



## MICHIGAN MILK PRODUCERS ASSOCIATION

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April 10, 2023

Mr. Bruce Summers  
Administrator  
Agricultural Marketing Service  
U.S. Department of Agriculture  
1400 Independence Avenue, SW  
Washington, DC 20250

Dear Administrator Summers:

On behalf of the over 1,000 dairy farmer members of Michigan Milk Producers Association (MMPA), I am writing to express our opposition to the proposal to address manufacturing allowances as a stand-alone issue in the Federal Milk Marketing Order (FMMO) hearing process. While we agree that manufacturing allowances need to be reviewed and updated, we oppose addressing them as a single issue without considering a more comprehensive approach to modernize and update the FMMO program.

MMPA is a dairy farmer owned cooperative and owns four dairy processing plants in three states. We are keenly aware of the need to update manufacturing allowances; however, it is critical that a more balanced approach be taken to update and modernize the overall FMMO program, not just one provision.

Over the last year, I have been participating with other dairy cooperative representatives on a FMMO modernization task force established through National Milk Producers Federation. An extensive amount of work, research and outreach went into developing the final comprehensive proposal recently approved by the NMPF Board of Directors. The proposal is on track to be submitted to the Department this month and will include specific recommendations on adjustments to the manufacturing allowance as well as a broader number of provisions in the FMMO.

Addressing the FMMO program in a broader manner will help achieve the program's intention to promote the orderly marketing of milk and assure consumers an adequate supply of milk. The program has been left largely unchanged since it was implemented in 2000.

We encourage you to not grant a national FMMO hearing on a single issue and move forward with a comprehensive approach to modernize the program.

Sincerely,

Doug Chapin  
Board Chairman