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May 10, 2016

VIA EMAIL AND FEDERAL EXPRESS

Ms. Elanor Starmer, Administrator
Agricultural Marketing Service
United States Department of Agriculture
Room 3071-S; Stop 0201
1400 Independence Avenue, S.W.
Washington, D.C. 20250

Re: Supplemental Submission in Support of Proposal to Amend All Federal Milk Marketing Orders to Include a Modified Wichita Option for Organic Milk

Dear Ms. Starmer:

Introduction

This letter supplements the Organic Trade Association's ("OTA") November 30, 2015 letter in support of its Federal Milk Marketing Order ("FMMO") Proposal for a modified Wichita Option for organic milk. OTA's Proposal maintains full FMMO regulation of organic milk and thus in no way is an "exemption."

OTA responds to the objections raised in opposition to its request for a hearing.¹ Notably, the objections raised in the letters do not address whether USDA should hold a hearing under 7 C.F.R. Part 900, but rather are arguments regarding the merits of OTA's Proposal. These arguments are more appropriate for consideration at a hearing subject to full examination and discussion. While the proper venue for this ongoing factual and data-driven debate should be at a hearing, it is important to correct for USDA certain legal and factual inaccuracies in those objections.

¹ Specifically, these objections include the following: National Milk Producers Federation ("NMPF") Letter, October 22, 2015; Pennsylvania Association of Milk Dealers and Northeast Dairy Foods Association Letter ("Northeast Milk Processors"), November 27, 2015; NMPF Letter, December 17, 2016, Dairy Farmers of America ("DFA") Letter, February 17, 2016; Agri-Mark, Inc. Letter, February 19, 2016; Land O'Lakes ("LOL") Letter, March 19, 2016; Prairie Farms Dairy, Inc., March 14, 2016; Michigan Milk Producers Association Letter, March 30, 2016; and Upstate Niagara Cooperative Letter, April 1, 2016.

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OTA's Proposal Would Result in More Orderly Marketing

OTA's Proposal corrects current disorderly marketing conditions. The present FMMO system requires organic handlers buying organic milk to make payment into the Producer-Settlement Fund ("PSF") of monies generated from the purchase and sale of certified organic milk and shares all those dollars with conventional dairy producers; however, the FMMOs do not fulfill the Agricultural Marketing Agreement Act ("AMAA") demand to bring forth an adequate supply of milk for organic consumers. Contrary to the assertion of opponents, organic milk is a distinct market as established by Congress and USDA's National Organic Program ("NOP") and FMMOs fail to provide organic milk and provide limited, if any, economic value to the organic industry.

While several assertions have been made about the disorderly pricing impact of OTA's Proposal on conventional dairy farmers (*e.g.*, NMPF Letter, Dec. 17, 2015, at 1 – 2) the data underlying these claims has not been evaluated, distorts reality, and OTA has been given no opportunity to cross-examine any economist or industry specialist as to the reliability of these numbers (something that would, appropriately, occur at a hearing). More importantly, this argument fails to consider the countervailing present impact on the organic industry.

First, impact claims based on USDA data overestimates the impact of OTA's Proposal because there is no present way to estimate the mitigating impacts of organic Class II, III, and IV volumes with the data released to date. We understand that no Market Administrator presently tracks Class II, III or IV utilization of organic milk volumes. Thus, reliance on only the released Class I data overstates as the worst case scenario the potential changes in blend prices of the Proposal because those omitted lower use classifications could likely reduce the pool value change. Arguments regarding the impact of OTA's Proposal cannot reliably depend on the impacts suggested by this data.

