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 1933 and Securities Exchange Act of 1934 that would require registrants to provide certain climate-related information in their registration statements and annual reports.

The Commission’s S7-10-22 proposed rule we see an unnecessary burden placed squarely on farmers, 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 will have a devastating effect on the 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. Who think’s up this stuff? Too many politicians are attempting to impart rules for livelihoods of the Americans in areas for which they clearly are uninformed and frankly have no clue what is going on in the real world.

The federal government has already acknowledged that collecting data will be nearly impossible. In many corporations and even small mom and pop operations, this would become a no-brainer to cease until further definition is outlined. But no, career politicians must continue to find ways to justify their jobs even if means the bread and butter farmers and ranchers lose the fight for a meaningless endeavor. 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. Talk about putting the cart before the horse. Congress doesn’t even know what the cart should look like. C’mon man!

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,

Mark S Nault
Oklahoma Farmer/Rancher