

February 12, 2008

URGENT: REQUEST TO STRIKE SECTION 3104

Dear Agriculture Committee Member:

We are writing to voice our concern and opposition to Section 3104 Voluntary Certification of Child Labor Status of Agricultural Imports provisions contained in the Senate's version of the Farm bill.

Clearly the motivation and intent of this language – to reduce the use of child labor in agriculture - is laudable. However, we have many questions and concerns regarding the potential impact, cost and scope of this legislation. Additionally, we question how the annual farm-by-farm certification and traceability system envisioned by this legislation would be attainable and feasible in agricultural settings.

As written, this provision applies to both domestic and imported agricultural products and could be exceedingly costly to implement. A provision of this magnitude needs to have full discourse and debate among all participants in the supply chain and we are concerned that this has not happened. Beyond the burden of implementing such a system, some of our trading partners may retaliate if a decision is made to treat imported products differently than those produced within the US and could well be viewed by our trading partners as “yet another effort by US agriculture” to harm farmers in developing countries. Many of these imported products are critical to the US food, fuel, fiber and industrial supply chain.

Traceability and certification systems are extremely complicated – even more so when applied to agriculture as one commodity supply chain may contain tens of millions of farmers – all of which, under this system, would have to submit to annual audits of their farms. Rarely are the costs of certification and traceability borne by end consumers, but are passed back upstream through the chain eventually to the farm gate price.

We are alarmed that a proposal of this scope would be considered without fully understanding the full impact to US agriculture. We urge you to strike Section 3104 during conference so that the important issue of certifying labor practices can be fully discussed in an appropriate Congressional setting with experts addressing all aspects of this issue.

Yours truly,

American Meat Institute
American Soybean Association
Chocolate Manufacturers Association
Fresh Produce Association of the Americas
Georgia Fruit and Vegetable Growers Association
Grocery Manufacturers Association
International Dairy Foods Association
National Association of Manufacturers
National Association of Wheat Growers
National Barley Growers Association
National Coffee Association

National Confectioners Association
National Corn Refiners Association
National Potato Council
National Oilseed Processors Association
North American Millers Association
Peanut & Tree Nut Processors Association
Sweetener Users Association
Texas Produce Association
United Fresh Fruit & Vegetable Association
United Fresh Produce Association
Western Growers Association