

IN THE MATTER OF A PROPOSED REGULATION AMENDING
NJAC 2:53-1.1 THROUGH 2:53-1.4

FINDING OF FACT

Introduction

This matter came on to be considered pursuant to a notice of hearing issued February 14, 1979, which notice was published in three daily newspapers in this state in the time and manner required by NJAC 4:12A-23. Notice was also published in the New Jersey Register pursuant to the provisions of New Jersey Administrative Procedure Act on March 8, 1979, 11 NJR 115.

The notice of hearing provided for receipt of testimony concerning whether an economic formula should be used in determining milk price movements under minimum milk pricing orders of the Division and whether there should be an adjustment in present margins. Also, testimony was invited concerning the establishing of differentials for returnable containers.

History

NJAC 2:53-1.1 through 2:53-1.4, commonly referred to as Order 69-1, became effective September 18, 1972. The effective date of the order, which was promulgated in 1969, was delayed by extensive litigation, including a review by the New Jersey Supreme Court. The order provided for only minimum retail prices on whole white milk, also it continued the use of a bracketing system designed to move retail prices based upon changes in prices paid to dairy farmers under terms of the joint Federal-State orders covering the state. The order also included the use of a minimum marketing margin based upon cost for large efficient dealers and stores serving a major segment of the market. The minimum price was conceived as a floor price to prevent destructive competition and was not expected to become the market price at which all or most of the milk was sold.

In 1976 the New Jersey Legislature amended and supplemented the Milk Control Act to require that the single marketing margin concept be continued in subsequent pricing orders of the division. Also, to provide assurance that low cost milk will continue to be available to consumers throughout the State. The Act required that any prices established yield no more than a reasonable return for the lowest cost, most efficient milk dealers and store outlets. In addition, only changes in cost since the base year 1974 should be considered.

The Act further provided that the director may use an economic formula as a price mover and establish cost-justified lower

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minimum margins or differentials based upon the size or type of container used. Specific provision was made for a public hearing before the adoption or amendment of any such proposed formula, but changes in price as result of the formula would not require additional hearings.

Studies

Following the adoption of the 1976 Amendment (NJSA 4:12A-22.1 and 22.2) the Division of Dairy Industry, anticipating consideration of adopting an economic formula, caused certain studies to be made. These studies included.

1. A Business Operations Analysis of the New Jersey Milk Processing and Distributing Industry 1971-1975;
2. A Cost of Processing and Delivering Milk in New Jersey 1976-1977; and
3. A suggested Economic Formula for Pricing Milk at Re-sale in New Jersey.

The use of an economic formula for moving minimum prices had been considered during the 1968-69 hearings which led to the adoption of Order 69-1 (NJAC 2:53-1.1 et. seq.), but was not adopted at that time. One of the reasons for not having adopted the formula was the fact that the proposal did not include a satisfactory index to reflect increases in productivity in the industry. Data included in the recent Business Operations Analysis was now available for use in developing such a productivity index and was considered in drafting the proposed economic formula for consideration at this hearing.

The recent cost study was designed to provide an indicator of the accuracy of the economic formula in reflecting changes in costs for the large, efficient dealers selling milk to stores in New Jersey.

Formula Adoption Considerations

Present Procedure

Price movements under Order 69-1 are based upon a bracketing system using 19¢ increments. Thus for each 19¢ per hundred-weight change in minimum prices to dairy farmers, minimum prices to consumers are changed by one-half cent per quart. The one-half cent per quart change in minimum prices results in a return of 23¢ to the total marketing system. Thus, for each one half cent change in price, 4¢ goes to cover costs other than raw milk. As conceived in the Order 69-1 Finding on Remand, this 4¢ covers those costs directly associated with price changes such as driver commissions.

Since September 18, 1972, the milk industry has been faced with rapidly increasing raw milk prices. Between September 18, 1972 and April 1979 minimum prices to farmers in South Jersey have risen from \$7.85 to \$13.36 per hundredweight (3.5 percent butterfat FOB the plant) -- an increase of 70 percent. Minimum prices to consumers have increased from \$1.04 to \$1.62 per gallon -- an increase of 56 percent. During the same period, other costs have increased rapidly as indicated by data included in Exhibit 4 and especially page 22 where the Index of Prices Paid in the marketing of milk in New Jersey was shown to be 140.1 in August 1978, using the average for 1974=100.

