



National Farmers Union

Testimony of Tom Buis

**Before the
U.S. House of Representatives Agriculture Subcommittee
on Livestock, Dairy and Poultry**

**Concerning the
Market Structure of the Livestock Industry**

**Tuesday, April 17, 2007
Washington, D.C.**

STATEMENT OF TOM BUIS
PRESIDENT, NATIONAL FARMERS UNION
BEFORE THE U.S. HOUSE AGRICULTURE SUBCOMMITTEE ON
LIVESTOCK, DAIRY AND POULTRY
MARKET STRUCTURE OF LIVESTOCK INDUSTRY

APRIL 17, 2007

Chairman Boswell and members of the subcommittee, my name is Tom Buis, and I am president of the National Farmers Union-- a nationwide organization representing more than 250,000 farm, ranch and rural residents. I am pleased to be here today to discuss the market structure of the livestock industry. I will submit my full testimony for the record and would like to focus in my oral testimony on a summary of issues NFU believe should be included in a comprehensive competition title in the next farm bill.

NFU is releasing an updated commissioned study conducted by Drs. Mary Hendrickson and William Heffernan from the University of Missouri - Department of Rural Sociology, which reveals the top four firms in most agricultural sectors have continued to increase their stronghold since our last study in 2005.

The study shows the top four beef packers dominate 83.5 percent of the market, four pork packers control 66 percent of that market, and the top four poultry companies process 58.5 percent of the broilers in the United States. Tyson Foods is listed in the top two of the pork and broiler markets and number one in the beef packing market.

Ethanol production is the only agricultural sector in which concentration has steadily decreased. A decade ago, the top four companies owned 73 percent of the ethanol market. Today, the top four companies control 31.5 percent of the ethanol produced. The increase in ethanol production competition is in direct relationship to the high number of farmer-owned ethanol cooperatives built across the country. Farmer-owned ethanol plants account for 39 percent of total capacity. This is a clear example of the impact and potential for public policies that encourage diversification and discourage monopolization in our food system.

NFU has helped provide financial support to track agricultural concentration data since 1999, yet Dr. Heffernan has been tracking concentration data since 1987; we have witnessed the concentration levels rise in nearly every sector with each report. The concentrated power of these firms increases their ability to manipulate markets, effectively eliminating free market competition to the detriment of family farmers and consumers. I have included the updated tables in my testimony but wanted to bring to the subcommittee's attention the difficulty our researchers had in obtaining the data. Congress should direct the Departments of Agriculture and Justice to collect and publish concentration information. Corporations currently consider the data proprietary, and the public has limited, if any, access to the data.

The information contained in this new research is further reason for Congress to immediately pass legislation to restore true competition in the marketplace for U.S. farmers and ranchers. Independent producers cannot be successful in the absence of protection from unfair and anti-competitive practices. I have attached the updated tables to my testimony for the record.

In order to restore balance in the marketplace, NFU believes a comprehensive competition title is needed to untie the hands of family farmers and ranchers across the country. Congress must intervene and accept responsibility for our dysfunctional livestock markets by including a comprehensive, top-to-bottom remedy to end non-competitive practices in the 2007 farm bill. Further study and “tweaks” here or there are insufficient. A non-competitive marketplace is code for farmers and ranchers being robbed; without price discovery, producers are almost always paid less for their products than the true and fair value of those commodities. National Farmers Union has been steadfast in its belief of the traditional agricultural system which is grounded by independent family producers. Many cite the free market as a basis for not taking action, yet I ask: how can you have a free market when there is no competition? How can one rely upon a free market without recognizing when it needs fixing?

Competition Title

A comprehensive competition title should include the requirement that USDA and all federal agencies enforce current antitrust laws. In January 2006, a report revealed USDA’s Grain Inspection, Packers and Stockyards Administration (GIPSA) failed to enforce laws created to combat increased consolidation and anti-competitive practices. The audit report revealed GIPSA has no policy to define investigations and therefore considers everyday tasks as “investigations.” The agency does not maintain accurate records in a tracking system and never implemented previous recommendations from the Office of Inspector General (OIG) or the Government Accountability Office (GAO). The Packers and Stockyards Act of 1921 was passed to address the unfair and deceptive trade practices of meat packers, but if the Act is not enforced, it is pointless.

It is GIPSA’s responsibility to maintain fair trade practices in the marketing of livestock; provide financial protection for participants in livestock transactions and ensure open competitive marketing conditions for livestock and meat. It appears farmers and ranchers have been fighting anti-competitive practices with one hand tied behind their backs. The report generates serious concern regarding the lack of action by GIPSA to enforce antitrust laws. Farmers and ranchers have seen and felt the negative impacts of increased consolidation and anti-competitive practices. The lack of action by GIPSA to combat anti-competitive practices is a disappointment for family farmers and ranchers across the country.

