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September 30, 2013

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Avenue, SW  
Room 2648-So, Ag Stop 0268  
Washington, DC 20250-0268

**RE: Docket: AMS-NOP-13-0049  
NOSB Livestock Sub-Committee  
Synthetic Methionine in Organic Poultry Feed Proposal**

Dear Ms. Michelle Arsenault,

**Introduction:**

Oregon Tilth fully supports the Livestock Subcommittee proposal to revise the current method of calculation for synthetic methionine (MET). While we have concerns regarding potential challenges of documentation and verification, Oregon Tilth appreciates the subcommittee's consideration for organic poultry producers. We believe that the subcommittee proposal is more appropriate for calculating synthetic MET and is consistent with 'Sound and Sensible' initiative to organic certification. We encourage NOSB to pass this proposal and thereby encourage the selective use of synthetic MET while organic producers remain competitive with the industry as a whole.

**The Competitive Disadvantage:**

Until non-synthetic MET is commercially available, organic poultry producers will remain at a competitive disadvantage in their ability to provide adequate amounts of MET. Non-organic growers are typically applying twice what are allowed for organic producers. However, if total MET is averaged over life, this competitive disadvantage should narrow as organic producers target its use to the most critical stages of development. Thus, increases to MET at one stage would be offset at a later stage. Regardless of the stage, any increased amounts would still be at or below those needed for adequate nutrition and health as stipulated in §205.237 (b)(2).

**Verification:**

Oregon Tilth does acknowledge that there will be challenges to verifying that synthetic MET is used at or below the restriction. Essentially, it is more difficult to track dynamic formulations than static formulation. Compliance with the MET restriction may not be fully determined until after the life cycle of the flock. For most operations, birds begin (on the second day of life) and end on the same farm. However, organic pullet operations and those purchasing organic pullets will be of special concern. For this reason Oregon Tilth would like to see the National Organic Program (NOP) provide guidance to producers and certifiers challenged by the additional verification burden associated with this proposed change.

**Sound and Sensible:**

MET is an essential amino acid required for proper cell development and feathering in poultry. Presently, non-synthetic forms of MET are not commercially available. As such, synthetic MET is allowed but restricted to half that of industry recommendations. However, both “adequate nutrition” and “stage of life” are fundamental considerations built into organic livestock practices. Oregon Tilth has concluded that the current restriction on synthetic MET as measured per ton of feed as fed is neither sound nor sensible. If we are to limit synthetic MET, then the reasonable method of calculation is as an average over the life of a flock. This is similar to the way other provisions in the regulation are calculated. For instance, achieving 30% Dry Matter Intake (DMI) for ruminants is calculated over the average of a growing season.

**Summary:**

This proposal is sound and sensible and consistent with the similar restrictions within National Organic Standards. It will directly benefit poultry producers while improving the overall quality of life for organic poultry flocks. At the same it will not increase the overall use of synthetic MET in organic poultry production as currently restricted. On behalf of organic poultry operations Oregon Tilth encourages the livestock subcommittee to approve this proposal.

Respectfully Submitted,

Oregon Tilth

*Oregon Tilth is a nonprofit organization supporting and promoting biologically sound and socially equitable agriculture through education, research, advocacy, and certification. Oregon Tilth advocates sustainable approaches to agricultural production systems and processing, handling, and marketing.*