



April 9, 2026

U.S. Department of Agriculture  
Economic Research Service  
Attention: Nisha Murray  
1400 Independence Avenue SW  
Mail Stop 1800  
Washington, DC 20250-1800

**Re: Docket No. IERS-2026-0001, Request for Information on Opportunities, Challenges, and Emerging Areas in Statistical Data, Analysis, and Research at the U.S. Department of Agriculture.**

To Whom it May Concern,

The International Dairy Foods Association (IDFA) appreciates the opportunity to comment on Docket No. IERS-2026-0001 regarding opportunities, challenges, and emerging priorities in USDA statistical data, analysis, and research. For the U.S. dairy sector, timely, trusted, and granular USDA data is foundational to efficient markets, risk management, long-term capital investment, and global competitiveness.

IDFA represents the nation's dairy manufacturing and marketing industry, which supports more than three million jobs that generate \$198 billion in wages and \$779 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, all on the cutting edge of innovation and sustainable business practices. 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 U.S. dairy product exports continue to grow, access to consistent, credible USDA market intelligence becomes even more important. In 2025, the U.S. dairy industry exported \$9.51 billion in dairy products, nearing the record high of \$9.54 billion set in 2022 and marking a 15% increase over 2024. As U.S. milk production continues to rise, expanding and diversifying markets is vital to U.S. dairy's global competitiveness and to the strength of the American economy.

## **USDA Data as the Foundation for Dairy Market Stability**

USDA's National Agricultural Statistics Service (NASS) and Economic Research Service (ERS) datasets are the trusted baseline for dairy market transparency. These data products inform everything from milk production and commercial disappearance to feed costs, cold storage, and global demand outlooks. They also underpin the World Agricultural Supply and Demand Estimates (WASDE) report and serve as the benchmark for proprietary agricultural analytics platforms used throughout the dairy supply chain.

Without this common baseline, market participants would face increased uncertainty, weaker price discovery, and less efficient production, procurement, and inventory decisions. Because dairy producers operate continuously and processors manage highly perishable and storage-sensitive commodities, even short disruptions in trusted market data increase risk across the entire supply chain—from feed purchasing and herd management decisions to forward contracting, inventory management, and export sales. Further, the information published by NASS, ERS and OCE provide important insights particularly for smaller entities who may not have the breadth of market intelligence due to their smaller footprint, placing a high value on the USDA datasets to support smaller entity's market decisions.

NASS and ERS also compile and synthesize the statistics used for the Dairy Margin Coverage Program (DMC). The DMC is a lifeline for U.S. dairy producers, allowing them to protect not only their operations but to shield American consumers from volatile prices. The U.S. dairy industry relies on DMC for risk management, ensuring efficient capital allocation and long-term investments. The entirety of the domestic dairy supply chain would be hampered without access to DMC, which relies on NASS and ERS synthesized analyses of trends and forecasts for dairy production, consumer demand, pricing, and cold storage end stocks.

## **The Critical Role of Dairy Production and Utilization Reporting**

The dairy industry relies heavily on USDA's data on commercial disappearance and milk production. The Milk Production Survey, the Dairy Production Monthly and Annual Reports, the Milk Production, Disposition, and Income Annual Summaries, and the Milk Production Monthly Report produced by NASS provide key insights into the U.S. dairy herd and the production of dairy foods. These reports are utilized throughout the various segments of the dairy industry.

Similarly, ERS produces reports on U.S. milk production, supply, and utilization of milk in dairy products, as well as supply and allocation of milk fat and skim solids by product. ERS provides detailed reports on domestic consumption of dairy products and fluid milk sales, dairy herd and production data by states and region, and historical data on fluid milk product plants. These invaluable reports enable the U.S. dairy industry to be well informed in a highly competitive global marketplace for dairy, in many instances providing a competitive edge for U.S. dairy.

