

UNITED STATES DEPARTMENT OF AGRICULTURE
BEFORE THE SECRETARY OF AGRICULTURE
AGRICULTURAL MARKETING SERVICE

In re:

Milk in the Northeast and Other Marketing
Areas

7 CFR Parts 1000 *et seq.*

Docket No. 23-J-0067;
AMS-DA-23-0031

**CARMEL, INDIANA
JANUARY 2024**

**TESTIMONY OF ORGANIC VALLEY / CROPP COOPERATIVE, PART 2
REGARDING NATIONAL HEARING ON
FEDERAL MILK MARKETING ORDER PROPOSALS**

January 17, 2024

I. BACKGROUND

A. PERSONAL BACKGROUND

My name is Shawna Nelson. I am the Executive Vice President of Membership for Organic Valley | CROPP Cooperative | (“OV|CROPP”). Our corporate address is One Organic Way, La Farge, WI 54639. In my role I oversee all cooperative membership engagement which includes personnel responsible for dairy hauling and scheduling, farmer resources, field operations, data analytics, milk management and farmer payroll as well as all producer related Federal Milk Marketing Order reports and filings.

Throughout my 19-year career at the co-op, I have had the opportunity to interact with the entirety of the dairy industry supply chain – with dairy farmers from coast to coast, processors, retailers, consumers, trade groups, regulatory bodies, and all of the amazing contributors that make dairy work for the American people.

I graduated in 2005 from the University of Wisconsin Stevens Point with a Bachelor of Science in Business Administration. Residing in dairy-centric southwestern Wisconsin and being part of CROPP Cooperative’s growth and maturation has been my life’s work.

Joining me on the stand to assist in providing fulsome information on our operations are:

- Chris Dahl, Dairy Payroll and Handling Manager for OV|CROPP. Chris oversees our producer side FMMO reporting requirements; and,
- Adam Warthesen, Senior Director of Government and Industry Affairs for OV|CROPP.

B. COMPANY BACKGROUND

Today, the cooperative has nearly 1,600 farmer-members in 32 states. Of our 1,600 farmer members, approximately 99.6 percent would qualify as small businesses under the SBA. The average herd size of our 1,411 organic dairy farmer members is around 80 milking cows and ranges from a dozen cows to our largest at around 1,000 cows. The cooperative employs 920 people with our largest workforce based in Wisconsin.

Organic sales and the premiums captured by our certified organic products is central to our business model. We have grown from a small group of farmers to a leading organic cooperative with sales topping \$1.2 billion. Our branded products are sold in all 50 states and 18 countries around the world. In our brand portfolio we offer dozens of different dairy products in nearly 137 SKUs.

1. CROPP's Processing Facilities

Our co-op relies on an extensive network of up to 90 co-manufacturers across the U.S. to process milk and other organic commodities into value-added products for retail and business to business sales opportunity. The cooperative operates three dairy processing facilities in two states. We also have two subsidiaries; a distribution company called Organic Logistics; and a meat business called Organic Meat Company. Our dairy processing facilities are located in Chaseburg, Wisconsin; Cashton, Wisconsin; and McMinnville, Oregon. These facilities process certified organic Class III and IV products. We utilize a network of co-manufacturers to process all our Class I and Class II and Class III products.

The Chaseburg Creamery is a pool supply plant in Federal Order 30. Chaseburg serves two primary purposes: to standardize milk loads for further processing and butter production for brand as well as private label customers. Milk from nearly 400 OV|CROPP farmers in the Midwest is routed through the Chaseburg Creamery.

OV|CROPP's operations at the McMinnville Creamery in Federal Order 124 are similar to those at the Chaseburg Creamery *i.e.*, standardizing organic milk for additional processing at other plants. McMinnville also has organic powder production capabilities. In the past year, this operation received milk from around 80 organic dairy farmers in the Pacific Northwest. Currently this operation is not a pool plant.

OV|CROPP's Conversion and Labeling Facility in Cashton, Wisconsin carries out additional dairy processing and packaging, *i.e.*, converting organic cheese from blocks to consumer sizes and packaging. Cashton also has capabilities for ghee refinement and packaging.

