



"The Organic Omega-3 Egg"

September 30, 2013

National Organic Standards Board

RE: Synthetic Methionine in Organic Poultry Feed Proposal
Submitted via: <http://www.regulations.gov>

Dear Friends:

I am Bob Beauregard, general manager of The Country Hen Organic Egg Farm. I am commenting today in full support of the Methionine Task Force's petition to amend the current requirement that currently places a hard cap of two pounds per ton of feed used in certified organic poultry production, and to replace it with the requirements for two pounds average per ton of feed over the life of the flock for layers and broilers.

This amendment will enable organic producers to operate in a manner more consistent with the philosophy and principles of organic production.

The organic philosophy was never intended to prescribe strict "one-size fits" all approach to animal husbandry or crop production. Instead, organic agriculture is built upon a foundation of being able to adapt farming and husbandry practices to the specific geography, climate, species and other factors.

The hard cap requirement illustrates the flaw in the current highly prescriptive requirement.

The methionine requirements in poultry are highly dependent upon the age of the bird, the time of the year, climatic conditions and a series of other factors.

In general layers require higher levels of methionine from day one through 30 weeks of age. Particularly, as pullets are coming into production, their physical well-being requires higher level of methionine. Even this factor, though, can vary depending on factors outside of our management abilities.

This July, for example, the area in which our grower houses are located experienced a ten-day period of extremely high temperatures and humidity. Because of the heat and humidity, our birds sharply reduced their feed consumption and thus their intake of methionine from the feed. We observed a series of health-related issues, including feather pecking, poor feathering and other symptoms directly related to inadequate methionine levels. This was particularly stressful in the pullets just coming into production.

At other times in the year—and the life cycle of the birds—we see very little need to supplement with synthetic methionine.

Implementing a lifetime average cap of two pounds per ton would provide the farmer with management discretion to utilize the appropriate levels of methionine based upon the specific factors at that time. This is simply more in line with the basic philosophy of organic agriculture.

It also will equip farmers with the ability to meet their commitment to the humane treatment of the animals under their stewardship.

Because organic poultry producers are already maintaining detailed records within their Organic Systems Plan, the ability of certifiers to verify compliance should not be difficult.

I hope this information is helpful and, again, strongly urge the NOSB to recommend this amendment to the current requirements.

Sincerely,



Bob Beauregard
General Manager
The Country Hen Organic Egg Farm