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**To:** ATR-Agricultural Workshops <agriculturalworkshops@usdoj.gov>  
**Subject:** Comment

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US Department of Justice

Dear US Department of Justice:

Thank you for the opportunity to submit comments in advance of the Department of Justice's workshops on "Agriculture and Antitrust Enforcement Issues in Our 21st Century Economy."

As an organic consumer, I am particularly concerned about Monsanto's control over the food crop seed supply. By buying seed companies both in the USA and abroad, and aggressively patenting life, Monsanto has gained control over as much as 90 percent of seed genetics. In my opinion this is anti-competitive behavior that skews markets and subjects farmers and consumers to the unchecked power of a company that can raise prices at will and controls both quantity and quality of much of the food supply. But it is not just the financial aspects that are the biggest concern to me.

Monsanto has acquired a diverse store of seed genetics, but they are only making available a few seed types that are genetically modified to be dependent on their chemicals. Let me say this again: these seeds are dependent on Monsanto chemicals. The genetic modification of Monsanto seeds has not been shown to provide a health benefit for either animals or human beings. In fact there is considerable evidence that GMO seeds create health problems for both animals and human beings. In my opinion the primary benefit of GMO seeds is to Monsanto, because they are dependent on Monsanto chemicals.

If Monsanto can control seed genetics as a monopoly, then could they not also control how much Monsanto pesticides and herbicides are used on those crops? If Monsanto contracts forbid farmers from saving seed or if the seed produced by GMO plants are not viable, and if the only seeds available are GMO due to Monsanto's ownership of all seed sources, does this not give Monsanto complete and absolute control over the food marketplace in it's entirety? Is our government willing to assign all control over our food supply to a single company? If a company controls all the seeds from which crops grow does this not give that company control over how much food could be produced, where it could be produced, when it could be produced and how much it costs consumers?

While I can understand the business model, the additional tragedy is that

human beings are by default being forced to use food crops that are increasingly based on seed sold not on the basis of nutritional value or health values, but sold in order to increase the use of Monsanto pesticides and herbicides and the profit associated with those chemicals. This objective seems counterproductive to consumers in a decade where the stated goals of the USA is to provide health care to all and reduce health care costs.

It is my belief that the steep increase in use of GMO in food products correlates with a steep rise in various health issues such as the dramatic increase in gluten sensitivity, the rise in autism, the rise in asthma, the rise in food allergy, the rise in digestive disorders, all connected to food. This trend simply can't continue.

The vast bounty of food crops that farmers have cultivated and improved upon over the last 10,000 or so years should not be allowed to be bought up and put out of commission by a company bent on whittling down food varieties to a few pesticide-dependent genetically modified crops.

While I understand the dynamics of Monsanto's business model, what I don't understand is the company's willingness to put profits ahead of human health. It is clear from numerous studies that genetically modified seeds introduce unknown factors into our human food supply. See: de Vendomois JS, Roullier F, Cellier D, Seralini GE. A Comparison of the Effects of Three GM Corn Varieties on Mammalian Health. - Int J Biol Sci 2009; 5:706-726.

I, for one, have health problems I believe are related to the GMO changes in our food supply. I firmly believe that my health is endangered by the decrease in availability of non-GMO, non-Monsanto food seed sources. Meanwhile, my ability to buy non-GMO foods is constantly threatened by Monsanto's business tactics of buying, then suppressing all seeds except their own genetically modified ones.

A very disturbing part of Monsanto's business model is that their Frankenseeds can cross-pollinate with organic and traditional varieties, destroying non-GMO seeds unique characteristics and infecting them with genetically engineered chemical dependence or even "Terminator" or "Traitor" technology that renders seeds sterile, a literal death sentence for seeds maintained through conventional breeding.

It can be seen in the farming literature, that Monsanto consistently sues farmers whose crops have been contaminated by accidental cross-pollination claiming those unfortunate farmers as having 'benefitted' from Monsanto patents. Embroiling farmers in expensive litigation, those who have unwillingly had their crops contaminated, is resulting in further reducing non-GMO food availability. These marketplace BULLY tactics of expensive litigation put fear into the heart of many, many farmers. It appears that Monsanto's clear aim is a global monopoly on all food crops and animal feeds. And they seem to be succeeding, unchecked by any government agency.

The same way we protect animal species from extinction, we must protect plant species, especially the tens of thousands of food varieties, from any company that is consciously eliminating or suppressing availability in order to skew the market into a monopoly.

I firmly believe in companies making a profit. But a monopoly of food source seeds is anti-competitive and not in the best interests of our citizens, our families, our health care goals, our economy or our national interest.

I urge you to please include in your investigation a consideration of the importance keeping seeds, the foundation of human life, at least in the marketplace, if not in the public domain where they truly belong.

Sincerely,

Jean Saffell