

**Testimony of Kay Doby
Poultry Grower
Cameron, North Carolina**

Before the

**House Committee on Agriculture
Subcommittee Livestock, Dairy and Poultry**

Hearing on

A Review of the Market Structure of the Livestock Industry

April 17, 2007

Chairman Boswell, Ranking Member Hayes, Members of the Subcommittee-

My name is Kay Doby. I am poultry grower from Cameron, North Carolina. Thank you for this opportunity to submit this testimony on behalf of the Campaign for Contract Agriculture Reform.

The Campaign for Contract Agriculture Reform (CCAR) is a national alliance of organizations working to provide a voice for farmers and ranchers involved in contract agriculture, as well as the communities in which they live. The goal of the campaign is to assure that the processor-producer relationship serves as a fair partnership, rather than a dictatorship. I am the President of the North Carolina Contract Poultry Growers Association as well as a member of the National Contract Poultry Growers Association, both of which are long-standing members of CCAR.

In the past, farm bill debates have focused on issues such as research, credit, conservation, and the structure of commodity price support mechanisms and direct farmer assistance programs. Certainly, those issues will continue to be a central part of the debate for the 2007 farm bill. But the structure of U.S. agriculture is rapidly changing and therefore the focus of the farm bill process should also be broadened to keep pace with the modern realities facing farmers and their communities.

Unfortunately, farmers are rapidly losing their independence. The traditional relationship of independent producers selling their products to independent processors is quickly changing toward an environment in which contractual arrangements between farmers and vertical integrators and processors are commonplace. In addition, agribusiness firms are rapidly consolidating to gain market control. It is critical that the farm bill not only address the structural issues of agriculture to help independent farmers stay independent and viable, but it is also important to acknowledge the rapid shift toward contract production, and to address the unique needs and challenges of contract farmers.

No one knows about this changed structure and the pitfalls of those changes better than poultry growers. In fact, production contracts have been around for poultry since the 1950s, and nearly 100 percent of broilers are now produced under contract.

In previous Farm Bill debates, the voices of poultry growers have not been heard. Because of the contract relationship that growers have with their poultry integrator companies, it is very difficult for poultry growers to speak out about their problems.

In order to get started in the poultry business, a potential grower must take out a loan of over \$300,000 per poultry house in order to build these sole-purpose structures on their farms to meet the terms of the poultry growing contract. The company provides the specifications for the house, but the grower has to pay for them. Often, growers don't even see the details of the contract before they take out the loan and build the houses, but instead are asked to move forward in making the financial commitment based on a "letter of intent" from the poultry integrator. So when a grower goes into debt to this extent, they must often put their farm and farmhouse up as collateral for the loan. At this point, the grower has very little choice but to sign the contract that is put before them. There are no negotiations. It is a take-it-or-leave-it contract. And it is subject to change at any time, based on the wishes of the poultry company. If you don't do as they say, they will stop delivering chickens to your farm, and you will not be able to make your loan payments. And as far too many growers have learned the hard way, if you attempt to speak out about your situation, or to work with other growers to raise concerns, you are vulnerable to contract termination or other more subtle methods of retaliation by the poultry integrator.

In 1993, my husband and I built two 500-ft poultry houses at a cost of \$188,000 dollars. The specifications of how to build the houses were provided by the poultry company. The houses were financed through the poultry company with 20 acres of our land put up as collateral. The first contract I signed was for 5 flocks a year for 10 years, the length of the loan. In the beginning, things looked good. The first year we received six flocks, and I was hopeful, because it looked like I'd get my loan paid off before 10 years. Little did I know that after one year into my supposed 10-year contract, the company would bring us another contract to sign, this time for 3 years with no guarantee of the number of flocks.

The next contract was for 2 years with a mandatory arbitration clause added, saying that I could not take the company to court for any reason. Then a few years ago, I was presented with a yet one more version of the contract. That is only "flock to flock." The grow-out period for one flock is about 8 weeks. Talk about job security!! At that time, we still owed \$60,000 on the houses and we were being told that we might get chickens to raise or we might not. Of course, without chickens in our houses, we would not be able to make the payments and we would lose the land we built the houses on. As a grower, you get the message very quickly. With your livelihood on the line, and the future of your business controlled completely by the company and its decision to give you birds or not, it's not a surprise the growers are reluctant to speak out about their circumstances. Plain and simple, they fear retaliation.