The Business Operations Analysis of the New Jersey Milk Processing and Distributing Industry (R Exhibit 2) reflects the impact of these sharply increased costs on returns to the dairy industry during the period 1971 through 1975. Each of the profitability measures used by the researcher shows decreases in profitability during the period. For example, the rate of return on sales for the industry ranged from 1 percent in 1971 to 0.8 percent in 1975 (R Exhibit 2 p 5). The report concluded in part that "For the period studied, the milk processing and distribution industry in New Jersey operated on a relatively low rate of return on sales, investment, and net worth...(T)he return on investment at 3.6 percent is not high enough to attract capital into the industry for the replacement of plant and equipment nor for the introduction of cost saving innovations" (R Exhibit 2 p 25).

Similar data were not available for the store segment of the distribution industry, but data in the record indicate competition at the store level during recent weeks resulted in sales of milk in gallon containers by supermarkets at or near minimum prices (R Exhibits 20A, 20B, 20C, and 20D). Whereas much of the time since January 1977, such stores were selling milk at prices above minimums established by the Division (R Exhibit 21).

Quoting again from the Business Operations Analysis, "Either the milk industry is extremely efficient or it is subjected to intense price competition. Otherwise, the market would tend to yield higher rates of return. It is the opinion of the author that during the period studied, the efficiency in milk handling was at a very high level, but at the same time intense price competition was taking place,..." (R Exhibit 2, p 25).

Based upon the record review of changes in costs versus changes in minimum prices; current prices out of stores versus costs for large efficient operations; and industry data as reflected in the Business Operations Analysis for the New Jersey Milk Processing and Distributing Industry, it is apparent that minimum, price levels in New Jersey should be adjusted upward. The record shows that the present price level does not yield a reasonable return for the lowest cost, most efficient dealers and store outlets. It is therefore in the public interest to avoid further erosion of the capital base and to promote a healthy dairy industry for the benefit of consumers (R Exhibit 2 p 26).

Proposed Formula

The formula proposed for use by the division was developed to take into account changes in the cost of goods and services used in processing and distributing milk adjusted to take into account changes in productivity occurring in the industry (R Exhibit 4).

With the goal of simplifying the price computation, the division published a proposal in the New Jersey Register which also converted milk costs to an index. The proposed "Index of Milk Price" would combine raw milk prices with other costs in the processing and distributing of milk, adjusted to reflect changes in productivity (R Exhibit 1 New Jersey Register, March 8, 1979, 11 NJR 115).

As initially proposed, the formula would have resulted in an increase in minimum prices of 3¢ per quart or 12¢ per gallon as of November 1978. Adjustments to the formula were made prior to the hearing to adjust milk costs from 3.5 percent to 3.25 percent butterfat which gave an indicated increase of only 2.5¢ per quart or 10¢ per gallon as of that time.

Formula Modification

Early in the hearing, cross examination by one of the attorneys raised questions concerning the index of productivity which had been developed for use with the formula and which warrant its modification (R Volume I p 95 ff). During the course of the cross examination, it was pointed out that the 1976 Act requires that the minimum marketing margins adopted under orders of the division yield no more than a reasonable return to the lowest cost, most efficient milk dealers and store outlets. The index of productivity used in the formula development had been based upon changes in productivity over the five year period 1971-1975 for all dealers serving the State of New Jersey.

Later in the hearing the witness for the trade association, representing most of the major milk dealers in New Jersey, suggested that changes might be made to the productivity index to reflect greater increases in efficiency than those reflected by the entire industry during the five year period (R Volume III, pp 136-141). He suggested that application of the formula be limited to one-half the dollar and cents effect shown in the formula computation to accommodate the productivity evidence (R Volume III P 140). More specifically, on re-direct he testified that (1) an increase of the minimum marketing margin in effect under Order 69-1 of one-half the economic formula projection computed since the base year 1974 would result in minimum prices which would yield no more than a reasonable return to the lowest cost, most efficient milk dealers and store outlets; and (2) if the director determines that the economic

formula should be adopted, a provision limiting its effect in the market to one-half the change in the minimum marketing margin indicated for the future should also be adopted for the benefit of the consumers. Such modification would yield a reasonable return for the lowest cost, most efficient milk dealers and store outlets (R Volume IV, pp 75 and 76).

