October 6, 2023

Dana Coale, Deputy Administrator USDA Dairy Program Agricultural Marketing Service U.S. Department of Agriculture 1400 Independence Avenue, SW Washington, D.C. 20250

RE: National Federal Milk Marketing Order Pricing Formula Hearing

Dear Deputy Administrator Coale:

We are writing to provide our complimentary concerns and positions as they relate to the Maine Dairy Industry Association's testimony regarding the National Federal Milk Marketing Order Pricing Formula Hearing.

As directors, commissioners, and secretaries of the departments of agriculture in our respective Northeast states, we understand the great need for this hearing and for the USDA Dairy Program to revise and update the Federal Milk Market Order Program's (FMMOP) component valuations, product survey, and formulas. The hearing and the record being developed should enable a decision by the Secretary making the FMMOP more responsive to the industry's supply and marketing requirements, particularly for our world-leading manufactured dairy products industry.

Paramount to this effort is the FMMOP's primary responsibility to ensure orderly marketing for fluid milk markets. Rational, regulated producer pricing is as essential a Market Order Program function as is price discovery. The COVID-19 pandemic starkly illustrated that we ignore threats to our regional food supply at our peril. The steady loss of our New England family-owned dairy farms is of grave concern. As the number of farms decreases, milk plants in the Northeast must travel ever-increasing distances to transport their raw milk supplies – a perishable product.

We believe that the widespread exit of Northeast dairy operations has brought our region's fluid milk supply to a tipping point. We assert that chronically inadequate and volatile producer pricing are the primary causes of this almost unimaginable loss of Northeast farms. While we recognize many pricing factors at work, the Dairy Program must be vigilant to ensure that FMMOP's producer pricing is part of the solution and not a cause of the problem.

Accordingly, when making the needed changes to price formula inputs, the Dairy Program and the Secretary must include as an equally fundamental consideration that this hearing does not result in a net reduction of producer pricing.

Thank you for considering our position.

Sincerely,

Amanda E. Beal

Amanda E. Beal, Commissioner Maine Department of Agriculture, Conservation and Forestry

Ken Ayars, Chief

Rhode Island Division of Agriculture and Forestry

Russell Redding, Secretary

Pennsylvania Department of Agriculture

Shawn N. Jasper, Commissioner New Hampshire

Department of Agriculture, Markets, and Food

Jebely E. Randle

Ashley E. Randle, Commissioner Massachusetts Department of Agriculture

Brian P. Hurlburt, Commissioner Connecticut Department of

Agriculture

Anson Tebbetts, Secretary Vermont Department of

Ce b. Tello

Agriculture, Food and Markets

Joe Atchison III, Assistant Secretary New Jersey Department of

Agriculture