Response to the Call for Input from the United Nations Special Rapporteur on the Right to Food for the forthcoming thematic report to the UN General Assembly:
Concentration of corporate power in global food systems and its implications for the realization of the right to food

12 June 2025

JOINT SUBMISSION:
This is a joint submission from the following civil society organizations: Friends of the Earth U.S., Foodrise, BankTrack, Rainforest Action Network, and Institute for Agriculture and Trade Policy.

These five organizations are part of an emerging global alliance that aims to serve as a platform for advancing strategic interventions to shift financing away from consolidated industrial agrifood systems towards rights-based, restorative models based on food sovereignty principles. The alliance is in process of formation and looks forward to engaging CSOs, financial institutions, and international policy fora on strategies to definancialize agrifood systems in order to support a just transition aligned with global human rights norms and climate and biodiversity targets.

At this time, other alliance-building participants include: *A Growing Culture • ActionAid • Adasina Social Capital • Alliance for Food Sovereignty in Africa • BankTrack • Brazilian Network for Social Justice and Human Rights • Center for International Environmental Law • Friends of the Earth (FoE) US • FoE International • FoE Cameroon • FoE Netherlands • Foodrise (formerly Feedback Global) • Forest & Finance Coalition • Institute for Agriculture and Trade Policy • IPES-Food • Rainforest Action Network • Transnational Institute • URSA Collective • US Right to Know • World Animal Protection*

RESPONSES TO KEY QUESTIONS

1. How does the concentration of power in the hands of a relatively small number of corporations affect food sovereignty and the right to food in your country or region?

As highlighted in a recent scoping paper from the UN Development Programme's Food and Power Initiative, concentration of power works on multiple dimensions to erode food sovereignty and the rights and dignity of peoples. *Visible power* operates through formal decision-making processes, such as laws, policies, budgets and institutional mandates; *hidden power* shapes policy agendas by allowing corporations, banks and other elite institutions to influence policymaking in their favor; *invisible power* shapes societal norms and beliefs to exclude, divide and control; and *systemic power* underpins all relationships through entrenched structures of domination, such as patriarchy, extractive capitalism, colonialism and white supremacy, which limit alternative ways of thinking and organizing. These four types of power, wielded explicitly and implicitly by a handful of global entities, are the greatest obstacles to the achievement of food sovereignty, locally, regionally, nationally and globally.

Below we describe two interlocking elements of this concentration of power: corporate dominance across the food chain; and financial incentives that entrench and enable these corporations to hold such dominance.

Buoyed by the multiple dimensions of power, corporations effectively lobby governments, resulting in further financial incentives, technological lock-ins, and skewed regulatory environments. This limits other duty bearers' and rights holders' abilities to implement necessary changes in support of healthy, just and sustainable food systems.[1]

Part One: Corporate dominance

Each stage of the food supply chain is dominated by a handful of companies. This concentration results largely from horizontal and vertical mergers that reduce competition, and typically increase market share or control over related markets.

Key areas of corporate concentration, as highlighted by the UNDP Food and Power Initiative, include:

- **Field to point of sale:** A few multinational corporations control most of the global market for seeds, fertilizers, pesticides, farm equipment and machinery, leading to high costs for smallholder farmers, reduced autonomy, loss of local food sovereignty, and increased economic disparities. Meanwhile, a handful of international commodity traders and processors dominate the middle of the industrial agri-food chain, exerting outsized influence on market structure and pricing. These processes work hand in hand with big data, biotech and digitalization strategies being rolled out across the industrial food chain, favouring the interests of a small number of large data companies, alongside the field to point of sale industrial agribusiness players.

- **Retail**: Major supermarket chains and fast-food restaurants dominate food retail in many countries, exercising monopsony power to undermine small producers' livelihoods, displacing local and territorial markets, influencing prices and product availability, and advancing policies favoured towards big business. Retail concentration also reduces people's access to local, healthy and culturally appropriate diverse food, and shapes food environments towards less healthy options such as ultra-processed foods and beverages.

