

Proposal: 1813 (AG64) Reg H, Q, LL & YY-Regulatory Capital Rule: Amendments to LBOs and Banking Organizations

Description:

Comment ID: 156392

From: South Carolina House of Representatives, Russell L. Ott, Representative

Proposal: 1813 (AG64) Reg H, Q, LL & YY-Regulatory Capital Rule: Amendments to LBOs and Banking Organizations

Subject: R-1813 Regulatory Capital Rule: Amendments Applicable to Large Banking Organizations and to Banking

Comments:

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To Whom It May Concern:

The farm I grew up on has been part of my family for as long as I can remember. We've always rolled up our sleeves and got to work growing cotton, corn, and peanuts, then as a young boy and now as an adult, knowing how important it is to provide for our community. Even though farmers work hard to help keep food on the table for countless families, it has felt like we continue to be an afterthought for our elected leaders. That's why I joined the South Carolina Farm Bureau Federation and ran for the South Carolina General Assembly, so that I could serve as a voice for farmers and other communities across the state. I now write this letter in my capacity as State Representative asking you to also stand with farmers by opposing the regulation to raise reserve requirements on banks.

The countless expenses that come with running a farm mean we are extremely reliant on banks to borrow money at a moment's notice. This can include purchasing crop tools, improving farming infrastructure, and paying workers. Such costs apply to the nearly 200 farms here in South Carolina, who maintain almost 5 million acres of land and employ nearly 13,000 workers. Under the proposed regulation, this funding would be on the verge of disappearing. The rule would have banks make it more expensive to borrow money, something that is already increasingly financially difficult to do under today's record interest rates. With no access to capital, farmers would find themselves having to make major financial cutbacks and reducing their productivity.

Mandating increased capital reserve requirements from banks is excessive, especially given that they are already subject to standards much higher than those in the European Union. This has remained true for years now, as U.S. regulators have long passed rules seeking to strengthen our banking sector. This includes the Federal Reserve, where Chairman Jerome Powell has said our "banking system is very strong, well-capitalized, highly liquid." With confidence in our financial system remaining strong, there is no need to intervene with a working operation.

Let's make sure we focus on protecting our hard-working farmers and making sure they have access to the financial services they need to keep up with rising demand. The Biden administration has already done that through legislation that provides \$3 billion in funding available for agricultural producers. We can build on their goal by stopping these unnecessary efforts to raise bank reserve requirements.

Representative Russell L. Ott
South Carolina House of Representatives