



11 March 2010

Office of Negotiations
Foreign Agricultural Service
U.S. Department of Agriculture
Stop 1040
1400 Independence Avenue, SW
Washington, DC 20250

Dear Sir/Madame:

Since it appears that few if any members of the Consultative Group to Eliminate the Use of Child Labor and Forced Labor in Imported Agricultural Products either farm or grew up on a farm, it is important that they view the issue of child agricultural labor in full context.

The U.S. Department of Labor's report on goods produced using child labor or forced labor is predominantly a lengthy list of farm products, largely produced in developing countries. These are often "small family farms" that Americans currently romanticize about. They typically lack any mechanization and support families with large numbers of children. During one presidential debate in 2000, former Vice President Al Gore boasted about how much he had learned from working on the farm as a child. The U.S. Fair Labor Standards Act places no limits on 16 year-olds in America performing hazardous farm jobs, and allows children under the age of 12 to work the farm outside of school hours and not be paid minimum wage. Moreover, a parent can have his/her child work on the farm *during* school hours. Children in both developing countries and America work on the farm, the differences being that the U.S. has an explicit law authorizing it, and its families have sufficient wealth to more frequently send their children to school.

Lest we get too arrogant with our prescriptions for behavior in other nations, perhaps the Consultative Group could recommend that the U.S. Senate ratify the United Nations Convention on the Rights of the Child. At this juncture, America is the only country besides Somalia not to have done so.

Sincerely,

A handwritten signature in black ink that reads 'Gary R. Blumenthal'. The signature is fluid and cursive, with a large, sweeping flourish at the end.

Gary R. Blumenthal
President