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Ms. Michelle Arsenault, Special Assistant
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. SW.,
Room 2648-S, Mail Stop 0268
Washington, DC 20250-0268

**RE: Docket: AMS-NOP-15-0002
Livestock Subcommittee – Synthetic Methionine in Organic Poultry Feed Proposal**

Dear Ms. Arsenault:

Oregon Tilth thanks the Livestock Subcommittee for the opportunity to comment on this proposed revision to the annotation for synthetic methionine (MET) on the National List.

We appreciate the thorough research and careful consideration the subcommittee has given to this material. As we stated in our previous comments on this proposal, we support the proposed annotation revision to allow for averaging the amount of synthetic methionine (MET) over the life of a flock. We believe that this proposal will provide organic poultry producers with a much-needed strategic approach to meet their flocks' nutritional needs at key stages of life, maintain their health and welfare, and continue to incentivize the industry to investigate natural MET alternatives.

Input from Organic Poultry Producers

As stated in the proposal, MET is an essential amino acid that is required for proper cell development and feathering in poultry. Our poultry clients have told us that since the previous step-down of allowed synthetic MET went into effect in 2012, they have faced increased issues with feather pecking and aggressive behavior in their flocks. This has caused significant welfare problems for these birds, with many producers experiencing a rise in cannibalism and mortality rates.

When we asked our producers how they thought the proposed change to the restriction would impact their operations, we heard that they supported the revision because they expected it to help reduce aggression and feather pecking, and they did not feel burdened by the additional record-keeping that would be required. We have also heard from our producers that the proposed change, while getting closer to allowing them to meet the MET needs of the birds, still would only allow for marginally adequate diets. The general consensus seems to be that there is still a strong incentive for the industry to develop commercially available natural MET sources in order to reach optimal nutrition for their birds.

Addressing the Challenges of this Proposal

The subcommittee materials identify several areas of concern with this proposed annotation revision. One significant worry is the difficulty for organic producers and certifiers to consistently calculate and verify the average synthetic MET/ton fed over the life of a flock. In addition, there was apprehension that allowance of an averaging methodology might lead to an increase in the amount of synthetic MET being

used in poultry diets. Oregon Tilth believes these are concerns that need to be carefully considered. In response, we offer the following information and suggested solutions.

Guidance on Calculation and Verification of Compliance

The subcommittee proposal includes a recommendation that NOP develop guidance for organic certifiers and organic poultry producers on how to calculate and verify the use and allowance of synthetic MET to ensure compliance with this proposed annotation revision. Oregon Tilth previously commented that there would be challenges in verifying that synthetic MET is used at or below the restriction due to dynamic formulations and additional factors. The subcommittee recommendation acknowledges these challenges, including the need for improved tracking, and the need for practical solutions that ensure consistent implementation and verification of this revision across the organic poultry industry.

We have considered how we would address these new challenges within our own certification system, outlining possible solutions that could provide a foundation for a comprehensive three-part verification protocol.

Our certification review process already requires poultry producers to submit all rations – planned for use for each flock from day two to end of life – for evaluation and approval prior to use. The only additional burden would be an added requirement for completion of a calculator tool to demonstrate that the synthetic MET levels would be compliant. Attached are two examples of a calculator spreadsheet that could be used for such a purpose; one is blank, and the other has been filled in with an example set of rations (adapted from a form provided by Vic Pouteaux, Director of Nutritional Services at Friesen Livestock Nutrition). The tool is similar to those used to verify other organic requirements, such as the thirty percent Dry Matter Intake (DMI) requirement for ruminants, and could be completed and submitted to our office for review prior to use. This would serve as a preliminary roadmap for compliance with this proposed restriction.

In addition, with ration verification already being performed at inspection, we would add the complementary step of specifically verifying the average synthetic MET levels in the feed records. OTCO would also have inspectors verify feed records from recently depopulated flocks in order to confirm that the ration plan submitted as part of their OSP was followed and that the rations were compliant. The same calculator tool could be used by the inspector during this verification step and submitted as part of the inspection report.

During the final review of a poultry client, we would verify that the rations viewed at inspection were compliant with the requirements for synthetic MET, and review the OSP ration plan to identify any areas of concern or deficiency. All concerns and deficiencies would be handled as appropriate, and escalated as necessary, through the certification process and in accordance with the NOP Penalty Matrix.

It is true that there will be more record-keeping required of the organic poultry producers, and additional verification will be required of certifiers. However, this extra documentation should not be burdensome, and will be able to provide the necessary verification at each step in the certification process. Our poultry clients tell us that this revised restriction will be a large step toward improvement in overall bird nutrition and welfare.

Effect on Total Amount of Synthetic MET used in Organic Poultry Production

Oregon Tilth wishes to address the concern about a significant increase in synthetic MET use during peak growth and production stages. A poultry nutritionist that works with some of OTCO's clients developed a sample set of rations which show the variation in synthetic MET levels that would be recommended for organic laying hen clients should this proposal be adopted by the NOP. For this particular set of rations, the maximum level of synthetic MET at any stage of life is 3.4 lbs/ton, and the total average methionine

over the course of the flock's life is 1.95 lbs/ton. This is just one example, but shows that the industry can use synthetic MET responsibly and actually reduce the amount being used overall through this allowance for averaging.

Based on the feedback we've received from our clients, synthetic MET continues to be a critical tool for organic poultry producers in order to meet the nutritional needs of their birds. This amendment will help alleviate the acute behavioral and welfare problems organic poultry producers have experienced as a result of nutritional deficiency, without increasing the overall use of synthetic MET. The organic poultry industry is still provided strong incentives to find natural sources of MET to meet the ideal nutritional needs of the birds. On behalf of organic poultry operations, Oregon Tilth encourages the NOSB to approve this proposal.

Respectfully Submitted,
Oregon Tilth

Oregon Tilth is a leading certifier, educator and advocate for organic agriculture and products since 1974. Our mission to make our food system and agriculture biologically sound and socially equitable requires us to find practical ways to tackle big challenges. We advance this mission to balance the needs of people and planet through focus on core areas of certification, conservation, public health, policy and the marketplace.