The Ranking System of Payment

Making matters worse, even when you do have chickens in your barns, growers are ranked against each other for their pay, based on the growers' success in adding weight to the bird over the grow-out period of 7 or 8 weeks. This is called your "feed conversion." The company will group you with between 4 to 15 other growers. They will take the average for that week of how much feed it took to grow the average weight bird. Then you will fall somewhere in the ranking system to determine what you will be paid. There will be half the growers making above the 50 percent mark and half of the growers will be in the minus. The companies will use the minuses to say you are a bad grower.

Now keep in mind that the company controls all of the inputs that determine your success in adding weight to the bird. For example, you have no control over the chicks that you receive. Maybe you received chicks that came from very young hens that just started laying, therefore you received little tiny chicks that have a hard time living and if they do live they never get to the weight of the others, but still eat as much. Now don't forget that your goal is to raise the heaviest bird on the least amount of feed. Maybe you received chicks that had an egg explode during the hatching process and it penetrated the other eggs with bacteria. If that happens, then you have sick little chicks. Yet you are being ranked for pay with growers that may have received healthy chicks.

The next problem is that you have no control over the feed. What if you get the wrong feed mixture for your age birds? If you get a low calorie feed, the birds are going to eat it and not put on as much weight.

Another factor that is beyond the growers' control is when the company will pick you your birds to take them to be processed. It is not uncommon for there to be a several-day variation in times that a grower's birds are picked up relative to other growers in their ranking. For example, if my birds are picked up at 58 days and the other grower's birds are picked up at 53, 54, 55 days, it makes a big difference. Your birds have just been sitting there for extra days eating thousands more pounds of feed and just adding to your litter. They have finished growing because the last days of feed are withdrawal, not packed with the calories for weight gain.

And even after your birds are picked up, there are still variations that could affect your pay greatly. Depending on the time they sit on the trucks before they go to processing, some of the birds may die. You aren't paid for a dead bird but you sure are charged for the feed that that bird ate.

The difference to my operation for being at the top of the ranking versus the bottom of the ranking for one flock is thousands of dollars. That's a lot of money, and it puts growers in the position to NOT want rock the boat, because the company can directly influence where you fall on that ranking. There is no way it can be fair to rank growers against one another when they never start out on the same level. There are too many things beyond the grower's control to base his pay on a ranking system, because a ranking system assumes fair competition and that growers are receiving the same inputs.

Forced Equipment Upgrades at Growers' Expense

One other commonly used practice that is economically abusive to growers is the practice of requiring equipment upgrades at the grower's expense, to make changes in the houses that were originally built to the company's own specifications.

With a traditional bank loan on a dwelling or land, one normally obtains equity as the loan is paid off. With loans for poultry houses and equipment, little equity is earned because the houses and equipment have limited salvage value. While loans are being paid off, cash flow is typically negative. After loans are paid off, cash flow may be positive, but inadequate to recover earlier losses.

Even with that dismal projection, the grower still works for the day that he will have the loan paid off. But guess what? The grower will never get to that day because the company won't let him. When a grower gets his houses paid for, the company wants the newer updated equipment in the houses or they will cut you off. So here you are with two choices, go back even deeper in debt or just sell your farm and salvage what you can.

The most recent example of this problem is tunnel ventilation. The poultry companies discovered by way of technology that if you put a chicken in a house and keep the temperature at 72 degrees after it feathers out and keep it virtually in the dark 24/7 for 8 weeks, you can raise a bigger bird on less feed. The feed is the company's only expense. Now this would be good if only the companies would share the profits with the growers, but they do not.

This new technology is achieved through what is known as tunnel ventilation. The curtains look white on the outside but they are black on the inside, no light can come through. Companies are now completely walling up one side of the houses. Some are even going so far as to wall up both sides. The only way the birds can get air is inlets in the ceiling that open when the fans come on to suck in air.

