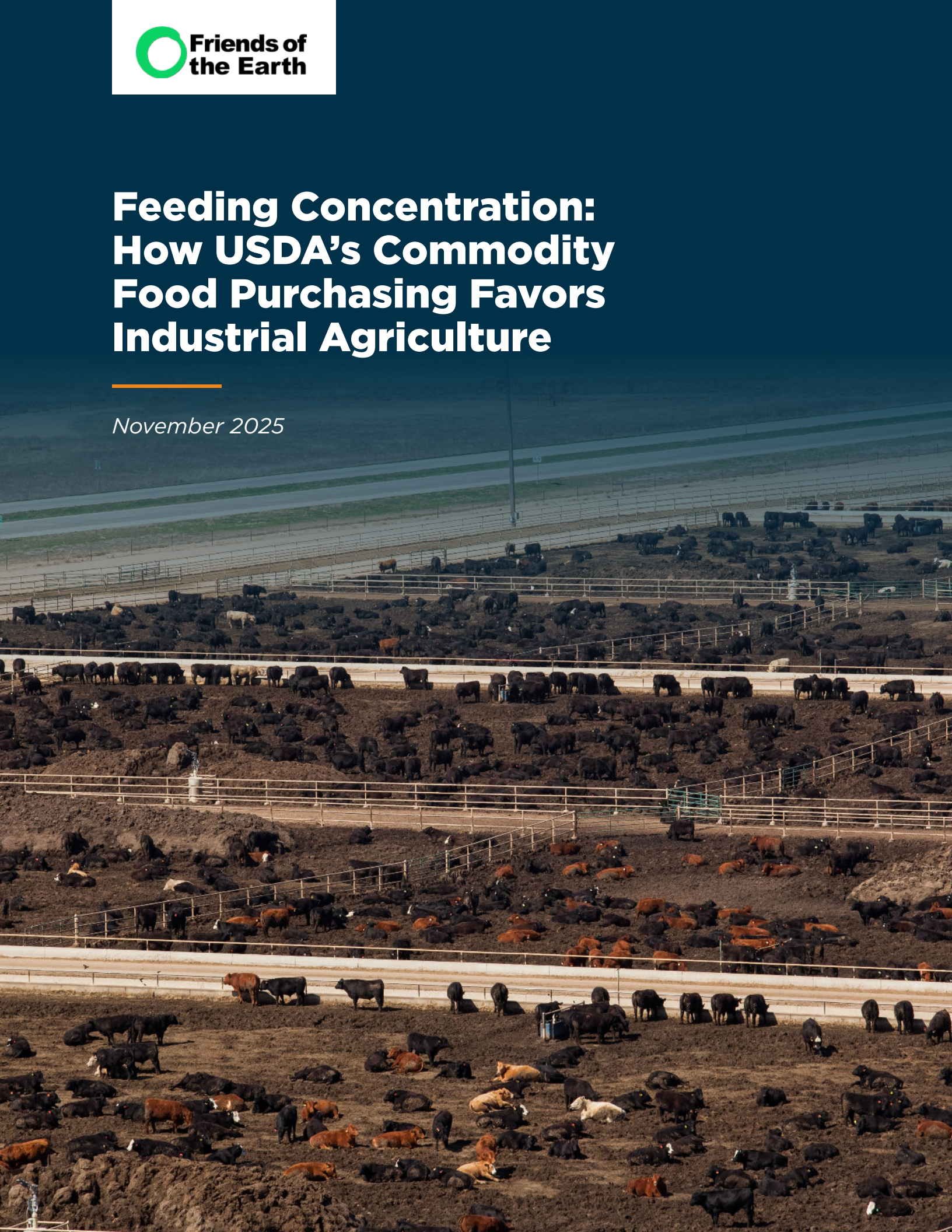
Friends of the Earth

Feeding Concentration: How USDA's Commodity Food Purchasing Favors Industrial Agriculture

November 2025



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Acknowledgements

This research brief was written by Chloë Waterman, with data analysis led by Nitya Jakka. The research methodology was developed by Chloë Waterman and Scott Richardson of Northbound Consulting Ventures, who graciously provided technical assistance to Nitya with the data analysis. Thank you to Kari Hamerschlag for reviewing, to Lisa Gonzalez for contributing to the research, to Keiko Okisada for designing the report, and to Danielle Sawaya and the Real Food Media team for developing the design template for the report, tables, and figures.

