

**From:** rachael.leclear@gmail.com <ealocalfoodnetwork@gmail.com> on behalf of Emporia Area Local Food Network <ealocalfoodnetwork@gmail.com>  
**Sent:** Wednesday, December 30, 2009 6:01 PM  
**To:** ATR-Agricultural Workshops <agriculturalworkshops@usdoj.gov>  
**Subject:** Comments for upcoming workshops  
**Attach:** EALFN DoJ letter.doc

---

To Whom It May Concern:

Please see attached for comments on the upcoming workshops regarding competition in agriculture. I have copied the text below in the event that the attachment fails.

Thank you,  
Rachael LeClear

---

December 30, 2009

Legal Policy Section - Anti-Trust Division

US Dept. of Justice

450 5<sup>th</sup> St., NW

Washington, DC 20001

To Whom It May Concern:

We are writing today to provide comments for upcoming Department of Justice and USDA workshops regarding competition and concentration of ownership in American agriculture.

It is our hope that these hearings will address the broad and potentially dangerous implications of anti-competitive practices. Vigorous enforcement, regulation, and legislation are sorely needed to restore healthy competition to that segment of the economy which is responsible for providing Americans with their most fundamental necessity – food.

Our nation's food supply has become the domain of a handful of large, interlocking corporations. As a result, prices can be manipulated, research and innovation are restricted, fair contracts are difficult to negotiate, and farmers' and consumers' choices are limited. The concentration of ownership problem is worsening and its effects widespread, from seed research to meat processing to the

unhealthy, over-processed foods that dominate an unhealthy American diet. Below is a partial list of problems that have increased with the growth of this oligarchy:

- Costs of seed and other production components are rising while the prices farmers receive are falling.
- Farmers are losing their right to save seed, and independent seed companies are disappearing. More than 200 have disappeared since 1996.
- Farmers cannot bargain collectively, which impairs their ability to negotiate fair contracts.
- Patents and licensing agreements severely restrict plant breeders' and researchers' access to genetic material and prevent researchers from testing existing varieties.
- Agricultural research at public universities is becoming increasingly dependent on funding from private companies. As a result, publicly-owned seeds and breeds are dwindling, and innovation is declining and corporate profit motives are controlling research.
- Manufacturers of genetically-modified crops are not held liable for contamination of farmers' crops.
- Contracts often leave farmers with little financial or legal control over their situations and take away their right to privacy.
- The divide in enforcement authority between the USDA and the Justice Department renders ineffective the enforcement of unfair, illegal, and unsafe practices
- Lack of regional competition and tacit collusion of companies restrict farmers' options.

Farmers and consumers deserve an open and fair marketplace. As environmental and energy concerns deepen, family farmers, independent regional companies, and unfettered research are becoming increasingly vital to the future of agriculture. These hearings can be an important step towards restoring fairness and competition. We hope you will accept these comments and use them to help establish the scope of your upcoming workshops.

Sincerely,

Rachael LeClear

Emporia Area Local Food Network Board

3301 W. 18<sup>th</sup> Ave.

Emporia, KS 66801

Rachael LeClear  
Coordinator of Continuing Education and General Education  
Flint Hills Technical College  
3301 W. 18th Ave.  
Emporia, KS 66801  
620.341.1372  
[rlclear@fhctc.edu](mailto:rlclear@fhctc.edu)