1.4 million meals to local food banks within our Shred Day markets.



Tracking Our Progress

Each quarter, a detailed report is produced to track progress across our environmental key performance indicators (KPIs). This KPI report tracks utility-related water, energy usage and operational-related emissions, along with data for other sustainability-related activities such as corporate travel. Other KPIs, like waste consumption, are tracked annually. We analyze the results and trends from these reports and share them with key decision-makers, such as our Corporate Real Estate leadership, the Corporate Sustainability Office and the Corporate Responsibility Council. We also relay relevant information and metrics to our Facilities Management and Engineering teams to keep them informed of our facilities' performances, which allows them to take action, as appropriate, to help ensure that we continue reducing our environmental footprint and meet our environmental sustainability goals. For more environmental metrics, view our [Environment Key Metrics Table](#).

Reducing Environmental Risk Through Credit and Lending Practices

Our credit and lending decisions and relationships are guided by our corporate credit policies and evaluated on the individual details of each borrower and transaction. In addition, we pursue certain lines of businesses and industries based on our ability to provide products and services using our specialized expertise. An example of this is our Environmental Services Group, which provides financial solutions to a range of companies, including those in the landfill, gas to energy, waste to energy, renewable energy and recycling businesses, that help reduce the physical risks of climate change. We have also implemented policies that require significantly increased rigor and due diligence when we consider financing within certain industries or to higher risk customers.

Our primary credit policy was updated in 2022 with an expansion on our commitment to supporting environmentally beneficial companies and projects as well as community investments and development work. This commitment includes the consideration of ESG-related matters (including climate change) and improved tracking of environmentally beneficial loans.

Real Estate Lending Practices

Our Environmental Risk Management Group, within our Enterprise Risk Division, manages environmental risks associated with the properties we finance. The team includes experienced environmental professionals who work to identify, evaluate and minimize potential environmental risks associated with loans secured by real estate. Managing these environmental risks helps limit the economic, regulatory and reputational risks associated with taking real estate as collateral in a loan transaction. Our Environmental Liability Policy requires properties that are pledged as collateral to be evaluated for potential environmental liabilities of significance using standard and proprietary due diligence tools. In this way, Comerica supports the cleanup and reuse of industrial and commercial properties that have underlying soil and groundwater contamination.

Comerica follows Federal Reserve System and Federal Deposit Insurance Corporation guidelines that require lending institutions to have policies and procedures in place to manage environmental risk. We require our customers to comply with environmental laws that are covered in our lending agreements and monitor for environmental compliance when loans are originated and, depending on the individual credit risk profile, when certain loans are renewed. In some cases, we require follow-up assessments with borrowers and create agreements with them that establish specific outcomes and deadlines.

Driving Sustainability Engagement and Awareness

Engaging Colleagues

We educate colleagues on sustainability through internal communications and discussion boards, our Master of Sustainability Awareness (MSA) program, green office teams, sustainability-focused work groups and training. New hires are required to complete mandatory sustainability awareness training; 100% of Comerica's new hires completed the course in 2022.

The voluntary Comerica MSA program is a cornerstone of our sustainability engagement strategy. Designed to teach colleagues about sustainability, the program provides them with ways to share their knowledge and put it into action. MSA engages in activities that support Comerica's sustainable business strategy and bring sustainability to life in our colleagues' everyday activities at home. As of 2022 year end, 671 Comerica colleagues were participating in the MSA program.

17% increase in MSA participants in 2022 (over 2021)

To further support sustainability action in our workplace and our colleagues' personal lives, Comerica partners with organizations such as Ecochallenge.org to advance colleague sustainability engagement. Ecochallenge.org provides learning and engagement opportunities on the topics of general sustainability, climate, health and social justice to help educate people and provide them with tools to create change. In 2022, Comerica participated in two Ecochallenges with colleagues across our markets (the Earth Month Ecochallenge in April and the People's Ecochallenge in October).



Colleague-Led Green Teams

Our green teams are made up of dedicated volunteers who organize year-round sustainability awareness events and support environmental volunteering initiatives. The work of the green teams also supports our MSA program. This year was a transition year for our green team program. Early in the year, the green teams supported many of our larger office buildings. Later in 2022, we started the process of developing market-based green teams, which will also allow Comerica colleagues from smaller offices across our markets to participate in 2023. Events in 2022 included environment-related volunteering projects and virtual and in-person educational events on sustainability topics such as green cleaning, food waste, environmental conservation, container gardening, plant-based eating and health and wellness.

