

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee (CACS) Notes
Tuesday January 13, 2015, 3:00 pm ET**

Attending: Carmela Beck (CB), Chair; Harold Austin (HA); John Foster (JFo); Jean Richardson (JR); Joe Dickson (JD) - Vice Chair; Jennifer Taylor (JT); Lisa de Lima (LD) - sitting in; Tom Chapman (TC) - sitting in
Absent: Wendy Fulwider (WF); Nick Maravell (NM); Mac Stone (MS)
Staff: Emily Brown Rosen (EBR), Michelle Arsenault (MA)

Workplan

Project	Contact	Status	Vote	Meeting
Assessment of Soil Conservation Practices	CBe/JFo	DD fall 2014	08 28 14	Proposal Spr 2015

Future Potential Projects	Contact	Status	Vote	Meeting
Peer Review	JFo	Added to CACS at Fall 2014 NOSB meeting. Memo from NOP sent to HS 11 19 14	01 13 15	Proposal Spr 2015

Agenda

- Approve notes of December 9, 2014
- Discuss/vote on final Peer Review proposal (JFo)
- Discuss the DRAFT Soil Conservation Practices Assessment Proposal (CBo)
- Adjourn

Discussion

- **The notes from** December 9, 2014 were approved with no changes.
- **Peer Review Proposal** - The draft proposal was circulated prior to the call and the group discussed it before proceeding to a vote. The members were very supportive of the document overall. Three topics that the group explored further involved: 1) The potential for conflicts of interest if current Board members were to sit on the peer review panel; 2) The addition of language in support of the findings by the OIG of using an independent third party assessment body rather than a FACA panel as the auditor; and 3) The role of the NOSB post-review.

Motion to accept the Peer Review Proposal as amended

Motion by: JFo

Seconded by: JR

Discussion: No additional discussion except to note that the lead reviewer resent the amended version to the members during the call and before they voted.

Yes: 8 No: 0 Abstain: 0 Absent: 1 Recuse: 0

Members that were absent for the vote will be allowed the opportunity to vote until COB Friday Jan 16. **ABS note: Two members voted via email and the vote above was changed to reflect this.**

- **Draft Soil Conservation Practices Assessment** - The lead noted that the document needs some word-smithing, and will edit and recirculate to the members so they can review it and vote on next call.
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future Call Schedule

December 9, 2014 3:00 ET

January 13 - Discuss Soil Conservation Practices Assessment Public Comment Narrative - CBe/TBD

February 10 - Discuss Soil Conservation Practices Assessment Public Comment Narrative/vote (CBe)
Complete final documents (2) for submission to NOP

March 10, 2015 3:00 ET

April 14, 2015 3:00 ET

Spring 2015 Milestones	Target date
NOSB Training	Feb 4-5, 2015
NOP - Complete Spring 2015 NOSB meeting tentative agenda	Feb 7, 2015
NOSB - Spring 2015 proposals due to NOP	Feb 25, 2015
NOP - Post proposals, Publish FRN, Open public comment	Mar 9, 2015
Discuss work agendas on ES call	Mar 13, 2015
Public comment closes	Apr 6, 2015
Work agendas finalized on ES call (last call before spring mtg)	Apr 10, 2015
NOP - Send compiled public comments to NOSB	Apr 13, 2015
Spring 2015 NOSB meeting - La Jolla, CA	Week of April 27 - 30

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee (CACs) Notes
Tuesday February 10, 2015, 3:00 pm ET**

Attending: Carmela Beck (CB), Chair; Lisa de Lima, Vice Chair (LD); Tom Chapman (TC); Jean Richardson (JR)

Absent: Nick Maravell (NM); Mac Stone (MS); Jennifer Taylor (JT)

Staff: Emily Brown Rosen (EBR), Michelle Arsenault (MA)

Work Agenda

Project	Contact	Status	Vote	Meeting
Assessment of Soil Conservation Practices	CBe/LD		NA	Proposal Fall 2015
Peer Review	JFo CBe	Added to CACS at Fall 2014 NOSB meeting. Memo from NOP sent to HS 11 19 14	01 13 15	Proposal Spr 2015

Future Potential Projects	Contact	Status	Vote	Meeting

Agenda

- Approve notes of January 13, 2015
- Discuss changing name of CACS to include ‘International Equivalency’
- Discuss the possibility of eliminating the “100% organic” category
- Discuss/vote Draft Soil Conservation Practices Assessment Proposal (CBo)
- Adjourn

