

June 1, 2022

The Honorable Gary Gensler
U.S. Securities and Exchange Commission
100 F Street NE
Washington, DC 20549-1090

SEC File No. S7-10-22
Submitted via <https://www.sec.gov/cgi-bin/ruling-comments>

To Whom it May Concern:

I appreciate the opportunity to submit comments on the Securities and Exchange Commission "Commission" proposed amendments to its rule under the Securities Act of 1993 and Securities Exchange Act of 1934 that would require registrants to provide certain climate-related information in their registration statements and annual reports.

Cattle producers are natural conservationists, overseeing millions of acres of land while preserving water and air quality. Unfortunately, through the Commission's S7-10-22 proposed rule we see a burden placed squarely on ranchers and landowners. A mandate such as this, that requires publicly traded companies that process or sell beef to report the greenhouse gas (GHG) emissions from their supply chain could have a devastating effect on my ability to raise cattle. This mandate by the Commission will indirectly place a burden on every farmer or rancher whose goods are sent to publicly traded processing companies, restaurants, or retailers.

The federal government has already acknowledged that collecting data will be nearly impossible. Further, this rule fails to protect cattle producers who, in good faith, submit data. Because there is no agreed-upon methodology for measuring agricultural GHG emissions it is highly likely that the accuracy of their data could be questioned. This creates unavoidable legal risk for every cattle producer.

As a cattle producer, I urge you to limit the proposed rule to only scope one (direct) and scope two (energy/electrical) emissions while omitting scope 3 (supply chain) emission compliance. Please consider the immense cost and disruption this rule will pose to ranchers like me, who already invest in conservation practices and lack the resources to comply with this highly technical rule.

The SEC should be responsible for regulating major publicly traded companies, not family farms and ranches.

Thank you for the opportunity to submit comments on this proposed rule.

Sincerely,

B. Earl Raborn