

July 13, 2023

Tom Vilsack
Secretary of Agriculture
U.S. Department of Agriculture
Jamie L. Whitten Building
1400 Independence Avenue SW
Washington D.C., 20250

Dear Secretary Vilsack,

As USDA certified organic dairy farmers from 24 states across the country, we urge the Department to ensure the proposal calling for an Organic Exemption¹ is included in any Federal Milk Marketing Order (FMMO) national hearing, referred to in the USDA Agricultural Marketing Service—Dairy Program’s Action Plan² published on June 1, 2023.

As a collection of organic farmers who market organic milk through cooperatives, as direct shippers to dairy buyers, or under our own brands, we feel the FMMO system has failed to recognize the unique position of organic milk and has not provided similar services enjoyed by other dairy farmers.

Certified organic milk is a distinct commodity produced in accordance with federal law and subsequent National Organic Program regulations in 7 C.F.R. § 205. Not only is this affirmed in the authorizing law and standards, but organic dairy, along with other organic crops, fruits, and livestock are allowed an exemption from 22 national promotion and research board assessments. This allowance, codified into law as part of Section 10004 of the Agricultural Act of 2014 (2014 Farm Bill³), further acknowledges the unique market needs of organic agricultural products.

Examination of the dynamics of the organic milk market further sustains our position that organic milk does not appropriately fit the tenets or purpose of the Federal Orders, and the Orders should be amended to reflect that experience.

Organic milk is not substitutable with other milk pooled on the orders, and more importantly, its pricing has historically exceeded regulated minimum prices and is detached from classified pricing.

Yet the reality is the Federal Order rules and requirements impact our farm gate milk price by burdening us and our organic dairy buyers with pool payments that go overwhelmingly to non-organic producers.

The proposal to exempt organic milk from pooling requirements is developed in a manner that maintains transparency, safeguards farmers, and demonstrates accountability. The Organic Exemption would:

¹ <https://www.ams.usda.gov/sites/default/files/media/MilkInnovationGroupAdditionalProposal.pdf>

² https://www.ams.usda.gov/sites/default/files/media/FMMOModernizatino_ActionPlan.pdf

³ <https://www.govinfo.gov/content/pkg/PLAW-113publ79/html/PLAW-113publ79.htm> (Pub. L. 113-79)

- Only apply to USDA Certified Organic milk **that is priced above the Class I minimum price**. Using Class I as the standard ensures that organic producers are paid at least the highest conventional price for that Federal Order—a backstop benefit for farmers.
- Ensures that handlers of organic milk remain subject to existing reporting requirements, enforcement mechanisms, and administrative fees in the FMMO system. The Market Administrators would still review records to verify the application of any Organic Exemption.

If adopted, an Organic Exemption would have only a small impact on the uniform prices of the 11 Federal Orders and little, if any, impact on consumers, but the exemption would matter greatly to organic dairy farmers like us.

We urge you to move forward with a national Federal Orders hearing that includes the Organic Exemption proposal. The hearing needs to examine the untenable position of organic dairy in the FMMO system. The growth of organic dairy as a specialized product from the farm and the impact the current Order regulations have on our organic milk pay price make this a necessary request.

We appreciate USDA's hard work to support organic dairy farmers facing challenging economic conditions and look forward to bringing our additional analysis and witnessed experiences to any forthcoming FMMO hearing.

Sincerely,

Full Name	Farm Name	City	State
Doug Hubby	Shamrock Farms	Stanfield	AZ
Albert Straus	Blake's Landing Farms	Marshall	CA
John Taylor	Bivalve Dairy	Point Reyes Station	CA
James and Lucille Mendoza	JLT Ranch	Petaluma	CA
Blake and Stephanie Alexandre	Alexandre Family Farm	Crescent City	CA
Steve Moody	Ielmorini Moody Dairy	Valley Ford	CA
Justin Sandahl	Sandahl Dairy	Montague	CA
Jessica McIsaac	Neil McIsaac & Son Inc	Petaluma	CA
Robert J Camozzi II	Triple C Ranch & Willow Creek Jerseys	Petaluma	CA
Gene & Ginger Sarvinski	Sarvinski Dairy	Ferndale	CA
Charles D. Martin	Martin Dairy	Fort Jones	CA
Randall Lee, Richard Ray and Scott Alan Lafranchi	Lafranchi Ranch	Nicasio	CA
Michael McCall	McCall Dairy	Petaluma	CA
Stan Poncia		Santa Rosa	CA
Jim Riebli	Jim Riebli Dairy	Petaluma	CA
Fagundes Brothers Dairy	Fagundes Brothers Dairy	Merced	CA
Justin Sauder	Mountain Sun Dairy	Center	CO
Ernest S. and Robin Mikita	Mikita Dairy	Calhan	CO
Juan Velez	Platteville Dairy	Platteville	CO