Discussion

- **The notes from** January 13, 2015 were approved with no changes.
- **Draft Soil Conservation Practices Assessment** - Several Board members met with NRCS staff while in DC last week for training and discussed various ways in which the NOSB, NOP, and NRCS overlap and can work more efficiently. Topics included: The NRCS CAP 138 program (Conservation Activity Plan) which offers support for farms in transition to organic. The group also discussed training and ways to perhaps coordinate resources of the NRCS and NOP.. Based on these conversations and input from NOP, the CACS will delay the proposal on Soil Conservation Practices Assessment to the fall 2015 meeting in an effort to add more specificity. LD will reach out to NRCS to learn more about their available tools.
- **Discuss changing name of CACS to include “International Equivalency”** - The NOSB chair suggested that the name of the CACS be changed to reflect the fact that the NOSB

Subcommittees always review and consider materials in light of international activities. Members discussed the pros and cons of doing this. The NOP will discuss this further and let the CACS know. JR will write an email to the Deputy Administrator proposing the name change.

- **Discuss the “100% organic” category** - Members discussed the idea of requesting an addition to the work agenda about the 100% organic label, to seek public comment. Several members indicated that based on feedback from many segments of the organic community, the label claim of 100% organic is confusing. One member noted that it is not used outside of the US. The NOP added that it was not part of OFPA, but that it was originally added by USDA AMS Administrator Merrigan in response to a segment of the community opposed to the inclusion of any synthetics in processing. The CACS will develop a request and submit it to the NOP Deputy Administrator for consideration as a work agenda item for 2016.
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future Call Schedule

January 13 - Discuss Soil Conservation Practices Assessment Public Comment Narrative - CBe/TBD

February 10 - Discuss Soil Conservation Practices Assessment Public Comment Narrative/vote (CBe)
Complete final documents (2) for submission to NOP

March 10, 2015 3:00 ET

Discuss Soil Conservation Practices Assessment Public Comment Narrative

April 14, 2015 3:00 ET

Discuss Public Comment pertaining to the Peer Review & other topics if applicable

May 12, 2015 1:00 ET

June 9, 2015 1:00 ET

July 14, 2015 1:00 ET

August 11, 2015 1:00 ET

September 8, 2015 1:00 ET

October 13, 2015 1:00 ET

November 10, 2015 1:00 ET

December 8, 2015 1:00 ET

Spring 2015 Milestones	Target date
NOSB Training	Feb 4-5, 2015
NOP - Complete Spring 2015 NOSB meeting tentative agenda	Feb 7, 2015
NOSB - Spring 2015 proposals due to NOP	Feb 25, 2015
NOP - Post proposals, Publish FRN, Open public comment	Mar 9, 2015
Discuss work agendas on ES call	Mar 13, 2015
Public comment closes	Apr 6, 2015

Work agendas finalized on ES call (last call before spring mtg)	Apr 10, 2015
NOP - Send compiled public comments to NOSB	Apr 13, 2015
Spring 2015 NOSB meeting - La Jolla, CA	Week of April 27 - 30

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee (CACs) Notes
Tuesday March 10, 2015, 3:00 pm ET**

Attending: Carmela Beck (CB), Chair; Lisa de Lima, Vice Chair (LD); Jean Richardson (JR); Mac Stone (MS); Jennifer Taylor (JT); Tom Chapman (TC)

Absent: Nick Maravell (NM)

Staff: Emily Brown Rosen (EBR), Michelle Arsenault (MA)

Work Agenda

Project	Contact	Status	Vote	Meeting
Assessment of Soil Conservation Practices	CBe/LD		NA	Proposal Fall 2015
Peer Review	JFo CBe	Added to CACS at Fall 2014 NOSB meeting. Memo from NOP sent to HS 11 19 14	01 13 15	Proposal Spr 2015

Future Potential Projects	Contact	Status	Vote	Meeting

Agenda

- Approve notes of February 10, 2015
- Discuss Soil Conservation Practices Assessment Public Comment Narrative Adjourn

Discussion

- **The notes from** February 10, 2015 were approved with no changes
- **Soil Conservation Practices Assessment.** Members discussed the draft document and made various editing and proofreading changes. The CACS received feedback from several stakeholders and discussed the incorporation of these comments into the discussion document. The lead reviewer will weave these comments into the narrative for review on the next call. One member asked about international implications for this document. Another member added that there is a need within the Organic System Plan or organic agriculture to address farmworker welfare, and she suggested that the NOSB consider issues that improve the organic farm environment, soil conservation, biodiversity, animal welfare, and contamination issues.
- The Chair asked about the status of the 100% organic topic that was posed as a possible work agenda item. The topic was deferred until the Sunset review is completed.
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future Call Schedule

