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March 9, 2016

The Honorable Tom Vilsack  
Secretary  
United States Department of Agriculture  
1400 Independence Avenue, SW  
Washington, DC 20250

Re: Opposition to the Modified Wichita Option for Organic Milk

Dear Mr. Secretary:

Land O'Lakes, Inc. is the third largest U.S. dairy cooperative with 2,200 dairy farmer member-owners pooled on five of the ten Federal Milk Marketing Orders (FMMO's). Land O'Lakes, Inc. is also a member of the National Milk Producers' Federation (NMPF) and joins in its opposition to the proposal by the Organic Trade Association (OTA) for a national hearing for the purpose of exempting OTA processors from paying into FMMO pools. Land O'Lakes agrees with the arguments included in the two NMPF letters dated October 22, 2015 and December 17, 2015.

Without repeating NMPF's arguments, Land O'Lakes would like to specifically point out that OTA's proposal does not provide specificity on how the proposal would provide any additional moneys to organic producers, while depleting the incomes of conventional dairy farmers.

Land O'Lakes believes granting OTA's proposal would set a destructive precedent where processors and marketers of milk with niche characteristics could petition the USDA to exempt that milk from pooling on FMMO's. Land O'Lakes believes that such a result would ultimately lead to the destruction of the Federal Milk Marketing Order system.

For these reasons, the dairy farmer members of Land O'Lakes urge the denial of OTA's request for a hearing.

Sincerely,

A handwritten signature in black ink that reads 'Chris'.

cc: Dana Coale, Deputy Administrator, Dairy Programs  
James Mulhern, National Milk Producers Federation