

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?

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, and 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 is that 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.