February 10 - Discuss Soil Conservation Practices Assessment Public Comment Narrative/vote (CBe)

Complete final documents (2) for submission to NOP

March 10, 2015 3:00 ET

Discuss Soil Conservation Practices Assessment Public Comment Narrative

April 14, 2015 3:00 ET

Discuss Public Comment pertaining to the Peer Review & other topics if applicable

Discuss Soil Conservation Practices Assessment

May 12, 2015 1:00 ET

June 9, 2015 1:00 ET

July 14, 2015 1:00 ET

August 11, 2015 1:00 ET

September 8, 2015 1:00 ET

October 13, 2015 1:00 ET

November 10, 2015 1:00 ET

December 8, 2015 1:00 ET

Spring 2015 Milestones	Target date
NOSB Training	Feb 4-5, 2015
NOP - Complete Spring 2015 NOSB meeting tentative agenda	Feb 7, 2015
NOSB - Spring 2015 proposals due to NOP	Feb 25, 2015
NOP - Post proposals, Publish FRN, Open public comment	Mar 9, 2015
Discuss work agendas on ES call	Mar 13, 2015
Public comment closes	Apr 6, 2015
Work agendas finalized on ES call (last call before spring mtg)	Apr 10, 2015
NOP - Send compiled public comments to NOSB	Apr 13, 2015
Spring 2015 NOSB meeting - La Jolla, CA	Week of April 27 - 30

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee (CACs) Notes
Tuesday June 9, 2015, 3:00 pm ET**

Attending: Carmela Beck (CB), Chair; Lisa de Lima, Vice Chair (LD) Tom Chapman (TC); Jean Richardson (JR); Jennifer Taylor (JT)

Absent: Nick Maravell (NM)

Staff: Emily Brown Rosen (EBR), Michelle Arsenault (MA)

Work Agenda

Project	Contact	Status	Vote	Meeting
Assessment of Soil Conservation Practices	CBe/LD		NA	Proposal Fall 2015

Future Potential Projects	Contact	Status	Vote	Meeting

Agenda

- Approve notes of March 10, 2015
- Discuss Soil Conservation Practices Assessment

Discussion

- **The notes from March 10, 2015** were approved as is.
- **Soil Conservation Practices Assessment.** The lead sent out the newest draft document prior to the call and the group discussed several minor changes and modifications. The lead will make additional edits and resend the document to the members for review on the next call. NOP suggested that the proposal outcome should have clear objectives, and be framed as a request for NOP to publish guidance.
- **The CACS would like to invite an NRCS representative to participate on the July 14 call.** MA will extend the invitation.
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future Call Schedule

May 12, 2015 1:00 ET - cancelled

June 9, 2015 1:00 ET

July 14, 2015 1:00 ET

August 11, 2015 1:00 ET

September 8, 2015 1:00 ET
October 13, 2015 1:00 ET
November 10, 2015 1:00 ET
December 8, 2015 1:00 ET

Fall 2015 Milestones	Target date
NOP - Complete Fall 2015 NOSB meeting tentative agenda	July 8, 2015
NOSB - Fall 2015 proposals due to NOP	Aug 26, 2015
NOP - Post proposals, Publish FRN, Open public comment	Sep 8, 2015
Discuss work agendas on ES call	Sep 11, 2015
Public comment closes	Oct 5, 2015
Work agendas finalized on ES call (last call before fall meeting)	Oct 8, 2015
NOP - Send compiled public comments to NOSB	Oct 13, 2015
Fall 2015 NOSB meeting - Stowe, VT	Oct 26 - 29, 2015

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee (CACS) Notes
Tuesday July 14, 2015, 3:00 pm ET**

Attending: Carmela Beck (CB), Chair; Lisa de Lima, Vice Chair (LD) Jean Richardson (JR);

Absent: Tom Chapman (TC); Nick Maravell (NM); Jennifer Taylor (JT)

Staff: Emily Brown Rosen (EBR), Michelle Arsenault (MA)

Work Agenda

Project	Contact	Status	Vote	Meeting
Assessment of Soil Conservation Practices	CBe/LD		NA	Proposal Fall 2015

