



United States Department of Agriculture  
Farm Service Agency  
1400 Independence Ave., S.W.  
Washington, DC, 20250-0506

February 16, 2024

RE: Docket [FSA-2023-0017](#). Agricultural Foreign Investment Disclosure Act Form Modernization and Information Collection Request

To Whom It May Concern:

The National Family Farms Coalition (NFFFC) is grateful for the opportunity to comment on the Agricultural Foreign Investment Disclosure Act (AFIDA) Form Modernization and Information Collection Request. NFFFC is an alliance of grassroots farmer- and advocate-led groups across 42 states, representing the rights and interests of independent family farmers, ranchers, and fishermen since 1986. Today, NFFFC's 31 state, national, and regional farm and rural organizations are bound by a common belief that communities have the right to determine how their food is grown and harvested; that everyone in the food system should receive fair prices or wages; that all producers should have equitable access to credit, land, seeds, water, markets, and other resources; and that our food and agriculture policy must support sustainable farming, ranching, and fishing practices. The issue of corporate investment in farmland is a major priority concern for our national membership and a key focus in our engagement with Congress.

NFFFC is encouraged to see that the United States Department of Agriculture (USDA) is reevaluating the effectiveness of AFIDA as it stands. As noted by USDA Deputy Under Secretary Mrs. Gloria Montañó Greene, and multiple members of the Senate Committee on Agriculture, Nutrition, and Forestry during a Senate Agriculture Committee Hearing in September 2023, the issue of foreign investment in U.S. agricultural land is a complex one, and must be approached through a multifaceted lens.<sup>1</sup> Expert witness, Dr. David L. Ortega, stated during his testimony to the aforementioned Committee "It is vital that any legislative and regulatory response be evidence-based, consider the broader agri-food landscape, and aim to strike a balance between safeguarding our national interests and promoting economic growth and opportunity."<sup>2</sup> In alignment with his statement, we believe USDA should scale-up its oversight of corporate land investment generally, but Congressional action is also needed to update federal land governance laws to both effectively respond to the significant changes in the scale and tactics of

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<sup>1</sup> Foreign ownership in U.S. agriculture | The United States Senate Committee on Agriculture, Nutrition & Forestry. (2023, September 27). Senate Committee on Agriculture, Nutrition & Forestry.  
<https://www.agriculture.senate.gov/hearings/foreign-ownership-in-us-agriculture>

<sup>2</sup> Ortega, D. L. (2023, September). Testimony of David L. Ortega, Ph.D. before the United States Senate Committee on Agriculture, Nutrition, and Forestry. In Hearing on "Foreign investment in U.S. agriculture."  
<https://www.agriculture.senate.gov/imo/media/doc/97550294-ee74-e7c9-b46b-c54bd9e3f0ee/Ortega%20Testimony.pdf>

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corporate (both foreign and domestic) land investment in the U.S. since AFIDA was passed into law in 1978. After decades of working with small and mid-scale farmers across the country, NFFC recognizes that corporate concentration in our food system undermines farmer livelihoods and rural economies across the U.S. and farmland ownership and access is not immune to this trend. To truly ensure a resilient U.S. food system, the USDA must have both the legal authority and budgetary resources to closely regulate all corporate holdings of farmland both foreign and domestic.

This need for greater Agency oversight of farmland investment is happening at a time when one-third of American agricultural land will likely change ownership in the next fifteen years.<sup>3</sup> Considering this significant land transition, it is important to recognize that according to a 2022 survey by the National Young Farmers Coalition, affordability, and land access are the biggest barriers to new and beginning farmers particularly for historically marginalized groups.<sup>4</sup> The average price of farmland has risen for decades in the U.S., reaching historic highs in recent years.<sup>5</sup> States with prime agricultural land, such as Iowa, saw a 21.4% increase in the dollar value per acre in a single year from 2021 to 2022 with an acre of land going for close to \$10,000.<sup>6</sup> Corporations, both foreign and domestic, can outbid small-scale independent farmers for prime farm, ranch, and forestry land, and as new and beginning farmers are economically ‘locked out’ of land access, rural communities and economies are suffering.<sup>7</sup> Higher levels of absentee land ownership result in lower educational attainment, more poverty, higher unemployment, higher food insecurity, and more Supplemental Nutrition Assistance Program participation.<sup>8</sup> Thus, the declining health of rural communities and corporate farmland investment are inextricably linked.<sup>9</sup> Small independent farmers are more likely to invest in the long-term health of their land, engage in climate-resilient practices, and actively participate in their local economy. Supporting this, the USDA’s stated vision is to “help rural America to thrive; to promote agriculture production that better nourishes