In 2002, the Senate approved a ban on packer ownership. Unfortunately, the provision was not approved as part of the final 2002 Farm Bill. Banning packer ownership of livestock is needed to ensure independent producers have a place in the future of livestock production. This is not setting precedence; instead, it is consistent with legislative action taken more than 85 years ago when Congress adopted the Packers and Stockyards Act to stop anti-competitive meat packer practices. Meat packers do not need to own livestock to improve meat quality or keep prices affordable, nor will banning packer ownership of livestock lead to market collapse.

With the recent decisions of the 8th U.S. Circuit Court of Appeals to declare state corporate farming bans unconstitutional, such as the Iowa ban on packer feeding and I-300 in Nebraska, it is increasingly important for this Congress to re-think its role in antitrust enforcement. A ban on packer feeding is that step in the right direction of increasing producer prices and restoring competition to a non-competitive market.

Captive supply reform is another step in the direction of restoring competition by requiring packers to bid against each other to win contracts. Instead of using its own captive supply of livestock to circumvent an open and transparent livestock market, contracts and agreements between packers and producers would be based upon fixed base prices. Today, packers directly own cattle and procure cattle through contracts. These two types of captive supply allow packers to fill daily slaughter needs without having to bid for cattle on the spot market. Captive supply reform does not eliminate the ability for cattle to be contracted for future delivery; instead, it would simply require all livestock marketing contracts to be traded in an open, transparent and public process, with all buyers and sellers having access to the same information.

Congress took action in 1999 to inject transparency in livestock markets by passing the Livestock Mandatory Price Reporting Act, which requires packers, processors and importers to provide price, contracting, supply/demand information to USDA. The department then uses the collected information to create price reports for producers. Since its implementation, the weight of bureaucracy has prohibited any true enforcement of the program from being realized, and the program has not been working as intended for the benefit of independent livestock producers.

Stronger oversight and review of the program is necessary to reach the original goal and congressional intent of the program. In a report released in December 2005, the GAO found that USDA regularly excluded transactions in its reports. From April through June 2005, USDA reports excluded nine percent of cattle transactions that packers had reported. GAO reviewed 844 USDA audits and found packers to have incorrectly reported or completely failed to report required information nearly 64 percent of the time. In order to achieve true market transparency for America's livestock producers, a competition title of the farm bill should address outstanding producer concerns and incorporate the recommended legislative fixes from GAO to the price reporting program.

In addition to injecting transparency and fairness into livestock markets, new marketing opportunities are required to ensure a strong and vibrant industry into the future. An end to the ban on interstate shipment of meat is needed to create such an opportunity. Many family farmers and ranchers have been forced out of business due to inadequate market competition. Ending the ban will increase competition and economic, marketing and trade opportunities for rural America.

Current law allows some meat products such as venison, pheasant and quail to be shipped between states without restriction. Foreign meat and poultry also do not face restrictions in interstate trading, while domestic meat is blocked. Removing the ban on interstate sales of meat and poultry will level the economic playing field for small business, promote competition in the marketplace and create a more uniform inspection system. Legislation has been introduced to achieve these goals and is supported by USDA advisory committees because of the multiple benefits.

In keeping with marketing opportunities, I must note that the current generation of commodity checkoff programs has lost the support and trust among a significant percentage of producers who pay for it. NFU believes mandatory checkoff programs should be legislatively reformed to become a truly voluntary program that earns the support and trust of the producers who financially support the program.

The May 2005 U.S. Supreme Court decision was surprising because the court ruled the mandatory beef checkoff program is a U.S. government program and the Constitution's First Amendment free-speech rights of producers funding the program do not apply. This contradicts mandatory checkoff proponents' arguments that the program is run and controlled by the producers. The disappointing aspect of the Supreme Court ruling was that it did nothing to address the problems or controversies surrounding mandatory producer funded checkoff programs. Issues such as accountability to producers who fund the programs and access to open and fair referendums remain unresolved. NFU supports a voluntary checkoff program, with producer participation determined at the point of sale. Any U.S. promotion program funded by producers of the commodities should be for the sole purpose of promoting U.S. products.

Earlier this year, Senator Tom Harkin introduced the Competitive and Fair Agricultural Markets Act of 2007, which NFU has endorsed. This legislation can and should serve as a basis for establishing a comprehensive competition title in the 2007 farm bill. Harkin's legislation establishes an Office of Special Counsel within USDA, which NFU has long advocated for in order to investigate and prosecute violations on competition issues. The position could streamline and increase the effectiveness of USDA to investigate and take action on antitrust law violations. Harkin's legislation puts power in the hands of producers by making it easier to

prove unfair and anti-competitive actions by packers and processors via the judicial process. USDA would also be given authority to enforce the Packers and Stockyards Act relative to poultry sales; current law prohibits the department from prosecuting violations discovered in the poultry industry.

