

**Block Farms**  
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Gilson, IL 61436  
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December 17, 2009

**BY ELECTRONIC MAIL**

**([agriculturalworkshops@usdoj.gov](mailto:agriculturalworkshops@usdoj.gov))**

**AND BY HAND DELIVERY**

Legal Policy Section  
Antitrust Division  
U.S. Department of Justice  
450 5<sup>th</sup> Street, N.W.  
Suite 11700  
Washington, D.C. 20001

To Whom It May Concern:

Block Farms is my family farm near Galesburg, Illinois. My family has farmed here since the 1840s. We raise hogs and grow corn and soybeans.

I recently learned that the U.S. Departments of Agriculture and Justice were teaming up to do an antitrust review of agricultural markets. Consolidation is not a new issue for agriculture or any other market for that matter. While it is true that there are only two or three companies selling farmers combines and fewer spot markets where we can sell hogs, there are also fewer places selling pickup trucks, groceries and clothes for farmers and others across rural America. This has happened gradually over decades.

One of the areas of focus for the DOJ is biotech seed. In seed, things have moved a lot faster and in a positive direction. I am submitting this comment as a way of sharing the experience I have as a farmer who buys seed.

Just 15 years ago, farmers faced an epic struggle in fighting weeds. In soybeans we used a variety of herbicides and still paid people to pull them by hand. In corn, we continuously fought grass. We also used insecticides, but still lost corn yield to insect pests. There were no biotech seed providers in those days.

Today, there is no shortage of biotech seed to choose from. The weed and insect control traits in today's seed make it easy even for a bad farmer to control weeds and protect a crop against insects. The most complicated thing about seed may be deciding which type is the best match for our farm. There are almost too many choices and more seed companies than I can name trying to earn my business.

For the past 25 years we have put out test plots on our farm so we can take a look at the new hybrids and see how they perform. I have attached the results from our 2009 test plots. They show the performance of a wide variety of hybrids we tried, but it's still only a small fraction of the seed available. They are all

“triple stack” hybrids with herbicide tolerance and resistance to stalk-borers and rootworms. These stacks are combinations of traits from Bayer, Dow, Monsanto and Syngenta. We expect to plant about 70% of our corn acres to triple stack hybrids next year.

As you can see there is significant difference in yields. We will look at these data and how a hybrid performs on our farm and in other trials as we make our decision. Also, we take into consideration how different varieties performed for us last year. Every year is different. Like all farmers we want the most yield for the least cost. Many people remark that corn seed costs dramatically more than it did 15 years ago. That’s true. We pay a range of prices that average about \$225 for a bag of “triple stack” corn seed. It sounds expensive, but we will *choose* to pay in this price range for seed to plant on about 70% of our acres. In contrast, on the required insect resistance refuge acres we will pay about \$175 a bag for corn that does not have insect resistance traits. In years when there is a lot of insect pressure, these hybrids will produce a lot less corn.

We will buy seed from seven different companies next year. Prices are negotiable and we will always look for a better deal. But in the end the way you make money buying seed is picking the one that yields the most and requires less chemicals and labor and fewer passes across the field. We want the hybrids that stand until we can get them out of the field in a late harvest and dry down so we don’t have to use as much natural gas to dry them.

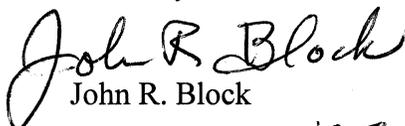
We will try the new SmartStax hybrids with eight traits in 2010. They can cost up to \$300 a bag, but don’t require nearly as much refuge to be planted. While that’s a big price jump, we’ll gladly pay it if the increased yields and reduced costs in other areas add up to more than the increased price. If not, we will choose something different or hold out for a better price. That’s supply and demand.

Finally, I would like to say that there is a tendency to be anti-big. But there is a tradeoff. We realize some companies have to be big to deliver the innovations we need. In the case of biotech seed, companies are big because they must make big investments and take big risks to bring new products to market. I look forward to the day these biotech companies bring drought tolerant crops that use less fertilizer to market. U.S. farmers need the new innovations to keep us competitive and the world needs them to make sure we can increase crop production to meet growing world demands and feed hungry people.

