

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Compliance, Accreditation & Certification Subcommittee (CACS) Notes **Tuesday, December 12, 2023 2:00 pm ET**

Present: Amy Bruch (ADB), Chair; Allison Johnson (AJ), Vice Chair; Carolyn Dimitri (CD); Nate Powell-Palm (NPP); Kyla Smith (KS); Nate Lewis (NL); Mindee Jefferey (MJ) - observer

Absent: Jerry D'Amore (JD); Kim Huseman (KH)

Staff: Michelle Arsenault (MA); Jared Clark (JC); Heather Kumar (HK); Esu Obu (EO)

Agenda

- Guest speaker: Lindsay Haines, NRCS. Transition to organic
- Review December 5, 2023 notes
- Improving Support for Organic Transition (AJ) - discuss draft
- Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss draft
- Additional Items
- Adjourn

Discussion

- **Guest speaker: Lindsay Haines, USDA Natural Resources Conservation Service (NRCS). Transition to Organic.** The Subcommittee welcomed Lindsay Haines, and relayed background about the NOSB and NOP relationship, and the Board's role in the transition to organic. Lindsay discussed the role of NRCS in relation to the TOPP project, as well as successes, and challenges. Successes include such things as training and outreach, and working with certifiers. Challenges include NRCS staff members' lack of experience and knowledge about organic production, resistance to standards, lack of criteria (different than NRCSs), and decentralization of the organization. The NRCS is looking to broaden its collaboration network with certifiers farmers. The Organic Transition Initiative (OTI) is a priority for NRCS through 2027, and Lindsay highlighted a funding opportunity that they managed to post as a National deadline of March 1 (rather than regional or state-level deadlines, which may be different and adds confusion). Lindsay also presented a list of needs and opportunities: more technical service providers (TSPs), assistance with communicating opportunities for funding (OTI, EQIP, AMS, CSP), training <https://conservationwebinars.net/>, OLPS rule, internal training for NRCS staff, coordination with TOPP. She emphasized that NRCS doesn't want to conflict with TOPP mentors who are already funded to provide guidance. Members asked follow-up questions and the group ended with a discussion about ways to improve communication and outreach. Lindsay also noted that if folks are seeking information, it's best to start at their local office, and if they can't answer your questions, to elevate it to regional and then state, if needed.
- **December 5, 2023** notes were approved as written.
- **Improving Support for Organic Transition (AJ).** The lead summarized the draft proposal, and asked for feedback. Members were supportive of the document and shared suggestions for minor edits. The lead will edit and reshare for the February 6 call.
- **Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH).** Deferred to later call.
- **Additional Items. Market development.** The CACS is seeking NOP approval to add this topic to the work agenda.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted).

December 5, 2023

December 12, 2023

- Possible Guest Speaker (NRCS) - Transition to organic
- Improving Support for Organic Transition (AJ) - discuss draft
- Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss draft

January 9, 2024

- Climate Induced Farming Risk and Crop Insurance (CD) - discuss draft
- Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss draft

January 23, 2024

- Possible Guest Speaker (OFA) - racial equity/transition
- Market Development discussion document (CD) - discuss draft

February 6, 2024

- Climate Induced Farming Risk and Crop Insurance (CD) - discuss/vote
- Improving Support for Organic Transition (AJ) - discuss/vote
- Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss/vote
- Market Development discussion document (CD) - discuss/vote

February 13, 2024

March 5, 2024

- Possible speaker

March 12, 2024

April 2, 2024

April 9, 2024

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled/status	Target meeting
Oversight improvements to deter fraud: Residue Testing for a Global Supply Chain	ADB/NPP/NL/KH	Proposal	Approved by Exec Cmmte/NOP 4.17.23	11.14.23 1.9.24 2.6.24	Spr 2024
Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	CD	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	1.09.24 2.6.24	Spr 2024
Opportunities in Organic: Improving Support for Organic Transition	AJ	Proposal	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	12.12.23 2.6.24	Spr 2024

Milestones

Spring 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~Nov 17, 2023	16 - 20
NOP - Draft Spring 2024 NOSB meeting tentative agenda	Feb 9, 2024	~ 10
NOSB - Spring 2024 proposals due to NOP	Feb 15, 2024	~ 9
NOP - Post proposals	Mar 5, 2024	7.5
Public comment closes	Apr 3, 2024	3.5
NOP - Send compiled public comments to NOSB	Apr 5, 2024	3
Public comment webinars	Apr 23 & 25, 2024	1
Spring 2024 NOSB meeting - Milwaukee, WI	Apr 29 - May 1, 2024	0
Final recommendations due	May 29, 2024	30 days post meeting

