

June 17, 2022

The Honorable Gary Gensler  
Securities and Exchange Commission  
100 F Street NE  
Washington, DC 20549



Dear Chairman Gensler;

The United States Cattlemen's Association (USCA) would like to offer the following concerns for your consideration regarding the Securities and Exchange Commission's proposed rule, S7-10-22.

The Commission's mission is to protect investors; maintain fair, orderly, and efficient markets; and facilitate capital formation. USCA believes the Commission is overstepping its authority and promoting unnecessary burdens which hinder progress toward that goal. Specifically, we would like to offer the following concerns for your consideration:

- America's farm and ranch families depend on a healthy environment for their livelihood. This requires them to be the best stewards of the land. They are committed to protecting air and water quality. To help producers fulfill their environmental responsibilities, the United States Department of Agriculture (USDA) and Environmental Protection Agency (EPA) monitor and regulate the livestock industry's environmental impact. The SEC is not tasked with environmental regulation, nor has it ever been granted such authority.
- Collecting the information mandated for Scope Three is nearly impossible because there is currently no agreed-upon method for measuring agriculture's greenhouse gas (GHG) emissions. Requiring the disclosure of such emissions would likely result in inaccurate and inconsistent data. This presents an incredible burden for everyone involved in the supply chain and elevates legal risks for agricultural families trying to make ends meet.
- The SEC is meant to regulate large publicly traded companies, but mandating Scope Three emissions reporting would expand the Commission's oversight far beyond its jurisdiction by indirectly affecting many other businesses. Private small businesses, including farms and ranches, should not be in the SEC's purview.
- Scope Three reporting would significantly increase burdens and costs for family farmers and ranchers who already face challenges with rising inflation and energy costs. Many lack the resources needed to measure and report GHG emissions. Agricultural producers already invest in conservation practices that protect environmental quality.

USCA opposes the proposed rule, S7-10-22, and requests that the Commission remove the Scope Three emissions reporting requirement. Thank you for considering the input of America's agricultural producers.

Sincerely,

Dr. Brooke Miller, M.D.  
President, U.S. Cattlemen's Association