Second, reliance on a comparison between conventional and organic pay prices to approximate impact is misplaced. The fact that there is such a price difference demonstrates that organic milk is viewed as entirely different by the market. Additionally, organic milk is genuinely distinct from conventional milk by law, a fact USDA legally recognizes through the NOP. Moreover, opponents' price difference arguments ignore entirely the fact that the higher price is necessarily a result of a factually demonstrable higher cost of production (*e.g.*, a significantly large component in organic cost of production is the cost of organic feed which USDA's own publications document consistently command their own large price premiums). The economically justified difference in pay prices, combined with the FMMO's inability to deliver one pound of organic milk to organic processors, is actually evidence that a change in the regulation is clearly needed because organic milk does not compete with conventional milk, especially as conventional milk cannot legally be substituted for organic milk. OTA's Proposal maintains full regulation of organic milk under the FMMOs, but permits an elective alternative

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method of meeting regulated minimum prices through proof of payment of significantly higher voluntary prices for organic milk, properly melding Congress' intent underlying both the NOP and FMMOs.

One purpose of FMMOs is to provide timely, accurate and consistent price signals to dairy farmers with respect to supply and demand. Over the past year, the organic price signal incorporated into FMMO pricing, because organic and conventional milk are treated the same, has muted and softened the price signals that conventional dairy farmers should be receiving to reduce supply in the face of relatively low prices for commodity prices using conventional milk. As a result, while organic milk has been short, there are significant, documented examples of conventional milk being dumped due to oversupply. These inefficient movements of conventional milk in the face of a different supply and demand situation for organic milk are themselves disorderly. OTA's proposal would correct for this misaligned price signal and result in more orderly marketing conditions.

Similarly, opponents have failed to show that any potential minor impact on conventional dairy farmers would, in fact, be disorderly marketing. USDA certainly can consider and hold hearings to consider FMMO Proposals that may have a depressive effect on producer prices; it has done so in the past with respect to replacements for the M-W price series and make allowance and yield factors for post-FMMO Reform product price formulas. The driving force behind a proposal is not solely the effect on producer prices but whether or not it will correct disorderly marketing; otherwise, FMMOs are nothing more than a farmer price support program. USDA has repeatedly said just the opposite. *See, e.g.,* USDA September 12, 2012 Letter Rejecting Requested FMMO Hearing on Ground that FMMOs are Not for Price Enhancement, Attachment 1. OTA agrees with USDA's assessment that "the FMMO program is a marketing tool that helps dairy farmers maintain a better balance in negotiating with processors by enforcing market-based minimum prices, monitoring the accuracy of milk weights and tests, and providing extensive market information to producers and processors to assist in market negotiations." Attachment 1, p.2. Impacts on prices can be a part of a disorderly marketing analysis, but opponents to OTA's Proposal have not shown how any pricing impacts from the Proposal would actually result in disorderly marketing as opposed to more orderly marketing of organic milk.

Moreover, USDA just last year convened a hearing to consider promulgation of a new California FMMO even though USDA's own preliminary economic analysis suggested that adoption of such a proposal would have significant price depressing effects on dairy farmers under a number of other FMMOs. *See, Preliminary Regulatory Impact Analysis of Proposals to Establish a California Federal Milk Marketing Order*, Appendix B, p. 26 (USDA's own analysis concluded that the average negative impact on producer prices at test outside of California would range

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from a negative 6 to a negative 26 cents per cwt).² The cooperatives who support a California FMMO cannot simultaneously successfully request a hearing when they want it and then turn around and demand that USDA not hold a hearing when the same issue of depressing FMMOs prices is present in both proceedings. Thus, USDA precedent is to hold a FMMO hearing under these precise circumstances.

The fact that an FMMO may be voted out during a potential referendum process (as argued by NMPF Letter, Oct. 22, 2015, at 4 and DFA Letter, Feb. 17, 2016, at 1) cannot be a basis upon which to deny a hearing request. Practically, this would require USDA to conduct some kind of analysis of farmer voting preferences prior to the actual hearing and vote, a task USDA clearly cannot, and should not, accept. Additionally, should an FMMO be voted out during referendum, historical practices show there is little threat of disorderly marketing occurring. The Western FMMO was terminated after a referendum in which (primarily DFA members) voted the order out. Milk remains available in Utah and Idaho. Should dairy farmers make the decision to vote out an order, it can only be inferred that such a result is the best outcome for those farmers. Resulting disorderly marketing seems unlikely considering the realities in states that have moved away from Federal Orders and, should it occur, it can be remedied through the promulgation of an FMMO.