- **Ultra-Processed Food and Beverages (UPFBs)**: Large corporations control significant portions of this market, impacting consumer preferences through marketing and the shaping of narratives that support the consumption of UPFBs, contributing to the ballooning of chronic disease, favouring (heavily subsidized) monoculture commodities, and undermining local food systems.[2] Corporate actors also exert significant pressure on lawmakers, using lobbying to shape legislation and policies in ways that serve their interests—often at the expense of public health and social well-being, particularly for the most vulnerable. Asian markets have been particularly targeted by transnational food and beverage corporations due to market growth potentials.[3]

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[1] In 2024, there were 736 child labor law violations in the United States, according to the Department of Labor. Two large meat companies, Tyson and Perdue, have been investigated for illegal child employment, and immigrant children have reported the dangerous and exploitative conditions in meatpacking plants. The combination of corporate lobbying, subcontracting to avoid responsibility, and various states loosening child labor laws results in these human rights violations flowing from concentrated corporate power. See: https://sentientmedia.org/agricultures-child-labor-problem/

[2] "The production of UPFDs utilizes only a limited number of ingredients (ultra-processed flour, sugar, vegetable oil and milk) and a few crops, such as wheat, soy and corn. This focus and over concentration on a few crops to make UPFDs has been at the cost of biodiversity — other crops and a range of animals and microorganisms that have been traditionally used as food that had helped make a more wholesome and healthier diet — and public health." https://www.iatp.org/rethinking-food-systems-southeast-asia

[3] "According to a 2019 study of total food and drink volume sales per capita in 80 countries during the period 2002-2016, the increase in volume sales of ultra-processed foods (UPFs) were highest in South and Southeast Asia (67.3%) followed by North Africa and the Middle East (57.6%), while for ultra-processed drinks (UPDs), the increases in volume sales were highest in South and Southeast Asia at 120%, with Africa ranking next at 70.7%." https://www.iatp.org/rethinking-food-systems-southeast-asia

- **Land markets:** Interconnected trends of land grabbing and increasing land inequality have led to the emergence of a select group of transnational landowners who own and control huge amounts of land around the world. According to new research by FIAN, the top ten institutional landlords control over 400,000 km² globally – an area roughly the size of Japan, Zimbabwe, or Paraguay. **The ownership of vast tracts of land by distant corporate entities for the sake of global supply chains or global financial capital flows, undermines state sovereignty and people's self-determination.** Land inequality and associated extractive uses are major drivers of climate change, biodiversity loss, and ecosystem destruction, and undermine just transitions to more equitable and sustainable food systems and economic models.

Beyond yielding power over these parts of the food chain, corporate concentration of land is a major part of the problem. Due to investments, landgrabs, and continued expansion of large-scale industrial farming and economic and trade policies that prioritize global commodity production, 70% of the world's farmland is now controlled by just 1% of the world's largest farms. Meanwhile, farms smaller than two hectares account for 84% of all farms but operate only 12% of the world's farmland.

Part Two: Financing for industrial agribusiness

The corporate food system works in tandem with the global financial system. Financial institutions provide the capital that fuels the expansion of agribusiness, allowing companies to scale operations, acquire land, and invest in infrastructure. Through loans, investments, underwriting, and insurance, banks and investors allow this extractive business model to survive and grow. In the case of industrial agriculture, this means reinforcing a system built on deforestation, land grabbing, biodiversity loss, and the violation of Indigenous and community rights.[4]

There is a serious problem with the ready availability of finance for companies with long track records of large-scale environmental destruction, landgrabbing, invasion of Indigenous lands, labour exploitation, intimidation and violence against defenders and/or pollution of air, land and water.

