



June 15, 2022

Mr. Clarence Prestwich
National Agricultural Engineer
Conservation Engineering Division
USDA Natural Resources Conservation Service
1400 Independence Avenue
South Building, Room 4636
Washington, DC 20250

RE: Docket No. NRCS-2021-0005

Dear Mr. Prestwich:

Thank you for the opportunity to comment on the proposed changes to NRCS Conservation Practice Standard 592 – Feed Management (Docket No. NRCS-2021-0005).

Newtrient was founded by 12 leading milk cooperatives representing nearly 20,000 dairy farmers producing approximately half of the nation's milk supply. Newtrient brings together farmers, industry associations, researchers, investors, technology leaders and product developers to make informed decisions about manure management opportunities. Newtrient's work includes advancing manure-based management and product technologies and bringing public and private sector partners together to advance environmental asset trading opportunities. Newtrient understands dairies, markets, practices, and technologies, and brings entities together for success in reducing the environmental impact of the dairy industry.

The National Milk Producers Federation (NMPF), established in 1916 and based in Arlington, VA, develops and carries out policies that advance the well-being of dairy producers and the cooperatives they own. The members of NMPF's cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of dairy producers on Capitol Hill and with government agencies. NMPF provides a forum through which dairy farmers and their cooperatives formulate policy on national issues that affect milk production and marketing.



The NRCS Feed Management Conservation Practice Standard has immense potential to significantly impact the greenhouse gas emissions resulting from the production of dairy and dairy products. According to a life cycle assessment for fluid milk commissioned in 2007, U.S. dairy contributes only 2% of all U.S. greenhouse gas emissions. Thanks to modern and innovative dairy farming practices, producing a gallon of milk in 2017 required 30% less water and 21% less land and had a 19% smaller carbon footprint than it did in 2007. However, a primary source of methane is enteric fermentation, and the Feed Management practice can aid dairy producers in reducing enteric emissions. Enteric methane emissions, including gas released from cow eructation, account for approximately one-third of a dairy farm's greenhouse gas footprint.

Today, dairies are not using the Feed Management practice for a variety of reasons and we expect modifications in the practice standard and updating the cost share rates will result in a practice that works for dairy producers and results in reductions in methane emissions. In reviewing data from NRCS related to dairy producers' use of NRCS conservation programs, between FY2014 and FY2020, dairy operators across the country had one contract for a Feed Management plan and practice count of three associated with the use of the Feed Management Conservation Practice Standard. None of the contracts had financial assistance obligations associated with the Feed Management practices.

The dairy industry is committed to making advancements in methane reductions through tools that can be used by all sizes and types of dairy operations. In 2020, the industry announced the Net Zero Initiative, an industry-wide effort that will help U.S. dairy farms of all sizes and geographies implement new technologies and adopt economically viable practices.

The most significant impact on the environment that we have seen in animal agriculture is the incredible efficiency that has been archived by the U.S. producers. One of the greatest tools we have is to continue to impact this efficiency by improving the feed and feeding practices as new advances are made. The potential of using this NRCS Feed Management Conservation Practice Standard (592) is tremendous, particularly if it encourages regular updates with the goal of increasing efficiency while reducing the environmental impact.

Specifically, on the proposed Feed Management Conservation Practice Standard, we appreciate the changes in this proposal standard included in the Federal Register, including the edit to



remove the need for animal scientists' certification under the criteria section. We also appreciate the changes that remove the need for certification to write a plan.

To make the changes to the Feed Management Conservation Practice Standard successful, the standard must be utilized by dairy producers across the country. Working within NRCS and externally to educate on the opportunities under the Environmental Quality Incentives Program to cost share on this practice and closely reviewing the cost share rates to ensure that they correlate with the efforts undertaken by dairy producers and advisors will be critical to the success of the practice standard. We look forward to working with NRCS to expand the adoption of this practice.

Thank you again for the opportunity to comment on this practice standard.

Sincerely,

A handwritten signature in purple ink that reads "Jamie Jonker".

Jamie Jonker, Ph.D.
Chief Science Officer
Vice President
Sustainability & Scientific Affairs
National Milk Producers Federation

A handwritten signature in black ink that reads "Mark Stoermann".

Mark Stoermann
Chief Operating Officer
Newtrient LLC