The few arguments presented regarding other alleged instances of disorderly marketing do not pass muster. If the USDA were to adopt Prairie Farms' reasoning in its March 15 letter, then the current treatment of partially regulated distributing plants ("PRDPs") is disorderly and these provisions of the orders would need to be amended. This position would cause more disruption to the FMMO system than any proposal which utilizes an existing mechanism like the Wichita Option, especially because the Wichita Option was adopted by USDA to remedy an earlier Order provision found unlawful by the U.S. Supreme Court. *Lehigh Val. Co-op. Farmers, Inc. v. United States*, 370 U.S. 76 (1962) (striking down compensatory payments to producer settlement fund from partially regulated Class I handlers as being an unlawful trade barrier prohibited by 7 U.S.C. §608c(5)(G)).

Finally, the disorderly marketing concerns regarding "uneconomic competition for access to the premium outlet" (Northeast Milk Processors Letter, Nov. 27, 2015, at 3) are unfounded because conventional dairy farmers cannot engage in competition for sales to organic processors. Conventional dairy producers are of course free to transition to organic production practices if they see this outcome being beneficial and that is one way in which OTA's proposal strives to solve the supply problem with which FMMOs presently interfere. The destructive competition that serves as the historical justification for FMMOs does not and could not exist between the conventional and organic dairy farmers under the OTA Proposal.

² Found at <https://www.ams.usda.gov/sites/default/files/media/Preliminary%20Impact%20Analysis%20-%20Final.pdf>.

Proposal Would Not Alter Fundamental FMMO Structure

OTA's Proposal does not alter any aspect of the fundamental FMMO structure. Rather, it builds on the Wichita Option, a long-standing and standard feature of FMMOs. The Proposal cannot alter the FMMO structure if it operates within it. Opponents maintain that the adoption of OTA's Proposal "would ultimately lead to the destruction of the FMMO system." (LOL Letter, March 9, 2016, at 1). This hyperbole has no basis in fact, but in any event it should be subject to testing, as is usually the case, at an evidentiary hearing. The Proposal draws from existing, current FMMO provisions which have not led to the destruction of any orders. The Wichita Option provision is currently utilized, without harm in all FMMOs, as all orders have PRDPs with route sales. In 2015, there were 37 PRDPs in the FMMOs. There are several with route distribution in most orders, and a few that are owned by cooperatives. Many of these PRDPs use the Wichita option. OTA's utilization of a modified Wichita Option is clearly within the bounds of existing FMMOs and consistent with current FMMO policy.

Organic Dairy Farmers are Beneficiaries

OTA is comprised of growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers, and others involved in organic production growth. OTA acts on behalf of, and for the benefit of, all of its members. Opponents' tactical decision to focus on three large dairy processor members (Agri-Mark Letter, Feb. 16, 2016, at 1) fails to alter the reality that the OTA Proposal is presented on behalf of, and supported by, organic industry members at all levels of participation, from farmers to retailers. Accordingly, the Proposal has been carefully crafted so as to create a system where values are maximized by reallocating previously pooled monies to benefit and grow the organic industry.

OTA's Proposal carefully and deliberately incentivizes increased payments to farmers, a point as of yet unrefuted in any meaningful way by any opponents. As discussed on page 3 of OTA's November 30, 2015 letter, the OTA Proposal creates a regulatory incentive for processors to pay monies generated from the partial regulation to the organic dairy farmers. Statements to the contrary, for example, that "there are no provisions in the proposal to ensure that organic dairy farmers are the recipients of the funds that would be withheld from the FMMO," (NMPF Letter, October 22, 2015, at 1) are, simply, wrong.

