April 3, 2024

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

Docket: AMS-NOP-23-0075

RE: Livestock Subcommittee – 2026 DL-Methionine Sunset Review

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment to the National Organic Standards Board (NOSB) on its 2026 Sunset review of DL-Methionine.

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, 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.

OTA thanks NOSB for carefully considering each crop production material scheduled for review as part of the 2026 Sunset Review cycle. Materials placed on the National List for use in organic crop production should remain on the National List if: 1) they are consistent with organic farming; 2) they are still necessary to the production of the agricultural product because of the unavailability of wholly natural substitute products in organic production; and 3) no new information has been submitted demonstrating adverse impacts on humans or the environment (OFPA SEC. 2118 [7 U.S.C. 6517] National List). Furthermore, decisions must be transparent, non-arbitrary, and based on the best current information and in the interest of the organic sector and public at large. It's critical that NOSB hears from certified farmers and stakeholders in the organic community on whether these inputs are consistent with and necessary for organic production, or whether there are other effective natural or organic alternatives available.

Using our online sunset surveys (see Appendix A) and direct outreach, OTA solicited feedback from certified operations to determine the continued need for DL-Methionine, as well as to address specific questions posed by the Board. OTA posts online sunset surveys for each input under review as part of the 2026 Sunset Review cycle. These surveys are open to any NOP certified organic operation and include questions addressing the necessity of each input, as well as any questions posed by the Board. The names of the companies submitting the information remain confidential and are not disclosed to OTA unless there is interest in providing contact details for follow up information.

Results of OTA Outreach
Below is a summary of the feedback OTA has received to date on DL-Methionine. OTA will open our online surveys again when the comment period opens for the fall meeting and share any further comment received at that time.

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§205.603 – Synthetic substances allowed for use in organic livestock production.

Substance	Summary of Responses
DL-methionine	Responses received from certified organic livestock operations raising poultry and poultry feed producers **Use** - As a feed additive **Have you tried alternative substances or management practices?** - There are no known alternatives available in sufficient form, quantity or quality - No other alternatives exist - Fish meal is the most common substitute, but there are sustainability concerns with the availability of marine ingredients. Also, too much fish meal can alter the taste of the feed. - There are limited alternative feedstuffs as noted above **How necessary is this substance to your operation?** - Essential **NOSB questions to stakeholders** 1. **Given supply disruptions of soybeans and soy products experienced by the organic livestock sector since February 2022, what organic crops other than soy could be incorporated into poultry rations to supply methionine?** - There is nothing commercially available to help replace the limited and unbalanced methionine soy adds. The disruption was short lived and we are well past this. - There are limited organic crop sources that are high in methionine. Fish meal is the most common substitute, but fish is outside the scope of organic and there are sustainability concerns with the availability of marine ingredients. Also too much fish meal can alter the taste of the feed. - There are feed alternatives to supply methionine, but none are economically viable or nutritionally equivalent. There are research projects looking at alternatives, but none are scalable as of yet. Some of these alternatives include black soldier fly larvae, flax, canola, and sunflower. We strongly support additional research in this field. 2. **Is there a need for changes to the USDA organic regulations to align with either Canadian (unrestricted amino acid are allowed in organic feed) and/or EU (non-organic feeds containing methionine are allowed) organic regulations? If so, what changes to the USDA organic regulatory text should be made?** - No change is needed - It would be helpful to remove the restriction on methionine. We do not average the inclusion rate over the life of the flock due to the massive recordkeeping and auditing requirements.

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	- Alignment with EU and Canada organic standards would create more consistent expectations for poultry feed. - The EU and Canadian standards are easier or more liberal which in theory creates a competitive disadvantage for the US. Our current stance is to stick with the regulation as is. At this time our producers do well with this allowance amount. 3. **What other nutritional barriers to organic poultry production do producers face when formulating well balanced rations for all poultry in the organic sector?** - The average still causes some imbalance but much better than a hard cap. - Methionine is a limiting amino acid so when the diet includes amounts below the birds' requirement it brings the nutritional value of the overall diet down to the inclusion rate of the methionine. - Methionine is an essential nutrient for poultry feed. - The change to averaging the 2 lbs/ton of synthetic methionine across the lifetime of the bird helps to alleviate these as it can be shifted from times of lower need to higher need. That said restricting synthetic methionine in rations could result in the feeding of more protein overall as the limited methionine is driving the volume. This could result in higher ammonia levels in housing negatively affecting welfare. Alternatively limiting methionine can suppress production. Our producers don't feel that this is a problem currently. Additionally, lysine is the most limiting amino acid in poultry production and goes hand in hand with methionine. 4. **Is the current restriction on methionine in organic poultry diets necessary? What would the impact be on poultry nutrition and feed formulations if methionine was allowed without any restrictions?** - Yes, please leave in place without restrictions. - I do not think the restriction is necessary. It makes auditing harder due to the massive amount of calculations required to make sure the averaging is within the restriction. If the restriction was removed it would be beneficial to the bird so she can have a proper diet for the stage of life. - All amino acids should be allowed without restriction per the Canadian standard. - The current restriction on methionine does not align with how other essential nutrients are considered, such as vitamins and minerals. Methionine is an essential amino acid for poultry. Restricting its use could impair the health of the birds. - Previously poultry had lower production and more diverse diets. With the larger flocks and higher production modern poultry rations rely more on readily available livestock feeds and less on scavenged or diverse feed. Without synthetic methionine as a way to supplement this essential amino acid it can become a bottleneck for formulating rations. We recognize there is a 15-20% reduction in eggs with the restriction on methionine, but we feel this limit supports the organic philosophy.

On behalf of our members across the supply chain and the country, the Organic Trade Association thanks the National Organic Standards Board for the opportunity to comment, and for your commitment to furthering organic agriculture.

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Respectfully submitted,

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Organic Trade Association

cc: Tom Chapman, co-CEO
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Appendix A – OTA Sunset Survey on DL methionine

- What livestock product do you use this on?
- Have you tried using any alternative substances (e.g., other substances that are on the National List and/or other natural substances) or management practices?
- How necessary is this substance to your operation:
    - Not Necessary
    - Somewhat necessary
    - Essential
- Optional: Please provide any additional context and/or contact information so we can follow up with any questions.

NOSB Questions to Stakeholders

1. Given supply disruptions of soybeans and soy products experienced by the organic livestock sector since February 2022, what organic crops other than soy could be incorporated into poultry rations to supply methionine?

2. Is there a need for changes to the USDA organic regulations to align with either Canadian (unrestricted amino acid are allowed in organic feed) and/or EU (non-organic feeds containing methionine are allowed) organic regulations? If so, what changes to the USDA organic regulatory text should be made?

3. What other nutritional barriers to organic poultry production do producers face when formulating well balanced rations for all poultry in the organic sector?

4. Is the current restriction on methionine in organic poultry diets necessary? What would the impact be on poultry nutrition and feed formulations if methionine was allowed without any restrictions?

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