Senator Harkin's legislation goes on to enhance contract producer protections, including the right for a producer to review a contract for three days; prohibits confidentiality clauses. It prevents mandatory arbitration and protects producers from contracts arbitrarily terminated. Finally, Harkin's competition legislation prohibits unfair, anti-competitive or deceptive practices by anyone that would impact the marketing, receiving, purchasing, sale or contracting of commodities. Producers would also be protected from discrimination based upon their membership in a certain organization or cooperative.

NFU has been very frustrated and disappointed in USDA's mishandling of implementing a National Animal Identification System (NAIS). The department has spent nearly \$100 million of federal dollars to register 25 percent of livestock premises across the country. In the meantime, the department has taken every position possible, from mandatory versus voluntary, public database versus private, protecting producer confidentiality versus not running cost estimates, and the list goes on. When discussions of establishing a national identification system started, many producers were open to the concept, in the interest of animal health, consumer health and beef/cattle trade issues. USDA's actions since 2004 have done nothing but erode producer confidence, by choosing to ignore the overwhelming number of questions and concerns of producers.

The development and control of a NAIS is a big concern to our members, who fear they will be held financially responsible and legally liable for a system that may or may not achieve the goals of a 48-hour trace-back capability. The current state of the NAIS could best be described as a mandatory-voluntary system, which results in nothing more than an unfunded mandate for livestock producers. U.S. producers have no assurance that their foreign competitors will have the additional burden and expense of complying with an animal identification system in their own country. We live in a competitive, global market where price determines market share. American producers are required to comply with strict labor, environmental and other production regulations, which drive up the cost of producing their commodities. Too often, our global competitors do not have to adhere to similar standards; a NAIS could simply be another example of increased production cost for U.S. livestock producers, with a potential loss of market share and no economic benefit.

National Farmers Union policy calls for a national animal identification system that:

- Is funded and controlled by the federal government;
- Mitigates producer liability;
- Limits producer information accessibility;
- Is coupled with the mandatory country-of-origin labeling law; and
- Is only accessed during times of animal disease or bioterrorism outbreaks.

Finally, Chairman Boswell, you well know that mandatory COOL was passed five years ago as part of the 2002 Farm Bill, but has been delayed by riders in must-pass appropriations bills. COOL was implemented on wild-caught and farm-raised seafood products in April of 2005 and is working.

Opponents of COOL say consumers do not care and do not want the information, yet every consumer survey demonstrates just the opposite. Last month, Food and Water Watch released its latest consumer poll which found 82 percent of consumers support mandatory COOL. Consumers not only want to know which country their food comes from but are willing to pay more for U.S. products. On February 28, one of the largest coalitions sent a letter to Congress urging an end to the prohibition on implementation funds for USDA. The letter, which is below, urged Congress to direct USDA to immediately prepare a common-sense rule for implementation of mandatory COOL on meat, produce and peanuts.

February 28, 2007

The Honorable Nancy Pelosi
Speaker
U.S. House of Representatives
235 Cannon House Office Building
Washington, D.C. 20515

The Honorable John Boehner
Minority Leader
U.S. House of Representatives
1011 Longworth House Office Building
Washington, D.C. 20515

The Honorable Collin Peterson
Chairman
U.S. House Agriculture Committee
2159 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Robert Goodlatte
Ranking Member
U.S. House Agriculture Committee
2240 Rayburn House Office Building
Washington, D.C. 20515

Dear Speaker Pelosi, Minority Leader Boehner, Chairman Peterson and Ranking Member Goodlatte:

On behalf of millions of consumers and producers, we write to urge you to change the date of implementing mandatory country-of-origin labeling (COOL) for beef, pork, lamb, produce and peanuts to September 2007. The Farm Security and Rural Investment Act of 2002 included a provision requiring retailers to notify consumers of the country-of-origin of beef, pork, lamb, produce, peanuts and seafood. We represent millions of Americans that continue to stand united in support of this valuable program. Our coalition has grown impatient with the implementation delays in previous Congresses, which restricted USDA funds to implement this very popular provision. Your leadership is needed to ensure the intent of Congress and the will of the American people are met.

As the delayed implementation date of September 2008 nears, opponents of mandatory COOL are trying to convince Congress that a change in statute is needed in order to reduce the expense and burden of the program. We do not support changing a statute that has not been given a chance to prove itself. USDA implemented mandatory COOL on farm-raised and wild-caught seafood effective April 4, 2005 with the existing statute; the experience gained from seafood implementation should be utilized by USDA to write a final rule on the remaining covered commodities that is not burdensome or expensive and meets the goal and intent of Congress.

Consumer surveys repeatedly demonstrate overwhelming support for mandatory COOL. A poll conducted in June 2005 by Public Citizen found 85 percent of respondents wanted COOL; 74 percent supported Congress making labeling a mandatory program; and 55 percent had "little or not much trust" in the meat, seafood, produce and grocery industries to voluntarily provide country-of-origin information. In January 2004, National Farmers Union commissioned a national poll of likely voters on the issue of mandatory COOL. That survey found 82 percent of respondents believed food should be labeled with country-of-origin information; 85 percent stated they would be more inclined to buy food produced in the United States; and 81 percent said they would be willing to pay a few cents more for food products grown and/or raised in the U.S. and identified as such.

