



June 6, 2017

M. Irene Omade
Grain Inspection and Packers and Stockyards Administration
United States Department of Agriculture
1400 Independence Ave. SW, Room 2542A-S
Washington, DC 20250-3613

Re: Scope of Sections 202(a) and (b) of the Packers and Stockyards Act (RIN 0580-AB28)

Dear Ms. Obade:

National Farmers Union (NFU) appreciates the opportunity to comment on the Farmer Fair Practices Rules (Scope of Sections 202(a) and (b) of the Packers and Stockyards Act; proposed rule published by the U.S. Department of Agriculture (USDA) in the Federal Register on April 12, 2017. The Farmer Fair Practices Rules will update the Packers and Stockyards Act, 1921 with basic protections for farmers and ranchers.

NFU is a grassroots general farm organization with nearly 200,000 family farmer, rancher, and fishermen members nationwide. Since 1902, NFU has supported family agriculture and rural communities through advocacy, education, and cooperative development. Delegates to NFU's annual convention, through a vigorously debated and democratic process establish NFU's policies. NFU policy states support of "Clarification of the Packer and Stockyards Act to allow individual producers to seek recourse for abuse of market power without having to prove competitive injury to the entire marketplace." The interim final rule on the scope of 202(a) and (b) directly addresses NFU's concerns. Additionally, NFU policy supports, "Modifications to regulations under the Packers and Stockyards Act that that govern integrator fair-trade practices and strengthen the enforcement mechanisms therein."

Per the comments submitted on March 18, 2017, NFU strongly supports the interim final rule on competitive injury and strongly urges USDA to allow the interim final rule to become effective immediately.

Sincerely,

Roger Johnson
President