The Honorable Thomas J. Vilsack  
Secretary of Agriculture  
United States Department of Agriculture  
Second Floor  
14th Street and Independence Avenue, S.W.  
Washington, D.C. 20250

Dear Secretary Vilsack:

On behalf of the Commonwealth of Virginia, I am writing to share concerns about how Virginia agriculture will be impacted by the proposed Grain Inspection, Packers and Stockyards Administration’s (GIPSA) rules. I appreciate your attention to these matters.

Based on conversations with both producers and agribusiness representatives, I am concerned that these proposed rules would have a negative impact on Virginia’s livestock and poultry industries. Animal production accounts for Virginia’s top four agricultural commodities (e.g., broilers, cattle and calves, milk, and turkeys) based on total cash receipts and accounts for three more commodities (e.g., equine, eggs, and hogs) among the top twelve. In addition, Virginia is home to a number of top agribusiness firms that produce, process, and market livestock and poultry products for the domestic and world marketplaces.

Despite GIPSA’s good intentions, I am concerned that the proposed rules far exceed what was authorized by Congress, thus causing the annual impact of the proposed rules to far exceed their predicted threshold. Specifically, I am concerned that the proposed rules are too vague and ambiguous in the definitions and terminology used to be understood by those regulated or to be fairly and equitably enforced by your agency. Producers and agribusinesses fear that the proposed rules will have negative and unintended consequences that should be avoided. For example, they expect that the changes being proposed could lead to the removal of incentives for investments in innovation that are needed for U.S. agriculture to remain competitive in the global marketplace. Finally, these principals also fear that if these rules become final, they will lead to litigation that might be time-consuming and costly to Virginia’s agricultural interests.

Because of these concerns, I respectfully request that the United States Department of Agriculture (USDA) conduct a comprehensive economic impact analysis before proceeding further with the proposed rules. In addition, I recommend that information about your analysis and the data generated be shared with the industry for review and comment. Finally, I respectfully request that you seek input and guidance from the state departments of agriculture during this process.
In closing, I laud the USDA’s and your commitment to a serious and good faith analysis of the thousands of public comments received on the proposed rules. I also thank you for your continued support of the United State’s family farms and agricultural industries.

Again, thank you for your time and attention to these important matters.

Sincerely,

Todd P. Haymore
Secretary of Agriculture and Forestry

cc: The Honorable James H. Webb, Member, United States Senate
    The Honorable Mark R. Warner, Member, United States Senate
    The Honorable Robert W. Goodlatte, Member, United States House of Representatives
    The Honorable Matthew J. Lohr, Commissioner, Virginia Department of Agriculture and Consumer Services