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Executive Summary

This brief analyzes USDA's $4.8B in food procurement for FY 2024, showing persistent market concentration that undermines the agency's goals to create greater competition in the food sector. Nearly half of the spending went to just 25 companies, with Tyson Foods receiving the largest share of USDA food contracts – five percent ($240 million) – despite a history of serious workplace safety and health violations, environmental concerns, and food safety issues.

To build a more fair, sustainable, and resilient food system, we recommend that USDA:

- Diversify its vendors and create market opportunities for small-, mid-sized, and independent producers in federal procurement.
- Prioritize purchasing foods that align with health and environmental goals, such as organic foods and pasture-raised animal products produced without the use of hormones and antibiotics.
- Disqualify vendors with histories of serious, egregious, or willful violations of workplace health and safety laws, including child labor laws, or violations of other federal laws.
- Improve transparency by providing detailed annual reporting on food purchasing.

Many of these recommendations would be realized by Congress passing the pending Preventing Child Labor Exploitation in Federal Contracting Act and the EFFECTIVE Food Procurement Act.

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Introduction

The U.S. Department of Agriculture (USDA) accounts for nearly half of direct[i] federal food purchasing, spending $4.8 billion in Fiscal Year 2024. USDA's Agricultural Marketing Service (AMS) purchases a variety of domestically produced food products for USDA's commodity feeding programs, which support child nutrition programs, food banks, Indian reservations, foreign aid, and low-income seniors.

This analysis is an update to parts of the November 2023 report *Measuring and Modeling Climate, Environmental, and Social Impacts of Federal Food Procurement*, which analyzed all federal food purchasing data from FY 2019 and FY 2022 (as opposed to this analysis covering only AMS' purchases in FY 2024).[1] The Methods section beginning on page 5 describes the methodology we utilized.

First, we report on the share of AMS spending by food type, comparing FY 2022 and FY 2024 findings. Then we analyze the level of concentration reflected in AMS spending overall and by food type, comparing FY 2017-2019, FY 2022, and FY 2024. We discuss implications of our findings related to concentration in the food system; industrial agriculture and small-scale, sustainable, and independent producers; and for transparency. We conclude with policy recommendations for USDA to use its purchasing power to support a more fair, resilient, and competitive food system.

i The U.S. Department of Agriculture also has jurisdiction over spending on food assistance programs like SNAP and WIC, as well as reimbursements for child nutrition programs, but this analysis is restricted to direct federal food purchases made by the Agricultural Marketing Service, which represents the agency's most direct point of leverage to shift food purchasing to align with policy goals.

Findings

A. Summary of Key Findings

- USDA AMS spent $4.77 billion on direct food purchasing in FY 2024, a three percent increase from FY 2022.
- Nearly half (46%) of USDA AMS' spending went toward animal products in FY 2024, a slight increase from FY 2022.
- By food weight, fruits and vegetables were the largest purchasing category (37% of purchases), followed by animal products (25.8%) and grains (25.7%) in FY 2024.
- USDA AMS' top twenty-five vendors collectively received 45% of all food spending in FY 2024. This represents a slight decline in the level of concentration reflected in USDA's food purchasing relative to FY 2022, where the top 25 vendors received half of total food spending and a substantial decline relative to FY 2017-2019 where only 15 vendors received 60% of spending.
- The top supplier to USDA AMS in FY 2024 was Tyson Foods, which accounted for 5% of total spending ($240 million) and 43% of all poultry spending, despite receiving consistent serious violations of federal workplace safety laws.
- In 10 of the 13 food categories we analyzed in FY 2024, just five vendors in each category received the majority of contract spending. For example, just five companies received 83% of pork spending, 76% of cheese spending, and 72% of poultry spending, respectively.