Many of the myths surrounding mandatory COOL have begun to resurface, despite being unsubstantiated for years. Consumers and producers have grown impatient with the backdoor delays and the rhetoric of packers, processors and retailers that flies in the face of common-sense. The time has come for Congress to end the prohibition on implementation funds for USDA and require the department to immediately prepare a common-sense rule for implementation of mandatory COOL; the regulation does not need to be burdensome or expensive.

Enclosed are three recent editorials that have been printed in support of repealing the implementation delay and moving forward with mandatory COOL as directed in the 2002 Farm Bill.

American consumers and producers have time and again expressed their strong support for this program. Given a choice, we believe consumers across the country will choose to purchase U.S. products; without mandatory COOL, consumers continue to be denied the ability to differentiate between U.S. and imported food products.

Thank you for your attention to this most important issue.

Sincerely,

Agriculture and Health Alive LLC (ME)
Alabama Contract Poultry Growers Association
Alaska Farmers Union
Alaska Marine Conservation Council
Alliance for a Sustainable Future (PA, NJ)
Ambler Environmental Advisory Council (PA)
American Agriculture Movement of South Dakota
American Agriculture Movement of Texas County (OK)
American Corn Growers Association
American Grassfed Association
Appalachian Crafts (KY)
Arkansas Farmers Union
Boulder County Community Gleaning Project (CO)
Buckeye Quality Beef Association (OH)
Calaveras County Cattlemen's Association (CA)
California Dairy Campaign
California Farmers Union
California Institute for Rural Studies
California National Farmers Organization
Campaign for Family Farms and the Environment (IA)
Caney Fork Headwaters Association (TN)
Cape Cod Commercial Hook Fishermen's Association (MA)
Carolina Farm Stewardship Association
Cattle Producers of Washington (WA)
Cattlemen's Texas Longhorn Registry (TX)
Center for Earth Spirituality and Rural Ministry (MN)
Center for Rural Affairs (NE)
Center for Science in the Public Interest
Center for Sustaining Agriculture & Natural Resources WSU (WA)
Church Women United of Chemung County (NY)
Church Women United of New York
Churches' Center for Land and People
Citizens Action Coalition (IN)
Citizens Awareness Network (MA)
Colorado Independent Cattle Growers Association
Colorado Women Involved in Farm Economics
Community Alliance with Family Farmers (CA)
Community Food Security Center, Community Food Bank, Inc. (AZ)
Community Food Security Coalition
Community Involved in Sustaining Agriculture, Inc. (MA)
Community Markets (NY)
Community to Community Development (WA)
Concerned Citizens of Central Ohio
Consumer Federation of America
Cornucopia Institute
Countryside Conservancy Farmland Center (OH)
Court St. Joseph #139, Catholic Daughters of the Americas (NY)
Cruetzfeldt-Jakob Disease Foundation
Cumberland Countians for Peace & Justice (TN)
Dakota Resource Council (ND)
Dakota Rural Action (SD)
Endangered Habitats League (CA)
Equal Exchange (MA)
Family Dairies USA
Farm Aid
Farm Fresh Rhode Island
Farms Without Harm (MI)
Ferris Farm (NY)
Florida Farmers, Inc.
Food and Water Watch
Foodshed Alliance (NJ)
Genesis Farm (NJ)
Georgia Organics
Georgia Poultry Justice Alliance
Go Wild Consumer Education Campaign (WA)
GrassWorks, Inc. (WI)
Hahn Natural Foods (PA)
Hispanic Farmers and Ranchers of America Inc.
HOLA/National Latino Farmers & Ranchers Trade Association
Horseheads Grange #1118 (NY)
Humane Society of the United States
Idaho Farmers Union
Idaho Rural Council
Illinois Farmers Union
Illinois National Farmers Organization
Illinois Stewardship Alliance
Independent Beef Association of North Dakota
Independent Cattlemen of Iowa
Independent Cattlemen of Nebraska
Independent Cattlemen's Association of Texas
Indiana Farmers Union
Indiana National Farmers Organization
Institute for Agriculture and Trade Policy
International Texas Longhorn Association (OH)
Intertribal Agriculture Council (MT)
Iowa Citizens for Community Improvement
Iowa Farmers Union
Kansas Cattlemen's Association
Kansas Farmers Union
Kit Carson County Cattlemen's Association (CO)
Ladies of Charity of Chemung County (NY)
Land Stewardship Project (MN)
League of Rural Voters (MN)
Líderes Campesinas (CA)
Lincoln County Stockmen's Association (CO)
Little Seed CSA (NY)
Louisiana Shrimp Association
Maine Organic Farmers and Gardeners Association
Mesa County Cattlemen's Association (CO)
Michigan Farmers Union
Michigan Land Trustees
Midwest Organic Dairy Producers Association (WI)
Minnesota Cattlemen's Association
Minnesota Farmers Union
Mississippi Contract Poultry Growers Association
Mississippi Livestock Markets Association, Inc.