## **Consumer, Nutrition, and Food Assistance Data**

The value of ERS spans not only dairy production and manufacturing but also understanding consumer trends and dietary patterns. Reports such as the annual Food and Nutrition Assistance Landscape and the Food Expenditures Series provide important insights into consumption of the dairy products IDFA's members produce. The Food Assistance Data & Collaborative Research Programs conducted by ERS, the Food Nutrition Service (FNS) and the Bureau of the Census detail food consumption, nutrient intakes and diet quality and provide important insights for the dairy sector into consumer behavior. These insights are increasingly important as dairy companies continue investing in nutrient-dense product innovation and as policymakers evaluate the role of dairy in federal nutrition programs.

## **WASDE, AMIS, and Cross-Commodity Outlooks**

The WASDE report is one of the most directly important research collections for the U.S. dairy industry. It contains relevant and actionable information, including feed costs projections, which allow U.S. dairy producers and processors to plan margins and hedge risks. From the farm level onward, the absence of the widely trusted baseline established through WASDE data would cause inefficient decision making, likely resulting in volatile prices and asymmetrical supply and demand. NASS and ERS are the primary sources of data collection and analysis for the WASDE report.

In addition to providing foundational data for the WASDE report, the Agricultural Market Information System (AMIS) database provides valuable insights on global feedstocks and fertilizers. U.S. dairy businesses enhance competitive advantages through understanding opportunities and the relative positioning of U.S. agricultural commodities within the macroeconomic landscape. For example, the AMIS platform highlights “market developments” for fertilizer costs across specific reasons and market drivers.

The Office of the Chief Economist (OCE) World Agricultural Outlook Board's (WAOB) baselines and cross-commodity analyses also enable more effective capital investment planning across all U.S. agricultural sectors, including dairy. A limitation of this information further weakens market stability and investor confidence. In a riskier farm economy, financing is more expensive, which constrains the ability of dairy processors to expand operations or mistime sales and stocks, thereby shrinking their returns.

The Agricultural Marketing Service (AMS) also relies on many internal data products to compile and publish critical dairy market reports including the National Dairy Product Sales Report. We strongly urge USDA to preserve the underlying data capabilities AMS staff rely upon to continue producing all current reporting for dairy.

## **IDFA Recommendations for Expanded Reporting**

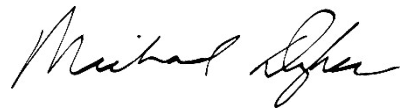
Finally, IDFA recommends expansion of two key reports to generate greater transparency due to growth in key products in recent years. Respectfully, IDFA requests USDA:

1. Expand Dry Milk Protein Production reporting in the NASS Dairy Products report to include protein categories similar to the whey categories. This expansion would reflect changes in dry milk production towards more high-protein products.
  - Specifically, USDA should consider creating three Milk Protein Concentrate Reports:
    - i. milk protein concentrate with protein up to 74.9%,
    - ii. milk protein concentrate with protein ranging from 75%-89.9%, and
    - iii. milk protein concentrate with protein content exceeding 90%.
2. Add milk protein and nonfat solids testing data to the monthly NASS Agricultural Price report's "Price Received for All Milk" table. Reporting of this information would provide more precise information on the actual supply of milk components and better inform market analysis and business planning.

The \$11 billion in dairy processing investments currently underway across the U.S. reflect the confidence that transparent, reliable USDA data from ERS, NASS and OCE help create. These capital decisions rely on credible long-range market signals, supply outlooks, and demand projections generated through USDA's research and reporting structure. USDA data provide key market insights that foster transparency, further enabling dairy market participants to better understand the marketplace in a highly segmented and geographically disparate industry.

Thank you again for the opportunity to provide commentary on Docket Number IERS-2026-0001. Should you have questions or need any further information, please do not hesitate to reach out to my colleagues, Chelsie Keys ([ckkeys@idfa.org](mailto:ckkeys@idfa.org)) or Elena Clark ([eclark@idfa.org](mailto:eclark@idfa.org)).

Respectfully Submitted,



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President & CEO  
International Dairy Foods Association (IDFA)