



The Johns Hopkins Center for a Livable Future
Bloomberg School of Public Health
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Mr. Randall D. Jones
Acting Administrator, Grain Inspection, Packers and Stockyards Administration
United States Department of Agriculture
1400 Independence Ave. SW, Room 2055-South Building
Washington, DC 20250-3613

June 7, 2017

Disclaimer: The opinions expressed herein are our own and do not necessarily reflect the views of The Johns Hopkins University.

Re: Comment on Grain Inspection Packers and Stockyards Administration (GIPSA) Interim Final Rule: Scope of Sections 202(a) and (b) of Packers and Stockyards Act (GIPSA-2016-PSP-0009-RULEMAKING-0348), posted in the Federal Register Number 2017-07361 on April 12, 2017

Dear Mr. Jones,

We are researchers at the Johns Hopkins Center for a Livable Future (CLF), an interdisciplinary academic center based within the Bloomberg School of Public Health in the Department of Environmental Health and Engineering. CLF engages in research, policy analysis, and education activities guided by an ecologic perspective that diet, food production, the environment, and public health are interwoven elements of a complex system. Recognizing that equity for farmers and ranchers is crucial for ensuring a just and healthy food system, CLF is concerned about fairness in the agricultural marketplace. Accordingly, it is our position that farmers and ranchers should have fair contracts and protection from deceptive and unfair practices by large-scale corporate packers and processors. As such, we welcome the opportunity to comment on the Grain Inspection, Packers & Stockyards Administration's (GIPSA) Interim Final Rule: Scope of Sections 202 (a) and (b) of Packers and Stockyards Act (GIPSA-2016-PSP-0009-RULEMAKING-0348).

We believe the Interim Final Rule (IFR) on competitive injury is imperative to the economic wellbeing of contract farmers and rural communities. The Packers and Stockyards Act (PSA) was passed into law to provide protection for American farmers and ranchers against unfair, deceptive and discriminatory practices, not to protect the profits of large-scale livestock packers and processors. The IFR affirms the original intent of the PSA by clarifying that ranchers and farmers challenging the unchecked power of meatpacker contracting and buying practices do not

need to demonstrate harm to the whole market in order to prove that they have been harmed by the action of a meatpacker. Finalizing the IFR will resolve confusion over the scope of PSA Sections 202 (a) and (b) and uphold the PSA as intended.

We urge you to make the IFR effective immediately to support independent livestock producers and contract poultry producers, create a fairer playing field for livestock and poultry producers, and address the unfair and undue preferences for certain producers in the livestock and poultry industries.

Thank you for considering our comments and recommendations, provided below. Please do not hesitate to contact us with questions at (410) 502-7578 or by emailing Bob Martin, Director of the Food System Policy Program, at rmarti57@jhu.edu or Carolyn Hricko at chricko1@jhu.edu.

Sincerely,

Robert Martin

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