Missouri Farmers Union
 Missouri National Farmers Organization
 Montana Cattlemen's Association
 Montana Farmers Union
 Moonglow Farms (WI)
 Morrow County Livestock Growers Association (OR)
 National Association of Counties
 National Association of Farmer Elected Committees
 National Campaign for Sustainable Agriculture
 National Catholic Rural Life Conference
 National Consumers League
 National Family Farm Coalition
 National Farmers Organization
 National Farmers Union
 National Grange
 Nature's International Certification Services (WI)
 Nebraska Farmers Union
 Nebraska Grange
 Nebraska State AFL-CIO
 Nebraska Women Involved in Farm Economics
 Neighborhood Farmers Market Alliance (WA)
 Network for Environmental & Economic Responsibility (TN)
 Nevada Live Stock Association
 New England Farmers Union (ME, NH, VT, MA, CT, RI)
 New England Small Farm Institute
 New Entry Sustainable Farming Project (MA)
 New Mexico Farmers Marketing Association
 New York Beef Producers Association
 New York National Farmers Organization
 New York State Grange
 New York Women Involved in Farm Economics
 North Carolina Contract Poultry Growers Association
 North Dakota Farmers Union
 Northeast Organic Dairy Producers Alliance
 Northeast Organic Farming Association of Massachusetts
 Northeast Organic Farming Association of New York
 Northeast Organic Farming Association of Rhode Island
 Northeast Organic Farming Association of Vermont
 Northeast Pasture Consortium
 Northern Plains Resource Council (MT)
 Northwest Atlantic Marine Alliance
 NY Farms!
 Ohio Environmental Council
 Ohio Family Farm Coalition
 Ohio Farmers Union
 Ohio National Farmers Organization
 Oregon Cranberry Farmers' Alliance
 Oregon Farmers Union
 Oregon Livestock Producers Association
 Oregon Rural Action
 Organic Choice Milk Procurement (WI)
 Organic Consumers Association
 Organic Farmers' Agency for Relationship Marketing, Inc. (WI)
 Organization for Competitive Markets
 Pacific Coast Federation of Fishermen's Association (CA)
 Partnership for Earth Spirituality
 Past Regents' Club of the Diocese of Rochester (NY)
 PCC Natural Markets (WA)
 Pennsylvania Farmers Union
 Pennypack Farm Education Center for Sustainable Food Systems (PA)
 Pesticide Action Network North America
 Powder River Basin Resource Council (WY)
 R-CALF United Stock Growers of America
 Regional Farm And Food Network (NY)
 Research, Education, Action and Policy on Food Group (WI)
 Rochester Roots, Inc. (NY)
 Rocky Mountain Farmers Union (CO, WY, NM)
 Rural Advancement Foundation International-USA
 Rural Opportunities Inc. (NY)
 Rural Roots (ID)
 Seattle Chapter of Chefs Collaborative
 Sisters Hill Farm (NY)
 Small Potatoes Gleaning Project (WA)
 Sno-Valley Tilth (WA)
 Social Concerns Office-Diocese of Jefferson City (MO)
 Society for Animal Protective Legislation (Animal Welfare Institute)
 South Dakota Farmers Union
 South Dakota Livestock Auction Markets Association
 South Dakota Stockgrowers Association
 Southern Mutual Help (LA)
 Southern Shrimp Alliance
 Spokane County Cattlemen's Association (WA)
 Sprout Creek Farm (NY)
 St. John the Baptist Fraternity, Secular Franciscan Order (NY)
 Stevens County Cattlemen's Association (WA)
 Sustainable Agriculture Coalition
 Sustainable Living Systems (MT)
 Taste of the North Fork, Inc (NY)
 Texas Farmers Union
 Torborg Farms (MN)
 True Roots (PA)
 Utah Farmers Union
 Veritable Vegetable (CA)
 Virginia Association for Biological Farming
 Wal*Mart Watch
 Washington Biotechnology Action Council
 Washington Cattlemen's Association
 Washington County Stockmen's Association (CO)
 Washington Farmers Union
 Washington Sustainable Food and Farming Network
 Western Organization of Resource Councils
 Western Sustainable Agriculture Working Group (MT)
 Wintergarden Sustainable Agriculture Coalition (TX)
 Wisconsin Farmers Union
 Wisconsin Independent Livestock Dealers Association
 Wisconsin National Farmers Organization
 Wisconsin Partners for SustainAbility
 Women Involved in Farm Economics
 World Hunger Year

As the delayed implementation date of September 2008 nears, opponents of mandatory COOL are trying to convince members of this subcommittee and your colleagues that a change in statute is needed in order to reduce the expense and burden of the program. NFU does not support changing a statute that has not been given the chance to prove itself. As I mentioned earlier, USDA implemented mandatory COOL on farm-raised and wild-caught seafood with the existing statute; the experience gained from seafood implementation should be utilized by USDA to write a final rule on the remaining covered commodities that is not burdensome or expensive.