A careful review of the entire record, especially in light of the testimony referred to above, shows that changes should be made in the application of the proposed formula. I find that increases currently indicated in minimum prices resulting from operation of the formula should be reduced by one-half. This will adequately compensate for any understanding of the rate of increase in productivity by the larger, more efficient plants and will continue to maintain low minimum prices for the benefit of consumers, in accordance with the legislative intent.

Price Levels

As noted above, the record supports an increase in the present minimum price level in New Jersey in order to maintain a healthy dairy industry and an adequate supply of milk. But care must be taken to protect the interest of the consumer and to fix prices at the lowest possible level consistent with the intent of the 1976 Amendment.

The economic formula, would boost prices by 2.5¢ per quart or 10¢ per gallon above presently existing minimum prices. After carefully reviewing the record and balancing the equities related to the need for an adequate return to the industry against our concern for keeping prices to consumers as low as possible, I have determined that prices should be increased only one-half that indicated by the formula. Even with this modest increase, New Jersey's minimum prices will continue to be among the lowest in the nation.

Implementing the Price Change

As noted above, Order 69-1 provides for changes in minimum prices based upon changes in prices paid to dairy farmers. These changes are implemented through the use of a bracketing system which relates raw milk prices to minimum prices to consumers in increments of 19¢ each. This procedure is easy to understand and has been accepted by the industry as an appropriate way for making price changes. A witness representing most of the dealers in New Jersey urged that the bracketing system be retained (R Volume IV p 76). Based upon this recommendation and general acceptance of the bracketing system by the industry, I find that the brackets should be continued but realigned as hereinafter provided.

The witness also recommended that the formula be adopted to reflect changes in costs of factors other than raw milk but that adjustments to the margin be made on a quarterly basis (R Volume III, p 135). Data for use in the formula would still be collected on a monthly basis, but indicated changes would be made only at quarterly intervals. This recommendation should be adopted and any price changes indicated by the formula shall be announced only for January, April, July or October.

The decision to limit the present increase in the minimum marketing margin to one-half of that which was indicated by the proposed economic formula, likewise demonstrates that a similar limitation should be applied with respect to the future use of the formula. This can be accomplished by spelling out in the order specific index ranges and the amount by which the price will increase or decrease within such range. In computing the index range care must be taken to round down to the nearest one-half cent per quart as suggested by the researcher in Exhibit 4.

The limitations herein provided on the use of the economic formula compensate for any understatement of the rate of increase in productivity by the larger, more efficient plants. But to assure consumers that all the benefits of changing technology are passed on to them in the form of lower milk prices, a study should be made to determine the current rate of productivity increases by the most efficient plants and stores. If, based upon the study, a change in the present formula is indicated a hearing can be held to consider amendments.

Further, the limit on the price increase and the continued use of brackets make it apparent that the easiest way to change the level of prices is to revise the brackets. The record shows that any changes in price suggested by the adoption of the formula or by testimony made a part of the record should be implemented in stages (R Vol. III pp 81 and 133). To accommodate this suggestion and spread the increase over a longer period, a portion of the increase should be delayed for a specified period of time. This may be done by the order implementing this finding of fact.

Container Differential Considerations

Testimony was received concerning a differential in minimum prices for milk sold in returnable containers. The testimony was based upon costs for the Lexan container. This container is very durable and considerably lighter than glass. The container has been on the market for only two or three years, and there is only limited experience concerning the tripage which may be expected from the container.

The proponent of the container differential recommended a differential of 7¢ per gallon and 4¢ per half gallon (R Volume III, p 26-27). This recommendation was based upon limited cost data submitted for his plant (R Exhibit 9). Testimony of the witness who conducted the cost study for the division indicated a cost differential for the container of 3.7¢ (R Volume II, p 192). The researcher considered only costs associated with in-plant container cost and the cost of handling the container in the store was not computed. The proponent testified that in his stores there was no additional cost for in-store handling. But on cross examination, one of the company employees indicated additional costs related to the handling of the empty containers between the store and the processing plant (R Volume V p 73 ff.).

