

June 23, 2023

Bruce Summers
Administrator Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Dear Administrator Summers:

On behalf of National Farmers Organization (NFO), we are writing in support of one of the proposals the Milk Innovation Group filed with the USDA on June 20th of this year. Specifically, we are supporting their proposal #6 - Organic Milk Exemption. NFO serves over 1,500 dairy farmers throughout the United States, including over 800 organic dairy farmers.

NFO has been working with and serving organic farmers since 1988. We have seen first-hand how the organic dairy industry has provided a future for thousands of family dairy farms over the years. While NFO is not a member of the Milk Innovation Group, our dairy leadership team believes that organic farmers have been unfairly asked to financially support minimum regulated uniform pricing yet are unable to access many of the basic benefits provided by federal orders.

We agree with the Milk Innovation Group's conclusion that Organic milk has had to pay into Federal Order pools and yet when demand for Organic milk arises, they are unable to rely on that same pool to supply the extra milk they might need. In other words, the Federal Order does not provide the service to Organic milk handlers that it was designed to provide for conventional milk. We have concluded that the fairest path forward for Organic dairy farmers would be to exempt them from Federal Order pooling.

As a matter of Board policy, NFO does not bloc vote its membership. Should you choose to call a hearing and subsequent producer vote on this Milk Innovation Group proposal, we will encourage our member-farmers to vote in the affirmative.

We want to express our gratitude to you and the entire staff at USDA for their hard work on behalf of America's farmers.

Sincerely,



Paul Olson
President
National Farmers Organization



James Hayes
Dairy Farmer and
Chair, NFO Dairy Committee