Our houses on our farm are what they call "conventional" houses. We have curtains that light can come through; the curtains come down automatically when it gets too hot. The company wanted us to convert our houses to tunnel ventilation, even though we paid hundreds of thousands of dollars to build our houses to their original specifications and still owed \$60,000 on them. The new upgrades that they wanted us to make would cost an additional \$80,000.

In other words it means that the company wants you to install tunnel ventilation so they can make more money off you. If you don't agree to do so, at your own expense, they threaten to stop giving you any more chickens and you will lose your farm. Poultry houses are a single-use structure and currently there is nothing else that can generate the revenue to pay for them that poultry can. You are completely vulnerable to the companies' demands.

I personally know growers that have been cut off. Others have given in and borrowed the money to do the upgrades, and are struggling under the additional debt.

While the companies do offer some additional pay to encourage you to shift to tunnel ventilation, I have looked at the figures and you can not make your additional loan payment with the improved pay they offer you. Not only can you not pay your loan, but you also have the additional expense of electricity because you must run fans to bring in fresh air in the summer. Before with conventional houses, you could just open the curtains, which is a much more energy-efficient strategy.

Farm business records show that contract producers who once had acceptable incomes from their poultry operations now put up a few hundred thousand dollars of equity, and borrow several hundreds of thousands more to hire themselves at minimum wage with no benefits and no real rate of return on their equity. Yet, integrators continue to earn 10 – 25 percent rates of return on equity.

Consumers have benefited from vertical integration in both quality and consistency of poultry products with lower prices. Reports show that many poultry integrators have benefited from vertical integration. Contract poultry producers have been left behind with a poverty level of existence.

Why Do Growers Sign the Contracts If They're So Bad?

A question often asked is: “If returns are really so low, why are people lined up to become contract producers?” Although no detailed studies are available, it appears that there are four major reasons why people continue to be interested in becoming contract producers. First, there are few other job opportunities in areas where poultry operations are often located. Second, many potential producers do not understand that cost and return budgets may use unrealistically long depreciation periods. In the past, some producers have been strongly discouraged by integrators from making public their contracts and financial information. And there may be deception in the information presented to potential producers by some integrators in that not all costs are shown, or costs are underestimated. Third, many potential producers may feel that they can be above average, even though the payment system prevents more than half of them from being above average. Fourth, the manner in which most integrators determine pay for individual flocks may result in declining pay as other producers adopt new, more efficient technology. Potential new producers may not recognize this and thus may not account for it in their profitability analyses.

Legislative Proposals To Address the Problems

Hopefully you are asking yourself, how can the companies do that? Because they have a contract that is written solely to benefit them. Because there are no laws that say they cannot do it, and because increasingly, their access to the courts of justice for growers are being barred by mandatory arbitration clauses in their contracts.

The companies are not going to change things unless they are made to do so, by commonsense laws governing fair standards of conducts in contracts, by adequate enforcement by USDA, and by a competitive market place that gives growers the ability and right to bargain for fair contract terms. The growers don't want anything that they are not entitled to, but they want things to be fair. And I have a few suggestions in that regard:

1) The Packers and Stockyards Act needs to be updated to give USDA's Grain Inspection, Packers and Stockyards Agency full authority, like the authority they already have in the red meat sector, to crack down on unfair and deceptive trade practices. Right now, their authority is very limited for poultry, and that means that there's no cop on the beat to make sure that poultry growers are not being abused. And even the limited authority that GIPSA has excludes any authority to provide protections for breeder hen and pullet growers. The Packers and Stockyards Act needs to be modernized to give GIPSA full authority to prevent unfair and deceptive trade practices in the poultry sector. And once they have that authority, we need to make sure that GIPSA is doing everything possible to fully enforce the law.