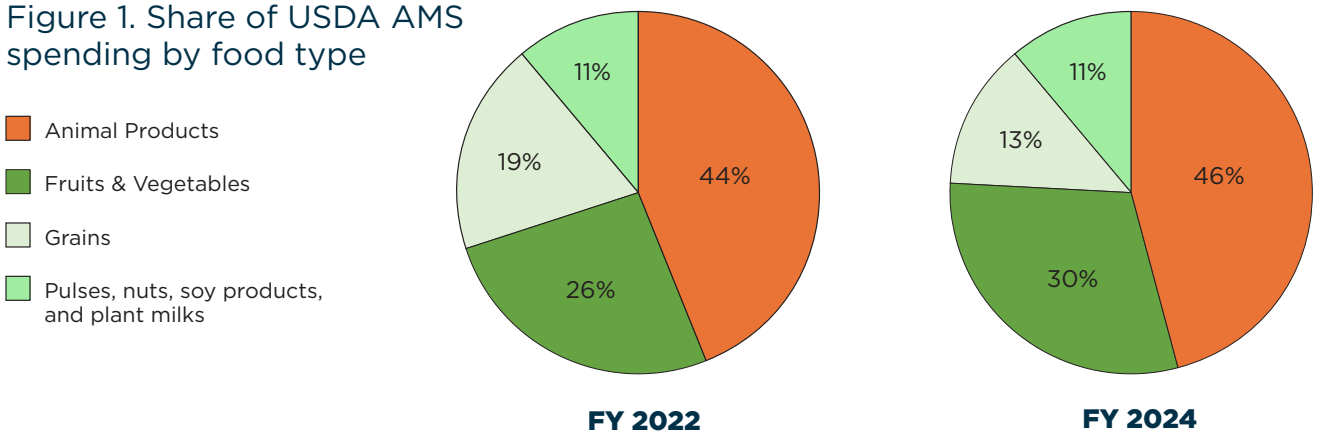
B. USDA AMS Food Purchasing Trends by Food Type, Spend, and Weight

USDA AMS spent $4.77 billion on direct food purchasing in FY 2024, a three percent increase for FY 2022. Nearly half (46.1%) of its spending went toward animal products. Relative to FY 2022, AMS purchased slightly more animal products, fruits and vegetables, and pulses, nuts, soy products, and plant milks in FY 2024. AMS purchased fewer grains.

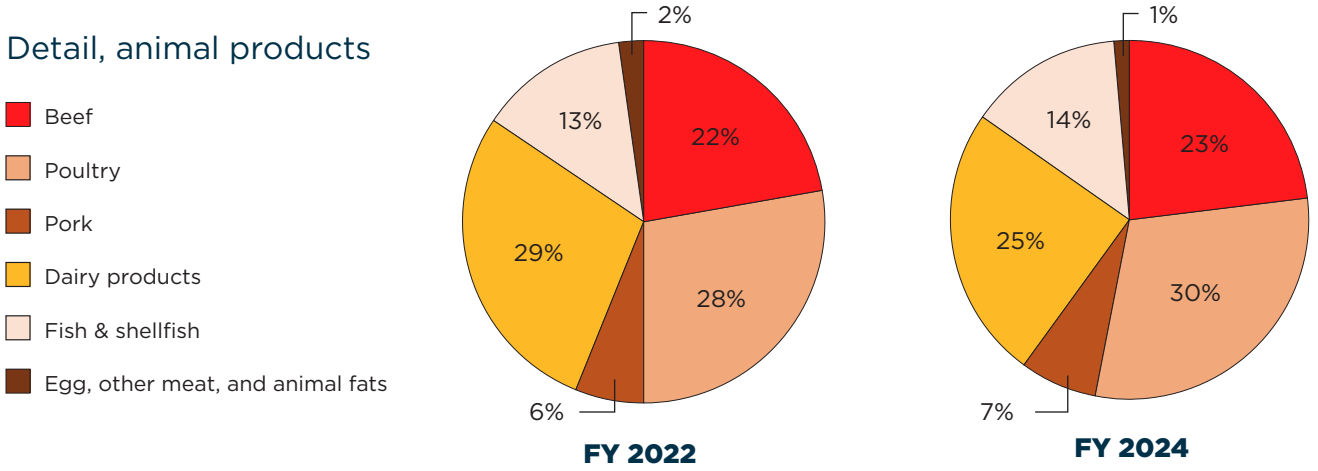
Table 1: USDA AMS spending levels by food type

