

**Kreher's Sunrise Farm
P. O. Box 410
5411 Davison Rd
Clarence, NY 14031-0410
(716) 759-6802
(716) 759-8687 FAX**

October 1, 2013

Michelle Arsenault, Agricultural Marketing Specialist
National Organic Program, USDA-AMS-NOP
1400 Independence Ave., SW.
Room 2640-So.
Washington, DC 20250-0200

RE: National Organic Program; Synthetic Methionine in Organic Poultry Feed Proposal

Comment on Docket number AMS-NOP-13-0049-0002

Regarding synthetic methionine levels allowed in organic feed for egg laying hens, I support allowing the use of averaging to determine the level of synthetic methionine used over the life of the flock. This would allow higher nutrient density feed to be used when the hens need the methionine the most (initial feed for the chicks and when they begin producing eggs) and a lower level to be used when it is not as necessary.

In order to do this the planned life length of the flock would need to be determined and be part of the system plan. Deviations such as moving a flock early would need to be explained and the average age that the flocks are moved out would need to be incorporated into the plan.

Averaging could be done using the actual weights of the different formulas of feed fed to the flock or could be tied back to feed purchases. Most egg farms keep detailed records of feed used to monitor flock performance.

Due to the current restriction of 2#/ton of DL Methionine, we are experiencing bird health challenges such as reduced feathering and increased picking and aggressive behavior. We would really like to see the averaging plus increasing the level to 2.5#/ton. Both of these changes would improve bird health.

Sincerely,

Hal J. Kreher
Manager