2) Pass legislation to specifically prohibit certain abusive contract clauses. For example, poultry growers, and some hog producers, are being forced to sign mandatory arbitration clauses. Often the company will force you to sign a new version of your old contract, but will add the arbitration clause, and threaten to stop sending you new chicks until you sign. This arbitration clause has the effect of saying that you can't seek justice in court, no matter what the company does to you. Even in the case of illegality, or breach of contract, or fraud, you can't go to court. Instead you have to go into a private arbitration system where you have no rights, and where they ask you to pay thousands of dollars up front just to start the arbitration process. Arbitration should be voluntary for both parties, not something forced on you by the company. Congress passed a law a few years ago to stop car manufacturers from using these abusive arbitration clauses on car dealers. Farmers would like the same protections that Congress has given to car dealers.

3) And what would be really best of all is if companies would be required to bargain in good faith with grower associations, instead of insisting on dealing with each grower individually. This is not a new idea. In fact in some states, like California and Michigan, the state laws have "good faith" bargaining requirements for some agricultural contracts. And it works well there. But the laws had to be there first to make this happen. We should do this at the national level too, by changing the Agricultural Fair Practices Act to require good faith bargaining in contract negotiations.

If large agribusinesses are allowed to control the terms of these take-it-leave-it contracts, and as long that Congress lets them abuse growers, companies will continue to shift the poultry model into other parts of agriculture, as we have already seen in many other commodities like hogs, tobacco, identity-preserved grains, and peanuts.

The problems of contracting and other manifestations of the lack of fair competition in agricultural markets are not confined to poultry. The problems are being seen in many other sectors of agriculture, particularly in the livestock sector. Therefore, over 200 organizations wrote to the House Agriculture Committee on January 18th of this year, in support of 8 legislative initiatives to help restore competition to agricultural markets, to the benefit of producers and consumers alike. A copy of that letter is attached to my written testimony. These legislative proposals include the ones that I have already mentioned, but also include others to address anti-competitive practices in the beef and hog sectors and elsewhere. It is my hope that this Committee will see fit to include a broad competition title in its version of the 2007 farm bill that will include provisions related to each of the 8 recommendations in the letter.

I would like to thank you for your time and willingness to listen to what's going on with today's poultry growers. The contract producer has been transferred into a mere servant of a corporation. Or, as some have said, contract producers are serfs – with a large mortgage.

January 18, 2007

The Honorable Tom Harkin
Chairman, Senate Committee on Agriculture, Forestry and Nutrition

The Honorable Saxby Chambliss
Ranking Member, Senate Committee on Agriculture, Forestry and Nutrition

The Honorable Collin Peterson
Chairman, House Committee on Agriculture

The Honorable Bob Goodlatte
Ranking Member, House Committee on Agriculture

The Honorable Patrick Leahy
Chairman, Senate Committee on the Judiciary

The Honorable Arlen Specter
Ranking Member, Senate Committee on the Judiciary

The Honorable John Conyers, Jr.
Chairman, House Committee on the Judiciary

The Honorable Lamar S. Smith
Ranking Member, House Committee on the Judiciary

Dear Chairmen and Ranking Members:

The over 200 undersigned organizations strongly urge you to make the issues of agricultural competition and market concentration a top priority as Congress considers the crafting of agricultural legislation and the next Farm Bill. During the 2002 Farm Bill debates, public testimony provided clear and compelling evidence of the need for free market competition and fairness for the nation's farmers and ranchers. Since that time these concerns have become even more urgent and prominent in the public eye.

Today, a small handful of corporations overwhelmingly dominate our food supply. The concentration of market control in the top four firms in U.S. food retailing, grain processing, red meat processing, poultry processing, milk processing, and nearly every category of food manufacturing is at an all time high. Corporate mergers and buyouts have concentrated the power of these firms and increased their ability to unfairly manipulate market conditions in their favor. This unprecedented level of horizontal market consolidation effectively eliminates free market competition to the detriment of independent family farmers and consumers.

Compounding the problem associated with horizontal consolidation is the rapid trend toward vertical integration. Manufacturers, processors, and packers increasingly control all stages of production and inventory through commodity ownership and one-sided contracts. This corporate control of production unnecessarily eliminates market transparency, creating an environment ripe for price manipulation and discrimination. It replaces farm-level decision making with centralized corporate planning and leaves farmers trapped in long-term debts tied to short-term, non-negotiable production contracts. In addition, top retailers and packers increasingly engage in relationships with dominant suppliers that exclude smaller competitors and minimize price competition. Because both supply and demand are controlled by the same few players in the market, the basic principles of supply and demand cannot function.