2022 Comerica Ecochallenge Team Metrics

- More than **17,000** gallons of water saved
- More than **1,000** meatless meals prepared
- Nearly **850** hours spent outdoors
- More than **250** hours spent learning
- More than **160** sustainability-related volunteer hours

Comerica and Community Impact

Comerica continues to expand CoWork, a corporate real estate initiative to help us reduce square footage and environmental impacts, while benefiting local nonprofits and community organizations. CoWork projects incorporate more ergonomic features, large screen monitors and other wellness and environmentally beneficial technology. Five additional offices received CoWork renovations in 2022, for a total of 27 completed locations since September 2015.

What this meant in 2022: CoWork provided Comerica with creative opportunities to reuse, repurpose and recycle surplus furniture, artwork, office supplies, carpeting, tile and other construction materials — reducing our total waste to landfills, resulting in:

- Six nonprofit organizations engaged
- More than 40 pieces of furniture and other items donated
- Office supplies and artwork donated to schools, churches and nonprofits
- \$1,420 raised for various charities
- 380 U.S. tons of construction materials recycled
- 77 U.S. tons of paper shredded and recycled as part of CoWork renovations

Our CoWork spaces included features such as low volatile organic compound carpets, glue, paint, stain and millwork; LED lighting with energy reduction features; GreenGuard Certified products to reduce indoor chemical air emissions; hydration stations to reduce bottled water use; and solar shades to improve temperature control and colleague comfort.

In 2023 and beyond: Comerica will be developing additional CoWork facilities, including two large facilities in Frisco, Texas, and Farmington Hills, Michigan. These spaces will consolidate our overall square footage, prioritize collaboration for colleagues and feature enhanced technology to support focus and productivity.



Supporting Supply Chain Sustainability

As stated in Comerica’s [Environmental Policy Statement](#), we expect our suppliers to manage resources wisely. During the supplier sourcing process, Comerica’s Sustainability Office reviews products and services requested to determine potential sustainability risks or opportunities. When found, the Sustainability Office reaches out to the sourcing lead to share recommendations, including requesting sustainable attributes of products purchased or additional supplier information to determine if risk mitigation is necessary. In 2022, we reviewed 163 sourcing projects associated with nearly 400 suppliers.

In 2021, we moved away from conducting a questionnaire-based assessment in lieu of a more targeted approach. We created a supply chain sustainability video that was sent to over 70 of our suppliers in 2022. The key focus areas of the video included:

- Why supply chain sustainability is important to Comerica
- Ways to incorporate sustainability into suppliers’ business practices
- Examples of Comerica’s sustainability progress
- How our suppliers can further engage with Comerica on sustainability

Our Green Procurement Team is composed of colleagues from Comerica’s Procurement Team, Corporate Sustainability Office and Corporate Real Estate. This team meets bimonthly to set sustainability goals for Procurement, discuss best practices on engaging with suppliers and brainstorm sustainable solutions for our supply chain. The team also determines supply chain sustainability-related training topics and organizes trainings for procurement colleagues.

Comerica has been recognized by CDP for our work with our supply chain, receiving an A on our most recent Supplier Engagement Rating.

CDP Supply Chain Engagement Recognition

A	A-	A
2020 CDP Supplier Engagement Rating	2021 CDP Supplier Engagement Rating	2022 CDP Supplier Engagement Rating

