

Tess Butler
Grain Inspectors, Packers & Stockyards Administration
U.S. Department of Agriculture
1400 Independence Avenue, SW Room 1643-S
Washington, DC 20205-3604

November 22, 2010

In re: Farm Bill Comments 75 Fed. Reg. 35338

During the crafting of the 2008 Farm Bill, farm advocates, rural community groups, faith based organizations and consumer groups worked diligently to restore fairness to livestock and poultry markets and level the playing field for livestock and poultry producers. These provisions were included in a new livestock title to the Farm Bill that was enacted by overwhelming bipartisan majorities in both houses of Congress. The reforms directed the Secretary of Agriculture to write new rules to implement provisions within the 1921 Packers & Stockyards Act (P&SA) and prohibit unfair livestock contract terms that have become widespread in the hog and poultry sector.

These needed reforms were enacted in light of the considerable and growing consolidation in the meatpacking and poultry processing industries. Nearly nine out of ten beef cattle, two out of three hogs and half of all poultry are slaughtered or processed by the four largest firms in each sector. This concentrated market power in the hands of a few companies has distorted livestock markets, lowered the prices farmers receive for producing livestock, enabled hog and poultry companies to impose unfair contract terms and reduced market transparency.

In June 2010, U.S. Department of Agriculture (USDA) issued proposed rules to make these reforms a reality. The proposed rule published by the Grain Inspection, Packers and Stockyards Administration (GIPSA) in the Federal Register of June 22, 2010 (75 Fed. Reg. 35338) included commonsense provisions to properly implement the P&SA, protect poultry and hog farmers' investments and improve market transparency for cattle and hog sales. The proposals carry out the 2008 Farm Bill's directive and establish clear, defined regulations governing specific practices that are prohibited because they are "unfair, unjustly discriminatory, or deceptive" under the P&SA.

Some of these changes represent a Bill of Rights for farmers and livestock producers as they curb some of the worst abuses that are commonplace today. In addition, these changes help ensure that independent family cattle and hog producers receive competitive prices for their livestock rather than a price distorted by meatpackers that offer special deals only to favored, larger operators. The proposed rules also prohibit poultry and hog companies from forcing farmers to make expensive upgrades that can cost tens of thousands of dollars without protections to safeguard their investments and make it illegal for meatpackers and poultry processors to retaliate against growers and farmers that stand up for their rights.

These rules are an important first step to restoring competition to livestock markets, protecting farmers from abusive practices and ensuring that livestock and poultry producers receive a fair share of what consumers pay at the grocery store. We strongly support the goals of the proposed rule and urge USDA to strengthen the protections for farmers by perfecting the strong provisions of the proposed rule. USDA should promptly finalize and implement these rules and demonstrate the Administration's commitment to farmers and rural communities by vigorously

enforcing the protections that are essential to restoring balance, fairness and transparency for livestock and poultry producers.

Sincerely,

Agricultural Missions, Inc. (NY)
Agriculture and Land Based Training Association (CA)
Agriculture of the Middle
Alabama Contract Poultry Growers Association
Alliance for a Sustainable Future (PA)
Alternative Energy Resources Organization (AERO) -MT
American Agriculture Movement
American Corn Growers Association
American Grassfed Association
American Raw Milk Producers Pricing Association
Appalachian Crafts (KY)
Ashtabula-Lake-Geauga CFU
Buckeye Quality Beef Association (Ohio)
C.A.S.A. del Llano (TX)
California Dairy Campaign
California Farmers Union
California Food & Justice Coalition
California Institute for Rural Studies
Campaign for Contract Agriculture Reform
Campaign for Family Farms and the Environment
Carolina Farm Stewardship Association
Cattle Producers of Louisiana
Center for Food Safety
Center for New Community
Center for Popular Research, Education and Policy (NY)
Center for Rural Affairs
Chemung County Church Women United (NY)
Chemung County Council of Churches (NY)
Chemung County Council of Women, NY
Church Women United of New York State
Community Farm Alliance
Community Food Security Coalition
Contract Poultry Growers Association of the Virginias
Court St Joseph #139, Corning/Elmira, Catholic Daughters of the Americas (NY)
Dakota Resource Council
Dakota Rural Action of SD
Davidson College Office of Sustainability
Ecological Farming Association
Family Farm Defenders
Farm Aid
Farm and Ranch Freedom Alliance
Farm Fresh Choice of the Ecology Center Berkeley
Farmers Market Coalition
Fay-Penn Economic Development Council