A critical role of government is to ensure fairness by facilitating properly operating markets and balance in the economic relationships among farmers/ranchers, consumers and food companies. Currently, inadequate federal legislation and the lack of enforcement of anti-trust policies allow a handful of corporations to continue to consolidate market power, manipulate prices, and create anti-competitive market structures. Federal government inaction has a dramatic, negative impact on not only farmers and ranchers, but also on rural communities, the environment, food quality, food safety, and consumer prices. It undermines sustainable production practices and state and local laws that support family-scale, sustainable farm and ranch operations.

Policy makers often voice the laudable policy goals of maintaining a diverse, farm-and-ranch-based production sector and providing consumers with a nutritious, affordable food supply. However, government failure to redress industry concentration--both vertical and horizontal--is thwarting these policy goals and driving the earnings of farmers and ranchers down and consumer prices up.

To address these problems, we urge you to champion a strong, comprehensive Competition Title in the 2007 Farm Bill. We also ask that you co-sponsor and support any of the following measures of this comprehensive package if they are introduced as separate or combined bills and to work for speedy congressional consideration of these proposals.

● **LIMIT PACKER CONTROL/MANIPULATION OF LIVESTOCK MARKETS**

1. *Captive Supply Reform Act:* This legislation will bring secret, long-term contracts between packers and producers into the open and create a market for these contracts. The Captive Supply Reform Act would restore competition by making packers (and livestock producers) bid against each other to win contracts. Currently, formula contracts and marketing agreements are negotiated in secret, where packers have all the information and power. These formula contracts and agreements depress prices and shut small and independent producers out of markets. The Captive Supply Reform Act would require such contracts to be traded in open, public markets to which all buyers and sellers have access.

2. *Prohibition on Packer-Owned Livestock:* Meat packers such as Tyson, Cargill, and Smithfield Foods use packer-owned livestock as a major tool for exerting unfair market power over farmers and ranchers. This practice fosters industrial livestock production and freezes independent farmers

out of the markets. Packer-owned livestock has been proven to artificially lower farm gate prices to farmers and ranchers while consumer food prices continue to rise. By prohibiting direct ownership of livestock by major meatpackers, a packer ban addresses a significant percentage of the problem of captive supply which packers use to manipulate markets, and would help increase market access for America's independent producers who currently experience great restrictions in market access due in part to packer ownership of livestock.

• INCREASE FAIRNESS IN AGRICULTURAL CONTRACTS AND MARKETS

3. *Fairness Standards for Agricultural Contracts:* In order to address the worst abuses contained in processor-drafted contracts, legislation that provides a set of minimum standards for contract fairness is urgently needed. Such standards should include at a minimum the following:

- (a) prohibition of the use of forced, mandatory arbitration clauses, which have been used by some packers or integrators to force growers to give up their access to the courts, even in the case of fraud, breach of contract, misrepresentation or other blatant contract abuses by the integrator or packer firm;
- (b) clear disclosure of producer risks;
- (c) full prohibition on confidentiality clauses;
- (d) recapture of capital investment so that contracts that require a significant capital investment by the producer cannot be capriciously canceled without compensation; and
- (e) a ban on unfair or deceptive trade practices, including "tournament" or "ranking system" payment.

4. *Clarification of "Undue Preferences" in the Packers & Stockyards Act (PSA):* Packers commonly make unjustified, preferential deals that provide unfair economic advantages to large-scale agriculture production over smaller family owned and sustainable farms. Courts have found current undue preference legal standards virtually impossible to enforce. Additional legislative language is needed in the PSA to strengthen the law and clarify that preferential pricing structures (those that provide different prices to different producers) are justified only for real differences in product value or actual and quantifiable differences in acquisition and transaction costs. Specifically, we are asking to:

- (a) Make clear that farmers damaged by packer/processor unfair and deceptive practices need not prove "harm to competition" to receive a remedy.
- (b) Make clear that "pro-competitive effects" or "legitimate business justifications" are not recognized packer defendant defenses, and not necessary for farmer-plaintiffs to prove the absence of, in a court case under the PSA.
- (c) Require courts to award attorneys fees to successful producer plaintiffs under the PSA.

