

**From:** Jeff Heehs <jhbklyn@yahoo.com>  
**Sent:** Tuesday, December 29, 2009 8:06 PM  
**To:** ATR-Agricultural Workshops <agriculturalworkshops@usdoj.gov>  
**Subject:** Comments Regarding Agriculture and Antitrust Enforcement Issues in Our 21st Century Economy

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December 29, 2009

To the Justice Department,

I'm writing as a concerned citizen who is active in food justice and food security issues in my neighborhood of Brooklyn, NY. Among the many challenges we face in our time, those concerning the safety, availability and quality of our food supply I believe are of primary concern. Food is fundamental to everyone's life. I am writing to say that the concentration of food enterprise in the U.S. is frightening, unhealthy and anti-competitive. A small handful of corporations control dominant shares in the production, processing and distribution of grains, meats, fruits and vegetables, fibers, and the seed used to plant most food crops. The trend is toward near-monopoly control of markets and prices. The laws of this nation forbid monopoly, vertical control of production and markets, and price fixing. In the case of food and agricultural production, the dominance of a few corporations is clearly anti-competitive. This results in food available to most consumers that is unwholesome, devoid of character and vitality, and often dangerous to eat.

Contributing to this frightening trend is the revolving door of executives between agribusiness companies and federal government agencies charged with keeping our food safe and our food industry fair and open. These executives leave their corporate boardrooms, marketing departments or legal offices to lead or staff the very agencies intended to regulate and prevent corporate abuses. Then, after altering laws and regulations in ways that favor the companies to the public's detriment, they return to lucrative jobs back at those same corporations. It should be a priority of this administration to end this revolving door policy that eliminates controls on food system integrity and threatens public health.

The profit structure and incentives of large corporations are distinctly misaligned with positive nutritional and health objectives. As food and agricultural corporations have grown and consolidated, their lobbies have become ever more powerful, ultimately influencing every aspect of US agricultural policy – with consequences that are entirely detrimental to public health. It makes my blood boil that my tax dollars subsidize the production of corn syrup, for example, which is significantly contributing to the obesity crisis – which then requires even more of my tax dollars to treat.

A strong, broadly diverse and decentralized food production backbone is also imperative for national security. An outgoing Secretary of Agriculture recently wondered aloud to the press why international terrorists haven't considered targeting our incredibly consolidated food production infrastructure. The best protection for our food supply is to foster more widely-distributed and varied sources of food production and processing close to every important population center. That kind of food security will never result from the agribusiness model that dominates food markets in this country today.

The global consolidation of food production is driven by the dictates of economic power and profit without consideration of its effect on consumers and workers. One serious effect of global, commodity trade in food is the huge contribution of the food industries, especially livestock, on global warming. Public policies that allow or encourage vast, concentrated types of food production cannot be allowed to continue when more natural, decentralized, localized ways of cultivation can do much to mitigate greenhouse emissions and give localities more community control over what they eat and how it is grown and marketed.

Good, wholesome food should be equally available to every citizen at a fair price. We're seeing the emergence of a two-tiered food system. Lower-income consumers, often people of color in large cities, have access only to the worst kinds of fast and junk food, while the growing interest in organic and whole food products is only accessible to the better off. This unequal distribution of good food is a direct result of our high-volume, over-concentrated industrial food production base. The result is a public health emergency involving an increasingly overweight population, with lower life expectancy now than a generation ago, and medical facilities crowded with the consequences of obesity and diabetes. A more diverse, open and fair food marketplace, with thriving regional food commerce in all parts of the country, must be encouraged to vie for local business and deliver fresh, diverse food options to local consumers. This is not the marketplace that huge agribusiness operations want to see happen. The purely market-force driven food economy we now have is disastrous for public health, food safety and security, and basic human fairness. Healthy food must be a right for everyone.

Sincerely,

Jeffrey Heehs

Brooklyn, NY