As far back as September 29, 2015, in OTA's original submission, OTA clearly set out how the requirements in provision 7 C.F.R. § 1000.74, would ensure dairy farmers would benefit from the proposal.³ However, the example bears repeating as it demonstrates, with simulated data, the

³ OTA has previously raised the issue of antitrust prohibitions on the discussion of, or agreement to, give any extra monies to farmers. See Nov. 27, 2015 Letter from Foley & Lardner LLP. As explained, antitrust restrictions apply to OTA's process of responding to USDA and prohibit it or its members from communicating regarding future pricing or forward-looking business plans. OTA has yet to receive any response on this point from its opponents, so

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effects of the OTA's Proposal. Under the Proposal, if the Class I price for the month is \$22.00 and the electing handler paid all of its USDA certified organic dairy farmers an all milk price of \$26.60, then the handler would receive a \$1.70 per cwt credit against its producer settlement fund obligation ($\$26.60 - (\$22.00 + \$2.90) = \1.70). If that handler's usual obligation for the month were \$2.00 per cwt, it would still pay \$0.30 per cwt to the producer settlement fund. If the handler's usual obligation was \$1.60, then it would pay zero, but not receive any benefit by way of a payment from the fund for the \$0.10 "over-credit." So looking at the handler's incentives each month, it benefits the handler to maximize payments to the organic farmers so that the all milk price paid is equal to the Class I price plus the \$2.90 threshold. Money paid less than that total must be paid into the settlement fund, but would be better spent on payments to farmers for the reasons described below. Either way, the handler must pay that money out (to the farmer or to the settlement fund). Objections that the Proposal fails to incentivize the same could only be made against the decision of \$2.90 for the threshold level. OTA welcomes discussion and debate on this point at a hearing, when all sides can fairly and completely present their evidence on this point.

Common sense also supports the conclusion that monies now diverted from organic to conventional would have such an effect. OTA submitted this proposal out of concerns for the inadequate supply of organic milk to meet growing demand, a symptom of the greater underlying problem of the FMMO system's unfairness to the legally distinct USDA certified organic product. Not only would this growing market penalize processors for failing to use generated monies for raw milk, but the regulation itself gives no motivation for the retention of any generated money. The organic processor can either pay the money into the producer-settlement fund (for which it receives no benefit) or to its producers (for which it will be able to encourage the production of more organic milk while building stronger relationships with its producers). Other than mere allegations that only processors would benefit from OTA's Proposal, no part in any letter has been able to explain, based on the language of the submitted Proposal, why OTA's explanation of this incentive is incorrect or insufficient to ensure money is directed to organic farmers.

Proposal Does Not Create a Competitive Advantage to Organic Over Conventional

OTA's Proposal does not create a competitive advantage to organic over conventional processors and producers because organic processors would, at least, continue to pay the minimum prices for organic raw milk, and likely pay more for such supplies.

Arguments regarding this advantage face irreconcilable contradictions with other objections and ignore the inherent statutory differences between organic and conventional milk. For example, the Northeastern Milk Processors argue that any change to the treatment of organic milk will

reaffirms here its analysis of antitrust restrictions and its role in preventing OTA from discussing certain alternatives to its Proposal.

both give organic fluid milk an unfair retail advantage in competition with conventional milk (Northeastern Milk Processors Letter Nov. 27, 2015, at 3), while at the same time arguing that organic milk will fail to serve the market served by conventional milk because consumers will not be able to afford it (*Id.*, at 5). The Proposal would not provide an economic advantage to organic processors over conventional processors.

Marketwide Pooling Benefits Conventional Producers and Handlers at the Expense of Organic Producers and Handlers

The *quid pro quo* that serves as the basis for the Class I-focused FMMO system is that, in exchange for higher minimum prices, Class I processors have priority access to milk supplies. It is, in fact, the only benefit that Class I processors receive from an FMMO system. Contrary to claims that pooling benefits both organic and conventional handlers and producers (NMPF Letter, Oct. 22, 2015, at 3), Organic Class I processors do not enjoy this single benefit from FMMOs. In times of shortages of organic milk, an FMMO Market Administrator cannot resolve this situation by calling for the provision of additional supplies from conventional dairy farmers.