Food & Water Watch
Food Chain Workers Alliance
Food First
Food Democracy Now!
Georgia Poultry Justice Alliance
Heartland Center / Office of Peace and Justice for the Diocese of Gary, Indiana and the Integrity
of Creation
Hispanic Organizations Leadership Alliance
Illinois Stewardship Alliance
Independent Beef Association of North Dakota (I-BAND)
Independent Cattlemen of Nebraska
Independent Cattlemen of Wyoming
Institute for Agriculture and Trade Policy
Iowa Citizens for Community Improvement
Iowa Farmers Union
Island Grown Initiative
Izaak Walton League
Just Food (NY)
Kansas Cattlemen's Association
Kansas Farmers Union
Kansas Rural Center
Ladies of Charity of Chemung County (NY)
Land Loss Prevention Project
Land Stewardship Project
Maryknoll Office for Global Concerns
Michael Fields Agricultural Institute
Michigan Farmers Union
Michigan Land Trustees
Midwest Environmental Advocates
Midwest Organic Dairy Producers Association
Minnesota Farmers Union
Mississippi Assoc. of Cooperatives
Mississippi Livestock Markets Association
Missouri Farmers Union
Missouri Rural Crisis Center
National Catholic Rural Life Conference
National Family Farm Coalition
National Farmers Organization
National Farmers Union
National Hmong American Farmers, Inc.
National Latino Farmers & Ranchers Trade Association
National Sustainable Agriculture Coalition
Nebraska Farmers Union
Nebraska Sustainable Agriculture Society
New England Farmers Union
Nebraska Wildlife Federation
Nonviolent Economics
North Carolina Contract Poultry Growers Association

Northeast Organic Dairy Producers Alliance
Northeast Organic Farming Association, Interstate Council
Northeast Sustainable Agriculture Working Group
Northern Plains Resource Council (MT)
Northwest Atlantic Marine Alliance
Ohio Ecological Food and Farm Association
Ohio Environmental Council
Ohio Environmental Stewardship Alliance
Ohio Farmers Union
Oregon Livestock Producers Association
Oregon Rural Action
Organic Consumers Association
Organic Farming Research Foundation
Organization for Competitive Markets
Partnership for Earth Spirituality
Past Regents Club of the Catholic Daughters of the Americas, Diocese of Rochester, NY
Past Regents Club, Diocese of Rochester (NY)
Pennsylvania Farmers Union
Pennypack Farm and Education Center (PA)
Pesticide Action Network North America
Pomona Grange #1, Chemung County NY
Powder River Basin Resource Council (WY)
R-CALF United Stockgrowers of America
Rocky Mountain Farmers Union
Rural Advancement Foundation International - USA (RAFI-USA)
Sisters of St. Francis of Philadelphia
Slow Food USA
South Dakota Farmers Union
South Dakota Stockgrowers Association
St John the Baptist Fraternity, Secular Franciscan Order, Elmira NY
Taos County Economic Development Corporation
Texas Farmers Union
The Cornucopia Institute
The Food Project
Tilth Producers of Washington
Trappe Landing Farm & Native Sanctuary
United Poultry Growers Association
Virginia Association for Biological Farming
Western Organization of Resource Councils (WORC)
Western Sustainable Agriculture Working Group
WhyHunger
Wisconsin Farmers Union
Women Involved in Farm Economics (WIFE)
Women, Food and Agriculture Network