Arbeitsgemeinschaft bäuerliche Landwirtschaft (AbL e.V.)
and
European Coordination Via Campesina (ECVC)

17 september 2026, Brussels

Mr. Tony Murphy
President of the European Court of Auditors (ECA)

Subject: Audit of the payment of EU agricultural subsidies (CAP) to non-agricultural financial investors and/or non-European investors

Dear Mr. Murphy,

Arbeitsgemeinschaft bäuerliche Landwirtschaft (AbL) and the European Coordination Via Campesina (ECVC) are writing to you in order to ask the European Court of Auditors (ECA) to carry out an audit of the allocation and use of payments under the European Union's Common Agricultural Policy (CAP) to agricultural enterprises being part of non-agricultural business groups and of business groups with owners outside the European Union (EU).

The question we raise is, whether the payment of agricultural subsidies to non-European and/or non-agricultural financial investors is consistent with the aim of supporting agricultural farms.

In this context, we would ask you to bear in mind that the legal basis for direct payments – the European Union's CAP Strategic Plan Regulation – expressly aims to support farmers and exclude non-agricultural investors from receiving EU agricultural subsidies. To this end, Article 4 (5) of the CAP Strategic Plan Regulation seeks to specify who receives subsidies and brings up the term 'active farmer' to prevent abusive payments to non-farmers. In order to determine who an active farmer is, the Member States shall apply objective and non-discriminatory criteria, such as income tests, labour inputs on the farm, company object or the registration of agricultural activities in national or regional registers.

This provision expressly refers to the 'company object' and thus also to corporate groups, groups of companies and comparable corporate structures. It is deliberately not limited to individual farms that form part of a corporate group as subsidiaries. Against this background, there are considerable doubts as to whether the competent authorities in the Member States have applied and verified these criteria appropriately. Otherwise, it would have been expected that EU direct payments would in fact be restricted to ‘active farmers’.

(1) Based on the provisions of the CAP Strategic Plan Regulation, we ask you on the one hand, to examine the situation whereby non-agricultural corporate groups, that is farms whose parent companies do not pursue an agricultural company object, are granted access to EU agricultural payments.

In Germany, according to data from the Federal Statistical Office for the year 2024, the situation is such that 2,378 non-agricultural corporate groups, whose parent companies do not pursue an agricultural company object, managed around 1.03 million hectares of agricultural land and therefore received an estimated €279 million in EU direct payments in the same year. For a significant proportion of these enterprises, it seems impossible that they could meet the criteria for being classified as ‘active farmers’ as set out in the CAP Strategic Plan Regulation.

To give a clearer picture of the situation in Germany, here are a few figures: Non-agricultural investors receiving CAP subsidies include the Lindhorst Group (whose core business is property and care homes for the elderly), with just under 3.4 million euros, the Steinhoff Family Holding, with 2.9 million euros. Also the Lürsen Group – a shipbuilder specialising in luxury yachts – benefits from EU agricultural subsidies totalling 1 million euros in 2024.

Furthermore, according to the German Government (Parliamentary Paper 19/23172), the Lukas Foundation, owned by the heirs of Aldi Nord (a chain of supermarkets), received a total of 3 million euros in 2019 through its seven agricultural companies. One of these, the subsidiary ALG Aschara Landwirtschaftsgesellschaft mbH, was ranked among the 30 largest recipients of direct payments in Germany in 2024, according to a study by Greenpeace and the data analysts Kaas & Mulvad from January 2026.

The situation is similar in most Member States of the European Union. As early as 2015, the European Economic and Social Committee drew attention to this trend in its opinion entitled „Land grabbing — a warning for Europe and a threat to family farming“. The European Commission also addressed the issue in 2017. Since then, the amount of agricultural land in the EU acquired and farmed by non-agricultural investors has increased significantly.

