

From: Lisa Griffith [<mailto:lisa@nffc.net>]
Sent: Monday, August 13, 2018 4:17 PM
To: O'Neill, Kathleen S <Kathleen.Oneill@ATR.USDOJ.gov>
Subject: Comments Seeking Reversal of Monsanto-Bayer merger

August 13, 2018

Dear Ms. O'Neill:

The National Family Farm Coalition is extremely disappointed that the U.S. Department of Justice has approved the Monsanto-Bayer merger and kindly requests that you reconsider your decision. Representing approximately 70,00 family farmers and ranchers throughout the US, our members have raised fears since the merger was first announced in 2016, and several were among the majority (90-plus percent) of farmers who opposed the merger in a recent survey by Friends of the Earth US.

Monsanto has gathered too much control over the US seed supply in the past 20 years, and we expect this merger with Bayer to accelerate that trend. Family farmers are extremely concerned about Monsanto-Bayer's increasingly concentrated control of the non-GM seed supply, the likelihood of higher seed prices and the loss of favored heirloom or hybrid seed varieties. A Monsanto-Bayer dominance in the seeds and pesticides markets - particularly as more multi-herbicide-tolerant seeds are released - means that more and more farmers will be compelled to plant these crops and spray more and more toxic herbicides throughout farm country. This will exacerbate the deterioration of wildlife habitat, soil and water health, and the quality of rural life. All of these factors fly in the face of reason during a time when rural communities are striving to revitalize their economies through local, sustainably grown foods.

In addition, we are increasingly worried about the impacts this merger will have on digital agriculture. If the merger is completed, Monsanto-Bayer would become the largest player in the field of data platforms and data collection, exposing farmers to risks and problems similar to those seen in existing data platforms such as Facebook and Amazon. The rapid development in agriculture data platforms creates a new dynamic in which corporations can increase their economic power, and stifle innovation for years to come. There are no other competitors with a comparable investment and expertise in this field, and Monsanto-Bayer will be able to combine its data businesses with its seeds, traits and chemicals to create a new and unprecedented platform. This would enable them to leverage the sale of one product into another, integrating all of their businesses and thereby raising barriers to innovation or disruption from competitors. Monsanto's software already limits farmer

selection to hybrid seeds, and future data algorithms will likely recommend solutions based on their own products.

We are asking the Antitrust Division of U.S. Department of Justice to heed the voices of people raising our nation's food. Our board president - an organic dairy and beef farmer - recently noted that, if the Monsanto-Bayer merger moves forward, three seed companies will control the majority of seed germplasm and seed markets in the U.S., and a significant portion of those markets throughout the industrialized world.

Thank you for your consideration of our request on behalf of family farmers and ranchers throughout the United States, and ultimately throughout the world.

Sincerely,

Lisa Griffith
National Program Coordinator

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