C. OV|CROPP's FMMO Obligations

With a mix of dairy products in all four FMMO classes and a broad geographic distribution of members we are extensively involved with the Federal Milk Marketing Orders. We have producers in eight of the Federal Orders: 1, 5, 7, 30, 32, 33, 51, and 124. Broken out by FMMO, Federal Orders 1 and 30 represent the largest portion of our supply base. Our cooperative processes dairy products in nine orders: 1, 5, 7, 30, 32, 33, 51, 124, and 131. For Class I, we bottle both brand and private label HTST, UHT and aseptic fluid milk at 13 plants across the U.S. These plants are in Federal Orders 1, 5, 30, 33, 51, and 124. The only order where we have neither producers nor processing is Order 6 (Florida).

OV|CROPP files monthly market administrator reports for both the Chaseburg Creamery and the McMinnville Creamery. We also file monthly 9(c) reports with the market administrators for each applicable FMMO for a portion of OV|CROPP's farmer members. However, the monthly reports for many of our farmer members are actually filed by other handlers.

OV|CROPP maintains a unique relationship with other dairy cooperatives in that a number of members are mutual members of other cooperatives, including DFA and National Farmers Organization. In that scenario, these dual members' milk is fully marketed by OV|CROPP, but (for example) DFA handles the relevant services (*i.e.*, payroll, field services), including filing monthly handler reports. OV|CROPP has this situation with about a dozen other handlers that file reports for its members. A breakdown of the handler reporting obligations for OV|CROPP members is as follows:

NFO – 55%
DFA – 16%
CROPP – 14%
Other Handlers – 15%

This arrangement benefits our members by supplementing OV|CROPP's staff for field services (e.g., bulk tank calibration) and outsourcing certain reporting and other administrative tasks. Over the years that has facilitated a focus on marketing our member-owners' organic milk by cooperative.

This unique situation, though, also teases out another flaw of the FMMO system – block voting by cooperatives. Because a number of organic suppliers of OV|CROPP are members of other cooperatives, those cooperatives then have the ability to block vote on behalf of these farmers. Thus, when another cooperative block votes in response to any USDA proposed rule from this hearing, its vote will include votes on behalf of organic farmers who likely do not agree with their position. Even the voting procedures in FMMOs are misaligned for the realities of the organic market.

II. OV|CROPP OPPOSES PROPOSAL 19

OV|CROPP opposes Proposal 19 because Class I differentials should not be increased and they should certainly not be increased on the basis put forth by proponents. Proposal 19 fails to account for the role of organic milk in the Class I marketplace. The USDSS modeling does not differentiate organic milk from conventional milk, and so too fails to account for the efficient movement of organic milk. Further, our cooperative was not included in this proposal development, nor have we seen any convincing testimony that demonstrates organic dairy issues were evaluated when setting the differentials in Proposal 19. Thus in our view, Proposal 19 misappropriately sets differentials in ways that could create disorderly marketing for organic Class I actors like OV|CROPP.

A. Organic Class I Utilization and Pricing Differs Significantly from the FMMO Average.

Organic milk maintains a higher share in Class I than all other FMMO classes. The table below compares the utilization of organic milk by class to total FMMO utilization.

	I	II	III	IV
Organic¹	55%	20%	15%	10%
FMMO Total²	27%	9%	54%	10%

However, despite organic milk being disproportionately represented in the FMMO system due to the high Class I utilization, it makes up smaller piece of the overall milk production in the US. In 2022, U.S. farms produced 226.6 billion pounds³ of milk with the 151.6 billion pounds⁴ pooled on the Federal Orders. Of this amount, only 41 billion pounds⁵ is classified as Class I. And of this 41 billion pounds, only 5 billion pounds are estimated to be organic.⁶ This means of the 226.6 billion pounds of milk produced in the United States, only 2.2% is Class I organic.

Organic milk also maintains higher pricing for farmers compared to non-organic milk. As an example, using the latest USDA NASS Certified Organic Survey⁷ there was a reported 5,196,491,771 pounds of organic milk annually produced with a national production value of \$1,632,652,318. This results in an average organic price of \$31.42 per hundredweight.

¹ As estimated by MIG expert Sally Keefe.