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<sup>3</sup> Keeping farmers on the land Read more - American Farmland Trust. (2023, December 22). American Farmland Trust. <https://farmland.org/keeping-farmers-on-the-land-read-more/>

<sup>4</sup> Ackoff, S., Flom, E., García Polanco, V., Howard, D., Manly, J., Mueller, C., Rippon-Butler, H., & Wyatt, L. (2022). BUILDING a FUTURE WITH FARMERS 2022: Results and recommendations from the National Young Farmer Survey. National Young Farmers Coalition. <https://www.youngfarmers.org/wp-content/uploads/2022/09/NationalSurveyReport22-1.pdf>

<sup>5</sup> Fairbairn, M., Calderon, E., & Treakle, J. (2022). Selling out the Delta Farmland Investment and small farmer land access in Mississippi. National Family Farm Coalition. [https://nffc.net/wp-content/uploads/SellingOuttheDelta\\_FINAL.pdf](https://nffc.net/wp-content/uploads/SellingOuttheDelta_FINAL.pdf)

<sup>6</sup> Land Values 2022 Summary (ISSN: 1949-1867). (2022). United States Department of Agriculture.

<sup>7</sup> Werner, M. (2022, March 21). Stratosphere: The amazing rise in the price of farmland and its growing impact on rural governments | Center for Rural Policy and Development. Center for Rural Policy and Development. [https://www.ruralmn.org/stratosphere-farmland-and-its-growing-impact-on-rural-tax-bases/#\\_edn1](https://www.ruralmn.org/stratosphere-farmland-and-its-growing-impact-on-rural-tax-bases/#_edn1)

<sup>8</sup> Bailey, C., A. Gopaul, R. Thomson, and A. Gunnoe. 2021. “Taking Goldschmidt to the Woods: Timberland Ownership and Quality of Life in Alabama. *Rural Sociology* 86(1): 50-80.

<sup>9</sup> Pahnke, A., & Treakle, J. (2023, October 2). Land policy for a sustainable farming future. National Family Farm Coalition. <https://nffc.net/land-policy-for-a-sustainable-farming-future/>

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Americans,” this cannot be accomplished without effectively regulating corporate agricultural land purchases through a federal regulatory baseline.<sup>10</sup>

Corporate conglomerates drive concentration and consolidation across our food system, including land ownership. Their growing market power displaces farmers and reduces the security and resilience of our food system. A handful of firms are now acting as monopolies or oligopolies across the food supply chain.<sup>11</sup> A parent firm through its subsidiaries may own the seed supplier, feed mills, breeding facilities, slaughterhouses, and packaging plants. A change in beneficial ownership can lead to a foreign entity owning a large chunk of our food supply chain, as happened with the sale of Smithfield Foods to a Chinese company that included 146,336 acres of farmland.<sup>12</sup> While foreign investment plays a role in this trend, it is not the driving factor. Foreign investment is a symptom of an underlying cause: corporate consolidation. Corporate consolidation relies on speculative investment, the scope and complexity of which has changed considerably since AFIDA became law. Farmland ownership was once primarily farmer-banker financed, but post the Tax Reform Act of the 1980s, farmland ownership is now facilitated through layers of limited liability companies and subsidiaries that allow multiple investors to make a profit off the land with limited risk to their assets.<sup>13</sup> As capital is transferred between these connected but legally independent entities it becomes extremely challenging to trace ownership and share values. AFIDA was not written to account for the complexity of how investment functions today. This speculative investment exacerbates social and economic inequalities in the food system in the absence of effective public policies for governing land ownership transparency, accountability, and enforcement. Concern over this outcome is exactly what drew bipartisan criticism voiced back in 1977 when investing pension capital in U.S. agricultural land was first proposed.<sup>14</sup> Despite these known concerns Congress and the USDA have done little to effectively address them in the almost fifty years since they were first voiced.

