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**Sent:** Tuesday, December 29, 2009 5:44 PM  
**To:** ATR-Agricultural Workshops <agriculturalworkshops@usdoj.gov>  
**Subject:** re: concentration of ownership in agriculture

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To whom it may concern,

I am writing today to provide comments for upcoming Department of Justice and USDA hearings regarding the increasing concentration of ownership in American agriculture.

It is my hope that these hearings will address the broad and potentially dangerous implications of anti-competitive practices. Vigorous enforcement, regulation, and legislation are sorely needed to restore healthy competition to that segment of the economy which is responsible for providing Americans with life's most basic necessity – food.

Our nation's food supply, from seed to table, is essentially the domain of a handful of large, interlocking corporations. As a result, prices can be manipulated, research and innovation are restricted, fair contracts are difficult to negotiate, and farmers' and consumers' choices are limited. The problem is worsening. The effects of concentration are widespread, from seed research to meat processing.

- Costs of seed and other production components are rising while the prices farmers receive are falling.
- Farmers are losing their right to save seed, and independent seed companies are disappearing. More than 200 have disappeared since 1996.
- Farmers cannot bargain collectively, which impairs their ability to negotiate fair contracts.
- Patents and licensing agreements severely restrict plant breeders' and researchers' access to genetic material and prevent researchers from testing existing varieties.
- Agricultural research at public universities is becoming increasingly dependent on funding from private companies. As a result, publicly-owned seeds and breeds are dwindling, and innovation is declining and corporate profit motives are controlling research.
- Manufacturers of genetically-modified crops are not held liable for contamination of farmers' crops.
- Contracts often leave farmers with little financial or legal control over their situations and take away their right to privacy.
- The divide in enforcement authority between the USDA and the Justice Department renders ineffective the enforcement of unfair, illegal, and unsafe practices
- Lack of regional competition and tacit collusion of companies restrict farmers' options.

Farmers and consumers deserve an open and fair marketplace. As environmental and energy concerns deepen, family farmers, independent regional companies, and unfettered research are becoming increasingly vital to the future of agriculture. These hearings can be an important step towards restoring fairness and competition. I hope you will accept these comments and use them to help establish the scope of your upcoming hearings.

Sincerely,  
Wilson Ihling  
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