² [USDA AMS, Market Summary and Utilization Annual Report, February 14, 2023.](#)

³ [USDA NASS, Milk Production, Disposition and 2022 Income Summary, April 2023.](#)

⁴ [USDA AMS, Market Summary and Utilization Annual Report, February 14, 2023.](#)

⁵ [USDA AMS, Market Summary and Utilization Annual Report, February 14, 2023.](#)

⁶ [USDA NASS, Certified Organic 2021 Survey, December 2022.](#)

⁷ [USDA NASS, Certified Organic 2021 Survey, December 2022.](#)

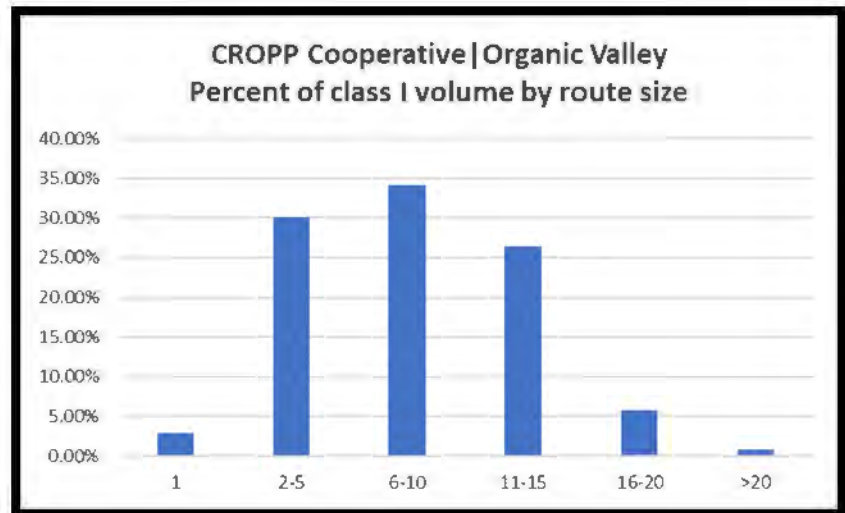
Comparatively, in 2023 the average regulated minimum price has been \$18.75⁸ and Class I prices have been \$21.86⁹, which is 43.33% and 30.4%, respectively below organic milk prices from the previous year. The fact is organic milk today, and historically, has always satisfied, and often far exceeded, the FMMO tenet that farmers received at least a minimum regulated minimum uniform price for farm milk.

B. Organic Route Movements Differ Significantly from Non-Organic.

Our experience aligns with the organic experience at large with Class I being where most of our organic farm milk is used and Class II being the second greatest use of farm milk. However, we are unique compared with most of the dairy industry in terms of milk movement and our assembly of milk destined for bottling or manufacturing.

For example, our average route, that services a Class I facility, has 7 farm stops and is on average 262 miles (nationwide).

Yet there are instances where this is not norm. Because of the dedication of our business to small farm patrons and necessity to process at certified organic facilities we have some routes with as many as 23 farm stops and a handful of routes that are more