NMPF argues that, should OTA's Proposal be adopted, "balancing costs of serving the conventional and organic dairy markets... would remain in the FMMO pool and would be borne only by the non-organic farmers and handlers remaining in the FMMO." NMPF fails to account for the actual proposal language which establishes economic disincentives for organic processors from using the conventional FMMO market to balance (*e.g.*, 7 C.F.R. §1000.74(h)). The Proposal would treat such balanced milk as "other source milk" and 7 C.F.R. §1000.74(i) gives the Market Administrator special authority to investigate and act against efforts to engineer milk supplies so as to avoid higher payment requirements.

Moreover, currently conventional farmers and handlers do not, and cannot, help balance the organic dairy market. The organic dairy industry bears that burden on its own, while also contributing into a settlement pool from which they cannot draw any benefit. And, due to the cost disparity in production, organic supplies are ill-suited to balance the conventional market. NMPF's real complaint is not that conventional producers and handlers will lose a source from which to balance their milk supplies, but rather that they will lose the benefit of the organic proceeds for which, up until now, they received in exchange for nothing. In sum, the organic industry bears all of the risk of both short supply and long supply: FMMOs provide no assistance to provide organic milk when it is short; and, with long-term fixed price contracts, the organic industry always incurs losses on sales of surplus organic milk when organic milk is long. These elements of the discussion also warrant a full airing as is typical at a FMMO hearing.

FMMOs provide orderly marketing because they ensure that farmers who produce essentially interchangeable milk can receive equal prices for their product, regardless of the ultimate use of the milk. The philosophy behind the notion that all farmers should share in the higher value (Class I) and lower value (other Classes) markets is that each participating farmer could, given

the opportunity, have served the higher value market. In the case of organic fluid milk, though, conventional farmers are not producing an interchangeable good and, under federal law, could not participate in the higher value Class I organic fluid milk market. Thus, under current FMMOs, organic milk producers are being forced to forego potential revenues that are paid into the settlement pool to be shared with farmers who are not producing a comparable product.

Several letters have claimed that the annual impact on conventional producers will be from approximately \$1,500 in the northeast to \$10,000 in the southwest. (*See, e.g.*, Agri-Mark Letter, Feb. 19, 2016, at 1). However, the impact on the organic producers and processors from their disproportionate contribution to the pools is equally impactful. Attachment 2 calculates the impact on organic producers and processors and shows that their current participation in the settlement fund has massive impacts on the organic industry. For example, the impact per producer in the Northeast FMMO 1 is \$23,050 per producer. In the Central Order 32, it is \$87,298. In the Southwest Order 126, it is a staggering \$525,600 per producer. Overall, the impact averages \$21,182 per organic producer.⁴ Organic producers receive a regulated minimum price below the value of their milk because they are subsidizing a pool which includes lower-value conventional milk. As a result, organic processors must adjust for this problem outside of the order in the form of additional premiums even though it already pays significantly higher prices for organic milk.

FMMOs Affect Supply and OTA's Proposal Remedies Organic Supply Problems

Claims that supply issues are driven not by FMMOs but by National Organic Program restrictions (NMPF Letter, Dec. 17, 2015, at 4 – 5) ignore the importance to consumers of the high level of integrity of organic certification and contradict the legal and practical role and importance of FMMOs. These assertions do not make any attempt to address the underlying unfairness regarding the treatment of organic milk under FMMOs, but rather seek to create a problem (by diminishing organic standards) under the NOP that does not presently exist. The fundamental purpose of the AMAA and, in turn, the FMMO system, is to “insure a sufficient quantity of pure and wholesome milk.” 7 U.S.C. 608c(18). In fact, in order to be able to fix minimum prices in any FMMO, the USDA must consider “economic conditions which affect market supply and demand for milk or its products in the marketing area...” *Id.* FMMOs are meant to respond to, and affect, supply. Thus, it is not only disingenuous, but legally incorrect, to argue otherwise. (NMPF Letter, Dec. 17, 2015 at 5).