DOJ and lawmakers should take care to enforce the law rather than cater to an anti-big impulse that is popular with many but simply penalizes successful companies that invest in the new technologies we need for our farm and for the world. In this case, it means companies that invest in benefits for farmers and rural America and that’s something we need to encourage.

Thank you for the opportunity to share my experiences and views on this matter.

Sincerely,

  
John R. Block

JRB:cr  
Attachments

US Sec of Agriculture 1985-1986  
Corn farmer

# BLOCK FARMS

## 2009

### Corn on Bean Plot

PLANTING DATE: 5/12/09  
 HARVEST DATE: 11/05/09  
 PLANTED POPULATION: 32,000  
 FERTILIZER: 210 N; P-K VRT  
 SOIL TYPE: Silty Clay Loam

LOCATION: Gilson, IL  
 HERBICIDE:  
 INSECTICIDE: None  
 8 ROWS; 30" WIDTH  
 TILLAGE: Conventional

<u>BRAND</u>	<u>PRODUCT</u>	<u>TRAIT</u>	<u>CK</u>	<u>H2O</u>	<u>TEST WT.</u>	<u>Yield</u>	<u>Adj. Yield</u>
AGRIGOLD	A6489VT3	VT3	Ck	22.8	54.9	218.7	
STONE SEED	6T438VT3	VT3		20.9	55.0	236.9	240.3
Golden Harvest	H-8061-3000GT	CBLLRWGT		19.7	54.9	211.5	214.0
STINE	9527VT3	VT3		23.7	52.1	243.7	245.2
PIONEER	35F44	HXTLLRR2		20.9	56.0	196.0	196.5
AGRIGOLD	A6399VT3	VT3		22.9	52.9	221.3	220.9
AGRIGOLD	A6489VT3	VT3	Ck	23.1	55.0	224.5	
STONE SEED	6T688VT3	VT3		19.6	56.5	226.2	224.0
DYNA GRO	V4993VT3	VT3		20.7	53.7	230.1	227.1
AGRIGOLD	A6458VT3	VT3		23.4	51.3	257.5	253.7
PIONEER	35K04	HXTLLRR2		20.7	59.8	222.6	217.9
DEKALB	DKC57-66	VT3		21.1	56.6	193.5	188.0
AGRIGOLD	A6489VT3	VT3	Ck	22.9	54.6	229.4	
STONE SEED	7T202VT3	VT3		22.0	55.4	196.2	191.7
MUNSON	23165VT3	VT3		23.8	52.9	212.9	210.2
DEKALB	DKC60-51	VT3		20.8	53.8	201.5	200.6
PIONEER	34R67	HXLLRR2		22.0	55.4	243.8	244.8
MUNSON	7081VT3	VT3PRO		21.4	53.5	216.8	219.6
AGRIGOLD	A6489VT3	VT3	Ck	22.7	54.9	218.5	
STONE SEED	7T728VT3	VT3		20.1	54.6	183.0	187.1
DEKALB	DKC61-69	VT3		21.5	52.8	199.9	203.4
STINE	9624VT3	VT3		21.6	55.3	200.1	203.1
AGRIGOLD	A6479VT3	VT3		21.2	54.3	193.3	195.8
DEKALB	DKC61-33	VT3		23.8	50.8	242.9	244.8
AGRIGOLD	A6489VT3	VT3	Ck	21.9	53.7	221.7	
STONE SEED	7T231VT3	VT3		22.5	52.8	222.4	222.7
DYNA GRO	57V40	VT3		22.8	51.8	194.1	193.2
MUNSON	7129VT3	VT3		23.1	54.9	245.1	243.1
PIONEER	33P83	HXTLLRR2		22.6	55.1	248.2	245.1
DEKALB	DKC61-19	VT3		22.1	54.1	243.9	239.6
AGRIGOLD	A6489VT3	VT3	Ck	22.4	53.0	228.5	
STONE SEED	7T765VT3	VT3		23.0	52.8	226.3	226.2
DEKALB	DKC62-54	VT3		22.1	53.6	203.2	208.4
Golden Harvest	H-9127-3000GT	CBLLRWGT		26.8	49.4	222.4	233.0
AGRIGOLD	A6489VT3	VT3		22.3	53.0	227.1	243.0
DEKALB	DKC63-14	VT3		23.2	52.9	222.2	243.4
AGRIGOLD	A6489VT3	VT3	Ck	22.6	54.7	196.6	
AGRIGOLD	A6533VT3	VT3		23.1	51.3	229.8	251.6
MUNSON	26125VT3	VT3		23.1	51.6	167.1	184.1
Golden Harvest	H-9145 3000GT	CBLLRWGT		27.7	51.0	220.1	232.4
DEKALB	DKC63-42	VT3		23.4	52.7	239.4	246.9
DYNA GRO	57V43	VT3		23.0	52.3	192.2	194.9
AGRIGOLD	A6489VT3	VT3	Ck	22.9	53.5	225.1	
MUNSON	27905VT3	VT3		22.9	54.5	208.8	202.9
Golden Harvest	H-9392-3000GT	CBLLRWGT		26.0	51.6	210.1	200.3
STONE SEED	8T468VT3	VT3		23.1	51.5	224.5	210.9
DEKALB	DKC65-63	VT3		24.0	53.9	243.7	226.2
AGRIGOLD	A6489VT3	VT3	Ck	22.7	51.1	244.5	
Ck Avg: (AGRIGOLD A6489VT3)				22.7	53.9	223.1	223.1
PLOT AVERAGE				22.5	53.5	218.5	219.9