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Compliance, Accreditation & Certification Subcommittee (CACS) Notes **Tuesday, December 5, 2023 2:00 pm ET**

Present: Amy Bruch (ADB), Chair; Allison Johnson (AJ), Vice Chair; Jerry D'Amore (JD); Carolyn Dimitri (CD); Kim Huseman (KH); Nate Powell-Palm (NPP); Kyla Smith (KS)

Absent: Nate Lewis (NL)

Staff: Michelle Arsenault (MA); Jo Mirenda (JM); Heather Kumar (HK); Esu Obu (EO)

Agenda

- Review November 14, 2023 notes
- Review schedule
- Discuss any proposal updates
- Finalize SC Guest Speaker List
- Additional Items
- Adjourn

Discussion

- **November 14, 2023** notes were accepted as written.
- **Review schedule.** The market development work agenda item was approved during the November 21 Executive call. The CACS Chair will update the document, recirculate it to CACS members, then submit it to NOP for approval.
- **Proposal updates.** Not discussed.
- **Finalize SC Guest Speaker List.** The CACS discussed ideas for speakers to invite to future CACS calls pertaining to various topics on its work agenda, such as crop insurance, residue testing, and transition to organic. Members exchanged ideas for speakers from various sectors of the organic community including USDA (maybe the testing lab or ERS), NRCS (transition to organic experts), and the Organic Farmers Association (OFA) (racial equity/TOPP). The group also expressed an interest in re-inviting Jon Veley from NOP as he has expertise with customs and border protection. To start, AJ will reach out to NRCS and confirm availability for the January 9 call, then NOP will send an invitation.
- **Additional Items.**
 - The group discussed an [NRCS announcement about organic transition](#) that seems to have gone unnoticed, and the NOSB Chair mentioned a working group looking at “shared resources for government entities, and the group discussed a clearing house/one-stop-shop/website to house this type of information, and how helpful that would be.
 - A member relayed an issue regarding bills-of-lading and liability for farmers. Members offered advice and suggestions, and one member pointed to § 205.103 for recordkeeping and audit trail requirements.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted).

November 14, 2023

- Testing – discussion

December 5, 2023

December 12, 2023

Improving Support for Organic Transition (AJ) - discuss draft

Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss draft

January 9, 2024

Possible Guest Speaker (NRCS) - Transition to organic

Climate Induced Farming Risk and Crop Insurance (CD) - discuss draft

Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss draft

January 23, 2024

Possible Guest Speaker (OFA) - racial equity/transition

Market Development discussion document (CD) - discuss draft

February 6, 2024

Climate Induced Farming Risk and Crop Insurance (CD) - discuss/vote

Improving Support for Organic Transition (AJ) - discuss/vote

Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss/vote

Market Development discussion document (CD) - discuss/vote

February 13, 2024

March 5, 2024

Possible speaker

March 12, 2024

April 2, 2024

April 9, 2024

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: Residue Testing for a Global Supply Chain	ADB/NPP/NL/KH	Proposal	Approved by Exec Cmmte/NOP 4.17.23	11.14.23 12.12.23 1.09.24 2.06.24	Spr 2024
Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	CD	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	1.09.24 2.6.24	Spr 2024
Opportunities in Organic: Improving Support for Organic Transition	AJ	Proposal	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	12.12.23 2.6.24	Spr 2024
Market Development.	CD	Discussion Doc	Approved by Exec Cmmte 11.21.23. Pending NOP approval	1.23.24 2.6.24	Spr 2024

Milestones

Spring 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~Nov 17, 2023	16 - 20
NOP - Draft Spring 2024 NOSB meeting tentative agenda	Feb 9, 2024	~ 10
NOSB - Spring 2024 proposals due to NOP	Feb 15, 2024	~ 9
NOP - Post proposals	Mar 5, 2024	7.5
Public comment closes	Apr 3, 2024	3.5
NOP - Send compiled public comments to NOSB	Apr 5, 2024	3
Public comment webinars	Apr 23 & 25, 2024	1
Spring 2024 NOSB meeting - Milwaukee, WI	Apr 29 - May 1, 2024	0
Final recommendations due	May 29, 2024	30 days post meeting