Brian England	High Plains Dairy	Gill	CO
Jason and McKane Wells	Wells Inc	Milton	IA
Nathan Nedved	Nedved Family Farms	Garner	IA
Tim D Maibach	Maibach farms llc.	Bloomfield	IA
Marvin R Lynch	O'Lynch Dairy	Cascade	IA
Parker Beard		Decorah	IA
Kim Lynch		Cascade	IA
Dirk Reitsma	Sunrise Organic Dairy	Paul	ID
Sean Mallett	Harmony Organic Dairy LLC	Twin Falls	ID
Greg Bingham	Bingham Farms	Weston	ID
Drue & Kathy Smith	3 Mile Dairy	Montpelier	ID
Perry Van Tassell	Hidden Valley Organic LLC	Paul	ID
Sheila Koester	Koester Organic Farm	Scales Mound	IL
Carl and Laura Linnemeier	Linn Dairy	Fort Wayne	IN
Josh Crooks		Fort Wayne	IN
Tony Batello		Columbia City	IN
Mark Hostetler	Rosewater Farm and Dairy, LLC	Milford	IN
Martin Yoder Jr		Middlebury	IN
Ronald Paul Longacre	Valley of Hope Farms LLC	Oakland	MD
Curvin L. and Glennis L. Eby	Green Acres Farmstead LLC	Hagerstown	MD
Harry and Peggy Strite	Creek Bend Dairy Farm	Williamsport	MD
Matt Fry		Chestertown	MD
Ronald W Holter	Holterholm Farms, LLC	Jefferson	MD
Andrew Chase	Chase Farm	Kingfield	ME
Doug Hartkopf		Albion	ME
Mark Irani		Blanchard	MI
Leah Chupp		Jones	MI
John Troyer Jr.		Holton	MI
Joe Borgerding	Borgerding Dairy LLC	Belgrade	MN
Ben O'Reilly		Goodhue	MN
Bob Van Drehle	R&R Dairy	Melrose	MN
Dennis and Ruth Buck		Goodhue	MN
Meg & Kevin Stuedemann	Derrydale Farm	Belle Plaine	MN
Chris O'Reilly	Green Acres Organic Dairy LLC	Goodhue	MN
John or Christine Donnay		Kimball	MN
Anna Donnay		Kimball	MN
Roger and Michelle Benrud		Goodhue	MN
Joel Middendorf	MiddMinn Dairy LLC	Verndale	MN
Kevin Donnay		Kimball	MN
Ross Carl Nelson		Altura	MN
Dan and Teresa Young	Dan and Teresa Young Farm	Altura	MN
Carrie Redden	Twelve Tails Family Farm LLC	Chokio	MN

Christopher Hoffner	Kerr Mill Holsteins	Mount Ulla	NC
Christian Gowdy	Brookfield Farm	Walpole	NH
Sean Mallett	Enchantment Pasture's LLC	Portales	NM
David Hardy	Hardy Family Farm LLC	Mohawk	NY
Peter Mapstone	Pastureland Dairy LLC	Manlius	NY
Douglas and Maryann Morse	Maple Valley Farm	Mannsville	NY
Christopher Kemnah	Clover Bliss Farm	South New Berlin	NY
Lloyd E. and Tammy L. Thomas	Thomas Farm	Greenwich	NY
Daniel Williams and Anna and Brigette Ullrich		Truxton	NY
Charles K Blood	Rocky Top Acres LLC	Hubbardsville	NY
Molly Brannen		Bovina Center	NY
John G. Kellett Jr.	Mohawk Oaks Farm	Fort Plain	NY
Steven C. and Jackelyn Worden	Glen Cove Farm	Windsor	NY
John Engelbert		Nichols	NY
Jim & Anne Phillips		Marathon	NY
James and Sarah Huftalen	Huftalen Farm	Erieville	NY
Jason Tuning	Tuning Family Farm	Cincinnati	NY
Rob and Shirley Hudyncia	Hu-Hill Farm	Fort Plain	NY
Ryker Smith	Tre-G Farms LLC	Manlius	NY
Thomas Heckman	Heckman Family Farm	Yorkshire	OH
Scott Everett Stoller	Stollers Organic Dairy LTD.	Sterling	OH
Eric Grim	Grim Farm, LLC	New London	OH
Tim Kline	Meandering Creek Family Farm	Fredericksburg	OH
Greg Gasser		Sterling	OH
David Osterloh	Iv-Ann Farms	Maria Stein	OH
Ronald and Marlene Pohl		Coldwater	OH
Dan Pohl		St. Henry	OH
Matt Pohl		Coldwater	OH
Eugene David DeBruin	DeBruin Family Dairy	Greenfield	OH
Ryan Weaver	Maple Vista	Fredericksburg	OH
Charles Eselgroth	Buckskin Valley Farms and Dairy	Greenfield	OH
Steve Pierson	Sar - Ben Farms	St. Paul	OR
Kyle Bansen	Bansen & Sons Dairy, Inc	Yamhill	OR
Peter J. Mahaffy		Coos Bay	OR
Arie deJong	Windy Ridge and Bonanza View Dairy	Bonanza	OR
David Martin		Port Royal	PA
David Beiler	Rolling Sunrise Farm	Manheim	PA
Nathan D Harkness	Cozy Valley Farm	Gillett	PA
Ivan K. Kauffman		Hegins	PA
Samuel K., Elizabeth, and Steven Kauffman	Coyote Hollow Farm	Spring Glen	PA