5. *Closing Poultry Loopholes in the Packers & Stockyards Act (PSA):* USDA does not currently have the authority under the PSA to bring enforcement actions against poultry dealers. Poultry producers should have the same basic enforcement protection that is offered to livestock producers when packers and livestock dealers violate the PSA. We seek legislation to clarify that USDA has authority over PSA violations involving poultry dealers in their relations with all poultry growers, including those who raise pullets or breeder hens as well as broiler producers. The PSA

enforcement loophole for poultry dealers should be closed.

6. *Bargaining Rights for Farmers:* Loopholes should be closed in the Agricultural Fair Practices Act of 1967 (AFPA) and processors should be required to bargain in good faith with producer organizations. The AFPA was enacted to ensure that livestock and poultry producers could join associations and market their products collectively without fear of retribution by processors. These goals have not been attained due to loopholes in that Act. Retaliation by processors is commonplace in some sectors. Legislation should be enacted that promotes bargaining rights and prevents processor retaliation.

● **ASSURE ADEQUATE MARKET INFORMATION AND TRANSPARENCY FOR PRODUCERS AND CONSUMERS**

7. *Livestock Mandatory Price Reporting:* The Livestock Mandatory Price Reporting Act of 1999 (LMPRA) requires packers, processors, and importers to provide price, contracting, supply and demand information to USDA, which then uses the information to create price reports for livestock producers. Since its implementation, bureaucratic inertia has blocked effective enforcement of the LMPRA and prevented the Act from operating to benefit independent livestock producers. The Government Accountability Office, at the request of Senators Harkin (D-IA) and Grassley (R-IA), has reviewed USDA implementation of the Act. In December 2005, the GAO issued a report documenting lengthy lag times for USDA corrections to missing or incorrect information from packers, and the failure of USDA to inform the public about violations of the Act revealed in USDA audits. The LMPRA was reauthorized in September 2006 without including GAO recommendations to improve the Act. If USDA does not implement these recommendations, Congress should amend the Livestock Mandatory Price Reporting Act in 2007 by incorporating the GAO report recommendations as legislative directives to USDA in implementing the Act.

8. *Mandatory Country of Origin Labeling:* Country of origin labeling (COOL) for beef, lamb, fresh fruits, fish and shellfish was passed as a provision of the 2002 Farm Bill. Mandatory COOL for the fish and shellfish commodities was implemented by USDA in April of 2005, but COOL implementation for all other commodities has been successfully stymied by the meatpackers and retailers. Country of origin labeling is a popular measure that allows consumers to determine where their food is produced and also enables U.S. producers to showcase their products for quality and safety. It also limits the ability of global food companies to source farm products from other countries and pass them off as U.S. in origin. Congress should reauthorize COOL to reiterate its benefits to producers and consumers and should provide funding to ensure that USDA undertakes immediate implementation of COOL.

In conclusion, farmers, ranchers, and consumers across the country are asking for these legislative reforms to ensure fair markets and a competitive share for family farmers and ranchers of the \$900 billion dollars that consumers pay into the food and agriculture economy annually. Market reforms remain a key ingredient for rural revitalization and meaningful consumer choice. The legislative reforms summarized above are key to achieving the goals of promoting an economically healthy and diverse agricultural production sector and providing consumers with healthy, affordable food.

Thank you.

