



## Michigan Agri-Business Association

December 7, 2021

Michigan Department of Agriculture and Rural Development  
Pesticide and Plant Pest Management Division  
Lansing, MI 48909

### **Re: MABA Support of Proposed Regulation 634**

I am writing on behalf of the Michigan Agri-Business Association (MABA), a Michigan-based nonprofit trade association representing more than 300 companies and organizations involved in the success of agriculture in our state. MABA strongly supports proposed regulation 634 by the Michigan Department of Agriculture and Rural Development (MDARD), related to commercial fertilizer sales in Michigan. This proposed rule set benefits our state government and the agriculture industry by creating a more efficient and streamlined process for reporting fertilizer tonnage.

Currently, companies selling commercial fertilizer in Michigan are required to report tonnage of sales twice each year, in January and July. Completing two tonnage reports annually – when one report would achieve the same objective – adds complexity and cost for businesses. Proposed regulation 634 streamlines this process by moving from a biennial system to an annual tonnage reporting system. The regulation will greatly reduce the burden on both the businesses that file these reports and MDARD staff who are responsible for processing and auditing them.

Our Association has encouraged the Department to promulgate these common-sense rule changes and we appreciate the time and effort the Department has put into drafting the updated rules. We support the regulation as proposed. Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Chuck Lippstreu". The signature is fluid and cursive, with a large initial "C" and "L".

Chuck Lippstreu  
President  
Michigan Agri-Business Association