

# IV. LIVESTOCK SUBCOMMITTEE

## PROPOSAL:

## PET FOOD AMINO ACIDS

### SUMMARY

These comments pertain to two related motions.

1. Motion to list amino acids (Arginine, Methionine, Cystine, Lysine, Taurine, Tryptophan, Threonine, Histidine, Isoleucine, Leucine, Phenylalanine, Tyrosine, and Valine) on Section 205.603 on the National List for use in organic pet food
2. Motion to list Taurine on Section 206.603(e)(4) for cats

**Reject** motion 1 to list the entire group of 13 synthetic amino acids in organic pet food.

#### *Rationale*

- Whole foods can supply the required amino acids.

**Reject** motion 2 to list Taurine as allowed in organic pet food.

#### *Rationale*

- Taurine is an essential nutrient for cats, but the synthetic version appears to be not essential since the nutrient can be obtained from natural sources such as beef and poultry.
- In our comments to the Fall 2012 NOSB meeting, Cornucopia requested an additional TR to focus only on taurine.

### BACKGROUND

A petition was submitted to the NOSB by the Pet Food Institute, a trade association of pet food manufacturers, to allow the addition of 13 synthetic amino acids to organic pet food: Arginine, Methionine, Cystine, Lysine, Taurine, Tryptophan, Threonine, Histidine, Isoleucine, Leucine, Phenylalanine, Tyrosine, and Valine. The

livestock subcommittee voted unanimously to deny that petition. Cornucopia agrees with this committee vote.

Whole foods can, and should, be used to supply nutrients in organic pet foods. Synthetic versions of these amino acids, which are essential for optimal health, are not necessary because pet food made from whole foods can supply them. Nature's Logic pet food ([www.natureslogic.com](http://www.natureslogic.com)), sold as natural, not certified as organic, states that it supplies complete and balanced nutrition with no "chemically synthesized vitamins, minerals, or trace nutrients."

The Livestock Subcommittee determined that there was a need for synthetic taurine to be added to organic cat food because the heat used in processing reduces the bioavailability of taurine.<sup>8</sup> They voted to list taurine on section 206.603(e)(4), as a synthetic supplement for organic cat food. We disagree with this determination. We request additional information on the possible natural sources of taurine for cats. Without this information there is no way to determine whether synthetic taurine is "essential" for use in organic production.

## **CONCERNS WITH SYNTHETIC AMINO ACIDS**

### ***Taurine can be obtained from whole foods.***

The American Association of American Feed Control Officials (AAFCO) develops profiles for the nutrients required in pet foods in order for them to be labeled "complete and balanced."

The NOSB Livestock Subcommittee, in discussions with AAFCO, concluded that the need for most of the petitioned amino acids could be easily met through feeding whole foods to pets. The only amino acid that the AAFCO believes needs to be supplied in synthetic form is taurine for cats. To meet AAFCO standards, canned cat food is required to have 0.2% taurine; dry food is required to have 0.1% taurine.

One of the founding principles of the organic movement is that synthetic nutrients for the soil do not lead to long-term, sustainable soil health. The same principle should apply to the debate around synthetic nutrients for pet food.

Consumers purchasing organic food for their pets do so with the understanding that they are buying *real*, wholesome food for their pets. Synthetic nutrients do not fulfill this expectation, especially when natural alternatives—real food—are available.

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<sup>8</sup> ICF International. 2012. Technical Evaluation Report. Amino Acids, Pet Food, line 148

Since cats are carnivorous, meat is part of their normal diet.<sup>9</sup> Since taurine is present in meat, it seems that feeding cats meat should meet their taurine requirements. If the taurine deficiencies in commercial cat food are caused by the reliance on vegetarian protein sources, like corn and soy, organic cat food should provide a real-food alternative and should not have to rely on synthetic taurine.

Cat foods labeled “organic” should be required to derive all taurine from natural sources. In a natural diet, cats obtain taurine from seafood, poultry, and beef.<sup>10</sup> Although the argument has been made that organic poultry and beef are prohibitively expensive for pet food, Cornucopia notes that cost is not a criterion for adding a synthetic substance to the National List. Furthermore, there are some existing canned cat foods on the market which are indeed certified organic where the principal ingredients are meat or organ meat.

The Technical Review conducted on the full complement of petitioned amino acids devotes two lines to answer the question of natural sources of taurine. We suggest that a supplemental report, focusing only on taurine, is needed to more thoroughly review the possible sources of taurine from natural supplements, such as seaweed, or whole foods. The proposal states, “In the case of organic pet foods, manufacturers have limited access to organic ingredients, thus the petitioner’s stated need to utilize synthetic nutrients to balance the formulations.” Reliance on information from the petitioner is not sufficient to determine the need for synthetic materials.

## CONCLUSION

Cornucopia urges the board to **reject** the addition of all synthetic amino acids, including synthetic taurine for cat food (at this time). The high cost of organic, whole food sources of taurine is not a justification for adding the synthetic version of this nutrient to the National List.

And, as more organic meat comes on the market, additional byproducts and low-value cuts, and organ meats, will become available. Creating the demand in the pet foods market will help fuel efficient, cost-effective and profitable growth in expanding the capacity to create organic meat products for human consumption.

Before adding taurine to the National List, a full TR is needed, with particular attention given to the natural and organic alternatives to synthetic taurine.

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<sup>9</sup> PetMD. Cats Are Different: How a Cat’s Nutritional Needs are Different from a Dog’s. Retrieved from [http://www.petmd.com/cat/nutrition/evr\\_ct\\_cat\\_nutritional\\_needs\\_different](http://www.petmd.com/cat/nutrition/evr_ct_cat_nutritional_needs_different)

<sup>10</sup> Spitze, A.R.; Wong, D.L.; Rogers, Q.R.; and Fascetti, A.J. 2003. Taurine concentrations in animal feed ingredients; cooking influences taurine content. *Journal of Animal Physiology and Animal Nutrition* 87:251-262

We also encourage the development of natural/organic sources of supplemental taurine. If synthetic taurine is added to the National List, manufacturers lose incentive to develop natural alternatives. It has become clear, over the years, that few materials are removed from the National list through the sunset process. Once a material is on the National List, manufacturers lose their incentive to develop compliant alternatives.