

MEMORANDUM

To: Comment File (S7-10-22) – The Enhancement and Standardization of Climate-Related Disclosures for Investors

From: The Office of the Chair, U.S. Securities and Exchange Commission

Date: March 10, 2023

Re: Meeting with the American Farm Bureau Federation

On March 9, staff from the Office of the Chair met with representatives from the American Farm Bureau Federation about the SEC’s proposal for the enhancement and standardization of climate-related disclosures for investors. During the meeting, participants discussed concerns that the proposal’s Scope 3 disclosure provisions could impose burdens on privately-held agriculture and ranching companies within the supply chain of large, publicly-traded companies that would be subject to the disclosure requirement.

Attendees from the American Farm Bureau Federation:

- Travis Cushman, Deputy General Counsel
- Andrew Walmsley, Senior Director, Government Affairs

SEC attendees:

- Mika Morse, Climate Counsel