

August 20, 2025

The Honorable Brooke L. Rollins
Secretary of Agriculture
U.S. Department of Agriculture
United States Department of Agriculture

Subject: Feedback on Proposed USDA Reorganization Plan Outlined in the Secretary's Memorandum of July 24, 2025 (SM 1078-015)

Dear Secretary Rollins:

The International Dairy Foods Association (IDFA) appreciates the opportunity to provide feedback on the U.S. Department of Agriculture's (USDA) proposed reorganization plan as detailed in the Secretary Memorandum, SM 1078-015. IDFA represents the nation's dairy manufacturing and marketing industry, which supports more than 3.05 million jobs that generate \$52 billion in direct wages and \$779.45 billion in overall economic impact. IDFA's diverse membership ranges from multinational organizations to single-plant companies, from dairy companies and cooperatives to food retailers and suppliers. Together, they represent most of the milk, cheese, ice cream, yogurt and cultured products, and dairy ingredients produced and marketed in the United States and sold throughout the world. As the leading voice for U.S. dairy manufacturing, IDFA and its members rely on a close, collaborative working relationship with USDA agency officials to ensure the continued growth and success of a vital sector of American agriculture.

IDFA supports the Administration's efforts to enhance efficiency and effectiveness in our federal government, and with these comments, we wish to make a fervent appeal to USDA that its proposed reorganization, particularly any relocation of staff from the Washington, D.C. metropolitan area, does not inadvertently erode the crucial customer service and technical expertise provided by several key agencies nor should it impact our industry's economic or critical security. We specifically urge the Department to ensure that at no time during the planning or implementation of this proposed reorganization there is a reduction in accessibility and responsiveness of the Agricultural Marketing Service (AMS), Animal and Plant Health Inspection Service (APHIS), Agricultural Research Service (ARS), Food and Nutrition Service (FNS), or the Foreign Agricultural Service (FAS). From IDFA's perspective, the work of these five agencies is crucial to the success of the dairy industry and we need the Department to make certain that any reorganization maintains and strengthens the high level of service and collaboration that the dairy industry and other stakeholders have come to depend on, especially for research and development, technical assistance in trade and exports, implementation of critical federal feeding and nutrition programs, procurement of billions

of dollars of vital food and agricultural commodities, and regulatory guidance for the dairy industry. The Department's commitment to prioritizing a strong, communicative partnership with industry with outstanding customer service must remain a core tenet of its mission.

1. Agricultural Marketing Service (AMS)

For the dairy industry, AMS is a cornerstone of market integrity and stability. The AMS Dairy Program has faced significant staff reductions in 2025, with a reported loss of approximately one hundred staff. With the vast majority of the remaining team already based outside of the National Capital Region, IDFA is concerned that any further reductions to AMS's presence in the Washington, D.C. area would be counterproductive, causing additional loss of institutional expertise that has taken decades to develop. Asking these senior professionals to relocate to other regions of the country would likely lead to a wave of retirements and vacancies that could lead to regulatory disruption and uncertainty. The most recent update to the Federal Milk Marketing Order system, which was conducted consistent with formal rulemaking and hearing procedures, is just the latest example of the complicated and complex nature of U.S. dairy policy. Implementation of these changes, along with any additional adjustments to dairy policy in the next Farm Bill or in any law passed by Congress, will require close coordination with all dairy stakeholders, including both processors and producers, to ensure an outcome that furthers the longstanding goals and objectives of the federal order system. A diminished D.C. presence would make it more difficult for AMS leadership to engage with Congressional staff, members of Congress, trade associations, and other stakeholders, as well as to be available to advise USDA leadership on issues of importance to our industry.

Furthermore, we urge the Department to ensure that the AMS Commodity Procurement team remains a true resource for other USDA agencies and federal departments, as well as food producers and processors. This team's expertise in acquiring U.S. grown food and commodities and placing them where needed at the correct moment in time, is a critical asset, particularly for partners such as the U.S. Department of Defense and the State Department, which rely on the team to acquire foods for our service members and families, military hospitals, diplomatic programs, and many other institutions. It is essential that this valuable function is not compromised by the proposed reorganization.

