

**From:** Maria Aguiar <maguiar@grassrootsonline.org>  
**Sent:** Thursday, December 31, 2009 3:18 PM  
**To:** ATR-Agricultural Workshops <agriculturalworkshops@usdoj.gov>  
**Subject:** Comment from Grassroots International  
**Attach:** Comment GRI. DOJ.Ag.Workshops 12. 31. 09.doc

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December 31, 2009

Electronically to: [agriculturalworkshops@usdoj.gov](mailto:agriculturalworkshops@usdoj.gov).

The Honorable Eric Holder The  
Attorney General U.S. Department of Justice  
The Honorable Tom Vilsack  
Secretary  
U.S. Department of Agriculture

The Legal Policy Section  
Antitrust Division  
U.S. Department of Justice

Dear Attorney General Holder and Secretary Vilsack:

I write on behalf of Grassroots International a non-profit organization, based in the United States, which provides grants to partners in developing countries and joins them in advocating for social change. Our primary focus is on land, water, and food as human rights.

Grassroots International would first like to commend the U.S. Department of Justice and the Department of Agriculture for seeking public comment on concentration in the agriculture and food systems in an effort to study the impacts on all of us as consumers as well as producers. We agree that this investigation is extremely timely given the 2009 food price volatility crisis and the rural crises that have ensued in both United States and across the developing world.

Grassroots International has been working in concert with colleagues from U.S.-based non-profit education and advocacy organizations to try and raise awareness about the underlying causes of growing food insecurity and the global food crisis. We agree with our colleagues that the well documented increasingly high degree of corporate concentration in both agricultural production and food delivery systems is a contributing factor to lack of availability of healthy and sustainably grown local foods both here and abroad.

Today there are a small handful of multinational corporations in the ag-biotech, agribusiness and food systems

sector that control production, transformation, distribution and marketing of food products of all kinds. These same few corporations that control the food system in the United States are increasingly taking control of land, seeds, water, and the food systems in developing countries where Grassroots International's partners work to build local sustainable agriculture models.

We often hear from our partners about the impacts of Archer Daniel's Midland, Bunge, Cargill, Monsanto and Syngenta operations in developing countries with much the same type of vertical and horizontal integration and concentration employed as here in the U.S. market place. The erosion of local rural community economies, the erosion of small to mid-size farms that cannot compete with these well capitalized agribusiness giants is having a devastating effect on rural producers and both urban and rural consumers in the developing world who have long relied upon local small scale producers for their food needs.

We can and must change this - not only for the benefit of consumers in the United States, like ourselves, but also on behalf of our partners in the developing world. We salute and thank the Department of Justice and the Department of Agriculture for providing us with this unique opportunity to work toward the reinvigoration of existing federal anti-trust mechanisms that can help to restore healthy competition to the food and agriculture sectors.

Sincerely,



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