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Compliance, Accreditation & Certification Subcommittee (CACS) Notes **Tuesday, November 14, 2023 2:00 pm ET**

Present: Amy Bruch (ADB), Chair; Allison Johnson (AJ), Vice Chair; Jerry D'Amore (JD); Carolyn Dimitri (CD); Kim Huseman (KH); Nate Powell-Palm (NPP); Kyla Smith (KS)

Absent: Nate Lewis (NL)

Staff: Michelle Arsenault (MA); Jo Mirenda (JM); Heather Kumar (HK); Esu Obu (EO)

Agenda

- Review November 14, 2023 notes
- Review schedule
- Discuss any proposal updates
- Finalize SC Guest Speaker List
- Additional Items
- Adjourn

Discussion

- **November 14, 2023** notes were accepted as written.
- **Review schedule.** The market development work agenda item was approved during the November 21 Executive call. The CACS Chair will update the document, recirculate it to CACS members, then submit it to NOP for approval.
- **Proposal updates.** Not discussed.
- **Finalize SC Guest Speaker List.** The CACS discussed ideas for speakers to invite to future CACS calls pertaining to various topics on its work agenda, such as crop insurance, residue testing, and transition to organic. Members exchanged ideas for speakers from various sectors of the organic community including USDA (maybe the testing lab or ERS), NRCS (transition to organic experts), and the Organic Farmers Association (OFA) (racial equity/TOPP). The group also expressed an interest in re-inviting Jon Veley from NOP as he has expertise with customs and border protection. To start, AJ will reach out to NRCS and confirm availability for the January 9 call, then NOP will send an invitation.
- **Additional Items.**
 - The group discussed an [NRCS announcement about organic transition](#) that seems to have gone unnoticed, and the NOSB Chair mentioned a working group looking at “shared resources for government entities, and the group discussed a clearing house/one-stop-shop/website to house this type of information, and how helpful that would be.
 - A member relayed an issue regarding bills-of-lading and liability for farmers. Members offered advice and suggestions, and one member pointed to § 205.103 for recordkeeping and audit trail requirements.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted).

November 14, 2023

- Testing – discussion

December 5, 2023

December 12, 2023

Improving Support for Organic Transition (AJ) - discuss draft

Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss draft

January 9, 2024

Possible Guest Speaker (NRCS) - Transition to organic

Climate Induced Farming Risk and Crop Insurance (CD) - discuss draft

Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss draft

January 23, 2024

Possible Guest Speaker (OFA) - racial equity/transition

Market Development discussion document (CD) - discuss draft

February 6, 2024

Climate Induced Farming Risk and Crop Insurance (CD) - discuss/vote

Improving Support for Organic Transition (AJ) - discuss/vote

Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss/vote

Market Development discussion document (CD) - discuss/vote

February 13, 2024

March 5, 2024

Possible speaker

March 12, 2024

April 2, 2024

April 9, 2024

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: Residue Testing for a Global Supply Chain	ADB/NPP/NL/KH	Proposal	Approved by Exec Cmmte/NOP 4.17.23	11.14.23 12.12.23 1.09.24 2.06.24	Spr 2024
Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	CD	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	1.09.24 2.6.24	Spr 2024
Opportunities in Organic: Improving Support for Organic Transition	AJ	Proposal	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	12.12.23 2.6.24	Spr 2024
Market Development.	CD	Discussion Doc	Approved by Exec Cmmte 11.21.23. Pending NOP approval	1.23.24 2.6.24	Spr 2024

Milestones

Spring 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~Nov 17, 2023	16 - 20
NOP - Draft Spring 2024 NOSB meeting tentative agenda	Feb 9, 2024	~ 10
NOSB - Spring 2024 proposals due to NOP	Feb 15, 2024	~ 9
NOP - Post proposals	Mar 5, 2024	7.5
Public comment closes	Apr 3, 2024	3.5
NOP - Send compiled public comments to NOSB	Apr 5, 2024	3
Public comment webinars	Apr 23 & 25, 2024	1
Spring 2024 NOSB meeting - Milwaukee, WI	Apr 29 - May 1, 2024	0
Final recommendations due	May 29, 2024	30 days post meeting

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, November 7, 2023 4:00 pm ET

Present: Amy Bruch (ADB), Chair; Allison Johnson (AJ), Vice Chair; Kyla Smith (KS); Kim Huseman (KH); Carolyn Dimitri (CD)

