

From: Brian Emerson <brian@oxhouse.org>
Sent: Thursday, December 31, 2009 8:00 PM
To: ATR-Agricultural Workshops <agriculturalworkshops@usdoj.gov>
Subject: Comments Regarding Agriculture and Antitrust Enforcement Issues in Our 21st Century Economy

Dear Legal Policy Section, Antitrust Division, U.S. Department of Justice,

I am a graduate student and food and agriculture specialist living in California. I urge you to put an end to further consolidation in the agricultural, processing, and supermarket sectors by exercising the full strength of US antitrust law. Food and agriculture is too important to be controlled by a handful of large corporations.

The top 5 U.S. FOOD RETAILING firms control 48% of the market. (Hendrickson and Heffernan 2007)

Four seed firms control about 29% of the world market for commercial seeds, globally: DuPont/Pioneer; Monsanto; Syngenta; and Limagrain. (Hendrickson and Heffernan 2007)

Share of U.S. Processing and Packing Markets Held by Top Four Firms, 2007
(Market Share/percent)
Beef packing 83.5;
Pork packing 66;
Broiler production and processing 58.5;
Turkey production and processing 55;
Flour milling (top 3) 55;
Soybean crushing 80
(Hendrickson and Heffernan 2007)

Just 10 Corporations control
67% of the global market share of the proprietary seed industry;
89% of the global market share of the agrochemicals industry;
66% of the global market share of the biotech industry
(ETC 2008)

This is not what efficient or democratic markets look like!

Thanks your for considering my comments.

Brian P Emerson
Santa Cruz, California