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GEORGIA AGRIBUSINESS COUNCIL

COUNCIL MISSION: "To advance the business of agriculture through economic development, environmental stewardship and education to improve the quality of life for all Georgians."

December 30, 2009

Legal Policy Section
Antitrust Division
U.S. Department of Justice
450 5th Street, N.W., Suite 11700
Washington, DC 20001

To Whom It May Concern:

This letter is a comment submission for the Antitrust Division of the U.S. Department of Justice and the U.S. Department of Agriculture's joint public workshop series beginning on March 12, 2010.

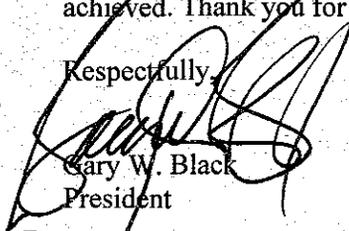
I write to you today on behalf of the more than 700 member companies of the Georgia Agribusiness Council, our State's broad based trade association for the entire food and fiber industry. The mission of the Council is to *"advance the business of agriculture and promote environmental stewardship to enhance the quality of life for the citizens of Georgia,"* setting forth a clear message that environmental stewardship and agricultural sustainability go hand-in-hand.

As you are aware, plant biotechnology has been rapidly adopted by farmers - and for good reason. Modifications to improve agronomic traits like herbicide tolerance and/or insect resistance can provide economic benefits that are increasingly difficult to find in farm production. Such technology has helped farmers increase yields with reduced fuel, labor, and pesticide inputs, thus contributing to the potential for profitability. Yet, there are still more advancements that can and will aid in farm productivity, such as better nutrient utilization, plant drought tolerance, and improved irrigation efficiency.

It is the cost of ROP inputs that ultimately drives farmers to make independent choices in selecting seed products that give them the greatest potential for profitability. Agricultural research has delivered great results over the last century to provide seed varieties that will produce the best crops in a variety of climates and under numerous environmental pressures. Intellectual property plays a fundamental role in the promotion of this agricultural research and resulting innovation. Consistent and adequate intellectual property protection is essential to the ongoing development of even more sophisticated products and technologies to ensure the sustainability of farmers and benefit the people their productivity will nourish.

Innovative agricultural technologies have already played a significant role to help farmers produce more from their land and help conserve natural resources. Stewardship and sustainability are of critical importance in agriculture and it is technology that will help ensure they are achieved. Thank you for the opportunity to comment on this very important matter.

Respectfully,


Gary W. Black
President