Mose S. Esh		Gratz	PA
Samuel S. and Susan L. Esh		Gratz	PA
Jamie Kulesa	Lone Star Organic Dairy	Wills Point	TX
Richard Carter	Tejas Dunes	Muleshoe	TX
Brian Boehning	Boehning Dairy	Earth	TX
Tiffany Boehning	Hilltop Dairy	Earth	TX
James Huffman	County Line Dairy	Muleshoe	TX
Triston Boehning	Renegade Dairy	Perryton	TX
Dawn Dial	Pepper Dairy	Dublin	TX
Gerardo Gonzalez	Coldwater Dairy	Stratford	TX
Philip R Witmer	Grazeland Dairy	Dayton	VA
Melanie and Patrick Harrison	Harrison's Homegrown	Addison	VT
Roger Scholten	Scholten Farm	Weybridge	VT
Selina Rooney	Rooney Farm	Morrisville	VT
Geoff Sweeney	Sweeney Farm	St. Albans	VT
John Andrew	Jasa Family Farm	Coventry	VT
Annie Claghorn		Leicester	VT
Cameron Clark	Riverhill Farms Inc.	Williston	VT
Sonya Roberge		Chelsea	VT
Brian Wilson		Shoreham	VT
Kelly Stone	St. Rocks Farm	Fairfield	VT
Damien Boomhower		Enosburgh	VT
James Callan	James & Kristie Callan	Fairfield	VT
Leon Corse	The Corse Farm Dairy LLC	Whitingham	VT
Guy and Matt Choiniere	Choiniere Family Farm LLC	Highgate Center	VT
Sebastien Latraverse	Spring Brook Farm LLC	Westfield	VT
Marcella Guillette	Sugarhouse Farm	Newport	VT
Jesse Wilbur	Lazy Dog Farm LLC	Orwell	VT
Sara Ackermann	Ackermann Dairy	Hardwick	VT
Ryan Mensonides	Providence Farms.	Enumclaw	WA
Charles Maynard and Jake Mallonee	Mallonee Family Farm LLC	Curtis	WA
Gary Robert and Susan Marie Burkhalter	Burkhalter Family Farm	Rosburg	WA
Hans Wolfisberg	Edelweiss Dairy	Everson	WA
Gerrit and Karen van Tol	van Tol Dairy	La Center	WA
Dean Wesen	Wesen Farms Inc	Bow	WA
Burton Haugen	Haugen Family Farm LLC	Buckley	WA
Joshua Tranel	Tranel Family Farms	Cuba City	WI
Matthew A Canter	Highland Farm	Cashton	WI
Max Flaig	Flaig Farms, LLC	Sparta	WI
Tim & Lisa Servais	Hamburg Hills Farm	Stoddard	WI
Jon TePoel		Maple	WI
Jeffrey & Pamela Riesgraf		Edgar	WI

James and Tammy Fahey	Ji-mmy Dairy Farm	Edgar	WI
Kristina Ralph	Lazy Daze Acres	La Farge	WI
Timothy and Heather Hansen		Dorchester	WI
Joel Goede	Goede Acres LLC	Genoa	WI
Andrew Jaworski	Andy's Organic Acres LLC	Green Bay	WI
Marcella Wentworth		Manawa	WI
Richard Fischer		Seymour	WI
Daniel Wentworth		Manawa	WI
Scott Adank	Pastureland Dairy Farm	Stratford	WI
Matthew James Keesling	Woodland View Dairy	Deerbrook	WI
Matthew and DeAnna D Turner	Kount-T-Line Acres	Owen	WI
Brett Runde	Runde Farms	Cuba City	WI
Cheyenne Christianson	Grazing Acres	Chetek	WI
Keith Wilson		Cuba City	WI
Timothy Vosberg	Blue-Collar Holsteins, LLC	Cuba City	WI
Dustin Voegeli	Shepherd's View Farms	Argyle	WI
Dan Flood		Oakfield	WI
Aaron Leibfried	Leibfried Dairy Farms LLP	Hazel Green	WI
Nathan Kling	Kling Family Dairy	Taylor	WI
John and Kay Wiemer	Wiemer Family Farms	Arcadia	WI
Nathaniel and Arnold Trussoni		Genoa	WI
Allan and Lisa Hass		Westby	WI
Mark Parker		Viola	WI
Kyle Puchalla		Independence	WI
Kevin Jahnke	Jahnke Family Farm LP	Lancaster	WI
Joel David and Katie Winnes	Hillsong Farm	Arcadia	WI
John Ihm	Ihm Organic View Farms LLC	Lancaster	WI
Kevin Mahalko	Mahalko Dairy	Gilman	WI
James and Jake Wedeberg	Wedeberg Farms	Gays Mills	WI
Doug and Tracy and Josh and Catherine Dransfield	Windspring Farms, Inc.	Gap Mills	WV
Remington Perkins	Perk Farm Organic Dairy	Frankford	WV