The lack of data concerning the size and scope of corporate farmland ownership makes it difficult to accurately assess the impacts on rural communities and our food system at large.<sup>15</sup> What data we do have is limited. As of December 2022, there is a reported 43.4 million acres of agricultural land held

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<sup>10</sup> About the U.S. Department of Agriculture. (n.d.). USDA. <https://www.usda.gov/our-agency/about-usda>

<sup>11</sup> Food Economics and Corporate Consolidation - FoodPrint. (2024, January 22). FoodPrint. <https://foodprint.org/issues/the-economics-of-food-and-corporate-consolidation>

<sup>12</sup> Bustillo, X. (2023, June 26). China owns 380,000 acres of land in the U.S. Here's where. NPR. <https://www.npr.org/2023/06/26/1184053690/chinese-owned-farmland-united-states>

<sup>13</sup> Loka Ashwood, John Canfield, Madeleine Fairbairn & Kathryn De Master (2020): What owns the land: the corporate organization of farmland investment, *The Journal of Peasant Studies*, DOI: 10.1080/03066150.2020.1786813

<sup>14</sup> Fairbairn, M., Calderon, E., & Treakle, J. (2022). Selling out the Delta Farmland Investment and small farmer land access in Mississippi. National Family Farm Coalition. [https://nffc.net/wp-content/uploads/SellingOuttheDelta\\_FINAL.pdf](https://nffc.net/wp-content/uploads/SellingOuttheDelta_FINAL.pdf)

<sup>15</sup> Tracking Speculative Farmland Ownership: Good Data Is Hard to Find. (n.d.). National Family Farm Coalition. <https://nffc.net/wp-content/uploads/VLS1-1.pdf>

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by foreign entities.<sup>16</sup> Canadian companies and individuals own the largest amount – 32% of the total – while entities from the Netherlands, Italy, the UK, and Germany hold the next largest percentages.<sup>17</sup> Chinese-held land, a focus of state and federal concern, amounts to less than 1%: 349,442 acres.<sup>18</sup> Companies based in countries such as Saudi Arabia, Iran, and Brazil do not own enough American farmland to be individually represented in the USDA’s annual AFIDA reporting. As noted in the 2022 AFIDA Annual Report, multinational corporations with investors or partners from many different countries further complicate the accuracy of tracking who owns what.<sup>19</sup> Regulation of all corporate agricultural land purchases is the first step in ensuring better regulation of foreign investment.

Despite AFIDA requiring foreign entities to disclose farmland purchases, limited enforcement action has made it essentially a voluntary practice.<sup>20</sup> The patchwork of State laws regulating foreign and multinational corporate land purchases, coupled with the inconsistent data gathered at the Federal level creates a gap in knowledge of which multinational corporations own what.<sup>21</sup> While NFFC acknowledges the USDA’s admitted funding and staffing challenges in the implementation of AFIDA, we feel that more information on foreign agricultural land investment to be germinal to the purpose of the agency.<sup>22</sup> With that in mind, we offer the following suggestions for strengthening the quality and quantity of information gathered through AFIDA.

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<sup>16</sup> Farm Service Agency. (n.d.). Foreign Holdings of U.S. Agricultural Land Through December 31, 2022. In United States Department of Agriculture. Retrieved February 1, 2024, from [https://www.fsa.usda.gov/Assets/USDA-FSA-Public/usdfiles/EPAS/PDF/2022\\_afida\\_annual\\_report\\_12\\_14\\_23.pdf](https://www.fsa.usda.gov/Assets/USDA-FSA-Public/usdfiles/EPAS/PDF/2022_afida_annual_report_12_14_23.pdf)

<sup>17</sup> Ibid.

<sup>18</sup> Ibid.

<sup>19</sup> Ibid.

<sup>20</sup> Midwest, B. F. I., & Midwest, B. F. I. (2024, January 22). Federal audit: More information on foreign-owned agriculture land needed. Investigate Midwest. <https://investigatamidwest.org/2024/01/22/federal-audit-more-information-on-foreign-owned-agriculture-land-needed/>

<sup>21</sup> Grey, J. G., Featherston, E. F., Johnson, C. J., & Zurik, L. Z. (2022, January 24). Secret Acres: Foreign-owned agricultural land inaccurately tracked by government. Investigate Midwest.

<sup>22</sup> Foreign ownership in U.S. agriculture | The United States Senate Committee on Agriculture, Nutrition & Forestry. (2023, September 27). Senate Committee on Agriculture, Nutrition & Forestry. <https://www.agriculture.senate.gov/hearings/foreign-ownership-in-us-agriculture>

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## Response to Specific Requests for Public Input

- Is the request for additional information an undue burden on foreign owners or their representatives? If so, why?