	FY 2022		FY 2024	
	$USD (MM)	%	$USD (MM)	%
Animal products	2,011.3	43.5%	2,194.6	46.1%
Beef	447.4	9.7%	509.9	10.7%
Poultry	560	12.1%	659	13.8%
Pork	122.5	2.6%	152.8	3.2%
Dairy products	574.1	12.4%	538	11.3%
Fish & shellfish	266.8	5.8%	308.2	6.5%
Eggs, other meat, and animal fats	40.5	0.9%	26.7	0.6%
Fruits and vegetables	1,226.7	26.5%	1,415.6	29.7%
Grains	868.6	18.8%	613.3	12.9%
Pulses, nuts, soy products, and plant milks	498.3	10.8%	538	11.3%
Vegetable oils	18.5	0.4%	3.9	0.1%
TOTAL FOOD SPEND	**4,623.4**	**100.0%**	**4,765.4**	**100.0%**

Figure 1. Share of USDA AMS spending by food type



Detail, animal products

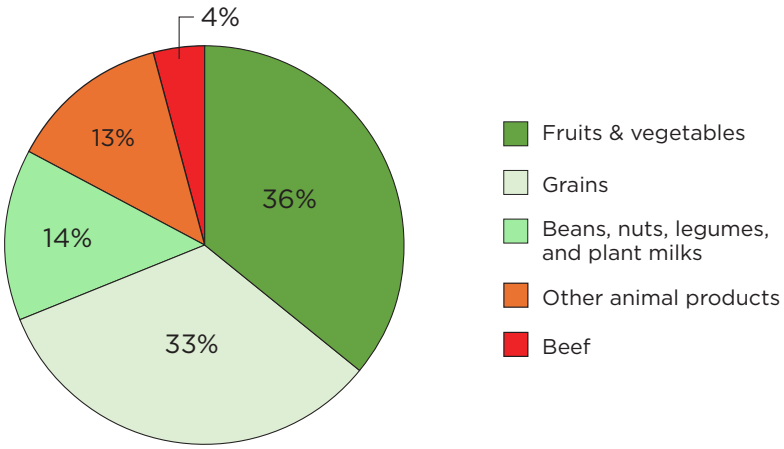


AMS includes both spending and volume data in the purchasing records it publishes annually. As shown in Table 2, fruits and vegetables were the largest purchasing category by weight (36.5% of purchases), followed by animal products (25.8%), and grains (25.7%).

Table 2. FY 2024 food product weights from USDA AMS purchases

	Pounds Purchased (mil)	Percent of Total
Fruits and vegetables	3,459	36.5%
Animal products	2,445.9	25.8%
Beef	315.8	3.3%
Pork	152	1.6%
Poultry	854.1	9.0%
Dairy products	862.8	9.1%
Fish and shellfish	224.9	2.4%
Eggs, other meat, and animal fat	36.3	0.4%
Grains	2,435.6	25.7%
Pulses, nuts, soy products, and plant milks	1,136.1	12.0%
Vegetable oils	1.5	0.0%
TOTAL	**9,478.1**	**100.00%**

Figure 2. Share of FY 2024 USDA AMS food purchasing by food type (measured in weight)



C. Market Concentration Reflected in USDA AMS Food Spending

We analyzed USDA AMS food spending by vendor to assess the level of market concentration reflected in the agency's food purchases. Our FY 2024 analysis follows two prior analyses:

