

From: mamarubin@msn.com
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To: ATR-Agricultural Workshops <agriculturalworkshops@usdoj.gov>
Subject: Comment

Deborah Rubin
19160 Dove Creek Drive
Tampa, FL 33647-3073

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US Department of Justice

Dear US Department of Justice:

Thank you for the opportunity to submit comments in advance of the Department of Justice's workshops on "Agriculture and Antitrust Enforcement Issues in Our 21st Century Economy."

As an organic consumer, I am particularly concerned about Monsanto's control over the seed supply.

By buying seed companies and aggressively patenting life, Monsanto has gained control over as much as 90 percent of seed genetics. This is anti-competitive behavior that skews markets and subjects farmers and consumers to the unchecked power of a company that can raise prices at will.

Another concern is that, while Monsanto has acquired a diverse store of seed genetics, they are only making available a few seeds that are genetically modified to be dependent on their chemicals.

The vast bounty of food crops that farmers have cultivated and improved upon over the last 10,000 or so years should not be allowed to be bought up and put out of commission by a company bent on whittling down food varieties to a few pesticide-dependent genetically modified crops.

The most devious part of Monsanto's business model is that their Frankenseeds can cross-pollinate with organic and traditional varieties, destroying their unique characteristics and infecting them with genetically engineered chemical dependence or even "Terminator" or "Traitor" technology that renders seeds sterile, a literal death sentence for seeds maintained through conventional breeding.

My main concern is that the Federal Government is requiring only insufficient, unpublished studies to be used or manipulated to legally approve these GMO's as safe for human and animal consumption. Recent studies have proven horizontal gene transfer, something Monsanto had baselessly assured the US government would never happen. And the US regulators required no testing to protect the people and environment. Why, how? Recent studies are showing GM corn and soy, as well as glyphosate, to be harmful to human health. Why weren't the proper safety

studies done before approval and 10-15 years of consumption. This is a ridiculous public policy, devoid of any true, comprehensive scientific methodology. And it is dangerous. I want to see real published, independently funded, peer-reviewed safety data. Given the fact that these crops cross-pollinate with other crops, you are leaving the public little choice as far as consumption goes. And most of the American public remains blissfully unaware that they are eating GMO's--largely due to industry's efforts with government's collusion to prohibit labelling of GMO foods as such. I want the government looking out for The People, not the Industry. There should be a moratorium on all new GM crops, animals, and other life-forms until we have adequate safety assurances and public participation in the process. The current safety standards have failed.

The same way we protect animal species from extinction, we should protect plant species, especially the tens of thousands of food varieties, from companies like Monsanto that are consciously eliminating them.

I urge you to please include in your investigation a consideration of the importance keeping seeds, the foundation of human life, at least in the marketplace, if not in the public domain where they truly belong.

Sincerely,

Deborah Rubin