



**Comments by the U.S. Dairy Export Council
Regarding USDA's Invitation for Comments on the USDA Reorganization Plan**

August 28, 2025

The Honorable Brooke Rollins
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington DC 20250

Dear Secretary Rollins,

Our organization submits the following comments in response to the U.S. Department of Agriculture's proposed reorganization plan to relocate resources outside of the Washington, DC metro area to rural communities around the country. The U.S. Dairy Export Council (USDEC) appreciates the opportunity to present its views on this important issue.

USDEC is a non-profit, independent membership organization representing the global trade interests of U.S. dairy farmers, dairy processors and cooperatives, dairy ingredient suppliers and export trading companies. Its mission is to enhance U.S. global competitiveness and assist the U.S. industry to increase its global dairy ingredient sales and exports of U.S. dairy products. USDEC and its 100-plus member companies are supported by staff in the United States and overseas in Mexico, South America, Asia, the Middle East, and Europe.

Trade Staff: A Different Type of Job to Benefit Farmers

First, we understand USDA's goal of ensuring agency staff with farmer-facing roles are located outside of the Washington, DC area and closer to those they are tasked with assisting. For most USDA staff, this proximity to farmers and the rural supply chains they rely on is appropriate and an important goal. As USDA assesses which select staff to retain in DC, however, we believe USDA's Trade and Foreign Agricultural Affairs (TFAA) roles – specifically all Foreign Agricultural Service (FAS) and U.S. Codex Office staff – uniquely benefit by being located in Washington, DC.

As you know, TFAA teams support America's farmers and food manufacturers by resolving policy impediments that impact trade opportunities. Being in Washington enables TFAA staff to meet with visiting foreign governments, as well as DC-based embassy staff. Additionally, proximity to the Office of the U.S. Trade Representative and other agencies involved in shaping agricultural trade agreements and resolutions allows for more effective coordination and influence over trade policy decisions. The U.S. Codex Office, for instance, convenes the interagency Codex Policy and Technical Committees, which bring together agency experts and political representatives from multiple executive agencies, and would continue to benefit from DC-based collaboration. This level

of close engagement helps ensure the interests of American farmers and agribusinesses are well represented, and USDA is able to respond most efficiently and effectively to emerging trade issues.

We commend the Trump administration's commitment to addressing U.S. agriculture's historic trade deficit and tackling unfair trade policies and regulations that have plagued American producers for years. FAS and Codex staff are critical government partners for accomplishing those goals, and we fear leaving the DC area could undermine their efficacy.

Additionally, there are certain positions at USDA's regulatory structures – notably within the Agricultural Marketing Service (AMS) Dairy Division and Animal and Plant Health Inspection Service (APHIS) – that require deep expertise and primarily work on trade policy resolution with all their FAS colleagues through collaboration with that same spectrum of stakeholders and USDA leadership in Washington. Their service to America's farmers would also greatly benefit from staying in the DC area to maximize their ability to continue robust collaboration with other agencies across the U.S. government, support engagements with embassies and visiting trading partners, and maintain within USDA's staff in-depth issue area expertise in support of USDA's trade objectives. These agencies, especially AMS, already have a significant presence spread throughout the United States. The limited staff based in the DC area play a vital role in consolidating input from their colleagues across the country and using that information to collaborate with the various stakeholders cited above in DC.

Finally, we note that basing these trade-related subject matter experts in the DC area also facilitates close collaboration and consultation between the Administration and its partners in Congress. Congressional briefing requests can at times include staff level experts; having them in the DC area ensures that USDA can be most responsive to those inquiries.

Conclusion

TFAA staff and their policy-focused partners at AMS and APHIS play a critical role in representing U.S. agricultural interests, helping to open and maintain access to global markets. They work closely with foreign governments, industry partners, and U.S. exporters to resolve trade barriers and promote American products. Their expertise supports economic growth in rural communities by ensuring fair and sustained trade opportunities.

We recognize the priority the administration has placed on in-person work for government employees. We are concerned the benefits of in-person interactions will be undermined if these particular staff involved in interagency collaboration on international trade issues are now spread out across the country, far from international visitors, industry stakeholders, and other government partners they work with to deliver for U.S. agriculture exporters.

On behalf of USDEC's 100-plus member companies, we appreciate the opportunity to provide comments on this important issue, and we remain available to provide any further clarification as needed. Should you have any questions, please feel free to contact Shawna Morris, whose contact information is provided below.

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