One of the arguments against COOL is the statute is too restrictive and complicated. My quick response if that is if USDA can label a wild-caught piece of fish, surely it can label a piece of meat or tomato. Fish, after all, don't have ear tags and those that swim in the ocean are pretty slippery. I don't see why the department would have a problem labeling 1,000 pound beef cattle.

Opponents to COOL say hamburger and ground meat is too difficult to track and therefore should be exempt. Ground beef is one of the main reasons FOR mandatory COOL. U.S. companies are able to import cheap – often of lesser quality beef, mix it with U.S. fat trimmings – put a USDA inspection and grade stamp on it and pass it off as a U.S. product for a retail premium.

While this misleading marketing practice might be good for the importer's bottom line, it isn't good for U.S. producers or consumers. According to USDA's Economic Research Service, Americans eat an average of 67 pounds of beef per person per year, with ground beef holding the largest market share at 42 percent. More than three billion pounds of beef imported each year, yet our consumers have no way of knowing whether the meat they're feeding their families is a "Product of U.S.A." or imported. Again, I urge you to do all you can to direct USDA to issue a common-sense implementation rule for mandatory COOL as soon as possible under the existing statute.

I would like to include with my testimony a letter from a coalition of organizations that are supporting a comprehensive competition title in the next farm bill. The letter was sent January 18, 2007 to the chairmen and ranking members of the Senate and House Agriculture and Judiciary committees. With that Mr. Chairman, I thank you again for the opportunity to testify. I'd be pleased to take any questions and thank all of the Members for their support of and work on these important issues.

CONCENTRATION OF AGRICULTURAL MARKETS

April 2007

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CR4 is the concentration ratio (relative to 100%) of the top four firms in a specific food industry.

BEEF PACKERS **CR4 = 83.5%***

	<u>Daily Slaughter Capacity**</u>	Historical CR4				
		1990	1995	1998	2000	2005
1. Tyson	36,000 head					
2. Cargill	28,300 head					
3. Swift & Co.	16,759 head	72%	76%	79%	81%	83.5%
4. National Beef Packing Co.	13,000 head					

Source: *Cattle Buyer's Weekly: Steer and Heifer Slaughter reported in *Feedstuffs* 6/16/03.

**Feedstuffs Reference Issue 2006 (9/13/06) as reported in *Feedstuffs* 1/29/07.

Note: Smithfield Foods is the 5th largest beef packer after a series of acquisitions.

BEEF FEEDLOTS

<u>Capacity</u>	<u>One-time</u>	<u>Top Cattle Feedlots 1998</u>	
1. Five Rivers (Smithfield and ContiBeef)	811,000	1. Continental Grain Cattle Feeding	405,000
2. Cactus Feeders Inc.	510,000	2. Cactus Feeders Inc.	350,000
3. Cargill (Caprock Cattle Feeders)	330,000	3. ConAgra Cattle Feeding	320,000
4. Friona Industries	275,000	4. National Farms Inc.	274,000
		5. Caprock Industries (Cargill)	263,000
		Source: <i>Beef Today</i> , Nov-Dec. 1998	

Source: *Feedstuffs* Reference Issue 9/13/06 as quoted in *Feedstuffs* 10/23/06

PORK PACKERS **CR4 = 66% (Estimated)***

	<u>Daily Capacity**</u>	Historical CR4				
		1987	1989	1990	2001**	2005***
1. Smithfield Foods	102,900					
2. Tyson Foods	72,800					
3. Swift & Co.	46,000	37%	34%	40%	59%	64%
4. Cargill	36,000					

** *Feedstuffs* Reference Issue 2001.
 *** 2007 *Feedstuffs* Reference Issue

Source: *Smithfield is reported to process 27 million hogs per year and account for 26% of the total market. From this figure, we estimated the CR 4. *New York Times* 1/26/07 ** Daily Capacity from 2007 *Feedstuffs* Reference Issue.

PORK PRODUCTION

	<u>Number of Sows*</u>	<u>Number of Sows In 2001**</u>	
1. Smithfield Foods	1,200,115	Smithfield Foods	710,000
2. Triumph Foods	399,800	PSF	211,100
3. Seaboard Corporation	213,600	Seaboard	185,000
4. Iowa Select Farms	150,000	Triumph	140,000

** *Successful Farming Pork Powerhouses* (October 2001)

Source: * *Successful Farming Pork Powerhouses* (October 2006). Notes: Smithfield includes sow numbers from PSF that is pending acquisition. Triumph markets pork through Seaboard.

