



We are a force for truth, a reasoned, non-partisan voice for the agricultural community to the public.

January 8th, 2024

Submitted via rule-comments@sec.gov

RE: Notice of Filing of Proposed Rule Change to Amend the NYSE Listed Company Manual to Adopt Listing Standards for Natural Asset Companies; File No. SR-NYSE-2023-09

American Agri-Women (AAW) is the nation's largest coalition of farm, ranch and agribusiness women with more than 50 state, commodity and agribusiness affiliate organizations across the country. AAW is ***opposed*** to the proposed rule change to amend the NYSE Listed Company Manual to Adopt Listing Standards for Natural Asset Companies.

To create a system that monetizes our natural assets, including minerals, water, forests and air for the benefit of the elite few through an investment portfolio is a national security threat. AAW is opposed to the creation of a new incentive for non-government corporate control over our publicly shared land. We disagree with allowing an investment company to have management authority over the "ecological performance" of enrolled natural assets.

The IEG estimates the dollar amount generated from the addition of NACs to our economy will be four times larger than today's entire economy. They also admit that "producing these essential goods and services and managing resources wisely is as valuable, or *perhaps even more valuable, than the food production.*" More than 44 million people in the US face hunger, including 1 in 5 children. AAW is opposed to any effort that threatens food production and prioritizes environmentalism over a basic human necessity to thrive.

The proposed rule is a direct threat to farmers and ranchers across the country, as well as oil and gas production, mineral development and food production. We cannot allow investors, including foreign interests, to have the ability to purchase or manage our national and state parks, conservation easements on private land without landowner permission, federal land or farmland. *This proposal would create one of the greatest threats in history to rural America.*

Thank you for the opportunity to comment.

Respectfully,

Rose Tryon VanCott

Rose Tryon VanCott
American Agri-Women President