June 26, 2017

MEMORANDUM TO THE NATIONAL ORGANIC STANDARDS BOARD

FROM: Miles V. McEvoy
Deputy Administrator
National Organic Program (NOP)

SUBJECT: Response to National Organic Standards Board Recommendation (April 2017 Meeting)

Background

This memorandum responds to the National Organic Standards Board (NOSB) recommendation made at its April 19-21, 2017, meeting in Denver, Colorado.

Summary of Recommendation

Petitioned Substances. The NOSB recommended one amendment to the National List of Allowed and Prohibited Substances (National List). This section of the U.S. Department of Agriculture (USDA) organic regulations includes synthetic substances allowed in crop and livestock production, nonsynthetic substances prohibited in crop and livestock production, and non-organic substances allowed in the handling of organic products.

<table>
<thead>
<tr>
<th>Substance</th>
<th>Section</th>
<th>NOSB Recommendation</th>
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</thead>
<tbody>
<tr>
<td>L-Methionine</td>
<td>Handling: 205.605(b)</td>
<td>L-Methionine was classified as synthetic. The motion to add L-Methionine to the National List with the following annotation passed: “for use in nutritionally complete pediatric enteral formulas based on soy protein”</td>
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Discussion and Response

Petitioned Substances: L-Methionine (Handling)

The NOSB considered a petition to allow L-Methionine, an essential amino acid, in soy-based nutritionally complete pediatric enteral formulas. The NOSB concluded that without addition of
L-Methionine, soy-based formulas would be nutritionally deficient. The NOSB passed the recommendation to add L-Methionine for this specific use to section 205.605(b) of the National List.

AMS Response:
AMS is reviewing the recommendation to add L-Methionine to the National List.

Summary
AMS acknowledges and sincerely appreciates the time that NOSB members provide to develop recommendations. In addition, AMS supports NOSB’s vital role in representing the diversity of the organic community to enhance organic regulatory implementation and ensure organic product integrity.