

24 December 2023

Vanessa A. Countryman, Secretary
Securities and Exchange Commission
100 F. Street, NE
Washington, DC 20549
7 Branch St.
Warren, PA 16365

SUBJECT: SR-NYSE-2023-09 - Notice of Filing of Proposed Rule Change to Amend the NYSE Listed Company Manual to Adopt Listing Standards for Natural Asset Companies

Dear Secretary Countryman:

If America persistently ignores its responsibility to defend its perimeter or its possessions, assets, and resources therein, we will slip down a slope into servitude of those who believe they should be in control. Eternal vigilance is the price of liberty.

The job of the SEC is to enforce ethical business principles and disincentivize market manipulation. In accordance with this mission and the larger eternal vigilance mandate of American interests I strongly believe the SEC should vote down Release No. 34-98665; File No. SR-NYSE-2023-09 - a proposal to allow a new form of company that is focused on control of natural resources on public and private land in the United States.

What's at stake is de facto control over America's resources by foreign governments and supranational institutions not the slightest bit interested in what's good or what's fair for American citizens. Known as "natural asset companies", these new entities would undermine America's ability to generate and access energy, critical minerals, water, and even our food by placing decisions about natural resources in the hands of institutions such as foreign governments and their sovereign wealth funds, university endowments, and the New York Stock Exchange. It's our collective responsibility to avoid that slippery slope.

According to author and ex-investment banker Carol Roth, the "natural asset company" designation is an invention of the Intrinsic Exchange Group (IEG), a small group that is opaque about its backers but includes folks from various environmental and ecological backgrounds. What is known is that it lists the Rockefeller Foundation, the Inter-American Development Bank, Aberdare Ventures, the NYSE, and AES Corporation co-founder and former World Wildlife Fund chairman Roger Sant among its "investors."¹

¹ <https://www.theblaze.com/align/roth-wall-streets-new-plan-control-public-lands-for-climate-justice>

The idea is to allow these NACs to use their money to buy the ability to control or “manage” productive public and private land and other natural resources. Their stated purpose is not to make a profit or to be productive but rather to protect, conserve, restore, and preserve these natural “assets.” These self-anointed elites want to buy the ability to make decisions about our land while carving the public out of the discussion.

The path to this end might be to offer money to the federal government (which owns and manages more than a quarter of America’s land) to manage lands that produce or cultivate food, water, timber, or energy or even lands that are used for recreation. The company would then decide whether the current activity is bad for the environment and take the land out of productive use in the name of “restoration” or “conservation.” At its worst it looks like an illiberal and authoritarian “environmental, social, and governance” scheme antithetical to our constitutional rule of law.

Baiting the federal government like this would take lots of cash, so the IEG pitched the world’s largest stock market, the NYSE, which became a partner. As part of this arrangement, the NYSE took a “small minority interest” in IEG, including one seat on the organization’s board of directors. It’s the NYSE who is now petitioning the SEC to allow NACs to be listed and traded publicly.

It’s a backward and unethical proposition. Go public to access piles of investor money used to eliminate growth earnings potential of its assets. The entire scheme has numerous red flags fraught with myriad potential conflicts of interest and bad outcomes. Along with conjuring a new company type out of thin air, IEG’s chairman and CEO announced last year the group had conjured up a new type of accounting along with it. “We created a new accounting system, which we called Statements of Ecological Performance, which accounts for the flow of ecosystem services in financial terms,” Douglas Eger told Koen van Seijen of the “Investing in Regenerative Agriculture and Food” podcast². If making up a new accounting standard to explain the backward and unethical use of investor money to control publicly owned land doesn’t raise a red flag, what will?

IEG’s Eger has implicitly revealed that this idea is part of a scheme by climate cultists and social engineers to exploit the financial services sector to push an anti-market, anti-growth agenda. “We were looking for a private-sector approach that wasn’t dependent on policy, it wasn’t dependent on traditional taxes, regulation, or philanthropy to price in these assets and give investors the opportunity to invest directly in nature, whether that’s for climate or biodiversity,” Eger told Politico’s E&E News³.

² <https://investinginregenerativeagriculture.com/douglas-eger>

³ <https://www.eenews.net/articles/invest-in-nature-might-be-possible-with-natural-asset-companies/>

The bottom line: vigilance in favor of American sovereignty in this case is the SEC not allowing the NYSE to list natural asset companies.

Sincerely

Larry Freudinger