Witnesses for the supermarket industry and full-service milk dealers each testified in opposition to any differential in price for returnable versus non-returnable containers. The representative of the supermarket industry did not provide specific cost data for handling returnable containers but did enumerate a number of areas where additional costs were involved as compared with non-returnables. These included: receiving and refunding or receipting the customer for empty containers; moving empty containers from the reception area to the storage area; inventorying empty containers; counting returnables back to the dairy; and costs associated with the cluttering and congestion of the areas for returnable containers (R Volume IV, p 16-41). The witness for the milk dealers testified that in-store handling costs would be at least 3.2¢ per gallon (R Volume IV, p 142). He also testified that additional costs were incurred by the dealer serving the supermarkets with returnable containers (R Volume IV, p 69 ff.). Thus, the 3.7¢ per gallon savings on the container found by the researcher would appear to have been dissipated by additional costs at other points in the system.

Based upon the foregoing, I find that testimony concerning whether or not there should be a differential in minimum prices for milk sold in returnable containers is inconclusive and a differential will not be provided at this time.

NOW THEREFORE, based upon the testimony of record at the hearing held on March 13, 14, 15, and April 3, 4, and 6, 1979, the minimum retail milk pricing order of the Division should be amended as shown on the attached Exhibit A.

This the 19th day of April 1979.

Woodson W. Moffett, Jr.
Woodson W. Moffett, Jr., Director
Division of Dairy Industry
Department of Agriculture
State of New Jersey

DEPARTMENT OF AGRICULTURE

DIVISION OF DAIRY INDUSTRY

The Department of Agriculture, Division of Dairy Industry, pursuant to the authority of NJSA 4:12A-1 et. seq. proposes to amend NJAC 2:53-1.1 through 2:53-1.4 by the entry of an order to be designated as Order 79-1 as follows:

ORDER 79-1

2:53-1.1 Minimum Prices on Fluid Whole White Milk

From and after the effective date hereof, subject to the provisions of Section 2:53-1.4 and Section 2:53-1.5, minimum prices to be charged to consumers through stores and vending machines and on home-delivery routes, shall be as set forth in Schedule 79-1N for North Jersey (Area One) and Schedule 79-1S for South Jersey (Area Two).

2:53-1.2 Schedule 79-1N; North Jersey

(a) Schedule 79-1N is as follows:

1. Minimum prices for fluid whole white milk sold out-of-stores and vending machines for off-premises consumption and on home-delivery routes.

	1	2	3	4	5	6
M. A. Order	\$10.57	\$10.76	\$10.95	\$11.14	\$11.33	\$11.52
No. 2	to	to	to	to	to	to
Class I Price	\$10.75	\$10.94	\$11.13	\$11.32	\$11.51	\$11.70
Quart	\$.40	\$.405	\$.41	\$.415	\$.42	\$.425
Half Gallon	\$.75	\$.76	\$.77	\$.78	\$.79	\$.80
Gallon	\$ 1.44	\$ 1.46	\$ 1.48	\$ 1.50	\$ 1.52	\$ 1.54

	7	8	9	10	11	12
M. A. Order	\$11.71	\$11.90	\$12.09	\$12.28	\$12.47	\$12.66
No. 2	to	to	to	to	to	to
Class I Price	\$11.89	\$12.08	\$12.27	\$12.46	\$12.65	\$12.84
Quart	\$.43	\$.435	\$.44	\$.445	\$.45	\$.455
Half Gallon	\$.81	\$.82	\$.83	\$.84	\$.85	\$.86
Gallon	\$ 1.56	\$ 1.58	\$ 1.60	\$ 1.62	\$ 1.64	\$ 1.66

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	13	14	15	16	17	18
M. A. Order	\$12.85	\$13.04	\$13.23	\$13.42	\$13.61	\$13.80
No. 2	to	to	to	to	to	to
Class I Price	\$13.03	\$13.22	\$13.41	\$13.60	\$13.79	\$13.98
Quart	\$.46	\$.465	\$.47	\$.475	\$.48	\$.485
Half Gallon	\$.87	\$.88	\$.89	\$.90	\$.91	\$.92
Gallon	\$ 1.68	\$ 1.70	\$ 1.72	\$ 1.74	\$ 1.76	\$ 1.78

	19	20	21	22	23	24
M. A. Order	\$13.99	\$14.18	\$14.37	\$14.56	\$14.75	\$14.94
No. 2	to	to	to	to	to	to
Class I Price	\$14.17	\$14.36	\$14.55	\$14.74	\$14.93	\$15.12
Quart	\$.49	\$.495	\$.50	\$.505	\$.51	\$.515
Half Gallon	\$.93	\$.94	\$.95	\$.96	\$.97	\$.98
Gallon	\$ 1.80	\$ 1.82	\$ 1.84	\$ 1.86	\$ 1.88	\$ 1.90

Larger-than-gallon: The quart equivalent of the minimum price for gallon containers minus \$0.01 per quart multiplied by the number of quarts in the unit.

