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**Sent:** Saturday, December 26, 2009 10:14 PM  
**To:** ATR-Agricultural Workshops <agriculturalworkshops@usdoj.gov>  
**Subject:** Comments on seed industry

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Legal Policy Section  
Antitrust Division  
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To Whom It May Concern:

I am a corn and soybean farmer and work with rotated acres, so I don't plant any continuous crops. It is a family farm, and I am the 6<sup>th</sup> generation who has worked the ground. In 2010, my family will have been on this farm for 150 years. We homesteaded in 1860 and still use the original house.

I farm 750 acres on my own, but I have a partner I work with who has an equal amount of land. Together we have 1,500 acres of ground. My wife does the record-keeping with the farm.

I have also been a seed dealer for 26 years starting with Dekalb, and since the merger and acquisitions I'm now under the Monsanto banner. My oldest son is also a Monsanto employee in South Dakota.

As such, I would like to offer my perspective on the DOJ and USDA agricultural sector competition public workshops.

Monsanto has been very open concerning their investment, research, and development of these new traits and technologies. This has greatly helped the innovations that have occurred in the private sector. It takes a lot of money to bring these innovations forward quickly, and the universities and other public programs simply do not have the capital to do this. The private sector has led in these innovations because of that. These have come fast. I think about the introduction of Yieldguard Corn Borer in 1995, and here we are fourteen years later. That's a lot technology in that short of time period. It's unbelievable. The acceptance has been as well. When Monsanto introduced Yieldguard Corn Borer in the biotech sector, farmers were standoffish at first. They said, "I don't know, that's \$18 a bag. I don't know if I can afford that." Today, it's just part of the bag of seed. The growers accept it and use the technology when they need to.

Farmers have more seed choices because of biotech innovations. Pioneer, Cropland Genetics, Northrup King, Garst, Golden Harvest, Legend and LG Seeds are all competitors to Dekalb. The top end of seed with the latest technology, Smart Stax, prices around \$400 per bag. The lowest price corn is around \$190 per bag. As a dealer, there is definitely price competition among seed companies. Monsanto is the industry leader in germplasm and traits, so our competition has to try to earn business through lower prices because they can't beat our performance.

Since I'm a Dekalb dealer, I'm a one brand farmer. But there are several things that drive my personal seed choices. Yield is the most important factor. I have purchased more expensive seed because it has been proven to perform better. My decision on buying seed is based on what that particular hybrid will give me in terms of gross income per acre, as well as yield, dryness and moisture levels. From a management standpoint, I also look at the insect and disease traits the seed has to overcome the challenges we face. Fortunately, technology has allowed us to manage some of those environmental issues instead of using the traditional herbicide and pesticide chemicals. I use university results, third party data and Monsanto studies, as well as my own personal

experience and combine yield monitors and field maps, in making these decisions. All of my seed have biotech traits in them. Even my refuge corn is Roundup Ready. I consider that a technology.

Many things have changed since farmers began using biotech. The most important is the reduction in pesticides and herbicides. With the Roundup Ready program, the herbicide program is much safer both environmentally and personally, for the grower themselves. I can't emphasize enough the impact of the corn rootworm. My growers refuse to deal with the organophosphate insecticide for it. It is skull and crossbones stuff, and they don't want to handle it. The corn rootworm technology has been very much accepted by my growers because of the safety issue. Yield has increased. There's no question that our fuel consumption per acre has dropped dramatically since the innovation of biotech.

Thank you for considering my views on these issues. I wish you the best.

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