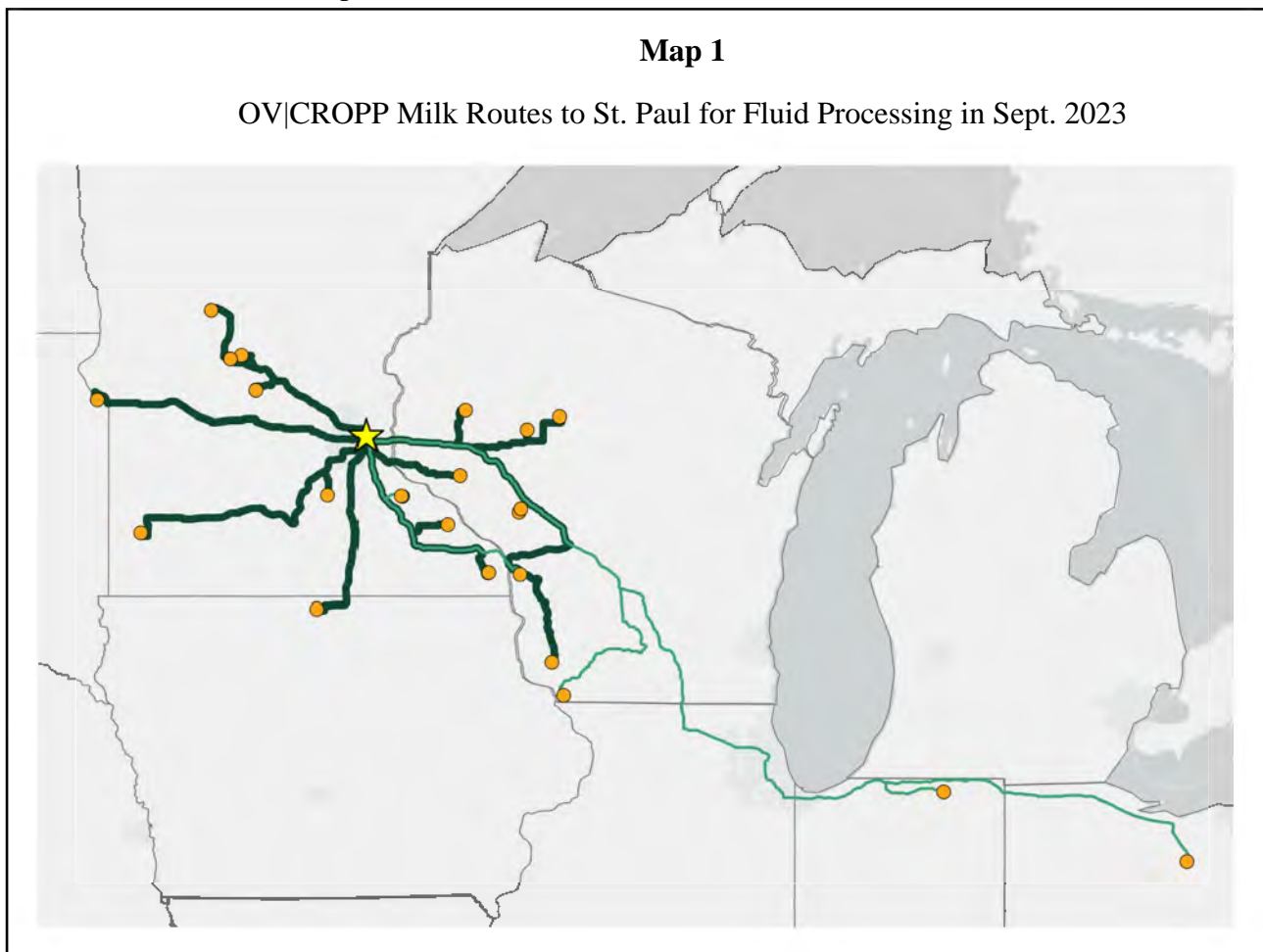
than 800 miles from the Class I facility. In the Midwest, these routes are even longer: averaging 416 miles with a maximum of 834 miles. The above chart entitled “CROPP Cooperative| Organic Valley percent of volume by route size” further illustrates this.

⁸ <https://www.ams.usda.gov/sites/default/files/media/UniformPrice2023.pdf>

⁹ <https://www.ams.usda.gov/sites/default/files/media/ClassIPrices2023.pdf>

A goal of our business is to support small and mid-sized farmers and undertake the extra effort to put together routes that allows us to do so. OV|CROPP is one of the last refuges for the small farmer, for organic farmers with 50, 75, or 100 cows. There are costs involved in managing a smaller farm base, including costs for more frequent route stops for smaller amounts of milk. OV is making a business decision in undertaking those costs, and we have found that both retailers and customers value purchasing products that are from a farmer-owned cooperative that supports small and local farms.

Map 1 below shows the milk routes that went to St. Paul, Minnesota for fluid processing in September 2023. The dark green lines show routes with five or more loads into the plant. Light green lines are routes that delivered three to four milk loads there. Routes with 1-2 loads delivering in the month (about nine percent of total loads) are not included.



Proposal 19 puts a thumb on the scale that penalizes this type of business. The fact that we are a producer-owned cooperative coupled with organic milk being so heavily Class I means that these Class I differentials have an outsized impact on our business. The interest of our ownership is to keep farmers on the land. A system built on alleged “efficiencies” of movement of milk and treating all milk the same disadvantages OV because it in no way reflects efficient movements of *organic* milk.

