



## Instructions for Submitting Comments

Remember, AMS has proposed two separate rules, and it's important to make your voice heard on both. The two proposals have different deadlines, but to make sure your voice is heard on both, comments must be filed online by **August 8, 2022** (AMS is not accepting mailed comments at this time). The two proposals are: Transparency in Poultry Grower Contracting and Tournaments Proposed Rule and Poultry Growing Tournament Systems: Fairness and Related Concerns Advance Notice of Proposed Rulemaking.

We strongly encourage submitting your comments to both rules using the instructions below to ensure AMS understands this issue is important to growers.

### Step 1: File comments on the AMS "Transparency in Poultry Grower Contracting and Tournaments" Proposed Rule

- Go to the comment form on the federal government's rulemaking website by visiting <https://www.regulations.gov/commenton/AMS-FTPP-21-0044-0001>.
- Copy and paste the comments into the form OR select "Choose files" to upload a signed copy that you've scanned into your computer.
- Select either "I am an Individual" or "I am a Company" as appropriate and fill in as much or as little of the personal information as you feel comfortable.
- Click "Submit Comment."

### Step 2: File the same comments on the AMS "Poultry Growing Tournament Systems: Fairness and Related Concerns" Advance Notice of Proposed Rulemaking

- Go to the comment form on the federal government's rulemaking website by visiting <https://www.regulations.gov/commenton/AMS-FTPP-22-0046-0001>.
- Copy and paste the same comments as for Step 1 into the form OR select "Choose files" to upload a signed copy that you've scanned into your computer.
- Select either "I am an Individual" or "I am a Company" as appropriate and fill in as much or as little of the personal information as you feel comfortable.
- Click "Submit Comment."

Re: Transparency in Poultry Grower Contracting and Tournaments; Proposed Rule, 87 Fed. Reg. 34980 (June 8, 2022); Poultry Growing Tournament Systems: Fairness and Related Concerns; Advanced Notice of Proposed Rulemaking, Request for Comments, 87 Fed. Reg. 34814 (June 8, 2022).

Dear Mr. Summers,

I am a proud member of the poultry grower industry and am writing to OPPOSE revisions to the regulations on poultry grower ranking systems, including AMS's proposed rule "Transparency in Poultry Grower Contracting and Tournaments" and revisions contemplated in the advance notice of proposed rulemaking, "Poultry Growing Tournament Systems: Fairness and Related Concerns." The proposed revisions to the tournament system are not in the interest of farmers, poultry companies, or consumers.

The current compensation system rewards family farmers for putting in the hard work to raise the best birds as efficiently as possible. It features fair, honest contracts that reward growers for superior, efficient performance, resulting in lowered costs of raising chickens that benefit the grower, our integrator, and the consumer. I am supportive of the current poultry grower compensation system because it encourages innovation and investment in the best equipment and practices. This innovation and efficiency have made the American poultry industry the best, most competitive in the world, and we are proud that we continue to efficiently produce affordable proteins at a time when cross-the-board inflation has contributed to prices for consumers.

The changes contemplated in AMS's proposed rule and advance notice of proposed rulemaking would do little besides adding costs and administrative burdens to the industry that will hurt all involved, including growers. Adding red tape and costly regulatory hoops to jump through undermines a system that works well for hard-working American farmers. Moreover, the proposed rule and advance notice of proposed rulemaking signal AMS intends these regulatory actions to be the first in a line of changes that ultimately would dismantle the tournament system. I strongly urge AMS not to undermine the financial rewards for hard-working growers that are the foundation of the current grower compensation model. Doing so will disincentivize growers from making their operations more efficient, raising the cost of production and ultimately harming consumers and growers alike.

Further regulating the system to add costs and administrative burdens would make our industry less competitive in an increasingly globalized marketplace, opening the door for other countries to compete for our business. These changes ultimately threaten jobs and the way of life of family farmers across the country.

The poultry industry is already highly regulated. We do not need more burdensome regulations that only add cost to running our family businesses. I therefore oppose and urge you to withdraw the proposed rule in its entirety and refrain from further steps that would only undermine a successful compensation system.

Sincerely,

Dear Grower:

You may have heard that the U.S. Department of Agriculture's Agricultural Marketing Service (AMS) is reviving efforts to restrict the tournament system that outlines how chicken processors can pay our growers. In particular, AMS is accepting public comments on both a proposed rule, "Transparency in Poultry Grower Contracting and Tournaments" and an advance notice of proposed rulemaking, "Poultry Growing Tournament Systems: Fairness and Related Concerns."<sup>1</sup>

These are two initial steps of a broader effort by AMS that would effectively eliminate the tournament system that lets us pay our hard-working growers fairly. Dismantling the tournament system will make it more difficult for us to pay premiums to farmers who, through their dedication, time, and skill, are able to raise the best birds in the most efficient manner. Like the government's previous attempts to change the tournament system, AMS's interference would unwind many of the efficiencies that have allowed our industry to become the most productive and efficient chicken industry in the world, America's top protein supplier, and a key part of American agriculture. It opens the door for other countries to compete for our business and our jobs.

The current proposals would add costs and burdensome administrative requirements to our already highly regulated industry, and we need your support to comment in opposition to both. They propose more needless regulation and paperwork that promises only to shoulder our industry with even more regulatory costs and to line the pockets of trial lawyers, all the while harming the men and women who own the family farms that make our industry great.

The last time USDA tried to impose a rule like this, we were proud that so many of our growers took the time to make their voices heard in opposition to needless government regulation. If you oppose unnecessary red tape and government oversight and value your right to be paid fairly based on your hard work and commitment to your farm and your family, we encourage you to join us in saying "NO" to additional, needless, excessive government regulation from Washington.

Please help by submitting a copy of the enclosed comments to AMS by Monday, **August 8, 2022**. Remember, there are two AMS proposals, and it's critical you make your voice heard on both. Enclosed you will find a comment template and instructions on how to file them. It's easy to make your voice heard; you can send the comments online in just a few minutes.

Thank you for taking the time to speak up on this important issue, and thank you for all you do to make the American chicken industry great.

Sincerely,

<sup>1</sup>The complete text of these documents can be found at the following links: Poultry Growing Tournament Systems: Fairness and Related Concerns, 87 Fed. Reg. 34814 (June 8, 2022), <https://www.federalregister.gov/documents/2022/06/08/2022-11998/poultry-growing-tournament-systems-fairness-and-related-concerns>; Transparency in Poultry Grower Contracting and Tournaments, 87 Fed. Reg. 34980 (June 8, 2022), <https://www.federalregister.gov/documents/2022/06/08/2022-11997/transparency-in-poultry-grower-contracting-and-tournaments>