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September 24, 2012

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-12-0040
NOSB Livestock Sub-Committee – Omnivore Diets

Dear Ms. Arsenault and National Organic Standards Board:

General Comments:

Oregon Tilth Certified Organic – OTCO is generally opposed to feeding organic meat and by-products to omnivores (pigs and poultry). Some of our organic livestock producers see a potential additional value added revenue source for organic cull cows, spent fowl and processing by-products as well as an additional source of feed in the currently very challenging organic grain market. These potential benefits are overshadowed however by perceived rejection in the marketplace as well as significant logistical and food safety concerns in putting such an allowance into practice.

- The prohibition in 237(5)(b) of feeding mammal and poultry slaughter by products to mammals and poultry is a bedrock principle of organic practices that has built organic integrity and become expected by consumers.
- Logistical challenges include: separation, certification, preservation and food safety are significant.
- Allowing the feeding of organic slaughter by products is not allowed under Organic Programs in Europe and Canada. Allowing omnivore diets would jeopardize these Equivalency Arrangements.

Until viable alternatives to synthetic methionine become available, the NOSB needs to continue to support the use of synthetic methionine. According to feedback from some of our organic poultry growers, the recently enacted stepped down limits can work as long as the allowances are an average over a bird's life in order to provide adequate nutrition at every stage of production. The current limit of methionine as a maximum of the total ration however, will cause health and welfare issues for poultry.

We appreciate the NOSB's efforts to find a suitable alternative to synthetic methionine and encourage further research.

OTCO is on record over the years in support of listing synthetic methionine on 205.603 without restriction. Based on continued feedback from our organic poultry producers we continue to believe that synthetic methionine is a critical nutritional tool in maintaining peak health of organic poultry thereby maximizing the welfare of the animals and mitigating the need for medication.

Answers to Questions from the Discussion Document

1. Would you recommend the LS look at a possible annotation to allow 100% organic meat scraps or by-products to be used in omnivore diets (poultry and pigs), since it is natural for these omnivores to consume both plant and animal materials? Explain.

No, the detriment to organic integrity and risk of consumer rejection outweigh the potential benefits of alternative feed sources and added value to organic livestock.

Although the idea could be supported as natural and potentially profitable, there are so many consumer, health and logistical issues that even if the practice were accepted and approved it would not be a practical or acceptable source of nutrition.

2. Natural herbal methionine, potato meal, and corn gluten meal are showing promising results. Should this type of research effort increase? Explain.

Certainly it is worth exploring all potential alternatives to synthetic methionine, however, care must be taken to assess their potential as legitimate alternatives in an organic agricultural system. Credible research must apply to established organic production systems. OTCO organic poultry producers continue to comment that what shows promise in a controlled small-scale experiment or for homestead production does not translate to the actual "real world" situation of organic farming as a successful/sustainable business.

3. There is a natural herbal methionine manufacturer in India that touts their product as being a 1:1 replacement for synthetic methionine. How can this product be brought to commercial availability/viability within the next three years in the United States?

No comment

4. How can the organic community spur more production and manufacturing of natural amino acids, including methionine and lysine, vitamins, and minerals products for livestock and aquaculture rations in the next three to five years?

Based on the recommendations of, and the literature cited by, the Methionine Task Force the most promising source of natural methionine appears to be from natural fermentation. This product, although more expensive and difficult to produce, is a molecular equivalent to synthetic methionine and therefore not subject to the challenges of variable quality and availability as well as the unintended nutritional imbalances from sourcing methionine through organic feedstuffs.

Unfortunately the search for alternatives to synthetic methionine comes at a time when organic livestock producers are facing very tight supply challenges. This is important to consider because while there are potential feed formulations to supply methionine to poultry, the actual continued availability of organic feed ingredients is unpredictable. In addition we have heard from our poultry producers that the key to successful ration is *balancing* amino acids. Often when methionine from alternative protein sources such as corn gluten meal, corn steep liquor and potato meal is adequate, other amino acids such as lysine and cystine are in excess causing production, health and air quality problems.

5. While the FDA regulates the safety of meat/slaughter by-products, what additional organic regulations or safeguards should be in place before organic livestock producers feed mammalian or avian slaughter by-products to their omnivore livestock?

To repeat, OTCO does not support this course of action partially because the safeguards that would have to be in place and which would not be entirely adequate to mitigate consumer concerns including but

certainly not limited to:

- Rendering facilities would need to be certified in order to assure that separation, processing materials etc were in compliance with NOP regulations. As with most of the meat packing industry, rendering has become consolidated to a few very large companies, who's business interests are not necessarily served by serving the organic livestock producers.
- Organic by-products would most likely require preservatives, which would need to be compliant with NOP regulations, similar to the current challenges of feeding fish and crab meal.
- Organic cattle and by products should be screened for the BSE prion and/or a maximum age established which would disqualify most organic cull cows.

6. Would the organic brand be damaged if organic livestock producers were given the choice of feeding organic animal by-products and naturally or organically harvested fish by-products?

Explain.

Yes. The prohibition of feeding mammals and poultry to mammals and poultry is fundamental to the market niche served by Organic as well as "natural" meat. The Organic brand would lose credibility and market share to "natural" labels which would continue to prohibit the practice.

Organic poultry and pork would lose much of the food safety credibility that has been build over the years.

7. Would a rule change at §205.237(5) (b) to allow the feeding of organic meat offal or by-products to omnivores be appropriate to help fulfill the essential amino acids, vitamins, and minerals requirement? If yes, state the language you would use. If no, offer viable suggestions to dealing with the absence of synthetic amino acids in omnivore rations.

No. OTCO does not endorse such a rule change at §205.237(5) (b). We also do not endorse prohibiting synthetic methionine until viable alternatives are commercially available. Until then OTCO endorses the continued use of synthetic methionine, the only essential amino acid that organic poultry producers must supplement to a 100% organic feed ration in order to assure healthy, productive animals.

Respectfully submitted,



Jim Pierce
Global Certification Program Manager
Oregon Tilth Certified Organic OTCO

Oregon Tilth, Inc. is a non-profit 501(c)(3) organization that supports and promotes biologically sound and socially equitable agriculture. Oregon Tilth offers educational events throughout the state of Oregon, and provides organic certification services to organic growers, processors, and handlers internationally. An NOP accredited certifier since 2002, Oregon Tilth currently certifies over 650 farms and ranches and over 600 handlers in more than 35 states affording us a broad perspective of current practices and challenges faced by organic producers and handlers.