



BEYOND PESTICIDES

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September 20, 2013

National Organic Standards Board
Fall 2013 Meeting
Louisville, KY

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.

Synthetic methionine is added to poultry feed. The current allowance 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 they say, "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 they use a batch of feed with lower MET, they could make up for it later by adding more. Furthermore, approval of this petition would extend the sunset date. Thus, this recommendation is not consistent with the step-down policy adopted by the Board.

In addition, the new NOP sunset process will make it even more difficult to remove this material or annotate it in the future if the board thinks it necessary. Because we believe the NOP process violates the statute, and will therefore not subject methionine to the required assessment to determine re-listing at sunset in the future, we sincerely urge NOSB members to oppose this petition and any others where removal or annotation might conceivably be needed for health, environmental, and essentiality issues until we reinstate the sunset process of OFPA.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar". The signature is written in a cursive style with a prominent initial "T" and a long, sweeping underline.

Terry Shistar, Ph.D.
Board of Directors