2:53-1.3 Schedule 79-1S; South Jersey

(a) Schedule 79-1S is as follows:

1. Minimum prices for fluid whole white milk sold out-of-stores and vending machines for off-premises consumption and on home-delivery routes.

	1	2	3	4	5	6
M. A. Order	\$11.16	\$11.35	\$11.54	\$11.73	\$11.92	\$12.11
No. 4	to	to	to	to	to	to
Class I Price*	\$11.34	\$11.53	\$11.72	\$11.91	\$12.10	\$12.29
Quart	\$.40	\$.405	\$.41	\$.415	\$.42	\$.425
Half Gallon	\$.75	\$.76	\$.77	\$.78	\$.79	\$.80
Gallon	\$ 1.44	\$ 1.46	\$ 1.48	\$ 1.50	\$ 1.52	\$ 1.54

	7	8	9	10	11	12
M. A. Order	\$12.30	\$12.49	\$12.68	\$12.87	\$13.06	\$13.25
No. 4	to	to	to	to	to	to
Class I Price*	\$12.48	\$12.67	\$12.86	\$13.05	\$13.24	\$13.43
Quart	\$.43	\$.435	\$.44	\$.445	\$.45	\$.455
Half Gallon	\$.81	\$.82	\$.83	\$.84	\$.85	\$.86
Gallon	\$ 1.56	\$ 1.58	\$ 1.60	\$ 1.62	\$ 1.64	\$ 1.66

	13	14	15	16	17	18
M. A. Order	\$13.44	\$13.63	\$13.82	\$14.01	\$14.20	\$14.39
No. 4	to	to	to	to	to	to
Class I Price*	\$13.62	\$13.81	\$14.00	\$14.19	\$14.38	\$14.57
Quart	\$.46	\$.465	\$.47	\$.475	\$.48	\$.485
Half Gallon	\$.87	\$.88	\$.89	\$.90	\$.91	\$.92
Gallon	\$ 1.68	\$ 1.70	\$ 1.72	\$ 1.74	\$ 1.76	\$ 1.78

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	19	20	21	22	23	24
M. A. Order	\$14.58	\$14.77	\$14.96	\$15.15	\$15.34	\$15.53
No. 4	to	to	to	to	to	to
Class I Price*	\$14.76	\$14.95	\$15.14	\$15.33	\$15.52	\$15.71
Quart	\$.49	\$.495	\$.50	\$.505	\$.51	\$.515
Half Gallon	\$.93	\$.94	\$.95	\$.96	\$.97	\$.98
Gallon	\$ 1.80	\$ 1.82	\$ 1.84	\$ 1.86	\$ 1.88	\$ 1.90

* Including direct delivery differential pursuant to section 1004.83 of Federal Order Number 4.

Larger-than-gallon: The quart equivalent of the minimum price for gallon containers minus \$0.01 per quart multiplied by the number of quarts in the unit.

NOTE: The director may extend the foregoing schedules or make changes pursuant to section 2:53-1.4 by filing a copy with the Division of Administrative Procedures for publication in the New Jersey Register.

2:53-1.4 Changes in Minimum Prices

(a) From time to time as indicated by an economic formula, the director shall change the prices shown in Schedules 79-1N and 79-1S to reflect changes in prices paid and in productivity in marketing milk in New Jersey. Such formula shall be computed as follows:

(b) First, compute an Index of Prices Paid in Marketing Milk as:

$$PP = 0.472WS + 0.187C + 0.051TG + 0.045U + 0.245WPI$$

Where:

PP = Index of Prices Paid in Marketing Milk in New Jersey.

WS = Wages and Salary Component (47.2 percent) based upon Average Hourly Earnings, Food and Kindered Workers, New Jersey as published by the New Jersey Department of Labor and Industry*.

C = Containers and Package Component (18.7 percent) based upon a weight of .80 for paper and .20 for plastic containers using the Index of Prices of paper, one-half gallon milk containers, BLS Code 0915-0239; and the Index of Prices of resin for blow molding bottles, BLS Code 0661-0103, as published by the United States Bureau of Labor Statistics*.

