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Organic Certification

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September 30, 2013

Ms. Ann Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave., SW.
Room 2646-So., Ag Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-13-0049

RE: NOSB Livestock Subcommittee Proposal on Synthetic Methionine in Organic Poultry Feed

Dear Ms. Arsenault and NOSB,

CCOF thanks the National Organic Standards Board (NOSB) for the opportunity to comment on the Livestock Subcommittee's Proposal on Synthetic Methionine in Organic Poultry Feed.

CCOF supports the Livestock Subcommittee's unanimous proposal to modify the 205.603 listing of DL-Methionine to shift the basis of the calculation to the amount fed over the course of a bird's life. We agree with the subcommittee that this shift in calculation method better protects animal health and welfare by allowing the proportion of synthetic methionine to be adjusted to the bird's actual needs over the course of its life. We find the rationale provided in the proposal to be convincing, and are very glad to see that the NOSB and the Methionine Task Force are in agreement about this modification.

We appreciate and acknowledge that this shift in calculation method may cause operators to have to keep more-specific records about methionine levels in the diet over time, and add to the complexity of the inspection and verification process for certifiers. However, we feel these challenges are surmountable and relatively insignificant compared to the benefit to the health and well-being of the organic poultry flocks.

The proposal notes that certifiers will need to develop tracking systems with producers and feed mills to verify compliance. We would like to point out that it is the responsibility of the producer to demonstrate their compliance with the rule, not the certifier to develop such systems. We believe that producers are capable of maintaining the systems and documentation necessary, and that certifiers will be prepared to verify compliance.

Additionally, we support the subcommittee's idea of guidance or training from the National Organic Program being provided to certifiers on how to enforce this proposed requirement in the infrequent case where a flock is depopulated ahead of schedule, or other unforeseen circumstances occur. Again, we are glad that the industry and the subcommittee are in agreement on a way to move forward with the phase-out of synthetic methionine in a way that supports the optimum health and well-being of organic poultry flocks. We are in strong agreement with OTA's comments regarding the importance of



supporting the organic community while we seek alternative options to synthetic methionine. We continue to support sound, science-based recommendations, rule making and guidance.

Again, CCOF thanks you for the opportunity to provide our comments, and the Livestock Subcommittee for their time on this complex subject. We are available to answer any questions you might have about our comments.

Sincerely,



Cathy Calfo, Executive Director/CEO
CCOF, Inc



Jake Lewin, Chief Certification Officer
CCOF Certification Services, LLC

CCOF is a nonprofit organization founded in 1973. It is one of the oldest and largest organic certification agencies in North America. CCOF serves as a trade association for more than 2,600 certified organic producers and 300 supporting members, in 38 states and three countries.