The global financial system profits from the corporate agribusiness model. Illustrative of this is the role of banks:

- A major investigation by Global Witness, Deforestation Dividends, revealed that banks and investors based in the UK, EU, US, and China earned an estimated $1.74 billion from 2016 to 2020 through investments in agribusiness firms linked to tropical deforestation and human rights abuses, despite many of these institutions having public commitments to environmental and human rights standards. Analysing over 70,000 financial deals with 20 of the most destructive agribusiness companies, the report shows that banks such as JPMorgan, HSBC, Deutsche Bank, BNP Paribas, and Rabobank profited from activities tied to rainforest destruction in regions like Southeast Asia, West Africa, and Brazil. **The findings underscore a systemic failure of voluntary bank commitments to curb industrial agribusiness-driven deforestation, pointing to the urgent need for enforceable regulations to hold financial institutions accountable.**

[4] BankTrack's "Dodgy Deals" database documents many agribusiness companies such as JBS, Minerva, Marfrig, Bunge, Cargil, Louis Dreyfus, Wilmar International, Royal Golden Eagle linked to various alleged cases of abuse, human rights violations, and environmental damage.

- Forests & Finance, a coalition which tracks credit and investment flows to forest-risk commodities in tropical forest regions, found private banks provided $395 billion since the Paris agreement while investors held $41 billion in bonds and shares as of July 2024.[5] Much of this private finance flows to high-risk companies without adequate due diligence or risk assessments.[6] **There is a massive disconnect between the amount of money being pumped into these sectors and the safeguards in place to prevent mass deforestation and rights abuses.**[7]

- The support of Multilateral Development Banks for Industrial Livestock operations undermines the achievement of the Paris goals, the GBF and almost all the SDGs. The Stop Financing Factory Farming campaign found that between 2023 and 2024, the World Bank Group alone funneled $1.4 billion in industrial livestock operations.[8] **Many of these loans are to large corporations, that with MDB support can expand their power and control over the market, often to the detriment of small scale farmers.**

Private financial institutions fund the growth of agribusiness corporations. Illustrative of this is the expansion of industrial livestock production:

- According to a 2024 Foodrise report, since the Paris agreement was signed in 2015, over half a trillion dollars in credit have been provided to the world's largest 55 industrial livestock companies – an average of $76.9 billion per year – fuelling the expansion of global meat and dairy production. As of March 2023, a total of $323.3 billion in shareholdings and bond holdings were held by private financial institutions in the world's largest 55 big livestock companies.[9]

2. What alternatives to corporate-controlled food systems are you promoting or supporting (e.g., agroecology, food cooperatives, community-supported agriculture)?

Alternative food systems must prioritise rights-based approaches over market-based mechanisms. These include land and labour reform, repurposing of public policies, reform of public policy, direct grants, and community-driven agroecological farms. This approach upholds Indigenous worldviews and local agricultural knowledge and aligns with global human rights frameworks like UNDRIP and the Global Biodiversity Framework.

Increasing public procurement from local farmers can improve food access and support agroecological transitions. "Farm to institution" initiatives that source local food for hospitals and schools[10] direct public procurement funds to local communities, with a focus on small and midscale farm-holders and local processers and emerging farmers, thereby connecting them to markets.

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[5] Banking on Biodiversity Collapse: Tracking the Banks and Investors Driving Tropical Forest Destruction 2024 (Forest and Finance, 2024) https://forestsandfinance.org/wp-content/uploads/2024/10/BOBC_2024_FullReport_EN.pdf

[6] The Forests & Finance policy assessment in 2023 assessed the quality of bank policies governing forest-risk financing against a set of 38 criteria. The average policy score was just 17%, with only 20 banks and investors out of 100 scoring 30% or above. https://forestsandfinance.org/resources/

[7] https://forestsandfinance.org/banking-on-biodiversity-collapse/#trends

[8] https://stopfinancingfactoryfarming.com/global-protests-to-confront-world-bank-group-over-factory-farm-financing-during-spring-meetings/

[9] The biggest creditors to the top 55 big livestock companies were: Bank of America ($28.8 billion), Barclays ($28.2 billion) and JPMorgan Chase ($26.7 billion). The biggest investors in the top 55 big livestock companies were BlackRock ($37.8 billion), Vanguard ($24.4 billion) and Capital Group ($21.4 billion).