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BROILERS CR4 = 58.5%*

1. Pilgrim's Pride
2. Tyson
3. Perdue
4. Sanderson Farms

Historical CR4				
1986	1990	1994	1998	2001
35%	44%	46%	49%	50%

Source: **Feedstuffs* 1/15/07
Note: The CR2 in this sector is 47%.

TURKEYS CR4 = 55%*

		Historical CR4				
		1988	1992	1996	2000	2005
1. Butterball LLC**	Slaughter Capacity 1,420 Million #s					
2. Hormel Foods (Jennie-O Turkey Store)	1,265 Million #s	31%	35%	40%	45%	51%
3. Cargill	961 Million #s					
4. Sara Lee	260 Million #s					

Source: **Feedstuffs* 10/9/06 (CR 4 is extrapolated from market share of new company.)
** Butterball LLC was created through a joint venture between Smithfield (49%) and Maxwell Foods (51%) that bought ConAgra's turkey operations.

ANIMAL FEED PLANTS

ANNUAL CAPACITY*

1. Land O'Lakes LLC/Purina Mills	12.5 million tons
2. Cargill Animal Nutrition (Nutrena)	8.0 million tons
3. ADM Alliance Nutrition	3.2 million tons
4. J.D. Heiskell & Co.	2.8 million tons

Source: * 2007 *Feedstuffs Reference Issue* (9/13/06)

FLOUR MILLING CR4 = unknown

		Daily Milling Capacity*		Historical CR4			
				1982	1987	1990	2005
1. Cargill/CHS (Horizon Milling)	} CR3=55%**	291,500 cwts					
2. ADM		277,800 cwts	40%	44%	61%	63%	
3. ConAgra		248,600 cwts					

Source: * *Milling and Baking News* 10/10/06 and 2006 *Grain and Milling Annual*
** Total US 24-Hour Milling Capacity is 1,492,456 cwts (*Milling and Baking News* 6/20/06)

SOYBEAN CRUSHING

CR4 = 80%*

		Historical CR4			
		1977	1982	1987	
1. ADM	} CR3=71%**	54%	61%	71%	Census of Manufacturing
2. Bunge					
3. Cargill					
4. Ag Processing Inc.					

Source: *2002 Census of Manufacturing (released 6/06); ***Wall Street Journal* 7/22/02

ETHANOL PRODUCTION**CR4 = 31.5%**

Million Gallons/Year (Capacity)

1. ADM	1070	Historical CR4			
2. US Biofuels	250	<u>1987</u>	<u>1995</u>	<u>1999</u>	<u>2002</u>
3. VeraSun Energy Corporation	230	73%	73%	67%	49%
4. Hawkeye Renewables	220				

Source: <http://www.ethanolrfa.org/industry>

Note: Farmer owned ethanol plants accounted for 39% of total capacity.

TOP DAIRY PROCESSORS IN U.S. AND CANADA

	Annual Sales *
1. Dean Foods	\$10,106 Million
2. Kraft Foods (Majority owner is Philip Morris)	\$ 4,400 Million
3. Land O'Lakes	\$ 3,901 Million
4. Saputo Inc.**	\$ 3,461 Million

Source: **Dairy Foods: Dairy 100* (2006)

Notes: ** Over 40% of Saputo Inc. plants are in Canada.

INPUT MARKET NOTES

Corn Seed: CR2=58%*

The CR2 in the U.S. corn seed market has remained relatively stable, changing little from a CR2 of 56%** that existed in 1997. However, while Pioneer dominated the market 10 years ago, now DuPont (Pioneer) and Monsanto have roughly equal shares.

Source: **Wall Street Journal*, 1/22/2007; ** Jorge Fernandez-Cornejo, 2004, USDA-ERS, The Seed Industry in the US.

Globally, Monsanto has its genetically modified seeds for corn, cotton, soybeans and canola on more than 90% of acreage that uses GMO seeds. By comparison, Syngenta is in 2nd place with about 4% of global biotech acreage using its seed.

Source: *Financial Times*, 11/16/2006.

Globally, four seed firms, DuPont (Pioneer), Monsanto, Syngenta and Limagrain have about 29% of the world market for commercial seeds.

Source: *Tracing the Trend Towards Market Concentration*. UN Conference on Trade and Development. 2006.

