



October 3, 2019

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Avenue, SW
Room 2642-So., Ag Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-19-0038

RE: Livestock Subcommittee – Methionine (2021 Sunset Review)

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Livestock Subcommittee’s Sunset Review of Methionine used in Organic Livestock Production.

The Organic Trade Association (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 over 9,500 organic businesses across 50 states. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's mission is to promote and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

The Organic Trade Association supports the continued listing of methionine on the National List under its restrictive annotation. Although research and development of natural alternatives is progressing, the need for synthetic methionine remains necessary for organic poultry production, thereby satisfying the National List criteria. We agree with the Livestock Subcommittee's assessment that this material should not be removed from the National List. It is essential that viable alternatives be researched and trialed on commercial-scale flocks before prohibiting the use of this essential amino acid.

OTA poultry members report that methionine is necessary for providing essential amino acids to organic poultry to ensure proper growth, and that alternative production practices or natural alternatives are not sufficient to provide the necessary amounts of the essential amino acid to promote flock health. Access to pasture has not proven to provide sufficient methionine intake, and alternative feed ingredients that are high in methionine are not available in natural or organic forms. As evidenced by the responses to our Sunset Surveys, methionine scores a “5” on scale from 1 to 5, with 1 being “unnecessary” and 5 being “critical /would leave organic without it”. Please see the separate comment submitted by the Organic Trade Association for full results of our Sunset Surveys created for each input under review as part of the 2021 Sunset Review cycle.

We fully support efforts to research and develop natural alternatives that would reduce the need for synthetic methionine supplementation. We support NOSB’s resolution from 2015 for aggressive industry and independent research on natural alternative sources of methionine, breeding poultry that perform well on less methionine, and management practices for improved poultry animal welfare. We also support this



area of reach as a top NOSB Research Priority. We appreciate and applaud the Methionine Task Force for its regular updates to NOSB on progress in finding alternatives.

This year the new annotation for methionine came into effect. Under the new annotation, methionine is restricted at the following maximum rates as averaged per ton of feed over the life of the flock: laying chickens—2 pounds; broiler chickens – 2.5 pounds; turkeys and all other poultry—3 pounds. By calculating the methionine limits as a lifetime average (instead of as a maximum level as fed, as it was previously), producers can adjust methionine supplementation based on the changing nutritional needs of the birds at specific stages of production. The industry will be adapting to this new restriction on methionine usage over the coming years. NOSB can continue to monitor the implementation and outcomes of the new annotation at subsequent Sunset Reviews.

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,

A handwritten signature in black ink that reads "Johanna Miranda".

Johanna Miranda
Farm Policy Director
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association