This plot experienced Green Snap due to severe winds on June 18, 2009.

## BLOCK FARMS

2009

## Corn on Corn Plot

PLANTING DATE: 5/12/09  
 HARVEST DATE: 10/20/09  
 PLANTED POPULATION: 32,000  
 FERTILIZER: 210 N; P-K VRT  
 SOIL TYPE: Silty Clay Loam

LOCATION: Gilson, IL  
 HERBICIDE:  
 INSECTICIDE: None  
 8 ROWS; 30" WIDTH  
 TILLAGE: Conventional

<u>BRAND</u>	<u>PRODUCT</u>	<u>TRAIT</u>	<u>CK</u>	<u>H2O</u>	<u>TEST WT.</u>	<u>Yield</u>	<u>Rank</u>	<u>Adj. Yield</u>
AGRIGOLD	A6489VT3	VT3	Ck	29.7	54.4	215.9		
STONE SEED	6T438VT3	VT3		26.4	53.6	218.7	10 <sup>th</sup>	209.2
AGRIGOLD	A6325VT3	VT3		25.8	55.0	223.3	3 <sup>RD</sup>	216.5
Golden Harvest	H-8061-3000GT	CBLLRWGT		23.1	54.4	188.7		184.5
PIONEER	35K33	HXTLLRR2		26.0	52.1	201.9		200.4
DEKALB	DKC57-66	VT3		28.4	54.7	202.0		203.1
AGRIGOLD	A6489VT3	VT3	Ck	31.1	54.0	200.0		
AGRIGOLD	A6399VT3	VT3		33.8	53.0	207.0		210.2
WYFFELS	W5281	VT3		27.1	52.8	210.7		213.3
STONESEED	6T688VT3	VT3		24.8	53.8	219.7	7 <sup>th</sup>	221.7
DYNA GRO	V4993VT3	VT3		27.4	51.8	210.7		212.1
DEKALB	DKC60-51	VT3		27.1	52.4	202.1		202.9
AGRIGOLD	A6489VT3	VT3	Ck	30.0	54.8	203.6		
STONE SEED	7T202VT3	VT3		31.3	52.2	199.0		199.4
AGRIGOLD	A6458VT3	VT3		32.0	51.2	226.7	1 <sup>ST</sup>	227.3
WYFFELS	W6261	VT3		28.2	52.5	198.1		198.9
PIONEER	33W84	HXTLLRR2		31.5	56.3	204.4		205.5
DEKALB	DKC61-33	VT3		30.6	64.0	199.3		200.6
AGRIGOLD	A6489VT3	VT3	Ck	31.5	54.0	202.3		
STONE SEED	7T728VT3	VT3		29.5	54.0	187.5		189.7
DYNA GRO	57V40	VT3		30.3	54.3	225.8	2 <sup>ND</sup>	228.6
WYFFELS	W6871	VT3		29.9	54.5	221.4	5 <sup>TH</sup>	224.9
MUNSON	7129VT3	VT3		30.0	54.0	201.4		205.6
DEKALB	DKC61-19	VT3		31.4	52.4	205.1		209.9
AGRIGOLD	A6489VT3	VT3	Ck	30.8	54.0	198.3		
STONE SEED	7T231VT3	VT3		33.5	51.8	196.4		199.3
