



BEYOND PESTICIDES

701 E Street, SE ■ Washington DC 20003
202-543-5450 phone ■ 202-543-4791 fax
info@beyondpesticides.org ■ www.beyondpesticides.org

March 26, 2014

National Organic Standards Board
Spring 2014 Meeting
San Antonio, TX

Re. LS: Methionine

These comments are submitted on behalf of Beyond Pesticides. Beyond Pesticides, founded in 1981 as a national, grassroots, membership organization that represents community-based organizations and a range of people seeking to bridge the interests of consumers, farmers and farmworkers, advances improved protections from pesticides and alternative pest management strategies that reduce or eliminate a reliance on pesticides. Our membership and network span the 50 states and groups around the world.

Beyond Pesticides opposes the use of synthetic methionine in poultry feed. Poultry with adequate access to pasture do not need synthetic methionine. In addition, we oppose this proposal, which may increase the amount of synthetic methionine used.

1. Focusing on methionine has allowed the NOSB and NOP to avoid the real issue –the systems in which organic poultry are raised.

Poultry have been domesticated for thousands of years. During most of the period of their domestication, they have been raised as part of farm systems that provided an adequate omnivorous diet without the need for synthetic supplements. §205.239(a)(1) requires that organic livestock operations must provide year-round access to the outdoors. If the access provided does not allow the poultry to forage for insects and other protein sources during the growing season, then it is inadequate. Thus, unlike the Livestock Subcommittee, which says, “Pasture may provide some supplementation during the right conditions, but is certainly not a dependable solution,” we believe that the discussion of the need for methionine supplementation must start with defining a system that naturally provides for adequate methionine for most of the year. A system that depends on routine synthetic inputs is not organic. As stated in the *Principles of Organic Production and Handling*, adopted by the NOSB on October 17, 2001:

Organic agriculture is an ecological production management system that promotes and enhances biodiversity, biological cycles, and soil biological activity. It emphasizes the use of management practices in preference to the use of off-farm inputs, taking into account that regional conditions require locally adapted systems. These goals are met, where possible,

through the use of cultural, biological, and mechanical methods, as opposed to using synthetic materials to fulfill specific functions within the system.

In our search for organic poultry systems, we need to start with systems that meet these requirements, rather than adapting industrial systems through input substitution. The American fascination with “BIG” is generally inconsistent with organic principles. It is notable that in contrast to USDA organic standards for poultry, which grew out of the industrial model, the EU standards put limits on the size of poultry operations. For example, EU standards limit the number of laying hens per henhouse to 3000, and require outdoor pasture of 4 square meters (43 square feet) per layer.¹ IFOAM recommends that at least 50% of that area must be covered with vegetation.² We believe that it is no accident that three areas of organic production that have resulted in the most contentious debate at the NOSB are those in which the organic market is most dominated by conversion of nonorganic operations following an industrial model –poultry, apples and pears, and aquaculture. In all three, we have seen the insistence of producers that synthetics are needed as a routine part of production.

Thus, the first step is to define organic systems that provide for most of the methionine needs of the flock. The second step is to determine what needs are not being met by the system and how to meet them. (It is interesting to note that under the LS proposal, those poultry producers who provide all of their methionine naturally or with natural supplements for 6 months would be able to feed twice as much synthetic methionine in the remaining 6 months.)

Besides pasture, a large number of nonsynthetic sources of methionine have been brought to the attention of the subcommittee. Perhaps their added cost would be less burdensome if they were used less than half the year.

2. The current proposal is inconsistent with the step-down elimination of synthetic methionine.

The current allowance for synthetic methionine is part of a step-down phase out of its use. The current listing for methionine on the National List sets a maximum level in feed. This proposal requests that methionine (MET) rates be expressed as an average per ton of feed over the life of the flock. The subcommittee says, “Overall usage of MET will be lowered. Producers can only add MET to the average cap, not consistently add MET at the maximum rate.” It also says, “Under this recommendation, producers would be able to exceed the above levels on a particular formulation, provided that there was an offsetting formulation below the level, such that the average inclusion rate of 100% synthetic MET over the entire life cycle of the flock was below the allowed maximum level.”

The subcommittee is mistaken when it says, “Overall usage of MET will be lowered. Producers can only add MET to the average cap, not consistently add MET at the maximum rate.” Producers could add MET at the maximum rate consistently under the proposal. Moreover, if

¹ http://www.ecocert.com/sites/default/files/u3/TS23-EC-v02en_Poultry%20breeding.pdf

² http://www.ifoam-eu.org/sites/default/files/page/files/ifoameu_reg_poultry_production_position_201201.pdf

they use a batch of feed with lower MET, they could make up for it later by adding more. Thus, this recommendation is not consistent with the step-down policy adopted by the Board.

3. Approving the petition would reset the sunset clock.

As noted in the proposal, “Synthetic MET is now subject to a sunset review by the NOSB by 2017.” This proposal, as a new petition, would re-set the sunset review to 2019, extending once again synthetic methionine’s use. Since the sunset process has been changed from a relisting to a delisting process, and given the constantly changing landscape regarding methionine alternatives, new information concerning relisting of the material must be considered under the same terms as the original petition. To do this, the NOSB must adopt a specific expiration date as an annotation to the listing. In this case, since the proposal is seen as a correction of the current listing that sunsets on October 2, 2017, which is part of a step-down phase out of the material, the expiration date should be set to October 2, 2017. We also note that because the Board is considering a petition rather than a sunset proposal, the NOP’s prohibition on annotations at sunset does not apply.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar". The signature is fluid and cursive, with a long horizontal stroke at the end.

Terry Shistar, Ph.D.
Board of Directors