Absent: Nate Powell-Palm (NPP); Nate Lewis (NL); Michelle Arsenault (MA); Heather Kumar (HK); Esu Obu (EO)

Staff: Jo Mirenda (JM)

Agenda

- Review October 10, 2023 notes
- Fall NOSB meeting debrief
- Finalize Work Agenda
- Schedule work agenda items for the semester
- Reminder: Cover Sheet for Geo Proposal - due 11.22 - attached
- Review roster for upcoming Semester
- Additional Items
- Adjourn

Discussion

- **October 10, 2023** notes were accepted as written.
- **Fall NOSB meeting debrief** – CACS topics generated a lot of public comments and robust conversation at the meeting.
 - Crop Insurance: The presentation by Francie Tolle (USDA Risk Management Agency) was especially valuable. Members appreciated Francie's time, expertise, and willingness to partner on solutions for the organic farming community.
 - Transition Support: Members were impressed by the volume and quality of public comments on transition. The TOPP presentations at the meeting were also impressive. There is a lot of positive work happening, and the Board needs to parse out where to be constructive. It is important to think about transition with a *systems-based* approach, to ensure that all steps of the supply chain are engaged, which includes market development and consumer demand. It is also important to think about different mechanisms for proving support; government programs are helpful, but industry solutions must also come in to play. The group discussed issues of profitability for farmers; prices need to reflect actual cost of organic production if farmers are expected to transition and stay in organic production.
- **Finalize Work Agenda** – CACS will work on 3 proposals for the spring 2024 Meeting: Crop Insurance; Residue Testing; Transition Support. Work Agenda Table (below) is updated to reflect the plan.
- **Schedule work agenda items for the semester** – Future call schedule (below) is updated to reflect the plan.
- **Cover Sheet for Geo Proposal is due November 22** – ADB is working on it.
- **Review roster for upcoming Semester**
- **Additional Items**
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted).

October 10, 2023

November 7, 2023

November 14, 2023

- Testing – discussion

December 5, 2023

December 12, 2023

- Transition – draft
- Testing – discussion

January 2, 2024

January 9, 2024

- Crop Insurance – draft
- Testing – draft

February 6, 2024

- Crop Insurance – final
- Transition – final
- Testing – final

February 13, 2024

March 5, 2024

March 12, 2024

April 2, 2024

April 9, 2024

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: Residue Testing for a Global Supply Chain	ADB/NPP/NL/KH	Proposal	Approved by Exec Cmmte/NOP 4.17.23	11.14 12.12 1.09 2.06	Spr 2024
Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	CD	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	1.09 2.06	Spr 2024
Opportunities in Organic: Improving Support for Organic Transition	AJ	Proposal	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	12.12 2.06	Spr 2024

Milestones

Spring 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~Nov 17, 2023	16 -20
NOP - Draft Spring 2024 NOSB meeting tentative agenda	Feb 9, 2024	~ 10
NOSB - Spring 2024 proposals due to NOP	Feb 15, 2024	~ 9

NOP - Post proposals	Mar 5, 2024	7.5
Public comment closes	Apr 3, 2024	3.5
NOP - Send compiled public comments to NOSB	Apr 5, 2024	3
Public comment webinars	Apr 23 & 25, 2024	1
Spring 2024 NOSB meeting - Milwaukee, WI	Apr 29 - May 1, 2024	0
Final recommendations due	May 29, 2024	30 days post meeting

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, October 10, 2023 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Kyla Smith (KS), Vice Chair; Kim Huseman (KH); Carolyn Dimitri (CD); Allison Johnson (AJ); Jerry D'Amore (JD); Logan Petrey (LP); Mindee Jeffery (MJ) - observer

Absent: Nate Powell-Palm (NPP); Nate Lewis (NL)

Staff: Michelle Arsenault (MA); Jo Mirenda (JM); Heather Kumar (HK); Esu Obu (EO)

Agenda

- Review October 3, 2023 notes
- Review public comments
- Finalize crop insurance questions
- Additional Items
- Adjourn