WYFFELS	W7251	VT3		30.7	53.4	204.2		204.4
AGRIGOLD	A6489VT3	VT3		31.5	55.5	202.3		199.9
MUNSON	26125VT3	VT3		31.3	51.6	206.3		201.3
DEKALB	DKC61-69	VT3		30.4	55.0	219.4	8 <sup>TH</sup>	211.7
AGRIGOLD	A6489VT3	VT3	Ck	28.1	56.7	214.1		
STONE SEED	7T765VT3	VT3		30.9	56.0	202.3		193.7
DYNA GRO	57V43	VT3		30.0	52.6	202.8		195.9
MUNSON	7298 3000GT	CBLLRWGT		32.4	52.7	200.4		195.2
PIONEER	33F88	HXTLLRR2		30.4	54.2	205.9		202.5
DEKALB	DKC62-54	VT3		28.6	53.8	197.5		195.8
AGRIGOLD	A6489VT3	VT3	Ck	30.4	54.8	203.8		
Golden Harvest	H-9145 3000GT	CBLLRWGT		33.7	54.0	208.2		210.3
STINE	9725VT3	VT3		33.3	52.4	208.2		212.5
MUNSON	27905VT3	VT3		30.8	54.4	208.6		215.0
AGRIGOLD	A6533VT3	VT3		32.1	51.9	206.4		214.9
DEKALB	DKC63-42	VT3		32.9	55.6	220.3	6 <sup>TH</sup>	231.0
AGRIGOLD	A6489VT3	VT3	Ck	31.1	54.0	191.0		
Golden Harvest	H-9127-3000GT	CBLLRWGT		33.5	51.5	218.8	9 <sup>TH</sup>	230.4
AGRIGOLD	A6632VT3	VT3		32.6	54.3	211.2		221.6
MUNSON	7405VT3	VT3		32.5	53.6	203.9		213.2
PIONEER	32T85	HXTLLRR2		33.2	54.6	215.2		223.3
DEKALB	DKC63-14	VT3		32.9	53.0	214.5		221.4
AGRIGOLD	A6489VT3	VT3	Ck	31.3	54.9	198.1		
WYFFELS	W8681	VT3		33.6	53.4	191.9		196.8
STINE	9806VT3	VT3		32.9	52.7	212.8		216.9
MUNSON	29205VT3	VT3		31.4	53.5	218.4		221.7
Golden Harvest	H-9392CB/LL	CBLL		33.0	52.7	202.8		205.2
STONE SEED	8T212VT3	VT3		32.7	54.5	213.4		215.0
AGRIGOLD	A6489VT3	VT3	Ck	29.6	55.4	203.0		
WYFFELS	W9121	VT3		31.7	55.3	205.1		204.2
AGRIGOLD	A6639VT3	VT3		32.0	52.6	202.9		200.3
PIONEER	32N73	HXTLLRR2		36.3	52.5	176.2		172.0
DEKALB	DKC65-63	VT3		32.2	54.6	221.8	4 <sup>TH</sup>	221.8
AGRIGOLD	A6489VT3	VT3	Ck	29.9	54.8	211.4		
Ck Avg: (AGRIGOLD A6489VT3)				30.3	54.7	203.8		203.8
PLOT AVERAGE				30.8	53.5	207.2		208.3