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To: ATR-Agricultural Workshops <agriculturalworkshops@usdoj.gov>
Subject: Comment

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December 18, 2009

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, and the indiscriminate use of Roundup as a "safe" pesticide, along with "Roundup ready" GMO seed stock developed and controlled by Monsanto. Proponents continue to quote only Monsanto's research that states glyphosate is safe to use. (Monsanto made \$1.976 billion on glyphosate products in 2008.) By buying up 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 poison our food supply, control the means of production, dictate farming practices and raise prices at will.

But, my main 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.

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.

Glyphosate products are also being sprayed in public areas by local governments onto the watersheds, county roads and state highways, on bike paths, in parks, on our food crops, etc.

On September 21, 2009, Beyond Pesticides sent comments regarding Glyphosate Registration Review to EPA to seriously consider the new and emerging science which illustrates that glyphosate and its formulated products pose unreasonable risk to human and environmental health, and as such should not be considered eligible for continued registration.

<http://www.beyondpesticides.org/documents/glyphosate-final9-21-1.pdf>

Glyphosate degradation pathway shows that, depending on which soil organisms are present, glyphosate degrades into sarcosine, formaldehyde, AMPA, and Methylamine.

Formaldehyde is a carcinogen listed by COEHH under California Prop 65. Since formaldehyde is a metabolite of glyphosate, according to Prop 65, the Local governments in California must stop discharging glyphosate into the watershed. http://www.oehha.ca.gov/prop65/law/pdf_zip/P65LAW72003.pdf

SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986

Glyphosate is a candidate for evaluation as a toxic air contaminant by the California Department of Pesticide Regulation. Formaldehyde is listed as a toxic air contaminant. Between 14% to 78% of glyphosate applied as a ground spray drifts off site.

I live in Ventura, County, CA where over 7 million pounds of pesticides were used last year. We must stop letting industrial chemical companies control agricultural production options for financial gain. Just like the global warming "carbon footprint" tax, we need to develop an awareness of chemical degradation of the earths productivity, and its impact on public health and safety related to our food supply.

Sincerely,

Renee Roth
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