

Methionine Task Force

September 27, 2013

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National Organic Program, USDA-AMS-NOP
1400 Independence Ave., SW.
Room 2640-So.
Washington, DC 20250-0200

RE: National Organic Program; Synthetic Methionine in Organic Poultry Feed Proposal

Comment on Docket number AMS-NOP-13-0049-0002

Dear National Organic Standards Board,

These comments are being submitted by the Methionine Task Force. This is an industry supported group made up of more than 25 members representing the organic broiler, layer and turkey production in the United States. We represent nearly 200 family farms and larger companies that in total supply more than 70% of the organic eggs marketed and two of the largest organic broiler companies nationally.

We are writing to support docket number AMS-NOP-13-0049-0002 that was passed out of committee earlier this month with one exception.

Prior to 10/1/2012 the allowed levels of methionine by species were:

Layers 4 pounds per ton
Broilers 5 pounds per ton
Turkeys and Ducks 6 pounds per ton

On 10/1/2012 the new levels became:

Layers 2 pounds per ton, a 50% reduction
Broilers 2 pounds per ton a 60% reduction
Turkeys and Ducks 3 pounds per ton a 50% reduction

This reduction was done without any justification and no fact or reason was sighted. This restriction is a hard cap per ton of feed and does not take into account and of the following issues:

Location and climate of the farm
Age of the bird
Nutritional requirements for the age

Since the 10/1/2012 hard cap went into effect, members of the task force and their certifiers reported the following issues in their flocks:

Several organic inspectors reported that the flocks seemed more nervous since their last inspection visit.

We have had many reports of poor feathering.

We have had many issues with higher ammonia levels in the houses since we are forced to feed a higher protein level than before.

Many producers had increased feather picking and higher levels of cannibalism.

One broiler producer had higher mortality on the lower methionine levels.

Prior to these animal welfare issues on March 25th, 2011 the Methionine Task Force submitted a petition requesting that the hard cap of methionine be changed to an average over the life of the flock. The petition also asked for the following levels of Methionine to be allowed:

Layers a 2.5 average per ton over the life of the bird
Broilers a 2.5 average per ton over the life of the bird
Turkeys and Ducks a 3.0 average per ton over the life of the bird

It is our position that allowing an average will give us the tools needed to combat all of the animal welfare issues listed above while not increasing the amount of methionine in the ration over the life of the bird. By allowing us an average calculated over the life, we are able to make minor adjustments depending on the stage of life and the environment that the producer lives in.

While the recommendation passed out of committee is quite close to the March 25th 2011 petition the following two differences appear:

Layers – We asked for a 2.5 pound average over the bird's life, the recommendation is for 2.0 average.

In talking to all of the layer members of the Methionine Task Force we have voted in favor of accepting this position and we fully support the change from a 2.0 hard cap to a 2.0 average over the life of the bird.

Broilers – We asked for a 2.5 pound average over the bird's life, the recommendation is for 2.0 average.

In talking to our membership, while we do not want to delay the vote on this important change, we do ask that the board reconsiders changing the level to a 2.5 average for the following reasons:

- Animal welfare has suffered as evidenced by higher mortality and poorer living conditions
- Broiler chickens were reduced by 60% (5 lbs to 2 lbs) in the last step down whereas all other groups (layers, ducks, turkeys) were reduced by 50%.
- A 2.5 lb life of flock average can get us very close to meeting the timing and levels of MET to match the needs of a young broiler chicken.

The Methionine Task Force wants to thank all of the members of the Livestock Committee in advance for their hard work and efforts in reaching this proposal for vote by the full membership of the National Organics Standards Board.

Thanks You,

Members of the Methionine Task Force