C. Proposal 19 would likely result in disorderly marketing for the organic dairy marketplace, including for OV|CROPP.

Proposal 19 as plainly stated would increase the Class I differentials in all 3,108 locations across the U.S. For our cooperative these modifications result purely in a greater cost through larger Class I pooling obligations with no benefit to our co-op or farmer-members. This increase, if realized, will take price from organic dairy farmers or saddle organic consumers with higher costs and risk a volume decrease in purchase at retail.

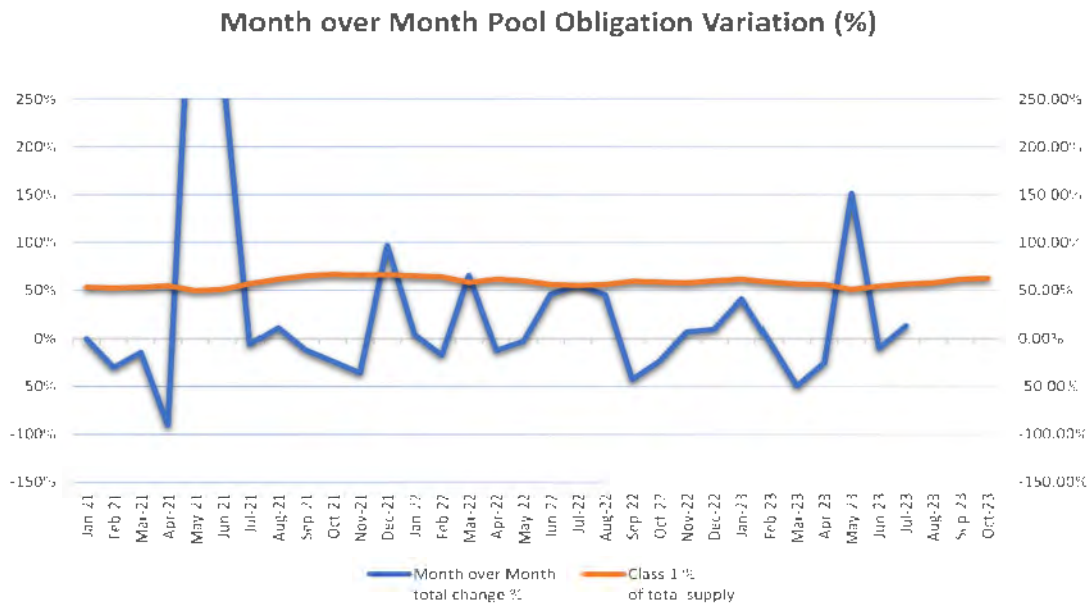
1. Proposal 19 would make OV| CROPP’s pool obligations unreasonably higher and even more unpredictable.

Proposal 19 represents the greatest risk of all of the non-MIG industry proposals pending at this hearing. When applied to our volumes and utilization of organic milk, Proposal 19 would exacerbate OV|CROPP’s already high and unpredictable pooling obligations. While the full impact is difficult to fully anticipate, we conservatively estimate that if adopted Proposal 19 would create a 30 percent increase in our co-op’s annual pooling obligations.

For our organic fluid milk business, the increased Class I differentials have no bearing on where our organic milk is processed, packaged and sold. Premium certified organic dairy processing is driven instead by two dominant factors: 1) who has the capabilities to process certified organic milk; and, 2) where is customer/consumer demand and distribution are most aligned.

Similarly, the adjusted location differential has no bearing on our milk supply strategies and which farmers we source organic milk to service the Class I organic market. As previously acknowledged routes can be unusually long and organic marketplace demand, not sufficiently identified or recognized by the FMMO, is influencing where we and the organic industry processes beverage milk and other organic dairy products.

The chart below demonstrates the detachment from pooling obligation variability and the Class I utilization of OV| CROPP’s Class I supply. The blue line charts the percentage change month to month of OV| CROPP’s monthly pool obligations. The orange line charts OV| CROPP’s monthly Class I utilization of milk as a percent of total supply. As you can see, OV| CROPP maintains a steady Class I utilization with no regard for the changes in the pool obligation.



