



# BEYOND PESTICIDES

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September 11, 2012

National Organic Standards Board  
Fall 2012 Meeting  
Providence, RI

## Re. LS: Materials and Discussion Document

These comments are submitted on behalf of Beyond Pesticides. Beyond Pesticides, founded in 1981 as a national, grassroots, membership organization that represents community-based organizations and a range of people seeking to bridge the interests of consumers, farmers and farmworkers, advances improved protections from pesticides and alternative pest management strategies that reduce or eliminate a reliance on pesticides. Our membership and network span the 50 states and groups around the world.

### Nonanoic acid

We support the recommendation of the Livestock Subcommittee to deny the petition for nonanoic acid as an insect repellent. Nonanoic acid meets none of the criteria for adding a synthetic material to the national list. Although the toxicity to humans is low, it is an irritant, and can be damaging to plants and beneficial soil organisms if misused. It is not essential, being less effective than a number of other known insect repellents as well as other fly management systems. It is not compatible with organic production, which seeks to meet its goals, where possible, “through the use of cultural, biological, and mechanical methods, as opposed to using synthetic materials to fulfill specific functions within the system.”<sup>1</sup>

### Amino Acids in Pet Foods

Amino acids are protein. To allow synthetic amino acids in organic pet food means that a major macronutrient —especially important to carnivores like dogs and cats— would be synthetic. This is totally incompatible with organic principles. It does not satisfy expectations of organic consumers regarding the authenticity and integrity of organic products. A consumer who is paying a premium for organic pet food does not want a major nutrient to come from synthetic sources.

We appreciate the fact that taurine poses special challenges for cat food manufacturers. This is because cats are obligate carnivores and therefore do not have the ability to synthesize taurine, which they would get in adequate quantities from their natural diet. However, this is no reason to permit cat food manufacturers to sell as organic a product made with cheaper ingredients like grain, which are not natural foods for an obligate carnivore, by supplementing

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<sup>1</sup> NOSB Principles of Organic Production and Handling, October 17, 2001.

the food with synthetic taurine. The Technical Review cites some manufacturers who sell cat food made without synthetic amino acids. One states on its website, “Since our foods are made from high levels of animal protein, all Nature’s Logic® diets naturally contain sufficient levels of the Omega-3 fatty acids eicosapentaenoic acid (EPA) and docosahexaenoic acid (DHA). They also exceed AAFCO’s [Association of American Feed Control Officials] protein amino acid requirements for arginine, histidine, isoleucine leucine, lysine, methionine-cystine, methionine, phenylalanine-tyrosine, phylalanine, **taurine**, threonine, tryptophan, and valine.”<sup>2</sup> (Emphasis added.)

We therefore ask you to deny the petition for all synthetic amino acids in organic pet food.

### **Discussion Document on Omnivore Diets**

Thank you very much for this discussion document. While we do not have a lot of substance to add to the discussion at this time, we do want to thank the committee for addressing a difficult issue in a way that fits so well with the spirit of the *Organic Foods Production Act*. For years, the board has been frustrated by the problem of methionine without, it appears, addressing the crucial issue head-on, “We have seemingly made vegetarians out of poultry and pigs.” We thank the Livestock Subcommittee for addressing the issue of how omnivores like poultry and pigs can have a diet that meets their needs and accommodates their natural behavior.

The one substantive suggestion that we have is that the board consider as a source of animal protein insects and other invertebrates (such as earthworms) raised for that purpose.

Thank you for considering these comments.

Sincerely,



Terry Shistar, Ph.D.  
Board of Directors

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<sup>2</sup> <http://www.natureslogic.com/ingredients/> Beyond Pesticides has no connection with Nature’s Logic and receives no funding from them.