⁴ At a hearing these disparate numbers could be better explained, discussed, analyzed and likely revised based upon the typical FMMO hearing. At first blush, it appears that some of the impacts listed by USDA are likely affected by other influences including monthly decisions regarding the pooling (or not) of eligible milk by non-Class I handlers which is another issue that adversely affects the organic industry and over which only conventional milk plays a significant role.

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If FMMOs cannot impact organic milk supply, then the AMAA would provide no basis upon which it should be regulating organic milk in the first place. OTA maintains that FMMOs have a significant impact on the sufficient supply of organic milk to processors and, ultimately, consumers. FMMOs set minimum price levels and simple economic theory shows that price levels drive supply. As mandated participants in the FMMO system, organic producers and processors are affected by FMMOs and have the right to propose amendments accordingly.

A Hearing is the Only Proper Venue for this Debate

OTA finds itself at a disadvantage in this process by refuting technical and data-driven arguments without the benefit of generating and introducing its own expert testimony, along with being able to cross-examine and evaluate the claims of its opponents. The complexity of the FMMO system is ill-suited to the conclusory and hamstrung process of a prolonged letter writing campaign. The hearing process is the appropriate venue for this necessary and healthy debate. OTA urges USDA to proceed to a hearing immediately.

Respectfully submitted,



Chip English
Ashley Vulin
Attorneys for the Organic Trade Association

Attachments

cc: Ms. Dana Coale
Ms. Laura Batcha
Marni Karlin, Esq.

Attachment 1

to May 10, 2016 OTA Letter to Ms. Elanor Starmer



1400 Independence Avenue, SW.
Room 2968-S, STOP 0225
Washington, DC 20250-0225

September 17, 2012

Ms. Dori Klein

Dear Ms. Klein:

Thank you for the petition you submitted requesting a national hearing to address the current situation facing America's dairy farmers. Clearly this is an issue of great importance to the Secretary of Agriculture as he conveyed directly in his letter to you. Like the Secretary, I am deeply concerned regarding the current economic situation that many dairy farmers are facing.

With regards to your specific request to hold a hearing, I would like to take this opportunity to discuss the program with you further. First, the Federal Milk Marketing Order (FMMO) program is not designed to be a price or income support program since it is not authorized to establish minimum prices above the relative market value of the products of milk. Instead, the FMMO program is a marketing tool that helps dairy farmers maintain a better balance in negotiating with processors by enforcing market-based minimum prices, monitoring the accuracy of milk weights and tests, and providing extensive market information to producers and processors to assist in market negotiations.

Section 608c (18) of the Agricultural Marketing Agreement Act of 1937, as amended, outlines the criteria and procedure by which the Secretary establishes and adjusts minimum prices in the FMMO program. Through a public hearing, the Secretary of Agriculture evaluates the marketing conditions in an area and considers the price of feeds, the available supply of feeds, and other economic conditions that affect the market supply and demand for milk and its products in a marketing area. Based upon evidence presented at the hearing, the Secretary sets minimum milk prices that are reflective of all the economic factors, will ensure a sufficient supply of milk, and will be in the public interest.

In section 1504 of the 2008 Farm Bill, Congress established specific timelines and additional requirements for conducting Federal order hearings. To ensure that these congressionally mandated timeframes are met, it is critically important that proposals to amend FMMOs be fully developed. Since the petition you sent does not contain a proposal, the U.S. Department of Agriculture (USDA) cannot approve your request. I have enclosed the Supplemental Rules of Practice regulations and a summary sheet of required information to provide you with additional assistance.