ENVIRONMENT	2012	2020	2021	2022
Energy				
Colleague Numbers for Intensity Metrics ³⁹				
Annual Report-based colleague FTEs - used for travel intensity-based metrics	9,035	7,681	7,442	7,488
Human Resources-based colleague FTEs - used for real estate intensity-based metrics	N/A	7,536	7,268	7,216
Total workers (including colleagues and contingent workers within our buildings, on FTE basis) - used for real estate intensity-based metrics	N/A	8,210	7,958	7,841
Energy Use (MWh)				
Total direct and indirect energy use - real estate and transport (MWh)	153,210	95,286	92,862	98,450
Total direct and indirect energy use - real estate and transport (billion joules)	551,556	343,029	334,284	354,419
Total direct and indirect energy use - real estate only (MWh) ⁴⁰	148,266	93,662	90,678	95,044
Direct energy use - fossil fuels (MWh)	30,966	24,378	23,497	27,393
Indirect energy use - purchased electricity, steam, chilled water in metered buildings (MWh)	93,779	53,689	51,495	50,702
Indirect energy use - estimated electricity use in leased (and unmetered) buildings (MWh)	28,465	12,048	12,384	13,022
Energy Intensity				
Total direct and indirect energy use - real estate (MWh) per square foot at year end	0.0267	0.0218	0.0213	0.0228
Total direct and indirect energy use - real estate (MWh) per square foot - average square feet over four quarters	N/A	0.0216	0.0212	0.0225
Total direct and indirect energy use (MWh) per FTE	N/A	12.64	12.78	13.64
Climate Change and Greenhouse Gas (GHG) Emissions⁴¹				
Total GHG emissions from Scope 1 and 2 Real Estate and Scope 1 Travel (metric tons of CO2e)	81,734	38,354	35,519	35,046
GHG emissions - Scope 1 and 2 Real Estate only - (metric tons of CO2e)	80,533	37,954	34,980	34,207
Emissions intensity - real estate (metric tons of CO2e per square foot at year end) within organization	0.0145	0.0088	0.0082	0.0082
Emissions intensity - real estate (metric tons of CO2e per square foot - average square feet over four quarters) within organization	N/A	0.0088	0.0082	0.0082
Percent cumulative Scope 1 and 2 (location-based) GHG reduction from 2012 base year (goal = 65 percent GHG reduction from base year by 2030)	N/A	53	57	57
GHG emissions - Scope 1 Transport only	1,201	400	539	839

³⁹ Our Human Resources-generated FTE number uses a slightly different calculation than the Annual Report FTE number and allows us to break down workers by individual locations. This allows for intensity metrics to be generated at the facility level. We use the HR-based FTE number for our real estate-related intensity-based metrics and Annual Report FTE for the travel-intensity metrics.

⁴⁰ Total direct and indirect Energy Use – Real Estate only includes Natural Gas, Diesel Fuel, Gasoline Fuel, Metered and Estimated Electricity, Estimated Natural Gas and Propane Gas for heat, Steam and/or Chilled Water.

⁴¹ Comerica uses the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition) for purposes of calculating its GHG emissions. Specific methodologies for estimating Scope 1, Scope 2 and Scope 3 emissions, including activity data sources, estimation techniques, global warming potentials and emission conversion factors, are disclosed in [Comerica's most recent CDP Response](#).

ENVIRONMENT	2012	2020	2021	2022
Climate Change and Greenhouse Gas (GHG) Emissions				
Breakdown by Scope				
Scope 1 GHG emissions - natural gas, jet fuel, diesel, gasoline and refrigerants	6,950	5,401	5,273	6,242
Scope 2 GHG emissions - electricity, steam and chilled water in company-controlled buildings	74,784	32,953	30,246	28,804
Scope 3 GHG emissions (metric tons of CO ₂ e) - Supply Chain and Transport				
Purchased Goods and Services				
Gross (metric tons of CO ₂ e) ⁴²	N/A	N/A	65,115	64,213
Capital Goods				
Gross (metric tons of CO ₂ e)	N/A	N/A	3,953	3,846
Fuel and energy-related activities				
Electricity transmission/distribution loss emissions	N/A	1,657	1,595	1,566
Upstream Transportation and Distribution				
Gross (metric tons of CO ₂ e)	N/A	N/A	4,064	3,649
Waste Generated in Operations				
Scope 3 lifecycle emissions associated with landfilled mixed solid waste	2,052	412	414	402
Business Travel				
Employee business travel by air and car	4,431	1,108	1,069	2,389
Emissions intensity - employee business travel emissions (metric tons of CO ₂ e) per FTE	N/A	0.14	0.14	0.32
Employee Commuting				
Employee commuting emissions (metric tons of CO ₂ e)	N/A	12,918	14,205	16,953
Downstream Leased Assets				
Total Downstream Leased Assets	1,257	419	470	502
Subleased metered electricity	726	271	190	186
Subleased estimated electricity	423	10	4	0
Subleased natural gas	81	65	51	70
Subleased steam	28	0	0	0
Subleased estimated heat - natural gas	N/A	5	3	0
Subleased corporate jet emissions	N/A	68	222	246

⁴² In 2021, we changed our approach to calculating Scope 3 emissions for the categories of Purchased Goods and Services, Capital Goods and Upstream Transportation and Distribution to capture a larger portion of our supply chain within the emissions estimate. The individual goods, services and transportation-related emissions for paper, computer, carpeting, furniture, shipping and armored services are still being provided for previous year reference but have been incorporated into the total emissions estimate for 2021.