Variation in pooling obligations, and associated location adjustments differential, should theoretically inform where milk would be best placed for conventional participants. That is, in fact, the justification for their existence. But as the chart above shows these regulatory signals have no discernable influence on Class I utilization for our organic milk over the last 3 years – utilization that remains remarkably consistent despite pooling obligations and variability.

The chart above also fails to fully show the swing that the pool obligation took from April 2021 to May 2021. In the span of that month, OV| CROPP's pool obligation rose approximately **475%**. In this time period, there was no shortage of organic milk, no natural disaster, no government shutdown that drove such a wild swing. Instead, it was caused by conditions in the conventional market for cheese, powder, butter, etc. as well as conventional milk supply factors. These are factors that have zero bearing on our organic business. Yet, due to those changes, we saw an increase in our pool bill of **475%**. The impact of the dissonant regulation on our business cannot be overstated.

2. Proposal 19 could result in inefficient movements of organic milk.

Review of the 13 fluid plants across the U.S. where we process, and package fluid milk shows a multi-million dollar annual increase in our pooling obligations when compared against a previous baseline. The demonstratable impact of this portion of the Class I differential functions akin to a tax that we have no ability offset or mitigate fully. Instead, our only option would be to reconsider our milk shipments and routes to see if there are more advantageous approaches under the regulations, when balanced with increased costs such inefficient movements would incent. Federal regulations should not contradict market forces in such a way. Table 2 below compares the current Class differential with Proposal 19 as well as the model minimum and average.

Table 2 OV CROPP Fluid Network Class I Differential Comparison								
Fluid Plant, City	County	State	Current	Model Minimum	Model Average	Proposal #19	#19 less Current	#19 less Model Avg.
Safeway, San Leandro	Alameda	CA	\$1.80	\$2.00	\$2.05	\$2.90	\$1.10	\$0.85
DFA Alta Dena N, CoI	Los Angeles	CA	\$2.10	\$2.20	\$2.25	\$3.00	\$0.90	\$0.75
DFA Bev. Sol; Richmond	Wayne	IN	\$2.00	\$3.40	\$3.60	\$3.70	\$1.70	\$0.10
DFA Bev. Sol; St. Paul	Ramsey	MN	\$1.70	\$2.70	\$2.75	\$3.00	\$1.30	\$0.25
Mountainside, Roxbury	Delaware	NY	\$2.70	\$4.20	\$4.35	\$4.40	\$1.70	\$0.05
Saputo, Delhi	Delaware	NY	\$2.70	\$4.20	\$4.35	\$4.40	\$1.70	\$0.05
Byrne Dewitt, E Syracuse	Onondaga	NY	\$2.50	\$3.90	\$4.00	\$4.20	\$1.70	\$0.20
Meijer, Tipp City	Miami	OH	\$2.00	\$3.50	\$3.65	\$3.70	\$1.70	\$0.05
Alpenrose, Portland	Multno- mah	OR	\$1.90	\$2.30	\$2.35	\$3.00	\$1.10	\$0.65
DFA WQF, Cedar City	Iron	UT	\$1.60	\$2.40	\$2.55	\$2.55	\$0.95	\$0.00
HP Hood, Barre	Washingt on	VT	\$2.60	\$4.30	\$4.45	\$4.35	\$1.75	-\$0.10
HP Hood, Winchester	Winches- ter City	VA	\$2.80	\$4.30	\$4.50	\$4.50	\$1.70	\$0.00
Smith Bros, Kent	Mercer	WA	\$1.90	\$2.40	\$2.40	\$3.00	\$1.10	\$0.60
Source: Hearing Exhibit 443 (MIG 64C)								

Just as Class I differentials do not encourage Class I utilization for organic milk, they do not move organic milk. It would be a fallacy to believe organic milk moves to fluid deficient regions because of adjusted location differentials. The pricing structure, long-term contracts with farmers, and economic streams of commerce for premium dairy are distinctly different than the non-organic dairy markets. This undeniable disconnect perpetuated by the FMMO is further evidence that not all milk is the same and that not all portions of the fluid milk industry behave or respond to price surface constructions in the federal Orders.

