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To: ATR-Agricultural Workshops <agriculturalworkshops@usdoj.gov>
Subject: Comment
Attach: Parr Comments Antitrust Enforcement.docx; ATT224025.txt

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Damian Parr's Comments Regarding Agriculture and Antitrust Enforcement
Issues in Our 21st Century Economy

My name is Damian Parr and I am an agriculture and food systems educator and farmer. I am currently a postdoctoral fellow at the Agricultural Sustainability Institute at the University of California, Davis.

I am deeply concerned about the continued consolidation of corporate power in the food and agriculture sectors. The primary reasons for my concern stem from severe negative impacts this consolidation is having on consumers and small- and medium-scale producers. My comments here are based on my first-hand experience being both a consumer and producer who has lived and worked in agriculture in both New York and California.

Consumer concerns:

My family and I have noticed that over the last 30 years it has become increasingly difficult to find healthy, locally produced foods that are both accessible and affordable. This is true for the urban, suburban, and rural areas where I have lived. The foods that are most accessible and affordable are often the least healthy and produced the furthest away from where they are sold. This unhealthy food selection must be taken into account when calculating the increasing negative public health impacts that we are suffering at the state and national levels.

Food selection is often dominated by only a few corporate brands that are in fact simply refashioning a handful of crop species, such as corn, into what is in fact a delusion of choice. At the same time that food "choices" are narrowing, there is the ever-present pressure by corporate food industry to reduce or eliminate consumer protections, such as the labeling of food product ingredients or country of origin labeling. The majority of consumers, myself included, have long been in support of labeling for genetically modified ingredients. The fact that corporations have been successful in thwarting consumer interests for labeling suggests that consolidated corporate powers will continue to work against us, the public.

A closely related issue to labeling is food safety. Despite increasing outbreaks and spreading of bacteria like E. coli and antibiotic resistant infectious agents, processing facilities for meat and vegetables continue to centralize the national and trans-national supply chains. This concentration of the risk of contamination directly parallels the concentration in corporate control of the

supply chain. The sanest solution to reducing risk is not attempting to sanitize everything in the world, but rather to diversify and decentralize a supply network to limit the potential for contaminants to spread to the scale of national or transnational. Small and medium scale production and decentralized distribution is the surest way to contain the spread of contaminants. There will always be contaminants on some level. The choice concerns the design of a system that either centralizes or diversifies the risk.

In addition to the issues of affordability, accessibility, nutrition, and safety, today's increasing corporate consolidation is proving to be excessively destructive to our environment and natural resources base. The consolidated corporate industry relies on vertical integration and a mono-cultural agronomic production system that would be entirely unprofitable if the ecological damages and air, water, and soil pollution was fiscally accounted for. Corporate consolidated agriculture requires economic policies that externalize (do not account for) the biological and physical costs to production, distribution, and consumption.

Producer concerns:

I began farming at the age of 16 and like many farmers that I know I have struggled with being squeezed by both the increasing input and overhead costs to production and the decreasing prices I can get for my products. Corporate consolidation has played a central role in creating this very antagonistic market environment for small and medium scale producers. One blatant example of this is Monsanto Corporation's domination in the seed market. Similarly, the market shares of ADM and Cargill in their respective sectors exemplify similar market failures. Animal operations contracted with Tyson and alike have also suffered unfair market pressures that not only lead to disadvantaging growers but also lead to previously mentioned intensive mono-cultural production practices, unhealthy animals and inferior, if not hazardous meat products.

Due to these difficult economic conditions and the pressures to intensify and scale-up operations, there are fewer and fewer small and medium scale producers and concomitantly, fewer and fewer decent paying jobs. This increasingly leads to the loss of rural economic viability, etc.

Our government's job is to protect us, the people, from the harm that industry is willing to do onto us for the sake of competitive advantage and profit. Corporations have one primary responsibility and that is to their legal charter to make profits. It's up to the public to pressure the legislature and administration to for protections against corporate misconduct. Corporate consolidation has bred an industry with political lobbyists that are more powerful than ever before. These lobbyists interfere with our civil society's ability to protect itself from industry abuses. A symptom and cause for such political dysfunction is fact that government agencies often employ former corporate lobbyists, and vice versa. I believe this is a serious conflict of interest that leads to further erosion of the public protections.

Thank you for the opportunity to submit my comments.

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