[10] See: Healthy Food, Healthy Hospitals, Healthy Communities (2005) by Institute for Agriculture and Trade Policy; and more on Farm to School efforts from the USDA.

- In the U.S., a nascent movement has emerged to incentivize institutions to source a higher percentage of food from local and regional farmers using a value-based procurement approach. Institutional food procurement holds more power to benefit farmers than any other local food market. The Good Food Purchasing Program works with large-scale purchasers to center Good Food values. The Institute for Agriculture and Trade Policy (IATP) has supported Farm to School efforts locally and nationally since 2007, emphasizing the sourcing of sourcing culturally appropriate foods.[11]

Rights-based approaches strengthen community autonomy and reduce health and diet inequalities.

- In the United Kingdom, the Foodrise project Queen of Greens is a mobile greengrocer, using a converted small bus to visit 33 stops in neighbourhoods around Liverpool and Knowsley in the United Kingdom every week. One in three adults in Liverpool is food insecure, access to good food is limited in parts of the city and a contributing factor to poor nutrition and unhealthy diets. The bus serves an average of 500 households a week with fresh fruit, vegetables, free range eggs and organic produce, at conventional market stall prices. It is funded by civil society organisations in the UK and is run as a social enterprise.[12]

3. What barriers or threats do these alternative systems face from dominant corporate actors or state policies?

The dominance of large corporate actors wielding political power gives them the ability to shape markets and further accumulate capital, particularly through legally enforceable mechanisms such as free trade agreements. Barriers imposed on alternative systems by this dominance include:

- **Shaping technological pathways** prevents the uptake of farmer-led innovations such as agroecological farming methods, as it forces path dependencies on proprietary technologies, such as modified seeds, synthetic fertilizers and digital tools, further impoverishing smallholders.
- **Influence over policy** skews regulations to favour the large players and directs subsidies towards these large players and away from territorial markets.[13]
- **Controlling public media narratives** and advertising with misleading narratives that portray industrial agriculture as sustainable, efficient, and essential for global food security which undermines public discourse about emergent alternative systems. They often marginalise or discredit alternative models such as agroecology and Indigenous land stewardship, while presenting industrial-scale farming as the only viable solution.[14]

[11] This is especially important in the context of communities whose diets have not been part of mainstream food culture, be it Hmong American, Somali American, or Native American. A recent statewide assessment shows the impact of Minnesota's Farm-to School program over the last decade.

[12] The bus plays a further role in providing signposting to health support via Public Health Liverpool and acts as a point of social contact for customers including single parents, older people and asylum seekers.

[13] 2024 research by the Fair Bank Guide exposed that between 2019 and 2023 Dutch institutions Rabobank, ABN Amro and ING Group have transferred US$ 1.89 billion to 18 key players within the agrilobby in Brazil in corporate loans, shareholding transactions and bond issuances to 18 companies that are currently engaged in agrilobby activities.

[14] See: The New Merchants of Doubt: How Big Meat and Dairy Avoid Climate Action (2024) by Changing Markets.

4. What kind of legislation is needed in your country to limit the growing corporate concentration and power in food systems and allowing to hold corporations accountable for human rights violations?

Financial regulation is needed to limit the impunity of corporations and their financiers and eliminate financial flows driving human rights violations and environmental impacts.

- The Forest and Finance report Regulating Finance for Biodiversity (2024) highlights the urgent need for policymakers to take decisive action to address destructive financial practices for five key jurisdictions: Indonesia, Brazil, China, the European Union, and the United States**. It recommends measures such as integrating biodiversity risks into risk management and disclosure, aligning monetary policies and financial products with sustainability, strengthening due diligence to prevent financing harmful activities, and ensuring corporate transparency and accountability.**

Mandatory Due Diligence Systems are necessary at various levels of government, from imports and exports, procurement, and investments. Voluntary commitments are structurally incapable of delivering systemic change. They often lack enforcement mechanisms, transparency, or meaningful accountability, allowing corporations and institutions to appear responsible while continuing business as usual.