3. Marketplace Price Elasticity Concerns

The elasticity of organic milk means any increase in price will lead to a disproportionate decrease in sales – a worrisome challenge for the one sector of Class I that seems to be holding its ground. Testimony provided by Dr. Capps shows for organic shelf milk, a 1.74 percent decline in sales for every 1 percent increase in price. Similar or even greater declines are shown for Lactose-Free and Health-Enhanced beverage milk categories which is likely to face a compounded impact for a business like OV| CROPP that only offers both specialty milks in organic options only. Dr. Capps' research also reflects our lived experience.

We want to reiterate what Jim Hau made clear: demand for milk is not price inelastic. And organic milk certainly is not. Further, as testified to by other witnesses, retailers will set prices based on their own price points. So one cannot conclude that a \$0.10/cwt increase in our pool obligation will only result in an equivalent \$0.10/cwt increase in the price on the shelf. Instead, retailers may raise the price \$0.20 or \$0.30 to meet the specific price point they want to land at. The assumption of the price elasticity of beverage dairy products is no longer accurate and organic dairy is especially vulnerable to worrisome shifts in consumers behaviors if price increases are forced into the marketplace to satisfy higher Class I differentials.

D. The de minimis organic milk that sells on the conventional market does not support all organic milk being subject to the FMMO system.

While we have heard suggestions that organic market participants benefit from the FMMO system when having to sell organic milk on the conventional market, such practices are of minimal volumes, rare, and have no meaningful impact on the non-organic marketplace. The economic realities of selling costly organic milk on the much lower-priced conventional market are a powerful motivator that dissuade the procuring of organic milk and movement of any of that milk through non-organic market channels except on rare occasions.

Naturally, even with the strongest utilizations there are minor instances such as line loss, milk left behind in the regular course of processing dairy products, and some seasonal or extreme

supply chain disruptions where organic milk will not be utilized as organic. This volume of certified organic entering the non-organic stream is both insignificant and non-impactful in the global context of dairy pricing.

As reported in the USDA NASS Certified Organic Survey, there is 5.20 billion pounds of organic milk annually produced. A simple deduction assuming 55 percent of the total enters Class I shows around 2.86 billion pounds. If you apply even a significant overestimate that 5 percent is utilized in conventional channels, often in our experience at sale values far below blend prices or Class III and IV prices, you have a mere 78.5 million pounds being absorbed annually into nonorganic channels. As a percent of all Class I milk this would be only 0.19 percent, less than two-tenths of 1 percent.

Organic markets and segregation requirements are substantially different than the experience of producers and stakeholders in non-organic dairy. Any overlap between the two systems is inconsequential. USDA should reject a rationale that perpetuates keeping organic dairy in FMMO system on the scaffolding that if any organic milk hits conventional channels, then all organic milk should be subject to the pooling requirements.

We maintain our position previously submitted in 2015 and for this hearing and call for organic milk to be granted an exemption from Class I pooling obligations, when organic milk maintains pricing above the regulated Class I minimum price.

III. POSITIONS ON OTHER PROPOSALS

OV| CROPP, as previously stated, is a member of the Milk Innovation Group (“MIG”). But we additionally support:

- Proposal 8: Submitted by the Wisconsin Cheese Makers Association
- Proposal 9: Submitted by the International Dairy Foods Association
- Proposal 14: Submitted by the International Dairy Foods Association
- Proposal 15: Submitted by the Milk Innovation Group

OV|CROPP opposes the proposals listed below.

A. Proposals 1 and 2 (Component Factors)

OV|CROPP, like most dairy handlers, pays farmers on a component and quality basis for their milk. Within that payment scheme butterfat receives the greatest value while protein and other solids are significantly less. Notwithstanding processing innovation, such as ultra-filtered milk which we launched and discontinued, we cannot attest to greater consumer interest or value in higher protein levels beyond those required in beverage milk's standard of identity. Generally, we would urge the department to leave component factors in skim milk priced at current levels, but we acknowledge each of these proposals have a negligible impact on our business.