In general, we do not believe that requests for additional information create an undue burden on foreign owners or their representatives, particularly for those foreign owners or their representatives of multinational corporations. Nonetheless, it is worth considering how the scale of investment, burden of reporting compliance, and potential risk are interrelated. The Government Accountability Office, in its report on the subject published in January of 2024, found that there are potentially significant national security risks associated with the inadequate collection of data surrounding foreign ownership of agricultural land.<sup>23</sup> We believe that larger-scale investments (in terms of acreage and/or land value) are more likely to be made by larger, well-capitalized investors, who are unlikely to be burdened by reporting requirements, but may offer different (and potentially more substantial) risks than small-scale investments by individual people. Requiring corporate entities, both foreign and domestic, to file their holdings with the Federal government is a vital first step in understanding the scope of risk to our food system.

- Are there additional options that should be added to the list above? If so, what are those options?

No comments

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<sup>23</sup>Cinelli, G. M., & Nunnenkamp, K. J. (2024, January 29). GAO finds significant gaps in current information collection process for Non-US ownership of US agricultural land. <https://www.morganlewis.com/pubs/2024/01/gao-finds-significant-gaps-in-current-information-collection-process-for-non-us-ownership-of-us-agricultural-land>



## Longterm Lease Holds

- Are long-term leasehold filings—particularly those in the wind turbine and solar panel industries—“different enough” from land ownership purchase or sale filings that a separate version of the FSA-153 form should be created? Should a different “logic path” of questions be developed for long-term leasehold filings?

Wind and solar leases can vary; there is the potential to have mixed-use land management arrangements where renewable energy and traditional agriculture are happening on the same tract.<sup>24</sup> On the other hand, any kind of energy infrastructure is usually use-specific, long-term, and has a high impact on the land (at least during installation, and in some cases ongoing impacts) which can be highly disruptive for agricultural production. Adding an option for mixed-used acreage under section 9. *Current Land Use* on the existing FSA-153 form could help to clarify how renewable energy projects are affecting rural communities and land access.

- Many foreign wind energy companies have long-term leaseholds on U.S. agricultural land farmed by U.S. producers that trigger the AFIDA reporting requirement. Currently, the entire acreage of the parcel is captured; this is because the number of wind turbines that will be established on the land (if any) is often an unknown at the time of AFIDA reporting. In addition, the existence of the leasehold generally precludes other energy company involvement on the acreage. Does this approach overstate foreign energy company activity on U.S. agricultural land? If so, how should the acreage associated with these leaseholds be captured?

This approach does not overstate foreign energy company activity on U.S. agricultural land. Capturing the entire acreage of the parcel regardless of where and how many wind turbines go up on it is critical to best understand how much and where agricultural land and food production is being affected by wind projects. Similarly to the previous question, this is an instance where a “mixed-use” acreage reporting option would be valuable.

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<sup>24</sup> National Agricultural Law Center. (2022b, March 30). Agricultural Leases Overview - National Agricultural Law Center. <https://nationalaglawcenter.org/overview/agleases/>



- How should solar panels or photovoltaics—which are situated above the agricultural land—be treated for AFIDA reporting given that AFIDA uses an acreage basis for reporting?

Every corporate leased solar project on agricultural land is potentially land that is no longer available to small and mid-size farmers.<sup>25</sup> If a solar or photovoltaics lease is affecting the way in which that piece of land can be used for food production the scale of the solar project should still be reported in acreage with a mixed-use reporting option. Solar leasing whether mixed-use or not, has the potential to affect the kind of access small and mid-size farms have to that land.

- Some foreign owners are providing a very low estimate of the value of the lease (as the flat payment is low) on the FSA-153 form while others are providing the estimated value of the entire parcel. How should “interest in the value of the agricultural land” be defined for leases?

No comments

### **Impacts on Rural Farms and Communities**

- Do the revised questions capture the scenarios needed to ascertain the impacts of foreign investment in U.S. agricultural land? If not, what questions should be added, or should the proposed questions be modified?

The FSA-153 form in Question 3 asks organizations to report if they are one of seven types: corporations, partnership, estate, trust, institution, association or other. This list does not include Limited Liability Companies (LLCs), which are a primary vehicle of absentee farmland investment and parcel holdings in the United States.<sup>26</sup> LLCs became commonplace in the 1990s, and because AFIDA has not been updated, this might explain the oversight. However, it is crucial LLCs be incorporated as an option in question 2, part D.