- A Friends of the Earth analysis of FY 2017-2019 USDA purchasing records found that 15 companies – 13 of which were meat and dairy companies – received 60% of contract spending during those years.[2]

- An analysis conducted by the Federal Good Food Purchasing Coalition in *Measuring and Modeling Climate, Environmental, and Social Impacts of Federal Food Procurement* found that the top 25 vendors (8% of the number of total vendors) collectively received half of total spending in FY 2022.[3] Cargill, Inc. was the largest supplier to AMS, representing nearly $270 million in federal grain contracts (6% of total purchases), followed by Tyson Foods, which represented more than $248 million, primarily in poultry contracts (5% of total purchases). Within most food categories, the markets were even more concentrated. In 10 of 13 categories, just five companies received the majority of contract spending. For the poultry category, a single vendor – Tyson Foods – received 43% of the agency's spending in that year.

In FY 2024, the top 25 vendors collectively received $2.1 billion (44.8%) of all food spending. **Table 3** provides an overview of these corporations by AMS spending level. This represents a slight decline in the level of concentration reflected in USDA's food purchasing relative to FY 2022 and a substantial decline relative to FY 2017-2019.

Just as was the case in FY 2022, in 10 of 13 food categories we analyzed, just five vendors in each category received the majority of contract spending for FY 2024. Only in the categories of fruits, vegetables, and beans were AMS' vendors diversified to the extent that the top five companies controlled less than half of total spending. The share of purchases controlled by the top five companies increased in FY 2024 relative to FY 2022 for oil, mixed fresh produce, eggs, and pork; remained the same for dairy; and decreased for poultry, nuts, fish, beef, grains, vegetables, fruit, and beans.

Table 4 provides an overview of the concentration by food category in 13 food categories, and **Table 5** provides an overview of the top five vendors for poultry, grains, cheese, pork, and beef.

Multinational Food Corporations Benefit from Lucrative USDA Contracts Despite Serious Public Health and Safety Concerns

Tyson Foods received the most revenue ($240 million) from USDA contracts in FY 2024, which represents 5% of total spending, despite:

- **Workplace Safety and Health Concerns**: Notably, Tyson Foods received 22 "serious" violations of workplace safety and health standards from the Occupational Safety and Health Administration (OSHA) between 2021 and 2024, and the company is under investigation by the Department of Labor and the Senate Judiciary Committee for allegations of child labor.[4,5]
- **Environmental Concerns**: Tyson also discharged an estimated 372 million pounds of wastewater pollutants (including nitrates and phosphorus) into U.S. rivers and lakes from 2018–2022, according to an analysis by the Union of Concerned Scientists.[6]
- **Food Safety Concerns**: Tyson recalled over 8.9 million pounds of chicken that may have been contaminated with *Listeria monocytogenes* in 2021,[7] 93,679 thousand pounds of ground beef due to contamination with "hard mirror-like" foreign materials in 2022,[8] and 30,000 pounds of dinosaur-shaped chicken nuggets potentially containing pieces of metal in 2023.[9]

Archer-Daniels-Midland (ADM) received $133 million in USDA contracts for FY 2024 despite:

- **Workplace Safety and Health Concerns**: ADM has received 19 serious OSHA violations between 2021 and 2024,[10] including for multiple serious grain mill explosions in 2023 and 2024 that severely injured workers and emergency responders,[11,12] with OSHA citing inadequate safety systems.[13,14]
- **Environmental Concerns:** The company has also violated state air pollution laws, exceeding limits on volatile organic compounds and particulate matter, and failing to follow proper testing protocols, according to Iowa regulators.[15,16] In 2024, ADM was found in violation of the Safe Drinking Water Act after a carbon capture injection well corroded and leaked carbon dioxide into unauthorized areas.[17,18,19]
- **Securities Fraud Concerns:** The company is also under investigation for federal securities law violations.[20,21]

Jennie-O-Turkey, a subsidiary of Hormel Foods, received $94.9 million in AMS contracts in FY 2024 despite:

