



June 10, 2022

Vanessa A. Countryman  
Secretary, Securities and Exchange Commission  
100 F Street NE  
Washington DC 20549-1090

Dear Secretary Countryman,

As a family owned independent seed business, and as a farmer, we are writing to you today to comment on File Number S7-10-22, the proposed rule at the Securities and Exchange Commission on Enhancement and Standardization of Climate-Release Disclosures for Investors.

This proposed rule is an overreach of the statutory limits of the SEC as it relates to the collection of climate data. To require all public companies to report on emissions, climate related targets and goals would be an end run around legislation, especially as it relates to Scope 3 Emissions.

This proposed rule will create a new burdensome reporting for family farms who sell into publicly traded supply chains and will force the disclosure of private information, and create multiple, new sources of substantial costs and liabilities. This would include reporting obligations, technical challenges, significant financial and operations disruption, and the risk of financially crippling legal liabilities for family farms, many of which only have a few employees.

Our customers and our farm is focused on growing food, fuel, and fiber, using environmentally responsible methods already developed through legislation that impact the environment positively. Further burdening our farmers with regulatory collection and reporting to Wall Street increases costs to the farmer and ultimately to the consumer. It is not the responsibility of the SEC to regulate and report on Scope 3 Emissions, especially since none of the registrants listed on the SEC's website has an SIC code corresponding to production agriculture. This proposed rule will impose rules that independent family farms, are not equipped to handle, nor should they be required to do through and an agency like the SEC.

For these reasons, we are asking that this proposed rule not be implemented, and any new policy around climate change be debated in Congress and not dictated by regulators who are not representing the people who produce the food, fiber and fuel.

Sincerely,

Sonny Beck  
Becks Hybrids, CEO

Scott Beck  
Becks Hybrids, President