Sincerely,

A Little Taste of Everything	Catholic Charities Diocese of	Crowley-Kiowa-Lincoln
A Taste of the North Fork	Sioux City, IA	Cattlemen's Association
(NY)	Catholic Charities of	(CO)
Adams County Farmers Union	Chemung /Schuyler Counties	Cumberland Counties for
(ND)	(NY)	Peace & Justice (TN)
Agricultural Missions, Inc.	Catholic Charities of Kansas	Dakota Resource Council
(NY)	City - St. Joseph, Inc.	Dakota Rural Action of SD
Agriculture and Land Based	Catholic Charities of	Delmarva Poultry Justice
Training Association (CA)	Louisville, Parish Social	Alliance
Agriculture of the Middle	Ministry Dept. (KY)	Delta Land and Community,
Alabama Contract Poultry	Catholic Rural Life,	Inc.
Growers Association	Archdiocese of Dubuque, IA	Eagle County Cattlemen's
Alabama Sustainable	Cattle Producers of	Association (CO)
Agriculture Network	Washington	Endangered Habitats League
Alliance for a Sustainable	Center for Food Safety	(CA)
Future (PA)	Center for Earth Spirituality	Environmental Action
Alliance for Sustainable	and Rural Ministry (MN)	Committee of West Marin
Communities (MD)	Center for Popular Research,	(CA)
Alternative Energy Resources	Education and Policy (NY)	Environmental Coalition of
Organization (AERO) -MT	Center for Rural Affairs	Mississippi
American Corn Growers	Central Colorado Cattlemen's	Family Farm Defenders
Association	Association	Family Farms for the Future
American Society of	Chemung County Church	(MO)
Agronomy	Women United (NY)	Farm Aid
Appalachian Crafts (KY)	Chemung County Council of	Farm Fresh Rhode Island
Art & Nature Project (NY)	Churches (NY)	FH King Students of
Beartooth Stock Association	Church Women United of	Sustainable Agriculture at
(MT)	NYS	UW Madison
Berkshire Co-op Market	CitySeed (CT)	First Nations Development
Bird Conservation Network	Community Action Resource	Institute
Blessed Kateri Tekakwitha	Enterprises (OR)	Florida Organic Growers
Region, Secular Franciscan	Community Food Security	Food Alliance (OR)
Order, NYS	Coalition	Food and Water Watch
Bronx Greens	Concerned Citizens of Central	Food Routes Network
California Dairy Campaign	Ohio	Foodshed Alliance of the
California Farmers Union	The Cornucopia Institute (WI)	Ridge and Valley (NJ)
California Institute for Rural	Corson County Farmers Union	Friends of Rural Alabama
Studies	(SD)	Georgia Organics
Californians for GE-Free	Court St Joseph #139,	Georgia Poultry Justice
Agriculture	Catholic Daughters of the	Alliance
Campaign for Contract	Americas, Corning (NY)	Global Exchange
Agriculture Reform	Court St Joseph #139,	Government Accountability
Campaign for Family Farms	Corning/Elmira, Catholic	Project
and the Environment	Daughters of the Americas	GRACE/Sustainable Table
Caney Fork Headwaters	(NY)	Grassroots International
Association (TN)	Crop Science Society of	Hahn Natural Foods (PA)
	America	