Additionally, the National Organic Program (NOP) is of great importance to the dairy industry. The program, which is housed within AMS, establishes and enforces consistent national standards for all organically produced agricultural products sold in the U.S., including milk and dairy products. The NOP accredits third-party organizations to certify that farms and businesses, including dairy farms, meet these national organic standards.

The NOP helps the U.S. dairy industry by providing a clear and enforceable framework for organic dairy production. This framework ensures that all organic dairy products are held to the same standards, building consumer confidence in the organic label. As consumer demand for organic dairy products grows, a robust NOP is vital for supporting this expanding market. By setting these standards and ensuring compliance, NOP provides a level playing field for producers of all sizes and allows the industry to capitalize on the growing demand for organic products. With many accreditors and auditors already in the field, removal of additional D.C.-based NOP staff would likely compromise the integrity of NOP's policies and enforcement procedures, which are otherwise widely considered to be gold standard and are relied upon by U.S. organic dairy producers and processors.

2. Animal and Plant Health Inspection Service (APHIS)

APHIS plays a pivotal role in ensuring the safety and marketability of U.S. dairy products both domestically and internationally. The agency's technical experts are indispensable for developing and maintaining sanitary standards that protect animal health and facilitate trade. IDFA members frequently collaborate with APHIS to resolve specific technical issues related to exports and imports, such as import permit requirements, health certificates, and negotiating foreign import requirements with foreign countries. Like AMS, APHIS is already organized in such a manner that the policy-focused staff are based in D.C., while many of APHIS' other staff are already based in the field, and receive direction and oversight from Washington staff. Thus, the relocation of these highly specialized D.C.-based professionals could disrupt these critical lines of communication and lead to delays in resolving issues that have significant financial implications for our industry.

Beyond trade facilitation, animal disease prevention is another essential service provided by APHIS. The dairy industry's ability to collaborate with APHIS on responses to emerging diseases, such as highly pathogenic avian influenza (HPAI) which has affected dairy herds, is of critical importance. Maintaining a presence in the Washington, D.C., region is essential for a "one health" approach to human and animal health challenges, as other major federal public health agencies, including the National Institutes of Health (NIH), Centers for Disease Control and Prevention (CDC), Food and Drug Administration (FDA), Office of Science and Technology Policy (OSTP), and others are based in the Washington, D.C. area.

IDFA recommends that the Department's reorganization of APHIS be executed in a manner that ensures the continuity of its policy and technical expertise and its ability to provide responsive, high-level support to other U.S. agencies, as well as to the dairy sector and other food and beverage industries, with a special emphasis on maintaining

and securing U.S. food and agriculture's critical infrastructure, animal health, and intellectual property.

3. Agricultural Research Service (ARS)

ARS provides critical research and development services that are vital to the U.S. food and agricultural sectors. As one of the world's leading agricultural science agencies, ARS has delivered significant breakthroughs in our nation's agricultural production and food security. Their work is essential for managing and mitigating food safety risks, reducing animal health and disease challenges, and improving the overall efficiency of food production and processing.

IDFA specifically recognizes ARS's ongoing partnership with the dairy industry. The agency is currently working on developing a marketable solution for ice cream waste, which not only will improve the industry's overall competitiveness but also will create new opportunities for small and medium-sized dairy processors. This project helps reduce costs while supporting new U.S. markets for food byproducts, such as new fats, renewable energy, and animal feed, among others. Projects like this one require several steps over several years before research can begin, including developing a research plan and team and purchasing specialized equipment. Given that ARS headquarters staff are located in the Washington, D.C., metropolitan area (Beltsville, MD), any plan to move these staff, laboratories, and expertise, could easily compromise our national security, diminish collaborative efforts with industry and other government research agencies in the region, and hinder the development of future innovations essential for the dairy industry's growth. IDFA urges the Department to ensure that the reorganization strengthens, not weakens, the agency's ability to partner with other research agencies, colleges and universities, and industry stakeholders on these critical projects.

