

**From:** matt vargas <thirdworldfarmer@gmail.com>  
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**To:** ATR-Agricultural Workshops <agriculturalworkshops@usdoj.gov>  
**Subject:** Comments

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I am writing because I am extraordinarily concerned about the lack of competition in agricultural markets. Corporate monopolies are wreaking havoc on agriculture and the environment globally and, with novel crop technologies like genetic engineering, have altered the very nature of food crops in ways that have not been scientifically demonstrated as safe. Indeed, a study published Dec. 2009 [de Vendmois JS, Roullier F, Cellier D, Sralini GE. A Comparison of the Effects of Three GM Corn Varieties on Mammalian Health. *Int J Biol Sci* 2009; 5:706-726. Available from

<http://www.biolsci.org/v05p0706.htm>] stated: "Our analysis clearly reveals for the 3 GMOs new side effects linked with GM maize consumption, which were sex- and often dose-dependent. Effects were mostly associated with the kidney and liver, the dietary detoxifying organs, although different between the 3 GMOs. Other effects were also noticed in the heart, adrenal glands, spleen and haematopoietic system. We conclude that these data highlight signs of hepatorenal toxicity, possibly due to the new pesticides specific to each GM corn. In addition, unintended direct or indirect metabolic consequences of the genetic modification cannot be excluded." The maize "events" engineered by Monsanto which were included in this study are already commercialized and being consumed by livestock and people globally.

The U.S. government, namely FDA, has never required adequate scientific investigation as part of the regulatory approval process of any (already commercialized) GMO food and the U.S. public is not given any clue that many of the foods they regularly consume contain genetically engineered ingredients (despite the public's overwhelming desire to know whether foods they consume are GMO). The revolving door between agribusiness and federal regulatory agencies is undoubtedly a major part of the problem. On the whole it seems appropriate to term the current situation whereby all-powerful corporate agribusinesses and negligent if not complicit government regulatory agencies (FDA, USDA and EPA) allow untested food crops to be consumed unknowingly by humanity as "food totalitarianism," a phrase that seems even more appropriate when it is considered that this handful of corporations essentially control the world's seed supply and the chemical inputs required to raise their engineered seeds to mature crops. Farmers and consumers the world over have been made subjects of food system totalitarianism. While farmers face an ever tighter cost-price squeeze and farmer suicides mount; and while consumers could well be experiencing acute and chronic effects of toxic foods, maize is reported as contaminated by GMO traits in its center of origin, where breeders would go to look for traits that might be needed to stave off new crop pests or diseases or which could be needed in a changing global climate. Rice, papaya, and rapeseed (canola) are other crops whose genetic contamination by woefully insufficiently tested GE varieties is well documented.

Genetically engineered crops are typically grown in large industrial monocultures that unsustainably exploit groundwater for irrigation; use enormous quantities of toxic chemicals which contaminate soils and groundwater and threaten farmworkers and rural communities while leaving toxic residues on foods; and contribute significantly to global warming.

The US DOJ should conduct full and proper investigation into all major agribusiness companies' activities and take full and proper action to restore farmers' rights to save, trade and purchase the seeds they need and desire. Companies such as Monsanto cannot be allowed to wield such power over farmers that farmers need worry about being held responsible for intellectual property theft if they save seed from their crop which might have been contaminated by proprietary GE traits through no fault of their own. DOJ's investigations could justifiably begin with the agri-biotech corporations but must not exclude any enterprise that exerts concerning influence over the food system, including businesses that operate in grain and food commodity trading which are implicated in exploding staple food prices that have turned into a global food crisis, with a record 1 billion hungry people in the world.

Please, DOJ, uphold justice!

Thank you for giving me the opportunity to comment.

Sincerely,

matt vargas

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