From: cohenm4@comcast.net
Sent: Thursday, December 24, 2009 1:28 AM
To: ATR-Agricultural Workshops <agriculturalworkshops@usdoj.gov>
Subject: Comment

Dear Sirs and/or Madams:

I write to express my concerns about the harmful impact of increased agricultural industry concentration and vertical integration. These huge companies and their partners have too much influence with lawmakers and governmental agencies, even adversely impacting adequate water policies, nutrition guidelines and healthcare expense. Not only can one say this concentrated power correlates with high personal cancer rates in America, but one must also conclude the concentrated industry is a cancer upon American?s society and infrastructure. The industry lacks proper regulation, oversight and transparency.

(1) Concentrated, non-transparent agribusiness successfully hides its practices from the American public, who would be appalled by the way animals are abused by huge companies cruelly squeezing every ounce of profitability from these animals. Americans are a people of faith, and the Bible has many passages admonishing against harsh animal treatment. States have started objecting to crowding animals into tiny cages. Confined Animal Feeding Operations? (CAFO?s) excessive growth-hormone-use (eg BGH) strains cows? bodies and causes residual pus in milk. The controlling companies? demand for the CAFO?s practice of clipping tails, wings & beaks must be halted. But, the few companies which dominate agribusiness want a high volume of uniform-sized product for their rapid slaughter?house assembly lines. They deter adequate inspection at the slaughterhouse, and they deter retail chains from inspecting the products sold to American consumers. The dominating oligopolies? slaughterhouses maximize profit rather than eliminate fecal matter. Instead, they plea for irradiation, effectively telling Americans ?EAT SH*T!?. Thanks to lobbyists, the regulatory & Congressional choruses echo to economically-strapped Americans: ?Tough sh*t? CHEW HARDER!?

(2) Concentrated, non-transparent agribusiness successfully hides its subsidies from the American taxpayers, who would be appalled by the amount of our deficit due to these subsidies. Even with vast taxpayer-subsidies and water allocations, the unprofitable industry can barely survive and seeks more government subsidies, such as via the recent Dairy Economic Loss Assistance Payment program. The legislation was designed to help the smaller dairy farmers, yet the concentrated CAFO BGH-users are trying to usurp these funds and gain more dominance. There is no way fast food franchises could retail and export so many cheap burgers & nuggets without subsidies that put sustainable, grass-fed farmers at a huge price disadvantage. The government must limit companies' market control and price supports to level the playing field for more sustainable family farms and cooperatives.

(3) Concentrated, non-transparent agribusiness successfully hides its wasteful energy intensiveness, carbon footprint and pollution footprint from Americans, who would be appalled by the amount of our foreign energy dependence, military budget, healthcare budget and adverse Global Warming / Green House Gas (GHG) impact due to CAFO practices, industry-influenced nutrition misinformation and American?s meat addiction. Worldwatch Institute reassessed the UN?s GHG study, looking at indirect GHG impact due to livestock, and concluded the CAFO-livestock paradigm accounts for 51% of GHG! Of course, the huge agribusiness conglomerates contribute generously to universities, and many of their patrons would feel compelled to dispute the 51% figure. This is yet another argument for antitrust action to limit the extent of influence unduly exerted by agribusiness profits. Even if 51% is too

high, it certainly deserves more unbiased analysis, transparency and publicity! Americans may be able to reduce our carbon footprint significantly, and support the international spirit of the UN?s Copenhagen Conference, simply with a voluntary portion of our population shifting our diet! Heavily concentrated agribusiness, with its free-market-distorting subsidies, have too much power over politicians, so Americans are unlikely to hear this message. Also, excessive manure-runoff kills fish populations (one of its retail competitors) and spreads e-coli contamination to vegetable fields.

(4) Concentrated, non-transparent agribusiness successfully hides from the American public the highly concentrated pharmaceutical companies? essentially free, massive infusion of BGH and antibiotics into livestock, for which BigPharma reaps a massive profit via treating humans for animal-consumption-based illness. If one animal ?sneezes?, an entire tightly-packed CAFO herd gets sick. Evolution is a fact of nature! Insects, viruses and herds have relatively short lifespans, and the diseases mutate and evolve. CAFO?s excessive antibiotic-use is correlated to swine & Asian bird flu out?breaks. While biased agribusiness-funded research has cast doubt on whether animal-based diets ?cause? massive amounts of severe and fatal human illness (including cancer, heart disease, obesity, osteoporosis, high cholesterol, erectile dysfunction, et al., for which there are ?strong correlations? if not ?causation?), there is absolutely no doubt in the highly concentrated pharmaceutical companies? boardrooms that animal-consumption causes them massive profitability! Even if this does not technically qualify as vertical integration, these collusive and potentially-fatal practices should be halted.

(5) Concentrated, non-transparent agribusiness successfully hides from the American public its stipulation that its subcontractors feed their CAFO herds uniform, expensive Genetically Modified Organism (GMO) grains to produce a uniform product for the fast slaughterhouse assembly line. There is significant risk to so much farm acreage being devoted to monoculture grains with terminator-seed technology. Grain farmers cannot save seeds for future crops, and they are forced into massive debt to the unregulated seed & GMO oligopolies. Their financial future is bleak at best, yet if harsh weather wipes out a portion of their crop, they will never climb out of their powerless servitude to their suppliers.

(6) Concentrated, non-transparent agribusiness successfully hides from the American public its mani?pulation of nutrition education. The Food Pyramids and guidelines have been distorted by agribusiness lobbyists. 70 years ago, for example, nutrition education recommended Americans have ample weekly portions of Calcium-rich dark leafy green vegetables. Now, Americans are convinced milk is the only real source of calcium. High dairy consumption is actually correlated with osteoporosis; people drinking much milk also eat much meat, and excess animal protein leaches calcium from bones. The Food Pyramid has been distorted so much that people don?t realize the small area of animal protein compared to the Pyramid?s total area means the proportion of animal protein in their diet should be that small, or smaller! If one eats more, cut back! No one hears this due to the undue influence of concentrated wealth and power. Instead people think the placement of meat at the top means meat is the most important element, and they should consume as much as possible. As I wrote above, the concentrated pharmaceutical companies have no doubt that their small investment to enable CAFOs and cheap & excessive animal-consumption generate massive profits!

Agribusiness can barely survive with its enormous government subsidies & water allocations, a few corporations dominate, and lobbyists dictate government policy. Even if AgriBiz and BigPharma companies aren?t vertically integrated, collusive and predatory practices shift costs to taxpayer Farm & Medicare subsidies and the healthcare industry. 2009 has had several excellent documentary movies (like *Food, Inc.* and *Fresh*) showing the cruel and unsustainable practices demanded by the few companies which dominate the livestock industry and hurt our environment. The government needs to crack down on antitrust violations, revise Farm Policy, and cull the lobbyists out of

government?s own ranks. Undue concentration, policy-influence and nutrition-miseducation needs to end, and food-related enterprises need to be subject to free-market forces. American consumers should make informed choices based on a transparent industry and a truly free market.

I thank you for conducting these hearings and reading my letter, and ask to be notified about your findings, recommendations and actions.

Sincerely,
Mitch Cohen