



DRAPER VALLEY F♦A♦R♦M♦S

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September 27, 2013

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

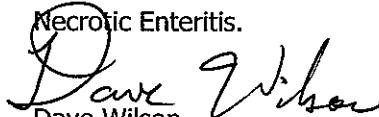
Comment on Docket number AMS-NOP-13-0049-0002

Dear Board Member:

On behalf of Draper Valley Farms, Mount Vernon WA, I am writing to encourage that the level of methionine inclusion in our feeding program at Draper Valley Farms be considered to change from a 2.0 pound maximum inclusion rate to a 2.5 pound average inclusion rate. We feel that this will lower our mortality rate and decrease ammonia levels in our houses that have challenged us to meet high animal welfare standards.

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 made efforts through ventilation and total clean outs of the house and we continue to have a higher mortality rate and ammonia levels in our houses. 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 us lower our mortality rate and drop ammonia levels that can be managed with ventilation.

We also feel that we have had an increased incidence of Necrotic Enteritis under these 2 pound maximum limits. With the proposed change 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.


Dave Wilson
Live Production Manager
Draper Valley Farms
Mount Vernon WA