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**Sent:** Monday, December 28, 2009 5:07 PM  
**To:** ATR-Agricultural Workshops <agriculturalworkshops@usdoj.gov>  
**Subject:** big business and big agriculture

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Ladies and Gentlemen:

Thank you for the opportunity to express my dismay, concern, perhaps even panic over the deplorable situation of agriculture and food in the United States today. I am cautiously optimistic that this dialogue you have opened will at least begin to address a massive, subversive and potentially catastrophic efforts of a few giant corporations to control the world food supply. Thirty years ago, I would have not believed it could have gotten this far.

I am writing as a consumer and a teacher. I teach children and adults organic gardening and cooking, and work in the community on issues related to urban agriculture and personal participation in the effort to increase food security; one of my jobs is Culinary Director of the Boise Urban Garden School in Boise, ID. I have a long history of researching in the area of Business, Government and Society (University of Washington, Ph.D. 1986), with a particular emphasis on food and environmental pollution. I consider myself somewhat well-read in the area of corporate activity in food production, although there is so much to know that I would never call myself an expert. Because this comes without reference, I will bullet the areas of my gravest concerns.

- Agricultural domination, particularly by Monsanto, in the area of GMO crops, with a clear intent to extend that domination to animal husbandry (e.g. patenting the genetic pool for pigs). Farmers who choose not to use GMO seed are highly vulnerable to airborne contamination by adjacent GMO crops, then subjected to unbelievable intimidation and lawsuits when they attempt to save seed. In the first lawsuit I became aware of (Percy Schmeiser, Canada), Monsanto actually prevailed because of the way the laws are written, a shocking miscarriage of justice. The culpability of Schmeiser has since been redressed in another lawsuit, but it has cost untold dollars to fight – and Monsanto's intimidation has not stopped. The money to fight the monster is available to few to none. Another extension of this domination: farmers who try to use non-GMO feed are increasingly unable to buy uncontaminated grain.
- Factory farms that now dominate meat and dairy production. The concerns cover the whole gamut from animal cruelty, to environmental pollution, particularly of groundwater, to breeding grounds for viral mutations, to dangerous animal feed that contains antibiotics/hormones/GMO grains, to careless contamination of meat for public consumption (e.g. E. Coli). The regulatory failure of the EPA, the FDA, (and others) is fairly complete – and a testimony to the level of "capture" agribusiness has managed.
- The failure of the government to provide adequate independent testing of pharmaceuticals, GMO's, and pesticides, instead relying on corporate assurances. Fifty years of environmental and health damage from pesticides should have prodded the government to demand more rigor before approving what the corporate entities want, instead we are traveling down the same road with genetically modified plants and animals. Independent research is showing repeatedly that there are harmful effects on animal reproductive systems by the third generation of animals eating GMO feed, and there is a growing body of research that shows real harm in the "inerts" of pesticides, which are out of the purview of government regulation to protect corporate "trade secrets." Monsanto again.
- Corporate ability to lobby for new rules and regs that hamstring small farmers and growers, allowing further concentration in agriculture – e.g. the proposed National Animal Identification System, which would be prohibitively expensive for small producers and basically exempt factory farms from the per-head registration (and related costs).
- Corporate ability to dominate both production and processing, e.g. the dairy industry, specifically Dean Foods. The official price paid to dairy farmers for milk to dropped by almost half over the past year, while store prices went up. Corporate producers dominate processing, and small farmers are left out in the cold – annual production costs exceed their raw milk costs by about \$100 per cow today, and small dairies are folding. This kind of vertical dominance is a major threat to non-corporate agriculture.
- Corporate insistence, made manifest through lobbying and dis-information, that the only way to feed the world is through the energy-intensive, technology intensive, chemically intensive, and genetically modified farming methods they espouse. Research keeps showing just the opposite: it is (relatively) small-scale organic agriculture that is water efficient, soil restoring, environmentally protective, highly nutritive, and energy-efficient AND produces the greatest output per acre. i.e. it is sustainable.

The escalating evidence of the dangerous contamination of the US food supply is very frightening. The future, if corporate domination of agriculture is not checked, is truly terrifying. I believe the government MUST do two things: 1)

use anti-trust or whatever other tools are available to start retrieving our food supply and agriculture in general from the control of huge corporations who have clearly demonstrated their willingness to act with impunity and without responsibility for public safety or environmental preservation; and, 2) actively support the growth of small-scale farming with every tool in the scientific and economic toolbox.

Thank for reading. I remain anxiously hopeful.

Very truly yours,

Susan S. Medlin, Ph.D.  
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