December 22, 2025

Donald J. Trump
President
The White House
1600 Pennsylvania Ave. NW
Washington, DC 20500

Dear President Trump,

As you begin implementing your recently announced financial relief package for American farmers, we write to urge you in the strongest terms to include mechanisms within the relief program that ensure funding is directed to those who truly need relief instead of lining the pockets of giant agribusinesses and foreign-owned conglomerates, and to ensure transparency in the process so that American taxpayers—including the very farmers this program aims to support—have a clear understanding of how you are spending their money.

On Monday, December 8, your administration unveiled a $12 billion aid package of one-time bridge payments to bolster American farmers whose incomes have suffered as a result of your disastrous trade wars.[1] This program seems to be analogous to the Market Facilitation Program (MFP) established during your first term. That program disbursed about $23 billion in aid to farmers with little accountability and oversight, and it had serious flaws that ignored important market dynamics that must be addressed this time around to ensure aid gets to the farms that need it most: small, medium, specialty crop, and family farms.

At its core, the MFP had extremely limited transparency, making it difficult to fully understand the extent of the problems. Subsequent analyses have shown that the program benefited larger farms over smaller farms, preferenced commodity crops over specialty crops and other agricultural products, and prioritized specific geographic areas over the rest of the country. A 2020 report by the Government Accountability Office (GAO) found that MFP payments "varied widely by commodity," resulting in farmers of certain products or in certain states receiving disproportionately higher payments than others. The largest and most consolidated players in the market benefited the most: across all MFP farmer-focused dollars the top 10 percent of recipients received 58 percent—more than half—of the funding available. Foreign agricultural mega-conglomerates also made out well – Brazilian giant JBS received an estimated $67 million through MFP government purchases. In light of your Administration's recent decision to buy more Argentine beef, enabling the dominant meatpacking firms to underpay U.S. cattle farmers while doing little to reduce beef prices at the grocery store,[2] it is critical that no further bailouts go to foreign producers who can use these imports to reduce their costs as meatpackers pay U.S.

[1] https://www.reuters.com/world/us/trump-unveil-12-billion-aid-farmers-hit-by-trade-war-white-house-official-says-2025-12-08/
[2] https://www.fb.org/market-intel/economics-of-u-s-beef-and-cattle-market

cattle producers less while continuing to charge consumers high prices for beef at retail. A subsequent GAO report noted that the Department of Agriculture (USDA), which administered the program, had few quality control measures in place to prevent, for example, fraudulent payments and to sufficiently protect small farmers.

As your administration proceeds unilaterally with a relief package without legislation or consultation with Congress, it is imperative you incorporate provisions to ensure that taxpayer funds do not only go to bail out giant agribusinesses, perpetuating the consolidation of the agriculture sector, but go to farmers who actually need them.

Anti-consolidation, pro-competition, pro-farmer provisions

The U.S. food and agricultural system has become increasingly and alarmingly consolidated over the last few decades, resulting in significant negative impacts for farmers, workers, consumers, and communities, including driving up costs for working Americans. The result of the severe corporate concentration in the agricultural sector and the resulting power imbalances hurts farmer income while raising prices for consumers, all while decreasing innovation.[3] One 2021 analysis finds that "[a]round three dozen corporations now dictate the lines of development and terms of trade for almost every industry that manufactures agricultural inputs, processes agricultural crops, and distributes food to the American public."[4] In the development and production of seeds and pesticides, four multinational corporations dominate the market; another four companies control the export of American corn, wheat, and soybeans and the processing of those crops; five corporations dominate the meat and poultry industries. A recent analysis illustrates the impacts of the market concentration that farmers and farmer advocacy groups have been raising the alarm about for years: "excessive market concentration and the associated types of power it confers to large and dominant firms can deepen inequalities in ways that risk undermining food security and food system livelihoods. Corporate concentration … can lead to market and price distortions that can cause harm to food consumers, producers, and workers."[5] Market-dominating firms in the concentrated agricultural sector exercise their outsize leverage to determine supply and demand conditions (and therefore prices) and food production conditions and technologies nearly unilaterally, and can exert significant influence over food and agriculture policymaking in ways that smaller farmers simply cannot.

As such, your administration must take the following steps to ensure this massive cash infusion into the agricultural sector does not only benefit the consolidated players at the top:

1. Establish "Grow American" requirements – Your administration should implement requirements in line with the *Buy American Agriculture Act*[6] to ensure taxpayer dollars go to supporting American farmers, not foreign conglomerates.
2. Restore canceled USDA competition initiatives – Over the last eleven months, Secretary Rollins has canceled several key competition initiatives at USDA, including the Seed

[3] https://farmaction.us/wp-content/uploads/2021/05/Hendrickson-et-al.-2020.-Concentration-and-Its-Impacts_FINAL_Addended.pdf
[4] https://farmaction.us/wp-content/uploads/2024/09/Kings-Over-the-Necessaries-of-Life-Monopolization-and-the-Elimination-of-Competition-in-Americas-Agriculture-System_Farm-Action.pdf
[5] https://www.sciencedirect.com/science/article/pii/S0306919225001022
[6] https://www.congress.gov/bill/116th-congress/house-bill/2712