The 2026 Greenpeace study covering six EU Member States (the Czech Republic, Denmark, Germany, Italy, the Netherlands and Spain) shows: The top 1 per cent of CAP recipients receive, on average, 27 per cent of all subsidies; the top 10 per cent receive an average of 63 per cent; and the top 20 per cent receive around 78 per cent. This means that the bottom 80 per cent receive only 22 per cent.

Financial market researcher Damir Gojsic conducted the study “The Largest 50 Beneficiaries in each EU Member State of CAP and Cohesion Funds”, commissioned by the European Parliament’s Committee on Budgetary Control. He states, that during the 2018–2021 funding period in particular 17 billionaires – among them the British vacuum cleaner manufacturer Dyson – benefited from the payments.

(2) Secondly, we ask you to examine the fact that non-agricultural, non-European investment funds are being granted access to EU agricultural payments.

One example of this situation is the case of Deutsche Agrarholding (DAH) in Germany. In 2023, an Australian-Japanese consortium took over this group of Companies. The DAH farms around 20,000 hectares in Germany. The previous owner of DAH was the 'Zech Foundation', based in Liechtenstein. The buyer, the Australian company Igneo Infrastructure Partners, is a subsidiary of the Australian firm 'First Sentier Investors', which in turn is owned by the 'Mitsubishi UFJ Trust and Banking Corporation' (MUFG) in Japan. MUFG is one of the largest companies in the world. In Brazil, MUFG acquired Agrex in 2013, a company that produces, stores and processes fertilisers, seeds, cereals and plant protection products. It is currently in negotiations regarding investments or the acquisition of shares in Raizen, another Brazilian company. According to its own figures, Raizen currently manages 1.3 million hectares of agricultural land. It is also known to have (indirect) interests in the agricultural sector in Gabon and Japan. It is estimated that in 2024, Igneo Infrastructure Partners received about €5.4 million in EU direct payments via its subsidiary DAH.

A further example is the Romanian company Agricost, which, at 57,000 hectares, is the largest single farm in the EU, is part of the corporate network of the United Arab Emirates' sovereign wealth fund ADQ and received around 10.5 million euros in CAP direct payments in 2024 alone. According to research by DeSmog, between 2019 and 2024, a total of more than 71 million euros in EU agricultural subsidies flowed via agricultural enterprises in Romania, Spain and Italy into the corporate network of the family of President Muhammad bin Zayid bin Sultan Al Nahyan.

In France, there is documented evidence of extensive investments by Chinese companies and business networks in agricultural land, as well. In particular, Hong Yang and Beijing Reward International Trade acquired several farms in the Indre and Allier departments in 2016 and 2017, which together covered an area of approximately 2,600 hectares.

In our view, the EU-wide payment of potentially more than €1 billion in agricultural subsidies to non-farmers and non-European investment funds contravenes Article 39 TFEU, which stipulates that the agricultural population must, in particular, be guaranteed a fair standard of living. Furthermore, it contradicts the provisions of the CAP Strategic Plan Regulation, which stipulate that direct payments must be concentrated on 'active farmers'. Given that the European Commission stated in the road to the next EU long-term budget that "The EU must maximise the impact of every euro it spends, focusing on EU priorities and objectives where EU action is most needed", we believe that such payments, which are contrary to their intended purpose and to the Treaty, are unjustifiable.

We would therefore be grateful if you could examine the facts outlined above in conjunction with the Courts of Auditors of the respective Member States. Should your examination confirm the irregularities described, we consider it imperative to reclaim payments made inappropriately – insofar as this is legally possible – for the past and to effectively prevent such payments in future through appropriate measures.

We have sent a similar letter to the President of the German Federal Court of Auditors, Mr. Ansgar Heveling, requesting that he examine the matter in conjunction with the ECA.

Yours faithfully,

Claudia Gerster

Chair of Arbeitsgmeinschaft bäuerliche Landwirtschaft (AbL)

Morgan Ody

Coordinating committee of the European Coordination Via Campesina (ECVC)