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April 15, 2009

Chief Standards Development and Review Branch
National Organic Program
Transportation and Marketing Programs
USDA-AMS-TMP-NOP
1400 Independence Avenue, SW
Room 4008 South, Ag Stop 0268
Washington, DC 20250

Re: Docket Number AMS-NOP-10-0021: Methionine

Oregon Tilth Certified Organic (OTCO) is a nonprofit research and education membership organization dedicated to 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, OTCO currently certifies 740 farms and ranches in over 35 states, affording us a broad perspective of current practices and challenges faced by organic producers, as well as the effect that the anticipated successes and challenges this discussion topic will have upon them.

Methionine:

Oregon Tilth has reviewed the recommendation to relist methionine to the National List of allowed synthetic materials. OTCO was pleased to see such collaborative efforts between industry, NOSB, NOP, and the task force. Due to such collaboration, OTCO will support the recommendation, as it is what the industry is supporting. OTCO also supports relisting as methionine is an important component in organic poultry feed rations and to meet the nutritional requirements of birds. It is understood that general feelings within the Livestock Committee and some within the industry feel organic poultry production should move away from the use of methionine. However, without proven alternatives readily available, methionine is necessary.

However, if the industry does make strides to move away from methionine use Oregon Tilth requests that the committee offer recommendations that allow ample time for production systems to trial other management practices, feed sources, breeds, etc. Trialing in these areas would be absolutely critical to allow smooth transition within production systems and avoid any disruption in the market place.

It is unrealistic to assume that production systems can be changed quickly and still meet the demands and particular tastes of consumers that have developed over decades.



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The committee should also consider potential adjustments within the standards that may be necessary to enable a shift from methionine use; including temporary variances, genetic availability, and alternative feedstuffs.

Thank you for the dedication and hard work you demonstrate by putting these actions and recommendations forward. Oregon Tilth looks forward to being involved in future discussions and process.