One of the egregious impacts of corporate dominance is the opacity of supply chains, which in turn enables systemic harms, for example, commodity-driven deforestation. As CSOs focusing on this issue, we note that:

- **Reforming supply chains to address deforestation risk requires legally binding mechanisms.**
    - **Certification is not a proxy for due diligence.** Voluntary certification schemes such as those promoted for forest-risk commodities (e.g. Roundtable on Sustainable Palm Oil, Forest Stewardship Council, and Roundtable on Responsible Soy) do not prevent landgrabs or deforestation, and do not ensure transparent governance, due diligence processes, and monitoring systems across entire supply chains.[15]
    - **Self-imposed guidelines by banks and investors fail to meet basic international standards** for environmental protection and human rights in forest-risk commodity financing. The global banking sector is consistently lagging behind the adoption of the minimum expected standard of corporate behaviour.
    - The Banking on Biodiversity Collapse (2023) report of the Forest and Finance Coalition highlights that many of the world's top agribusiness lenders still operate without strong policy safeguards. An assessment of 38 ESG criteria found that financial institutions scored an average of just 17%. The 2024 BankTrack's

[15] As defined by the UN Guiding Principles on Businesses and Human Rights, due diligence is a process for identifying, preventing, mitigating, and accounting for human rights impacts – both actual and potential impacts. Human rights due diligence requires meaningful engagement with stakeholders (e.g. human rights defenders, supply chain workers) and must be rooted in international human rights frameworks. The OECD Guidelines explain that industry schemes should not be used as proxies for due diligence or play a dominant role in due diligence procedures. See: False Solutions to Deforestation: A Fact Sheet on Forest-Risk Certification Schemes by Friends of the Earth U.S. (2025).

Global Human Rights Benchmark found that 38 out of 50 of the world's largest commercial banks are implementing less than half of their human rights responsibilities, as set out in the UN Guiding Principles on Business and Human Rights (UNGPs).

- **Legally codified procurement policies** are one means of enacting mandatory due diligence systems for forest-risk commodities. By requiring federal or state governments to set up their own mandatory screening and not rely on industry-driven voluntary certification schemes, supply chains would be thoroughly assessed for their contribution to deforestation and would prohibit government purchasing products linked to deforestation, forest degradation and rights abuses, thereby influencing the markets for those products and impacting larger systems change.

Implementation of Moratoriums on expanding industrialised food systems. Governments must restore competition and ensure a level playing field for *all* farmers.

- **Break Up Food and Agriculture Monopolies**. Institute a moratorium on new mergers of food, agriculture or food processing companies to stem the tide of mega-mergers that have driven unprecedented consolidation in the agriculture sector.
    - Example of the call for an Aquaculture Moratorium: A recent Foodrise report (2025) identified that between January 2015 and November 2024, financial institutions provided US$18.8 billion in credit to the salmon farming companies owned by Mowi, Kverva, Bakkafrost, Cooke, Grieg Maturitas and Laco. The report urges governments and public institutions to stop financial support to salmon corporations, stop new industrial farms, ban sourcing of fish meal and fish oil from food insecure regions, ban sourcing of fish meal and fish oil where marine systems are under pressure and mandate full supply chain transparency on fish sold by retailers including information on fish feed.
- **Enforce and Strengthen Antitrust and Fair Practice Laws**. In the U.S. context, this includes through eliminating "pro-competitive effects" or "legitimate business justifications".
- **Stop Subsidizing Overproduction**. For example, by prohibiting government loan guarantees for new contract poultry or hog operations, except for specialty market growers that are not concentrated animal feeding operations.
- **Level the Playing Field for Independent Processors**. For example, by addressing the bias in food safety regulations toward large corporate slaughter and processing facilities.

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