





Paul Rice Fair Trade USA 1900 Harrison St. Suite 1700 Oakland, CA 94612

Dear Mr. Rice,

We are writing to you concerning Fair Trade USA's (FTUSA) solicitation of feedback for your Agricultural Production Standard Dairy Draft Amendment. We refuse to engage in an exercise that doesn't reflect the needs and values of workers, and we urge Fair Trade USA to dissolve its performative comment process and halt its pilot in the dairy industry. It's clear from <u>Fair Trade USA's work in other industries</u> that this solicitation of input is a sham process that seeks to protect corporations without genuinely incorporating feedback from impacted communities.

Fair Trade USA has <u>demonstrated your inability</u> to protect workers' rights on certified farms and plantations. The lack of worker-driven mechanisms for monitoring and enforcement make it impossible for the program to make real change on the ground. FTUSA has a <u>history</u> of creating programs that actively undermine organizing by farmworker communities, and your entry into the dairy industry has already been <u>actively opposed by the workers</u> it is supposed to benefit.

The FTUSA program appears designed with no intention that the standards actually be met, with no way for its designated monitors to determine what actual working conditions are. Such a program could not truthfully certify dairy farms' compliance with any standards, because their enforcement systems lack ways for workers to understand their rights, report violations of those rights, be protected from retaliation for attempting to enforce standards, or participate in any meaningful way in monitoring their employers' compliance. The program fails to address major structural issues in the dairy industry, including the economic pressures squeezing small-scale dairy farm owners and farmworkers, and environmental challenges.

We demand that FTUSA stop this insincere "public consultation" and end your harmful proposed expansion into the dairy industry.

Sincerely,

Anuradha Mittal - Chair, Board of Directors, Ben & Jerrys Alianza Agricola
Center for Constitutional Rights
Coalition of Immokalee Workers
Comité de Apoyo a Los Trabajadores Agrícolas (CATA)
Cornucopia Institute
Corporate Accountability Lab
Fair Food Standards Council
Fair World Project
Family Farm Defenders
Farm Forward
Federation du Commerce - Quebec, Canada
Farmworker Association of Florida

Food Chain Worker Alliance

Garment Worker Center

Global Labor Justice - International Labor Rights Forum

Harrisburg Urban Growers

HEAL Food Alliance

Institute for Agriculture and Trade Policy

Justice in Motion

Migrant Justice

National Center for Law and Economic Justice

National Family Farm Coalition

Northeast Organic Farming Association - Vermont (NOFAVT)

Northeast Organic Farming Association - Interstate Council (NOFA-IC)

Northeast Organic Farming Association - NH Chapter

Northeast Sustainable Agriculture Working Group (NESAWG)

Partners for Dignity & Rights

Real Food Generation

Stonewall Farm, Keene NH

Street Vendors Association of Chicago

T'ruah: The Rabbinic Call for Human Rights

University Network for Human Rights

Worker-driven Social Responsibility Network

Workers Center of Central New York



































































