



BEYOND PESTICIDES

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March 11, 2013

National Organic Standards Board
Spring 2013 Meeting
Portland, OR

Re. LS: Pet food amino acids

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.

Amino acids are the building blocks of 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 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 the food with synthetic taurine. The Technical Review (lines 996-1001) 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.”¹ (Emphasis added.)

The purpose of the petition is to allow pet food manufacturers to claim their products are “complete and balanced.” Since there are manufacturers who do so without adding any

¹ <http://www.natureslogic.com/ingredients/> Beyond Pesticides has no connection with Nature’s Logic and receives no funding from them.

synthetic amino acids, their use—including the use of synthetic taurine—is not essential. We therefore ask you to deny the petition for all synthetic amino acids in organic pet food.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar". The signature is fluid and cursive, with a prominent loop at the end.

Terry Shistar, Ph.D.
Board of Directors