ENVIRONMENT	2012	2020	2021	2022
Climate Change and Greenhouse Gas (GHG) Emissions				
Other Downstream				
CBRE Business Travel on Comerica Account	N/A	157	139	132
Comerica Leased Fleet	N/A	84	83	79
Real Estate Square Footage (square feet at year end)				
Total metered and unmetered (square feet at year end)	5,545,466	4,305,584	4,260,643	4,171,534
Total subleased (square feet at year end)	137,637	62,725	47,105	30,412
Real Estate Square Footage (average square feet over four quarters)				
Average metered and unmetered (square feet over four quarters)	N/A	4,332,328	4,270,844	4,233,360
Average subleased (square feet over four quarters)	N/A	63,178	50,811	44,449
Environmental Resource Management				
Waste				
Landfilled colleague waste (short tons)	2,086	1,332	1,339	1,300
Percent cumulative reduction from 2012 base year (Goal = 20 percent Landfilled Waste Reduction by 2020)	N/A	36	36	38
Total recycled/repurposed waste (short tons)				
Recycled office paper	3,108	1,212	1,486.04	1,285
Recycled/repurposed electronic equipment	149	42	96	78
Recycled operational waste	110	157	153	150
Recycled cardboard baler waste	N/A	1	0	3
Recycled pallets	N/A	8	6	9
Universal waste	3	3	2	2
Total waste diverted from landfill - including recycled office paper, recycled/repurposed electronic equipment, recycled colleague waste and universal waste (percent)	62	52	57	54
Paper				
Total paper consumption (Tons)	1,266	607	353	360
Office copy paper consumption (Tons)	560	140	140	116
Other office paper consumption (Tons)	618	447	210	239
Marketing paper consumption (Tons)	88	20	3	5
Paper Intensity metrics (pounds consumed per FTE)				
Total office paper (office copy and other office paper) consumption in pounds per FTE	N/A	155.87	96.20	98.25
Office copy paper consumption in pounds per FTE	N/A	37.18	38.40	32.05
Percent cumulative reduction from 2012 base year (goal = 50 percent Office Copy Paper Reduction by 2020)	N/A	75	75	79

ENVIRONMENT	2012	2020	2021	2022
Environmental Attributes of Paper				
Total FSC-certified office paper (percent of total)	47	24	40	31
Total FSC-certified marketing paper (percent of total)	64	100	100	100
Office copy paper >= 30 percent post-consumer recycled content (percent of total office copy paper)	97	95	97	92
All other papers (excluding office copy paper) >=10 percent post-consumer recycled content (percent of total papers except office copy paper)	14	5	3	4
Total post-consumer recycled content by weight (percent of total paper consumption)	14	7	12	9
Water Stewardship				
Total water consumption (cubic meters) ⁴³	451,532	298,125	281,845	322,840
Intensity metric - water consumption (cubic meters per Total Colleague FTE)	N/A	39.56	38.78	44.74
Intensity metric - water consumption (cubic meters per Total Worker FTE)	N/A	36.31	35.42	41.17
Percent Cumulative reduction from 2012 base year (goal = 30 percent Water Reduction by 2020)	N/A	34.0	37.6	28.5
Environmentally Beneficial Loans (part of ESG-Related Lending and Investment Impact Topic)				
Loans and commitments (billions \$)	1.0	1.2	1.7	2.7
Loans and commitments (number of companies)	127	120	126	148
Supplier Sustainability Engagement				
Percent of carpet purchases that were NSF 140 Gold rated and/or Cradle-to-Cradle silver certified	99	100	100	100
Percentage of flooring purchases, including carpet and vinyl flooring, that contained recycled content	N/A	86	98	70
Percentage of computers and displays purchased that carried an EPEAT rating	N/A	100	100	100
Percentage of furniture purchases that were BIFMA® level certified	N/A	94	100	98
Percentage of office supplies purchased from Office Depot that contained post-consumer recycled content	N/A	19	20	21
Percentage of office supplies purchased from Office Depot that were at least "light green" in Office Depot's GreenerOffice™ Eco-Rating System	57	24	35	30

⁴³ Our "direct billed" water consumption includes all properties for which Comerica receives and pays water bills directly via our utility bill payment and management system. Leased properties controlled by our landlords are not included in these totals.