Global Phosphate, Nitrogen, Potash and Feed Phosphate Fertilizer Companies

1. Yara (6% of world's fertilizer market)*
2. Mosaic (Cargill owns 67% with ICM owning 33%)
3. Potash Corp

Source: * Dow Jones Commodities Service 2/14/07

U.S. FOOD RETAILING**CR5 = 48%***

Supermarket	Sales in Thousands			Change '04-'06	Historical CR5		
	2006	2005	2004		1997	2001	2004
1)Wal-Mart	\$ 98,745,400	\$ 79,704,300	\$66,465,100	48.57%	24%	38%	46%
2)Kroger	\$ 58,544,668	\$ 54,161,588	\$46,314,840	26.41%			
3)Albertson's**	\$ 36,287,940	\$ 36,733,840	\$31,961,800	13.54%			
4)Safeway	\$ 32,732,960	\$ 29,359,408	\$29,572,140	10.69%			
5)Ahold	\$ 23,848,240	\$ 21,052,200	\$25,105,600	-5.01%			

Source: * *Progressive Grocer's Super 50* (5/1/05) *Progressive Grocer* reports only grocery sales from supermarkets and does not report general merchandise, drug or convenience sales. **Note the CR5 is from 2005, and has most likely grown larger given the rates of change from 2004 to 2005.** In February 2005, the top 50 supermarkets accounted for 82% of total supermarket sales nationally.

** Supervalu completed their acquisition of 60% of Albertsons in June 2006. The remaining 40% was sold to Cerebus Capital Management. **Supervalu is now the 3rd largest supermarket.** *Progressive Grocer* 2/1/07.

WORLD'S TOP GROCERY RETAILERS 2006

1.	Wal-Mart Stores (United States)	\$312.4 billion annual sales
2.	Carrefour (France)	\$ 92.6
3.	Tesco (United Kingdom)	\$ 69.6
4.	Metro Group (Germany)	\$ 69.3
5.	Kroger (United States)	\$ 60.6
6.	Ahold (The Netherlands)	\$ 55.3
7.	Costco (United States)	\$ 52.9
8.	Rewe (Germany)	\$ 51.8
9.	Schwarz Group (Germany)	\$ 45.8
10.	Aldi (Germany)	\$ 45.0

Source: *Supermarket News* 5/29/06

TOP U.S. FOOD PROCESSING COMPANIES:

Company	2005 Food Sales	2002 Food Sales
(Fiscal year in parentheses if different from calendar year)	(\$ millions)	(\$ millions)
1. Tyson Foods Inc. (10/1/05)	23,899	21,285
2. Kraft Foods Inc.	23,293	21,485
3. Pepsico Inc.	21,186	17,363
4. Nestle (US & Canada)	19,941	13,110
5. Anheuser-Busch Cos. Inc.	11,546	10,574
6. Dean Foods Co.	10,505	8,992
7. General Mills (5/28/06)	9,803	9,206
8. Smithfield Foods Inc. (4/30/06)	9,614	7,356
9. ConAgra Foods Inc. (5/28/05)	8,195	22,521
10. Swift & Company (5/29/05)	7,847	8,476

Source: *Food Processing*, Vol. 67(8):34-48, August 2006.

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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 Contract 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	FoodRoutes 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 Organic Consumers Association
Kansas Farmers Union	National Farmers Union	Organic Seed Alliance (WA)
Kansas Rural Center	National Hmong American Farmers, Inc.	Organization for Competitive Markets
Kerr Center for Sustainable Ag (OK)		

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	RECEIVED AFTER 1/18/2007
Platte County Farm Bureau (NE)	Southern Colorado Livestock Association	Urban Farming Institute
Powder River Basin Resource Council (WY)	Southern Research & Development Corp. (LA)	
Producers Livestock Provender Alliance (OR)	Southern Sustainable Ag Working Group	
Putting Down Roots (PA)	Spokane County Cattlemen's Association (WA)	
Rainbow Natural Grocery (MS)	St John the Baptist Fraternity, Secular Franciscan Order, Elmira NY	
R-CALF United Stockgrowers of America	Stevens County Cattlemen's Association (WA)	
Red Tomato (MA)	Sustainable Agriculture Coalition	
Regional Farm and Food Project (NY)	Temple Beth El of Flint, Michigan	
Rochester Farm Connection (NY)	Texas Mexico Border Coalition Community Based Organization	
Rochester Roots (NY)	Tilth Producers of Washington	
Rocky Mountain Farmers Union	United Hmong Association	
Rural Advancement Foundation International-USA (RAFI-USA)	The Urban Nutrition Initiative (PA)	
Rural Coalition/Coalición Rural	Utah Farmers Union	
Rural Life Committee of the North Dakota Conference of Churches	Valley Stewardship Network (WI)	
Selene Whole Foods Co-op (PA)	Virginia Association for Biological Farming	
Sevananda Natural Foods Market	Washington Cattlemen's Association	
Sierra Club Agriculture Committee		

FOR FURTHER INFORMATION, CONTACT:

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A COPY OF THIS SIGN-ON LETTER AND BACKGROUND INFORMATION ON THE 2007 FARM BILL'S COMPETITION AND CONCENTRATION ISSUES ARE POSTED ON THE NATIONAL CAMPAIGN FOR SUSTAINABLE AGRICULTURE'S WEBSITE AT:
<http://sustainableagriculture.net/CompConc2007.php>.