B. Proposals 13, 16, 17, and 18 (Base Class I Skim Milk, subject area)

Most concerning for OV|CROPP of the Issue 4 proposals are Proposals 17 and 18 which modify the base Class I skim milk price back to "higher of" and eliminates advanced pricing. It needs to be reiterated, that both the base Class I skim milk price formulas as well as advanced pricing provide no value or use to the organic dairy marketplace. We only view these through a lens of how they will impact our pooling obligations and hence what resources they take from our cooperative and farmer owners.

Overlaying our volumes and Class utilization, Proposal 17 is nearly twice as costly for OV|CROPP compared to any other proposal for Issue 4, it represents a 4.1 percent annual increase compared to our current obligations.

C. Proposal 21 (AFBF's Class II Differential)

While CROPP Cooperative is most heavily positioned in Class I, second to that is Class II where many of our branded half & half and creamers are grouped. The same realities of our business and market position described for Proposal 19 are applicable for Proposal 21.

The proposed change in the Class II differential as offered in Proposal 21 will have a negative financial impact for our cooperative.

All of our Class II fluid creams are packaged in Class I bottling facilities. This includes a large number of the 13 fluid plants listed in Table 2 on page 11 as well as four other Class I facilities that manufacture only Class II products for the cooperative.

We align ourselves with testimony of Tim Galloway as well as cross examination of the Proposal 21 sponsors that points out how in practice Proposal 21 creates an economic disparity that could allow facilities doing the same Class II product manufacturing different pooling/de-pooling advantages. A facility only dedicated to Class II products is afforded the opportunity to de-pool while a facility serving both Class II and Class I could not exercise a similar de-pooling opportunity. By the nature of our business, with the aforementioned dairy processors, we would ultimately have no ability to de-pool milk for Class II products while other Class II market participants might deploy this strategy when classified pricing conditions are favorable for such an option. For us to seek Class II de-pooling opportunities, if and when such classified pricing conditions avail themselves, would remain impractical since they create an inefficient movement of milk and disrupt longstanding co-manufacturer relationships. Proposal 21 in our view creates an unlevel playing field among Class II manufacturers which will translate to a unlevel playing field among milk handlers and their farmer patrons.

If Proposal 21 is advanced, we anticipate an increase of an estimated 3.5 percent in our annual pooling obligations for the Class II products we have manufactured and market for the cooperative. More difficult to assess is how Proposal 21 would impact the commercial relationship (dairy product pricing) with any number of our dairy ingredient customers that also manufacture Class II products.

D. CONCLUSION

CROPP strongly opposes both Proposal 19 and Proposal 21 and urges USDA to not adopt these measures. A more fundamental review of the basis and rationale for Class I differentials should be done examining the practicality and relevance of these measures in today's dairy market.

Increases in annual pooling obligations for OV|CROPP if Proposals 19 and/or Proposal 21 are adopted undermine would restrict our ability to return more financial stability to our farmer-owners. OV|CROPP leadership and board directors, in order to compensate for these unmitigable costs increases would need to consider:

- Increases to retail consumer and customer organic dairy product prices, a non-starter in a high inflationary economy and especially a risk for those of us in the premium dairy categories;
- A required pull back on cooperative asset investments and staffing, a move that would fundamentally limit our ability to bring product to market; and
- A suppression of farm pay price increase opportunities and perhaps a situation where we need to reduce our organic milk pay price.

The cooperative cannot sustain the risk of these increased costs without significant harm to our small farm owners. It is fundamentally, problematic that organic dairy farmers and our cooperative receive no overall upside benefit for our mandated participation in the FMMO system. OV|CROPP is a collection of farmers that:

- Voluntarily manages our own supply through a quota system;
- Maintains strict segregation of our organic milk from conventional to meet the requirements of USDA's National Organic Program; and
- Pays farmers far above the FMMO regulated minimum uniform prices.

The federal order system destabilizes what our cooperative hopes to offer farmers and consumers of organic dairy.

DATED this 17th day of January, 2024.

By:

A handwritten signature in black ink, appearing to read "Shawna Nelson". The signature is fluid and cursive, with a large initial "S" and "N".

Shawna Nelson
Executive Vice President of Membership
Organic Valley | CROPP Cooperative