- **Workplace Safety and Health Concerns**: Between 2021 and 2024 the company received six serious OSHA violations involving preventable employee amputation and injuries due to inadequate training and safety protocols.[22,23,24,25]
- **Environmental Concerns**: In July 2021, the company violated the Comprehensive Environmental Response, Compensation, and Liability Act by failing to report an anhydrous ammonia spill.[26] This hazardous pollutant is known to cause both acute and chronic respiratory conditions, particularly among poultry workers.[27,28]
- **Food Safety Concerns**: In 2018 Jennie-O-Turkey issued two separate recalls of 311,486 pounds of ground turkey product from plants in Minnesota and Wisconsin.[29,30] In 2023, the company recalled 11,000 pounds of frozen meatballs for misbranding and failing to declare an allergen on the label.[31]
- **Antitrust Concerns**: In June 2025, the company agreed to a $3.5 million antitrust settlement with workers following a class-action lawsuit that alleged collusion among the major poultry processors to suppress worker wages and benefits.[32,33]
- **Animal Cruelty Concerns**: Finally, the company has faced accusations of severe animal cruelty, including a legal filing in 2025 requesting an investigation into the mass culling of 50,000 turkeys in Minnesota that allegedly violated a state animal cruelty law.[34,35]

Table 3. Top 25 suppliers to USDA AMS in FY 2024 by contract value

Vendor	Total Purchases	% of Total
Tyson Foods	$239,812,912	5.1%
ADM	$133,435,873	2.8%
Bongards Creameries	$114,863,264	2.4%
CHS Inc.	$111,631,881	2.4%
Stutz Packing	$104,269,243	2.2%
Jennie-O-Turkey	$94,902,087	2.0%
Pacific Coast	$94,349,588	2.0%
Ameriqual Group, LLC	$87,563,162	1.8%
Inn Foods Inc	$80,918,397	1.7%
Wescott Agri Products	$80,184,111	1.7%
JBS USA	$75,869,544	1.6%
Cherry Meat	$74,863,155	1.6%
Associated Milk	$74,749,175	1.6%
Caviness Beef	$74,340,895	1.6%
OBI Seafoods	$72,220,856	1.5%
Del Monte Foods	$69,366,572	1.5%
Didion, Inc	$68,905,210	1.5%
Crider, Inc	$68,459,034	1.4%
Olga H Barrios	$67,549,612	1.4%
Goodman Foods	$64,525,365	1.4%
Seneca Foods Corporation	$57,770,200	1.2%
McCall Farms	$56,959,177	1.2%
Central Valley	$55,980,530	1.2%
Supreme Rice	$52,141,907	1.1%
Lakeside Foods	$50,850,272	1.1%
TOTAL	**$2,126,482,022**	**44.8**%

Table 4: Concentration of AMS food contracts among top five vendors by food category

Food	% of Spend Recieved by Top 5 Vendors	% of Spend Recieved by Vendors	Total Category Vendors	FY 2024 Spend *($ USD, MM)*	% of Total Spend
Oil	100.0%	68.0%	5	$3.9	0.1%
Mixed Fresh Produce	92.7%	81.3%	37	$30.8	0.6%
Pork	82.7%	30.9%	14	$152.8	3.2%
Eggs	80.3%	49.3%	14	$26.7	0.6%
Poultry	71.5%	36.2%	26	$659.0	13.7%
Grains	63.2%	20.4%	41	$437.4	9.1%
Nuts	62.3%	31.8%	27	$218.3	4.5%
Fish	61.0%	23.4%	24	$308.2	6.4%
Dairy	60.4%	21.5%	55	$534.4	11.1%
Beef	56.6%	14.7%	32	$509.9	10.6%
Beans	44.7%	11.4%	32	$142.1	2.9%
Vegetables	35.5%	9.6%	112	$721.0	14.9%
Fruit	32.3%	9.9%	128	$924.5	19.2%