Liaison Project, Farmer Seed Liaison Contract, Agriculture Competition Partnership, and Regional Food Business Centers. Additionally, USDA canceled its antitrust enforcement partnership with state attorneys general which was aimed at enhancing the capacity of state enforcers to investigate competition and consumer issues in the food supply chain. This is particularly critical as price-fixing remains rampant among large poultry processors, meat processors, and in the fertilizer industry. While we appreciate that USDA and the Department of Justice (DOJ) have signed a memorandum of understanding aimed at protecting farmers and ranchers from increases in input costs that are potentially due to anticompetitive practices and conditions, USDA must reinstate the aforementioned programs to ensure a robust capacity to go after market manipulators in the agricultural sector.

3. Improve data-sharing within USDA – Your administration should ensure that the Agricultural Marketing Service (AMS) is routinely sharing granular data with its Packers and Stockyards Division (PSD) to ensure PSD can conduct effective oversight and enforcement of the *Packers and Stockyards Act*.

4. Consult with partner agencies – USDA should consult with experts in the DOJ's antitrust division and the Federal Trade Commission on implementing and enforcing these provisions and on any additional guardrails that should be added to ensure this relief package promotes and incentivizes competition in the agricultural sector and does not reward consolidation.

Transparency in use of taxpayer funds

A key problem with the 2018-19 MFP was the lack of information about where exactly money went. Civil society groups and government watchdogs have been unable to pursue a granular accounting of who received MFP funds, and how much, because USDA did not maintain the necessary data.

On the front end, USDA must post in the Federal Register for public comment the methodology it will use to determine projected losses and apportion payments of relief dollars. The 2021 GAO report on MFP noted that UDSA's methodology over-estimated the harm of tariffs to 14 out of 29 commodity crops, resulting in disproportionate payments within and across crops and geographic regions that, by and large, went to the biggest players in the agriculture industry. The GAO also pointed out that USDA developed the MFP with little transparency, preventing the Department from receiving outside input on how to improve its methodology.[7] Publicly posting the methodology and soliciting public comment will allow farmers and the organizations that represent them, agricultural economists, antitrust experts, and others to provide valuable feedback to ensure money is being spent as intended and will actually go to address harm where it has occurred.

Once payments begin to go out, USDA should establish a database where it publicly posts detailed information about payments, updated at least every week. The data should include:

- Aggregate amount of dollars paid out that week;

[7] https://www.gao.gov/products/gao-22-468

- Total number of recipients;
- Number of payments broken down by payment size, categorized by tranches of $25,000 up to maximum payment amount (e.g., $0-25,000, $25,001-$50,000, etc.);
- Type of crop (commodity or specialty) for which the payment was distributed;
- What proportion of recipients had a net farm income for 2023 of less than $250,000 , as recorded in the data in the Economic Research Service publication ‘‘Farm Income and Wealth Statistics’’ as of December 3, 2024 (with such information being collected at the time of application for aid); and
- Geographic distribution of payments, broken down by congressional district.

Payments should go directly to farmers who need them

Ensuring relief dollars get to farmers—particularly small, medium, family, and specialty crop farmers—is a top priority. It is critically important that USDA administer the relief payments in a way that results in the most aid going directly to the most impacted farmers.

Critically, USDA must disburse payments based on farm-gate sale and prioritize individuals actively engaged in farming so that relief goes directly to producers, not to huge exporting conglomerates. Additionally, since larger corporate farms can more easily absorb tariff-related costs than smaller or specialty crop farms, USDA should adopt a payment model based on historical revenues.

In addition to soliciting public comment on the methodology USDA uses to assess harm due to tariffs, USDA should ensure that the model this time includes quality control measures to address flaws from the MFP, including the variance of payment values within and across commodities, overestimation of harms from tariffs for certain commodities, and variance of payment values for the same crop in different geographic regions of the country.

Conclusion

Let us be extremely clear – your administration is opting to use billions in taxpayer dollars to provide relief to farmers whom your incoherent trade policies have harmed in the first place. Farmers who have seen input costs skyrocket and lost export markets because of trading partners retaliating against your own tariff bullying tactics deserve relief – but that relief must go to farmers in need and not to bail out giant agribusinesses and foreign-owned conglomerates.

During much of your first term, the U.S. lost over 140,000 farms[8], due in large part to increasing consolidation. Therefore we urge you, in the strongest terms possible, to incorporate the recommendations in this letter into your tariff relief package for farmers to address the failures of the 2018-2019 MFP and to ensure relief gets directly to farmers without incentivizing further consolidation in the agricultural sector and rewarding the biggest players to the detriment of small and medium farms, family farms, and specialty crop farms.

Sincerely,

[8] https://www.nass.usda.gov/Publications/Highlights/2024/Census22_HL_FarmsFarmland.pdf

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