

**THIS MARK MATTERS.**



April 5, 2023

The Honorable Tom Vilsack  
Secretary  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

Dear Secretary Vilsack,

I am writing to express my opposition to the proposals submitted separately by the International Dairy Foods Association (IDFA) and the Wisconsin Cheese Makers Association (WCMA). These narrowly focused proposals call for a Federal Milk Marketing Order (FMMO) hearing to address changes to manufacturing allowances in the FMMO pricing formulas.

As a dairy farmer from Rogersville, Mo., and as chairman of Dairy Farmers of America (DFA) and the National Milk Producers Federation (NMPF), representing dairy farmers from every state, I am in strong support of modernization of the FMMO system. However, updates to FMMOs require a balanced, measured approach that consider the needs of both dairy farmers and dairy processors to ensure we foster a system that supports the health and longevity of our industry.

Currently, the IDFA/WCMA proposals call for an increase in manufacturing or make allowances. To address this single issue without considering other necessary updates to the current FMMO system would be economically harmful to U.S. dairy producers. The submitted narrowly focused proposals lack the necessary details for meaningful improvement and is a short-sighted reaction which may solve one problem while creating greater issues within the industry.

I know first-hand what can be accomplished when farmers work together. That is why DFA and its farmer-leaders have been engaging across the industry through NMPF to discuss a united, comprehensive approach. As a result of these collaborative efforts, the NMPF board recently unanimously approved a proposal that addresses the entire FMMO system to achieve a solution that is fair for the entire industry.

Our recommendation offers a thoughtful, measured approach, recognizing the need to adjust the make allowance and equally the need to restore the previous “higher of” Class I mover considering the disproportionate risk borne by farmers under the current formula. It is anticipated NMPF will submit this proposal to USDA later this month requesting a comprehensive national federal order hearing to modernize FMMOs.

I urge you to not grant the IDFA/WCMA proposals a national FMMO hearing on the single issue of adjusting manufacturing allowances when there is an opportunity forthcoming through the NMPF proposal to take a more holistic and balanced approach to reform.

Sincerely,

Randy Mooney  
Owner, Mooney Dairy Farm  
Chairman, Dairy Farmers of America

CC: Bruce Summers, Administrator, Agricultural Marketing Service, U.S. Department of Agriculture  
Dana H. Coale, Deputy Administrator, Dairy Programs, Agricultural Marketing Service,  
U.S. Department of Agriculture

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