Table 5. Top suppliers to USDA AMS by select food category

Food	% of Spend Received by Top Vendor	Top Vendor	% of Spend Recieved by Top 5 Vendors	Top 5 Vendors by Contract Value
Beef	14.7 %		56.6%	**Cherry Meat** Caviness Beef Central Valley Ameriqual Group Florida Beef Inc.
Pork	31.0%		82.7%	**Goodman Food (aka Don Lee Farms)** JBS USA Mistica Foods John Hofmeister & Son Calumet
Poultry	36.2 %		71.5%	**Tyson Foods Inc.** Jennie-O Turkey Crider Inc. Pilgrim's Pride Ameriqual Group
Cheese	27.2 %		76.3%	**Bongards Creameries** Associated Milk Masters Gallery Leprino Foods Miceli Dairy
Milk	29.4 %		69.9%	**Transylvania** Gossner Foods Inc. Diversified Foods Prairie Farms GH Dairy
Grain	20.6 %		69.2%	**ADM** CHS Inc. Supreme Rice, LLC Farmers Rice Andersons Inc

Discussion

A. Concentration

Previous research has documented that U.S. food production is highly concentrated among a small number of large corporations, particularly in the meat, poultry, and grain sectors.[36] This concentration can contribute to higher food prices, limited choices, and deceptive marketing for consumers; unfair compensation for farmers and ranchers; and exploitation of farm workers.[37] Recent administrations – both Democratic and Republican – have emphasized the need to create fair markets for producers, particularly in the meat and poultry supply chains, and to reduce the negative impacts of major food corporations on public health, including in the Trump Administration's recent Make America Healthy Again Commission Report.[38,39]

In the context of food procurement, the US government's dependence on a small number of multinational corporations poses serious risks: For example, JBS, the world's largest meatpacker, was implicated in a bribery scheme involving its Brazilian parent company,[40] yet continues to receive substantial USDA contracts. Former USDA Secretary Tom Vilsack acknowledged that suspending the company's contract could disrupt food supply chains and raise prices,[41] highlighting the government's limited leverage over dominant suppliers due to lack of competition. This level of reliance on a single multinational corporation – one controlled by a foreign entity with a track record of corruption – raises not only economic and ethical concerns but also national security risks. A resilient, secure food system must be diversified enough to withstand disruptions, corporate misconduct, or geopolitical tensions that could compromise supply or public trust.

B. Entrenching Industrial Agriculture, Undercutting Independent and Sustainable Producers

While USDA does not report on production practices associated with the food it procures (e.g., whether meat was raised without antibiotics, or produce was certified organic), it is likely that the overwhelming majority of products purchased through USDA Foods are conventionally produced. This inference is supported by the dominance of vendors that operate within large-scale, vertically integrated supply chains common in industrial agriculture systems. Industrial agriculture is characterized by heavy reliance on synthetic fertilizers and pesticides,[42] widespread monoculture crop production,[43] and the use of large concentrated animal feeding operations (CAFOs).[44] These practices contribute to significant air and water pollution,[45,46] fuel climate change,[47] drive biodiversity loss,[48,49] and pose public health risks like antimicrobial-resistant infections,[50,51] toxic pesticide residues in food,[52] and veterinary drug residues like the growth-promoting beta-agonist ractopamine in meat.[53]

AMS does not require or express a preference for higher-quality or more sustainably produced foods in its bid solicitations or specifications, and its contracts are awarded on a least-cost basis. This makes it nearly impossible for producers employing higher-welfare, regenerative, or organic practices to compete with large-scale industrial food companies.

By privileging low-cost bids and failing to require any disclosure or preference for healthier or more sustainable practices, USDA's

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procurement system entrenches a conventional supply chain model that externalizes many of the environmental and public health impacts associated with their practices and crowds out smaller, independent producers. Many of these producers – and the distributors, food hubs, and cooperatives that source from them – cannot compete with the artificially low prices enabled by the subsidies and harmful cost-cutting practices (e.g., routine use of antibiotics and growth-promoting drugs) that characterize industrial agriculture. Compounding this challenge are stringent eligibility criteria, requirements for large-scale volume and distribution capacity, complex bidding procedures, and limited awareness of procurement opportunities that, according to the USDA's Equity Commission, have "effectively precluded disadvantaged businesses" from accessing USDA commodity procurement opportunities.[54] Without targeted interventions, USDA's procurement system will continue to replicate the very market concentration and environmental degradation it has pledged to address.