Question 5 asks respondents to check the type of interest held in agricultural land. The options include whole fee interest, partial fee interest (with what percent), life estates, trust beneficiary, purchase contract, and other. It is not clear if these options fully capture the array of securities utilized by business firms, including public or private debt and equity. Including a provision that

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<sup>25</sup> National Agricultural Law Center. (2022b, March 30). Agricultural Leases Overview - National Agricultural Law Center. <https://nationalaglawcenter.org/overview/agleases/>

<sup>26</sup> Ashwood, L., J. Canfield, M. Fairbairn, K. De Master. “What owns the land: the corporate organization of farmland investment.” *Journal of Peasant Studies* 49(2): 233-262.



clarifies stakes in such firms through common shares, stocks, convertible, and corporate bonds is useful to understand who has power over American farmland. Further, it is not clear how this form would track firms' use of global depository receipts to acquire farmland, which can be traded abroad and represent ownership stakes in a foreign company for investors globally.

Question 6 on acquisitions asks how the tract was acquired, including options of cash transaction, credit or installment transaction, trade, gift or inheritance, foreclosure, or other. Today, large corporations divide their holdings by transferring assets and debts into new subsidiaries. Capital also can be transferred among subsidiaries through internal markets. This leads to the creation of corporate entities that are not necessarily reported on parent companies' financial statements.<sup>27</sup> This can create a complex web of corporate affiliates difficult to trace to an ultimate parent company. Adding in transfer as an option in Question 6 could help identify firms that acquire property through a transfer to flag firms that are seemingly disconnected at face value but actually are firms acting in concert, which is a reportable indirect interest for AFIDA.

- Do these questions put an undue burden on the foreign owner or their representative?

In short, these questions are not an undue burden. Transparency in property ownership and effective land market regulation is an essential part of the U.S. economy and any well-functioning democracy. Historically in rural areas, land ownership has been a point of pride. If not, the more important question is why a business firm would not want to disclose its ownership stakes. As mentioned above these questions enable the USDA to gather necessary data to better understand the impact of foreign investment in U.S. agricultural land and our food system as a whole. With the size and scope of land investments often being in the thousands of acres range, a proportional amount of information needs to be collected on these holdings.

- Are there situations where responding to the questions as written may result in unclear inferences—for example, if there are foreigners who are both farming land they have purchased within a county, and renting? How common are such situations?

It is important that USDA accurately recognize what kind of entity is responding to the questions as written, and tailor its reporting requirements accordingly. Most land investment in the U.S. is through firms, not people by land by name. Business firms are masking foreign ownership of U.S.

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<sup>27</sup> Prechel, Harland. 2014. "Corporations and Commerce." In *Concise Encyclopedia of Comparative Sociology*, edited by Sasaki Masamichi, Jack Goldstone, Ekkart Zimmerman, and Stephen K. Sanderson, 163–173. Boston: Brill.





land by utilizing organizational structures that enable acquisitions. Therefore, the most important focus of USDA reporting requirements should be on corporate firms, and not foreign people.

### **FSA–153 form general questions**

- By regulation, reporting by foreign owners is required to the third tier of ownership. The form does not capture information on the ultimate owning country or countries. Should this information be captured?

Focusing on the ultimate owning country or countries is helpful, but could feasibly miss the beneficial owners and their locations. For example, only requiring land disclosures relative to foreign nation-states will miss powerful financial investors acting across the globe and putting domestic food production at risk. While our comments above lay out why understanding corporate ownership of agricultural land is essential, the Corporate Transparency Act (CTA) of 2021 also sets precedence for mandating that businesses report who ultimately has a controlling stake in them.<sup>28</sup> In passing CTA the federal government has acknowledged ownership interests are easy to hide in multinational corporate structures. This creates significant issues with transparency and accountability in agricultural land ownership. Collecting precise information on ownership structure is necessary to better understand the scope of corporate consolidation in our food system.

- Should foreign owners be required to report beyond the third tier of ownership? If so, why?

Foreign owners should be required to report beyond the third tier of ownership. The success of AFIDA relies on the adequate collection of data and transparency of farmland ownership. The nature of corporate investment allows for multiple individuals or entities to hold full or partial ownership through several levels of parent companies or subsidiaries beyond the third tier.<sup>29</sup> Not requiring the reporting of foreign ownership at all tiers undermines the accuracy of AFIDA data as stakeholders can easily hide ownership interests beyond the third tier of reporting.