Harding County Stockgrowers Association (SD)	Kit Carson County Cattlemen's Association (CO)	National Latino Farmers & Ranchers Trade Association
Harvest Co-op Market (MA)	La C.A.S.A. de Llano (TX)	National Organic Coalition
Heartland Center / Office of Peace and Justice for the Diocese of Gary, Indiana	Ladies of Charity of Chemung County (NY)	National Poultry Justice Alliance
Hispanic Farmers and Ranchers of America Inc.	Land Stewardship Project (MN)	Nebraska Farmers Union
Hispanic Organizations Leadership Alliance	Little Seed CSA (NY)	Network for Environmental & Economic Responsibility
Horseheads Grange #1118, Chemung City (NY)	Madera County Cattlemen's Assoc (CA)	Nevada Live Stock Association
Humane Society of the United States	McKenzie City Energies & Taxation Association (ND)	New England Small Farm Institute (NESFI)
Idaho Rural Council	Merced-Mariposa Cattlemen's Association, (CA)	New York Beef Producers Association Southern Tier Region
Illinois Farmers Union	Mesa County Cattlemen's Association (CO)	NY Sustainable Agriculture Working Group
Illinois Stewardship Alliance	Michigan Farmers Union	Nojoqui Ranch Produce (CA)
Independent Beef Association of North Dakota	Midwest Organic and Sustainable Education Service	North Carolina Contract Poultry Growers Association
Independent Cattlemen of Iowa	Minnesota Farmers Union	North Dakota Farmers Union
Independent Cattlemen of Nebraska	The Minnesota Project	Northeast Organic Dairy Producers Alliance
Independent Cattlemen's Association of Texas, Inc.	Mississippi Contract Poultry Growers Association	Northeast Organic Farming Assoc -MA
Indiana Campaign for Economic Justice	Mississippi Livestock Markets Association	Northeast Organic Farming Assoc -NY
Indiana Farmers Union	Missouri Farmers Union	Northeast Organic Farming Assoc-CT
Institute for Agriculture & Trade Policy	Missouri Rural Crisis Center	Northeast Organic Farming Assoc-VT
Institute for Responsible Technology	Montana Cattlemen's Association	Northern Plains Sustainable Agriculture Society
Iowa Citizens for Community Improvement	Montana Farmers Union	Northern Plains Resource Coun (MT)
Iowa Farmers Union	National Campaign for Sustainable Agriculture	NYS Safe Food Coalition
Just Food (NY)	National Catholic Rural Life Conference	Ohio Environmental Council
Just Harvest, Pittsburgh	National Center for Appropriate Technology (NCAT)	Ohio Farmers Union
Kansas Cattlemen's Association	National Family Farm Coalition	Oregon Livestock Producer Association
Kansas City Food Circle	National Farmers Organization	Oregon Tilth
Kansas Farmers Union	National Farmers Union	Organic Consumers Association
Kansas Rural Center	National Farmers Union	Organic Seed Alliance (WA)
Kerr Center for Sustainable Ag (OK)	National Hmong American Farmers, Inc.	Organization for Competitive Markets

The Partnership for Earth Spirituality (NM)	Social Concerns Office, Diocese of Jefferson City	Washington County Stockmen's Assoc (CO)
Past Regents Club, Diocese of Rochester (NY)	Social Concerns/Rural Life Department, Catholic Charities, Diocese of Sioux City, IA	WA Sustainable Food & Farming Network
PCC Natural Markets (WA)	Soil Association	West Carroll Cattleman Assoc. (LA)
PCC Farmland Trust (WA)	Soil Science Society of America	Western Organizations of Resource Councils
Pennsylvania Association for Sustainable Agriculture	South Dakota District IV Farmers Union	Wisconsin Farmers Union
Pennsylvania Farmers Union	South Dakota Farmers Union	
Perkins County Farmers Union (South Dakota)	South Dakota Stockgrowers Association	
Platte County Farm Bureau (NE)	Southern Colorado Livestock Association	
Powder River Basin Resource Council (WY)	Southern Research & Development Corp. (LA)	
Producers Livestock	Southern Sustainable Ag Working Group	
Provender Alliance (OR)	Spokane County Cattlemen's Association (WA)	
Putting Down Roots (PA)	St John the Baptist Fraternity, Secular Franciscan Order, Elmira NY	
Rainbow Natural Grocery (MS)	Stevens County Cattlemen's Association (WA)	
R-CALF United Stockgrowers of America	Sustainable Agriculture Coalition	
Red Tomato (MA)	Temple Beth El of Flint, Michigan	
Regional Farm and Food Project (NY)	Texas Mexico Border Coalition Community Based Organization	
Rochester Farm Connection (NY)	Tilth Producers of Washington	
Rochester Roots (NY)	United Hmong Association	
Rocky Mountain Farmers Union	The Urban Nutrition Initiative (PA)	
Rural Advancement Foundation International-USA (RAFI-USA)	Utah Farmers Union	
Rural Coalition/Coalición Rural	Valley Stewardship Network (WI)	
Rural Life Committee of the North Dakota Conference of Churches	Virginia Association for Biological Farming	
Selene Whole Foods Co-op (PA)	Washington Cattlemen's Association	
Sevananda Natural Foods Market		
Sierra Club Agriculture Committee		

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ON THE 2007 FARM BILL'S COMPETITION AND CONCENTRATION ISSUES
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AGRICULTURE'S WEBSITE AT:**

<http://sustainableagriculture.net/CompConc2007.php>.