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| <i>From:</i> | <i>KELLY SHEA</i> | <i>Date:</i> | <i>10/23/99</i> |
| <i>Re:</i> | <i>Mark's speech</i> | <i>Pages:</i> | <i>3 (including cover page)</i> |
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Presentation for the NOSB meeting
Monday October 25, 1999, Washington D.C.

Thank you for the opportunity to speak with you regarding a possible ban on the use of amino acids in organic production. When it came to our attention, that the issue was up for a vote, we felt it crucial to ask the people who produce eggs and milk for Horizon Organic Dairy for their feedback on this issue, and on its possible ramifications for them. Today I will share with you the opinions of the veterinarians, herdsman, farmers, and the others that feed and care for the certified organic livestock, which provide the raw ingredients for our products.

Amino acids are essential organic constituents of living organisms. All proteins are composed of them; all animals require them. To completely ban the use of amino acids, without a public review and comment period, would do a disservice to certified organic

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livestock production.

In the case of poultry, methionine is very important for egg production. A methionine deficiency ~~is~~ can result in poor feather growth, causing loss of body heat. A situation most crucial to the free range birds.

Within some dairy herds, zinc methionine is used to boost the cows' immune response and for mastitis prevention and foot problems. Additionally, we see amino acids used as part of therapy when helping animals get back on their feet after going through severe stress or high fevers.

Veterinarians have been recommending methionine for years because of its importance as a vascular dilator and its therapeutic effectiveness in strengthening the connective tissue proteins. Lysine is another of the essential amino acids, which is crucial to improving protein availability. The amino acids, cysteine and methionine, help rid the body of toxic metals such as lead and abnormally located iron and copper, all free radical catalysts.

At Horizon our focus is the production of quality, certified organic food, which has been produced with the highest level of attention to detail and regard for the earth. Our progressive and efficient farm management practices plan for good herd health, pollution prevention, the transitioning of more acres to organic, and ultimately, the happy cow.

Each of our farms follows a unique and individual farm plan. Designed for that particular operation's ecological, environmental and unique herd health practices. If we are to be

effective stewards of our farms and of our earth, we must study, discuss, and share the results of our experiences.

What seems to be lacking in this situation is such sharing. There is little or no transparency. The decision on the use of amino acids in livestock, crop and processed food production seems to be a closed process, not fitting into our industry protocol for decision making.

The information from the Technical Advisory Panel had not been made public, nor has the completed OMRI reports. Without this information, we are not all on the same page. The Federal government has paid for and received information, that if shared with members of the industry, would facilitate a well-rounded, informed decision making process.

Based on the limited information we do have, I see no reason why amino acids, synthetic or otherwise, should not be allowed on a case by case basis. Granted, they should be monitored and restricted to prevent abuse. Monitoring could also discover the amino acid's derivation. We need to guard against GMO's in our production.

There should be an unveiling of information and a public comment period. A decision should be delayed until a complete and clear picture of the benefits and/or liabilities of the various individual amino acids, (synthetic or otherwise) is formulated. We then may clearly, and in good conscience, make the appropriate decision, to ban them, to have a

transition period with time to research viable alternatives and substitutes, or to leave things as they are and add the materials in use to the National List.