



CCOF

Organic Certification Trade Association Education & Outreach Political Advocacy



March 19, 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

Document Number AMS-NOP-12-0070; NOP-12-17

**RE: NOSB Livestock Committee Agenda proposal Livestock Subcommittee
Petitioned Material Proposal regarding Required Synthetic Amino Acids for Pet Foods**

Dear Ms. Arsenault and NOSB,

CCOF thanks the National Organic Standards Board (NOSB) for the opportunity to comment on the Livestock Committee's proposal regarding the Petitioned Synthetic Amino Acids for Pet Foods. We support the committee's proposal to allow inclusion of taurine for cats, and the recommendation to reject the other petitioned synthetic amino acids.

CCOF supports availability of organic pet food. We believe it creates an important market for secondary meat and grain products that might otherwise be wasted. Organic pet food must be able to support the nutritional needs of the animals, and we support the NOSB deferring to the Association of American Feed Control Officials (AAFCO) to make the determination of nutritional requirements.

Again, CCOF thanks you for the opportunity to provide our comments, and the Livestock Committee for their time and effort on this subject.

Sincerely,

Handwritten signature of Cathy Calfo in black ink.

Cathy Calfo, Executive Director/CEO

Handwritten signature of Jake Lewin in black ink.

Jake Lewin, Chief Certification Officer

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 3 countries.