



**\*\*DELIVERED ELECTRONICALLY\*\***

September 23, 2025

Dear Wisconsin State Lawmakers,

On behalf of Wisconsin's food manufacturers, including dairy, vegetable, fruit, meat, and other processors that anchor both our rural and urban economies, we write to strongly oppose LRB-2577/P2, relating to ingredient disclosure requirements and labeling.

Wisconsin has earned its reputation as "America's Dairyland" and as one of the nation's leaders in food production because of its commitment to safety, quality and innovation. Our food manufacturers operate under the most rigorous federal standards in the world, with oversight from the U.S. Food and Drug Administration (FDA) and the U.S. Department of Agriculture (USDA). Against that backdrop, this bill represents a duplicative and deeply problematic regulatory scheme that will harm Wisconsin businesses, mislead consumers, and undermine confidence in safe, wholesome products.

### **Why This Bill Harms Wisconsin Food Manufacturers**

The bill requires warning labels for an expansive list of ingredients, including ingredients that are FDA-approved and broadly recognized as safe. For Wisconsin's dairy, vegetable, fruit, and meat processors, the impact would be severe:

- **Economic Costs:** Manufacturers would be forced to re-engineer recipes, redesign packaging, and retool production lines. These costs will hit small and mid-sized processors the hardest, squeezing margins and threatening jobs in rural communities where food plants are often the largest employers.
- **Competitive Disadvantage:** Wisconsin brands compete nationally and globally. A state-only labeling mandate would single out Wisconsin products as "unsafe" while identical items made elsewhere would move freely across state lines without such warnings. The bill creates an unfair playing field that could drive production and investment out of Wisconsin.
- **Legal and Trade Conflicts:** Federal law governs food safety and labeling. Creating a patchwork of state-by-state mandates opens Wisconsin to legal challenges, creates supply chain chaos, and signals to potential investors that our state is hostile to manufacturers.



This bill is also troubling in its encouragement of criminal penalties for food manufacturers. Fines of up to \$5,000 and a year in jail go far beyond reasonable regulation. Wisconsin's food processors, many of which are family-owned businesses operating on thin margins, should not face criminal prosecution for using ingredients that are federally approved and safely consumed across the country. It would send a message that Wisconsin is willing to jail its food processors for following FDA rules. That is not the business climate Wisconsin should be known for, nor is it a responsible use of state resources.

### **Why This Bill Misleads Consumers**

Rather than providing clarity, the bill would confuse and alarm shoppers:

- The mandated "WARNING" label ties ingredient decisions in Wisconsin to bans in Australia, Canada, the EU, or the UK—nations with very different regulatory systems. These ingredients are safe under U.S. standards.
- Such warnings imply a health hazard where none exists, undermining public trust in both Wisconsin food and in science-based federal oversight.
- Consumers deserve accurate, science-driven information, not politically charged labels designed to stigmatize safe products.

### **A Political Solution That Misses the Mark**

Let's be clear: Wisconsin families face real challenges—affordability of food, access to nutritious options, and global competition that threatens our agricultural economy. This bill addresses none of those issues. Instead, it would raise costs, hurt farmers, and damage the very industries that define our state.

At a time when policymakers should be working to strengthen our homegrown food industry—supporting exports, investing in innovation, and expanding markets—this proposal takes Wisconsin in the opposite direction. It is a misguided attempt at food policy that prioritizes politics over science, foreign regulatory agendas over American standards, and symbolism over substance.



## Our Request

For these reasons, **we respectfully urge you to decline to sign on to LRB-2577/P2**. Doing so will send a clear signal that Wisconsin remains committed to:

- Protecting consumers through science-based regulation.
- Supporting family farms, processors, and food workers who drive our economy.
- Resisting unnecessary mandates that undermine our competitive edge.

Wisconsin can and should lead the nation in producing food that is both safe and trusted. This bill would do little good for consumers, while doing great harm to the industries that sustain our state.

Thank you for your thoughtful consideration of this issue, and for your commitment to practical, pro-Wisconsin policymaking.

Sincerely,

A handwritten signature in black ink that reads "Scott Manley".

Scott Manley  
Executive Vice President of Government Relations  
Wisconsin Manufacturers & Commerce

A handwritten signature in black ink that reads "Nick Novak".

Nick Novak  
President  
Midwest Food Products Association

A handwritten signature in black ink that reads "Rebekah Sweeney".

Rebekah Sweeney  
Senior Director, Programs & Policy  
Wisconsin Cheese Makers Association