

BC Natural Chicken, LLC

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September 27, 2013

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

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

Dear Board Members:

On behalf of Coleman Natural Foods, BC Natural Chicken, Fredericksburg PA, I am writing to encourage that the level of methionine inclusion in our feeding program at BC Natural Chicken be considered to change from a 2.0 pound maximum inclusion rate to a 2.5 pound average inclusion rate. We feel that by making this change it would improve the welfare of the chickens and allow us to more easily meet the high animal welfare standards that our customers require.

Since the change to 2.0 pounds of methionine on October 1st, 2012 we have had an increased ammonia level in our organic grow out facilities. We have increased the protein levels in our diets to reach the minimum levels of methionine which increases ammonia production in the broiler houses. We have increased our ventilation rates and our litter clean out intervals and still struggle to maintain ammonia at or below our requirement of 20ppm. During one of our recent animal welfare audits we had two farms fail due to ammonia levels over our maximum limit. Our best efforts were put forward to pass this audit. By allowing methionine to go to a 2.5 pound average inclusion rate we would increase methionine during the first 4 weeks of life and decrease methionine in the final 3 weeks. We would be able to lower the protein levels when the birds are young therefore decreasing the amount of ammonia generated during the first 4 weeks of life. This would help maintain our ammonia levels under 20ppm when broilers are young and need supplemental heat in the houses. We would maintain an average of 2.5 pounds of methionine over the life of the bird.

We also feel that we have had an increased incidence of Necrotic Enteritis under these 2 pound maximum limits. With the proposed change to a lower protein and increased methionine we would lower the protein level in the feeds during

the first 4 weeks. This will help with animal welfare by lowering the potential for incidences of Necrotic Enteritis.

BC Natural Chicken will continue to work with our nutritionists and the academic community to investigate alternatives to synthetic methionine. So far there have been no other sources that can serve as a replacement.

Stephen P Fannin
Director of Live Operations
BC Natural Chicken
Fredericksburg PA