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<sup>28</sup> U.S. Beneficial Ownership Information Registry now accepting reports | FinCEN.gov. (2024, January 1). <https://www.fincen.gov/news/news-releases/us-beneficial-ownership-information-registry-now-accepting-reports#:~:text=The%20bipartisan%20Corporate%20Transparency%20Act,secure%2C%20and%20free%20of%20charge.>

<sup>29</sup> Brown, M. (2024, February 6). Who owns the AG land? Congress considering changes to the federal reporting regime. National Agricultural Law Center. <https://nationalaglawcenter.org/who-owns-the-ag-land-congress-considering-changes-to-the-federal-reporting-regime/>



- What ownership level should bear the reporting obligation?

Any level of foreign ownership should bear a reporting obligation. Setting a level is arbitrary and only encourages the creation of more subsidiary firms to dodge reporting requirements. As land acquisitions are structurally replicating consolidation in the other agricultural sectors, it is helpful to analyze how levels of foreign ownership work through an emblematic case. Syngenta by name today is an important supplier of seeds, pesticides, and related services for U.S. farmers. Syngenta, however, is owned by the People’s Republic of China. However, according to Bloomberg L.P. data, it is a **fifth-level subsidiary** of the People’s Republic of China. Syngenta merged into ChemChina Petrochemical Co Ltd. when it was acquired. ChemChina Petrochemical Co Ltd. is a subsidiary of China Sinochem Holdings Co Ltd, which is a subsidiary of SASAC of the State Council, which is a subsidiary of the People’s Republic of China State Council, which is a direct subsidiary of the People’s Republic of China.

- Should the FSA Farm Records and AFIDA definitions of “tract” be aligned? If so, why?

The FSA Farm Records and AFIDA definitions of “tract” should be aligned. Ensuring these definitions are aligned helps with consistency in reporting and will allow the FSA to better understand the location of specific tracts, the farms, individuals, or business entities associated with those tracks, and what USDA programs they might be engaging with.

- The AFIDA regulation currently provides a list of exemptions to reporting. Should filing be required in situations of contingent future interests? If so, what kind and what types should be exempted, if any? Should reporting be required under any circumstances for easements? Please explain.

No comments

- Should foreign owners be required to submit an amended FSA–153 form when land use changes within the agricultural category (say, if acres move from pastureland to cropland relative to the original reporting)?

Foreign owners should be required to submit an amended FSA-153 form when land use changes within the agricultural category. With changes in the agricultural use of the land come risks to environmental degradation and bio-security. The USDA encourages pig farms, for example, to have



biosecurity plans, and changing ownership and thus control over such farms shapes their risk.<sup>30</sup> Issues such as erosion or pest and disease outbreaks will vary greatly depending on the type of agricultural activity happening on the land.<sup>31</sup> Ensuring there is accurate data concerning types of agricultural activity and clear ownership is key to accountability and protecting our food security.

In closing, we reiterate that corporate land grabs hurt independently owned farms, local rural communities, and agricultural communities. Foreign investment is entangled in the larger issue of corporate concentration and consolidation of our food system. To effectively understand and address foreign investment the USDA must first be empowered to regulate corporate land investment as a whole. Our Coalition members work daily with small to mid-scale farmers struggling to access land or retain the land they are on. We understand this struggle to be driven by corporate concentration and consolidation in our food system and we will continue to advocate for Federal regulation of corporate agricultural land purchases. We thank you again for the opportunity to offer these comments. Should you have any additional questions about this comment, please don't hesitate to contact Jordan Treakle ([jordan@nffc.net](mailto:jordan@nffc.net)).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jordan Treakle', with a horizontal line underneath.

Jordan Treakle  
National Programs and Policy Coordinator  
National Family Farm Coalition  
[jordan@nffc.net](mailto:jordan@nffc.net)

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<sup>30</sup> Animal and Plant Health Inspection Service. "Factsheet; Biosecurity for Pigs with Outdoor Access." Accessed February 13th, from [https://www.aphis.usda.gov/publications/animal\\_health/biosecurity-for-pigs-outdoor-access-factsheet.pdf](https://www.aphis.usda.gov/publications/animal_health/biosecurity-for-pigs-outdoor-access-factsheet.pdf).

<sup>31</sup> Waage, J. K., & Mumford, J. D. (2008). Agricultural biosecurity. *Philosophical transactions of the Royal Society of London. Series B, Biological sciences*, 363(1492), 863–876. <https://doi.org/10.1098/rstb.2007.2188>