Ms. Klein
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As demonstrated through Secretary Vilsack's letter, we will continue to evaluate all options currently available to USDA that could provide assistance to dairy producers during this difficult time. We are available to help you and any other interested party by providing specific information or data needed as you develop a comprehensive proposal that can begin the hearing process and address dairy industry concerns. Please do not hesitate to contact me if you would like additional assistance.

Thank you for ensuring that America's dairy farmers are represented during this extremely difficult period.

Sincerely,



Dana H. Coale
Deputy Administrator
Dairy Programs

Enclosures



Attachment 2
to May 10, 2016 OTA Letter to Ms. Elanor Starmer

| Estimated Pool Value of Class I Organic Milk Per Producer | | | | | | | | |
|---|--------------|---|-----------------------|----------------------|---------------------|---------------------|------------------------|-------------|
| FMMO Area | Order Number | Estimated Annual Pool Value of Class I Organic Milk [1] | Organic Producers [2] | Nonorganic Producers | Total Producers [3] | \$/Organic Producer | \$/Nonorganic Producer | \$/Producer |
| Northeast | 1 | \$21,712,812 | 942 | 10,828 | 11,770 | \$23,050 | \$2,005 | \$1,845 |
| Appalachian | 5 | \$485,790 | 49 | 2,079 | 2,128 | \$9,914 | \$234 | \$228 |
| Florida | 6 | \$665,332 | 0 | 187 | 187 | | \$3,558 | \$3,558 |
| Southeast | 7 | \$951,077 | 9 | 1,995 | 2,004 | \$105,675 | \$477 | \$475 |
| Upper Midwest | 30 | \$4,156,487 | 546 | 9,581 | 10,127 | \$7,613 | \$434 | \$410 |
| Central | 32 | \$11,436,040 | 131 | 2,834 | 2,965 | \$87,298 | \$4,035 | \$3,857 |
| Mideast | 33 | \$733,593 | 409 | 5,226 | 5,635 | \$1,794 | \$140 | \$130 |
| Pacific Northwest | 124 | \$758,396 | 81 | 380 | 461 | \$9,363 | \$1,996 | \$1,645 |
| Southwest | 126 | \$5,256,002 | 10 | 540 | 550 | \$525,600 | \$9,733 | \$9,556 |
| Arizona | 131 | <i>Restricted</i> | 2 | 93 | 95 | | | |
| | | \$46,155,529 | 2,179 | 30,067 | 32,246 | \$21,182 | \$1,535 | \$1,431 |

Notes:

- [1] Change in Value of the Pool by Removing Class I Organic Milk (By Order) January 2013 - June 2015
<https://www.ams.usda.gov/sites/default/files/media/Change%20in%20Pool%20Value%20%20January%202013%20-%20June%202015.pdf>
- [2] Census of Agriculture Organic Survey; Table 16; Organic Livestock & Poultry Inventory and Sales - Certified and Exempt Organic Farms: 2014
https://www.agcensus.usda.gov/Publications/2012/Online_Resources/Organics/organics_1_016_016.pdf
- | | |
|-------------------------|---|
| FMMO | State(s) |
| Northeast (1) | Connecticut, Maine, Maryland, Massachusetts, New Hampshire, New York, Pennsylvania, Vermont |
| Appalachian (5) | Kentucky, North Carolina, South Carolina, Virginia |
| Florida (6) | Florida |
| Southeast (7) | Alabama, Arkansas, Georgia, Louisiana, Mississippi, Tennessee |
| Upper Midwest (30) | Minnesota, North Dakota, Wisconsin |
| Central (32) | Colorado, Illinois, Iowa, Kansas, Missouri, Nebraska, Oklahoma, South Dakota |
| Mideast (33) | Indiana, Michigan, Ohio, West Virginia |
| Pacific Northwest (124) | Oregon, Washington |
| Southwest (126) | New Mexico, Texas |
| Arizona (131) | Arizona |
- [3] USDA AMS Dairy Programs Number of Producers Delivering Milk to Regulated Handlers
https://www.ams.usda.gov/sites/default/files/media/Number_Producers_YTD_2015.pdf