4. Food and Nutrition Service (FNS)

FNS is a crucial partner in connecting the dairy industry with a range of federal food assistance programs, including the National School Lunch Program, the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), and the Supplemental Nutrition Assistance Program (SNAP), which also administers Healthy Fluid Milk Incentives Projects. FNS staff provide essential guidance and program management that help ensure dairy products are a core component of these nutritional programs. While FNS staff have a regional positioning at present, the presence of FNS in the Washington, D.C. area is critical for policymaking. Therefore, any proposed relocation of the remaining D.C.-based FNS staff could complicate and slow down the collaborative processes that are necessary to innovate and adapt these nutrition programs to meet the needs of beneficiaries while also supporting the dairy industry. IDFA believes it is vital that the reorganization of FNS be implemented in a way that

safeguards its ability to provide proactive and collaborative service to industry partners, ensuring that nutritious and wholesome dairy products remain accessible to millions of Americans.

5. Foreign Agricultural Service (FAS)

FAS is a critical partner for the U.S. dairy industry, which is a major exporter of high-quality dairy products to a global market. FAS staff provide invaluable technical assistance and market intelligence that enable our members to navigate complex international trade regulations and expand into new markets. The proposed relocation of FAS personnel raises significant concerns about the potential for a loss of institutional knowledge and a breakdown in the collaborative constructive interaction that exists between the agency, other agencies focused on trade, and Washington-based trade associations. Physical proximity and in-person engagement with FAS experts are essential for quickly addressing time-sensitive trade barriers on behalf of the dairy industry.

Furthermore, it is imperative that FAS maintains a strong presence in the National Capital Region to ensure seamless coordination and close proximity to the Office of the U.S. Trade Representative (USTR) at the White House, other branches of the Foreign Service, and export-related expertise at the U.S. Department of Commerce, U.S. Department of State, International Trade Commission, and others. This relationship is vital for the development and execution of U.S. agricultural trade policy and for representing U.S. interests in international trade negotiations.

Additionally, the nature of the Foreign Service requires a central location in Washington, D.C., where Foreign Service Officers (FSOs) can provide value between foreign postings. This central hub is essential for training, professional development, and maintaining institutional knowledge across the global network of offices. A decentralized model would disrupt these critical functions and could hinder the effectiveness of FSOs, who are the eyes, ears, and voice of U.S. agriculture around the world.

IDFA urges the Department to guarantee that any reorganization of FAS preserves a robust, expert-level presence in Washington, D.C., capable of providing immediate and effective support to the dairy industry's export and trade priorities.

6. National Institute for Food and Agriculture

NIFA is a critical pillar for the long-term success and stability of the U.S. dairy industry. NIFA's continued investment in advanced agricultural research, education, and extension, through the Land-grant Universities system, is essential for developing and implementing solutions to current and future challenges for the U.S. dairy from farm to table, ensuring that U.S. dairy remains a leader at home and in global dairy agricultural.

NIFA's initiatives, like the Agriculture and Food Research Initiative (AFRI), the Food Safety Outreach Programs (FSOP), and Formula Programs (Hatch, Smith-Lever, etc), have not only driven improvement in dairy quality, food safety, and innovation, but also trained the workforce needed to successfully start, operate and grow dairy farms and dairy foods processing plants.

The reorganization of NIFA began prior to 2025, but as the Department continues to complete and optimize that reorganization, IDFA encourages USDA to be cognizant of the need to preserve in-house expertise at NIFA and continuity of program support, while thinking creatively about how best to equip NIFA to meet the emerging needs of the American food and agriculture industry. NIFA's contribution to dairy foods science, education, and extension have been impactful to our industry's competitiveness, and will continue to be in the future.

Conclusion

We thank you for the opportunity to comment on the Proposed USDA Reorganization Plan outlined in the Secretary's Memorandum of July 24, 2025 (SM 1078-015).

Sincerely,



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