



September 30, 2024

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP

Docket: AMS-NOP-24-0023

RE: Livestock Subcommittee
Proposal: Methionine Annotation change

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Livestock Subcommittee's Proposal to change the DL-Methionine annotation for use 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. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, brands, retailers, material input providers, and others. OTA's mission is to grow and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

On behalf of our members in the livestock sector, OTA supports the proposed revision to remove the restrictive methionine annotation. While OTA and its members have found the current process manageable and did not request the NOSB take up this initiative, we acknowledge that the current restrictive annotation presents tradeoffs that the NOSB has carefully considered. Despite investments in research and development, no viable natural alternative to synthetic methionine has been identified, and its inclusion remains critical for organic poultry production.

Maintaining the restrictive annotation brings hidden costs for producers, inspectors, and certifiers who must manage feeding ratios, maintain and audit documentation, and address noncompliance. These costs, in both time and money, are either passed on to the consumer or borne by the producer. For producers, this makes organic farming less financially viable, and for consumers, it raises the price of organic poultry products, thereby limiting access to a larger portion of the U.S. population and limiting the expansion of organic poultry production. Furthermore, the time and resources currently spent by certifiers on enforcing methionine restrictions could be reallocated to reducing certification costs or enhancing due diligence in other areas, such as preventing feedstock fraud, an activity that would bring benefit to both producers and consumers.

Methionine has long been approved on the USDA's National List, and OTA is unaware of any consumer research indicating concerns over the level of use of essential feed additives that are synthetic. Additionally, restricting methionine could create challenges in meeting consumer expectations around animal welfare. According to OTA's 2024 consumer survey, 54% of consumers believe organic certification is better for animal welfare, and 45% are willing to pay a premium for organic products that protect animal health and welfare. Organic standards must safeguard the brand equity of the USDA organic seal and therefore the board must ensure that any restrictions on essential feed inputs that are synthetic do not conflict with consumers' expectations around the organic seal and animal welfare.

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,



Scott Rice
Sr. Director, Regulatory Affairs
Organic Trade Association

cc: Tom Chapman
Co-CEO
Organic Trade Association