Future Potential Projects	Contact	Status	Vote	Meeting

Agenda

- Approve notes of June 9, 2015
- Guest speaker: Lindsay Haines NRCS (Discuss Soil Conservation Practices Assessment)

Discussion

- **The notes from June 9, 2015** were approved with no changes.
- **Soil Conservation Practices Assessment.** Guest speaker: Lindsay Haines NRCS. The members discussed the purpose and scope of the document and also assessed specific sections and language. The members also discussed the fact that there is no definition of soil erosion in the organic regulations, while NRCS has metrics for compliant, tolerable, and sustainable soil loss levels.
- The CACS discussed the intent of the document and will bring it forth as a proposal for the fall 2015 NOSB meeting
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future Call Schedule

June 9, 2015 1:00 ET

July 14, 2015 1:00 ET

Guest speaker: Lindsay Haines NRCS

August 11, 2015 1:00 ET

September 8, 2015 1:00 ET

October 13, 2015 1:00 ET

November 10, 2015 1:00 ET

December 8, 2015 1:00 ET

Fall 2015 Milestones	Target date
NOP - Complete Fall 2015 NOSB meeting tentative agenda	July 8, 2015
Request for TRs for 2018 sunset materials	July 15, 2015
NOSB - Fall 2015 proposals due to NOP	Aug 26, 2015
NOP - Post proposals, Publish FRN, Open public comment	Sep 8, 2015
Discuss work agendas on ES call	Sep 11, 2015
Public comment webinars	Sep 22 & 29, 2015
Public comment closes	Oct 5, 2015
Work agendas finalized on ES call (last call before fall meeting)	Oct 8, 2015
NOP - Send compiled public comments to NOSB	Oct 13, 2015
Fall 2015 NOSB meeting - Stowe, VT	Oct 26 - 29, 2015

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee (CACS) Notes
Tuesday August 11, 2015, 3:00 pm ET**

Attending: Carmela Beck (CB), Chair; Lisa de Lima, Vice Chair (LD) Jean Richardson (JR); Tom Chapman (TC);

Absent: Nick Maravell (NM); Jennifer Taylor (JT)

Staff: Emily Brown Rosen (EBR), Michelle Arsenault (MA)

Work Agenda

Project	Contact	Status	Vote	Meeting
Assessment of Soil Conservation Practices	CBe/LD		NA	Verbal Report Fall 2015?

Future Potential Projects	Contact	Status	Vote	Meeting

Agenda

- Approve notes of July 14, 2015
- Adjourn

Discussion

- **The notes from July 14, 2015** were approved with no changes.
- **Soil Conservation Practices Assessment.** The group discussed the draft document, and came to the consensus that the scope of the question they were tasked with answering is too broad for the NOSB to address in any meaningful or useful way. The CACS may present a verbal report, instead of a discussion document, at the fall 2015 meeting instead. Members discussed various approaches to move forward including seeking more information and guidance from the NOP, and contracting a TR on soils to determine what tools are being used to assess soil health. The NOP will discuss this and provide some additional input.
- **Wild Farm Alliance document: “Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production”.** The members discussed the possibility of adding this project to the CACS workplan. (In order to do that they would write a justification as to what the problem is, how they would address it, and what the intended outcome is. Then it would have to be approved by the NOP). After a lengthy discussion about the scope of the problem, and the possible paths and outcomes, the members acknowledged that Conversion of native ecosystems into organic crop production is a serious problem, but that it is too large in scope for the CACS or

NOSB to take up.

- The CACS will cancel the September 8 meeting
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future Call Schedule

July 14, 2015 1:00 ET

August 11, 2015 3:00 ET

September 8, 2015 3:00 ET

October 13, 2015 3:00 ET

November 10, 2015 3:00 ET

December 8, 2015 3:00 ET

Fall 2015 Milestones	Target date
NOP - Complete Fall 2015 NOSB meeting tentative agenda	July 8, 2015
Request for TRs for 2018 sunset materials	July 15, 2015
NOSB - Fall 2015 proposals due to NOP	Aug 26, 2015
NOP - Post proposals, Publish FRN, Open public comment	Sep 8, 2015
Discuss work agendas on ES call	Sep 11, 2015
Public comment webinars	Oct 13 & 20, 2015
Public comment closes	Oct 8, 2015
Work agendas finalized on ES call (last call before fall meeting)	Oct 9, 2015
NOP - Send compiled public comments to NOSB	Oct 13, 2015
Fall 2015 NOSB meeting - Stowe, VT	Oct 26 - 29, 2015