

S. Brett Offutt  
United States Department of Agriculture  
Agricultural Marketing Service  
Fair Trade Practices Program, Packers and Stockyards Division

Dear Mr. Offutt,

I am writing in response to Document Number AMS-FTTP-18-0101, from Volume 85, Number 8, pages 1771-1783 of the Federal Register, *Undue and Unreasonable Preferences and Advantages Under the Packers and Stockyards Act*, published January 13, 2020.

As USDA revises and finalizes this rule, I ask you to add and strengthen protections for contract farmers. Contract livestock and poultry production is a valuable economic opportunity for rural communities, but many farmers feel trapped by the debt load, risk, and contract terms of the current system. We ask you to improve conditions for farmers by doing the following:

1. For decades, farmers have taken on great personal risk to share with USDA about "customary" industry practices that are exploitative and lead to financial ruin. Please remove any language from the rule that will allow exploitative practices of livestock and poultry farmers to continue just because they are "customary." Many current customary practices are costly and harmful to farmers.
2. Add protections for farmers that choose to speak publicly about their contracts and dealings with packing companies and protect them from retaliation.
3. Add protections for farmers to join farmer associations and not suffer retaliation for doing so.
4. Add protections so that packing companies cannot discriminate against farmers on the basis of national origin, race, disability or any other protected category.
5. Require that contract prices be based on clear, transparent, and predictable standards. Pay should not be based on inputs the packing company provides that may dictate the health of animals or the quality of feed.

The rule as drafted will encourage collusion among corporations, lead to lower prices for farmers, hurt rural communities, and lead to more exploitation of American farmers & ranchers.

In the final rule, we ask USDA to include detailed, specific protections for contract poultry and livestock producers that apply for all forms of poultry and livestock, that are suitable for the future of the industry, are enforceable, and have real consequences for companies that commit offenses.