



March 19, 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

Docket: AMS-NOP-12-0070

RE: Livestock Subcommittee – Pet Food Amino Acids

Dear Ms. Arsenault:

Thank you very much for this opportunity to provide comment on the Livestock Subcommittee proposal on Required Synthetic Amino Acids for Pet Foods.

OTA is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States, representing organic businesses across 49 states. Its members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's Board of Directors is democratically elected by its members. OTA's mission is to promote and protect the growth of organic trade to benefit the environment, farmers, the public and the economy.

OTA supports a proposal that will, in fact, give National Organic Program (NOP) certified pet food manufacturers access to all 13 essential amino acids. The opportunity to expand the availability of certified organic pet food in the marketplace not only holds strong benefits for pets and consumers, but for agricultural producers as well. We urge NOSB to look to the comments submitted by pet nutrition experts and manufacturers of NOP certified pet food.

Thirteen synthetic amino acids were petitioned to the National List for use in organic pet foods. The Subcommittee is recommending the addition of only synthetic Taurine (CAS 107-35-7) for cats, based on its research that Taurine is essential and natural forms are not adequate while the other 12 essential amino acids can be obtained through typical agricultural ingredients. The Subcommittee has concluded that Taurine fulfills the National List essentiality criteria (§ 205.600b.6).

OTA agrees that synthetic amino acids may be added to the National List *provided* they are essential nutrients required by American Association and Feed Control Officials (AAFCO) and they cannot be obtained through allowed nonsynthetic/agricultural sources. We also recognize that without the inclusion of proper levels of the 13 amino acids that were petitioned, dog and cat food formulations cannot be classified as "complete and balanced" under the governing guidelines of the AAFCO¹. **All**

¹ AAFCO is a voluntary membership association of local, state and federal agencies charged by law to regulate the sale and distribution of animal feeds and animal drug remedies. State regulators utilize the Official Publication of the Association of

13 amino acids have been determined to be essential by AAFCO, and they are all required in the diets of canines and felines. The absence of even one of the required amino acids at the required minimum or maximum levels prohibits a pet food from being labeled as complete and balanced.

OTA supports the reasoning behind the subcommittee proposal however we have some concerns about the availability of nonsynthetic and organic ingredients that will provide the adequate nutritional requirements of a complete and balanced pet food product. We recommend that NOSB look to the experts in the field of pet science and nutrition and pet food manufacturing and the comments they bring forward. It's critical that NOSB carefully determine whether all 13 essential amino acids can in fact be obtained through allowed nonsynthetic/agricultural sources.

OTA acknowledges that NOP is developing pet food standards based on the 2008 NOSB Recommendation. NOSB included a reserved section (205.603.e.4) for "other nutrients" because it anticipated petitions for pet food additives such as required amino acids. The request to add required amino acids to the National List was in anticipation of formal pet food standards. OTA looks forward to the completion of NOP's work, and to the publication of a rule that will support and enforce the labeling of organic pet food.

Again, on behalf of our members across the supply chain and the country, OTA thanks the National Organic Standards Board for the opportunity to comment and for your commitment to furthering organic agriculture.

Respectfully submitted,



Gwendolyn Wyard
Regulatory Director of Organic Standards and Food Safety
Organic Trade Association (OTA)

CC: Laura Batcha
Executive Vice President
Organic Trade Association (OTA)

American Feed Control Officials (AAFCO) as a model for the regulation of pet food products, including the nutrient composition of products eligible to be labeled as "complete and balanced." AAFCO Dog and Cat Food Nutrient Profiles do not contain any nutrient that has not been determined to be essential.

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