C. Transparency

Greater transparency in USDA food procurement is essential to ensuring public accountability, promoting fair competition, and enabling fair access to federal markets. Currently, USDA publishes limited information on its food purchases, providing only contract-level spending totals by food type without disclosing key details such as the production practices used; the distributors, processors, or producers that the vendor sources from; or the geographic origin of the food. This lack of transparency prevents recipient agencies – like school districts and food banks – from evaluating whether commodity foods align with their own consumer demand, or in some cases, their policy commitments (e.g., many large schools have pledged to only purchase poultry raised without routine antibiotics[55]). It also prevents policymakers, watchdog organizations, and the public from evaluating whether USDA spending aligns with its stated goals – such as supporting small and mid-sized producers, promoting public health, and ensuring worker safety.

USDA should provide detailed annual reporting that includes the names of each supplier, processor, and producer involved in commodity food purchases; the types of products procured and their geographic origin; and any public health, sustainability, or labor attributes associated with the products. Additionally, USDA should establish mechanisms for evaluating the equity, environmental, and market outcomes of its procurement system, such as regular audits or performance scorecards.

Conclusion and Policy Recommendations

Despite modest progress in reducing vendor concentration since FY 2017–2019, USDA's food procurement remains highly consolidated. AMS' procurement practices not only reflect but reinforce the broader market concentration and conventional production systems that must be reformed.

The agency's bid evaluation system prioritizes lowest-cost contracts without regard for environmental performance, compliance with critical federal laws, or production practices that improve public health (e.g., produced without toxic pesticides, hormones, or antibiotics). This disadvantages independent producers who employ more responsible practices and makes it nearly impossible for them to access USDA markets. At the same time, a lack of transparency in reporting obscures public scrutiny and prevents policymakers from assessing how taxpayer dollars are being spent or whether they are advancing USDA's goals around competition, fair markets, and environmental protection.

To better align USDA food procurement with those goals, we recommend the following actions:

1. Diversify the Vendor Base

USDA should increase contracting opportunities for small- and mid-sized farms, cooperatives, food hubs, and historically underserved producers. Congress can support this by creating new set-asides or preferences for these entities and providing technical assistance and grants to help them meet procurement requirements.

2. Align Purchasing with Public Health and Environmental Goals

AMS should incorporate nutrition, public health, and sustainability-related production practices into its bid specifications and shift away from a least-cost model to one that considers these factors. This includes targeting products that are certified organic, raised without routine antibiotics or added hormones, pasture-raised, or produced under third-party animal welfare certifications. These standards would improve the quality of USDA commodity foods, benefiting the children, seniors, and other people who rely on its feeding programs, while expanding markets for independent and sustainable producers.

3. Strengthen Vendor Accountability

Congress and USDA should establish clear eligibility criteria for vendors, including disqualification for companies with histories of serious, repeated, or egregious violations of workplace safety and health, labor, environmental, or other laws.

4. Increase Transparency in Federal Food Purchasing

USDA should annually publish disaggregated food procurement data, including the names of each supplier, processor, and producer; production regions; food types and volumes; and information on production practices. It should also conduct and publish regular assessments of procurement impacts on market concentration, public health, equity, and environmental outcomes.

Several of these policy recommendations are encapsulated in the pending **EFFECTIVE Food Procurement Act** and the **Preventing Child Labor Exploitation in Federal Contracting Act**.

By diversifying its food procurement, targeting purchases of healthier and more sustainably produced commodities from small and mid-sized independent producers, and increasing accountability and transparency, the U.S. Department of Agriculture can use its purchasing power to support a more fair, resilient, and competitive food system.

Endnotes

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