TG = Truck and Gasoline Component (5.1 percent) based upon a weight of .66 for trucks and .34 for gasoline using the Index of Prices Paid for Motor Trucks, BLS Code 1411-02, computed as the average of the preceding twelve months; and the Index of Prices Paid for regular gasoline at Chicago, BLS Code 0571-02, computed as the average of the preceding twelve months, as published by the United States Bureau of Labor Statistics*.

* For the third preceding months.

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U = Utility Component (4.5 percent) based upon a weight for electricity of .75 and for fuel oil of .25 using the Index of Prices Paid for commercial electrical power in the Middle Atlantic States, BLS Code 0542-1204; and the Index of Prices Paid for number six fuel oil at Tulsa, BLS Code 0574, computed as the average of the preceding twelve months as published by the United States Bureau of Labor Statistics*.

WPI = Other Expense Component (24.5 percent) based upon the whole-sale price for industrial commodities (all commodities less food and agricultural commodities) computed as the average of the preceding twelve months, as published by the United States Bureau of Labor Statistics*.

(c) Second, compute an index of productivity based upon an increase of 1.25 percent per year or .1042 percent per month from the 1974 base year.

(d) Third:

$$\text{Index of Costs} = \frac{\text{Index of Prices Paid}}{\text{Index of Productivity}} \times 100$$

(e) Minimum milk prices shown on Schedule 79-1N and Schedule 79-1S shall be increased or decreased for January, April, July, and October of each year as indicated by the formula for Index of Costs when applied to the Average Marketing Margin for the base year 1974 of 14.4¢ per quart. Changes shall be made based upon the following schedule:

<u>Index of Costs Range</u>	<u>Price Change</u>
131.6 - 135.0	-0-
135.1 - 138.5	-0-
138.6 - 142.0	.5¢ per quart
142.1 - 145.4	-0-
145.5 - 148.9	.5¢ per quart
149.0 - 152.4	-0-
152.5 - 155.9	.5¢ per quart
156.0 - 159.3	-0-
159.4 - 162.8	.5¢ per quart

NOTE: The director may extend the foregoing schedule by filing a copy with the Division of Administrative Procedures for publication in the New Jersey Register.

2:53-1.5 Limitations on Price Changes

Notwithstanding the provisions of sections 2:53-1.2 and 2:53-1.3, until September, 1979 the minimum prices shall be .5¢ per quart less than the indicated prices on Schedules 79-1N and 79-1S.

* For the third preceding months.

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2:53-1.6 Price Change Automatic

Changes in minimum prices provided in sections 2:53-1.1 through 2:53-1.5 shall be effective based upon minimum prices to be paid to dairy farmers for raw milk sold for Class I use, and shall be announced by the director prior to the effective date thereof.

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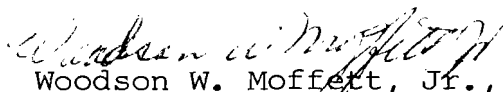
The Director, Division of Dairy Industry published a proposal to amend NJAC 2:53-1.1 through 2:53-1.4 in the March 8, 1979 issue of the New Jersey Register (11 NJR 115). Subsequent to that date, the director held a public hearing on March 13, 14, 15 and April 3, 4, and 6, 1979.

Based upon the testimony made of record at such hearing, a Finding of Fact has been filed with the Secretary of State (Division of Administrative Procedure) in accordance with NJSA 4:12A-23 which finding of fact provides for adoption of the above new proposal to amend NJAC 2:53-1.1 through 2:53-1.4.

Pursuant to the New Jersey Administrative Procedure Act, interested persons may present statements or arguments in writing, orally in person, or by telephone, relevant to the above proposal on or before May 30, 1979. Comments shall be directed to:

Woodson W. Moffett, Jr., Director
Division of Dairy Industry
New Jersey Department of Agriculture
P. O. Box 1999
Trenton, New Jersey 08625
(Telephone: 609-292-5646)

The Department of Agriculture, upon its own motion or at the instance of any interested party, may thereafter adopt this regulation substantially as proposed without further notice.


Woodson W. Moffett, Jr., Director
Division of Dairy Industry
Department of Agriculture

State of New Jersey
Department of Agriculture
Division of Dairy Industry
P. O. Box 1999
Trenton, New Jersey 08625