Discussion

- **October 3, 2023** notes were accepted as written.
- **Review public comments.** Members briefly discussed written comments, as well as the oral comment webinars. The Chair was encouraged because there was increased participation from people who are new to the process, including more farmers. The group discussed oral and written comments, which are intended to inform the Board about topics that are on the agenda, although stakeholders are free to comment on any topics they want. The Chair added that commenters view the Board as their voice, and the vehicle to get their opinions and ideas to the government. The CACS discussed process and best practices for the oral comment webinars. The CACS received written comments on the Organic Transition Initiative, and indicated that it's a great program and they are happy to help promote it.
- **Finalize crop insurance questions.** The CACS reviewed the questions for Fancie Tolle, from the USDA Risk Management Agency (RMA), which they will forward to her this week in preparation for her presentation at the Fall 2023 NOSB meeting.
- **Additional Items.**
 - Members discussed the conversation that was started during the Materials Subcommittee about the distinction between handling and post-harvest handling.
 - Residue testing. The group discussed the comments that referenced current guidance, which has not been updated in some time. The group asked about the 2019 NOSB recommendations on Genetic Integrity Transparency, and why it was not implemented. It is listed as "on hold" and it's likely that there were no thresholds or tolerances by which to measure.
 - Members discussed timing for presentations of each of its four topics.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted.)

October 3, 2023

October 10, 2023

November 7, 2023

November 14, 2023

December 5, 2023

December 12, 2023

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: Minimum Reporting Requirements	ADB/NPP	HOLD	08.10.17 NOP Memo to CACS	8.1.23	TBD
Oversight improvements to deter fraud: Consistent Location Identification	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	7.11.23 8.1.23 8.8.23	Fall 2023
Oversight improvements to deter fraud: Residue Testing for a Global Supply Chain	ADB/NPP/NL/KH	Discussion document	Approved by Exec Cmmte/NOP 4.17.23	6.6.23 8.1.23 8.8.23	Fall 2023
Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	CD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.27.23 7.11.23	Fall 2023
Organic and Climate-Smart Agriculture: What and Why Organic?	JD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.6.23 7.11.23 8.1.23 8.8.23	Spr 2024
Opportunities in Organic: Improving Support for Organic Transition	AJ	Discussion document	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	6.27.23 7.11.23	Fall 2023

Milestones

Fall 2023 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	Jun 8, 2023
NOP - Draft Fall 2022 NOSB meeting agenda	Aug 4, 2023
NOSB - Fall 2023 proposals due to NOP	Aug 10, 2023
NOP - Post proposals	Aug 30, 2023
Public comment closes	Sep 28, 2023
NOP - Send compiled public comments to NOSB	~Oct 2, 2023
Public comment webinars	Oct 17 & 19, 2023

Fall 2023 NOSB meeting - Providence, RI	Oct 24 - 26, 2023
Final recommendations due	Nov 25, 2023

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Compliance, Accreditation & Certification Subcommittee (CACs) Notes

Tuesday, October 3, 2023 4:00 pm ET

Present: Amy Bruch (ADB), Chair; Kim Huseman (KH); Nate Powell-Palm (NPP); Nate Lewis (NL); Carolyn Dimitri (CD); Allison Johnson (AJ); Jerry D'Amore (JD); Kyla Smith (KS), Vice Chair

Absent: Logan Petrey (LP)

Staff: Michelle Arsenault (MA); Jo Mirenda (JM); Heather Kumar (HK); Esu Obu (EO)

Agenda

- Review September 12, 2023 notes
- Discuss public comments (All)
- SOE town hall (KS)
- Potential work agenda item - Weed Management (NL)
- Additional Items
- Adjourn

Discussion

- **September 12, 2023** notes were accepted with minor revisions.
- **New support staff.** The CACS welcomed the newest NOSB technical support staff member.
- **Discuss public comments (All).** The CACS reviewed the Fall meeting agenda and briefly discussed timing for discussions. A member asked about the process for the discussion documents and whether they will end up as proposals for the next meeting. It's possible and depends on public feedback and Board discussion.
- **Guest speaker.** The CACS discussed questions for Francie Tolle, (USDA Risk Management Agency) who was invited to speak at the fall meeting on the topic of crop insurance. Members suggested questions ranging from general thoughts about the discussion document, to price and yield data needs, to the relationship between RMA, NOP, and other agencies. A member added that there may be conflict between the organic regulations and what RMA considers good farming practices, and maybe there is room to discuss Organic System Plans (OSPs) and how to incorporate that into RMA guidance. A member mentioned draft Senate Bill 98, the Agriculture Advancement Act, for which data collection has occurred, and suggested working with other groups who may have data-collection-best-practices.
- **SOE town hall (KS).** A member reported on an SOE town hall meeting that she was participating in. There were seven producers in attendance, and they asked good questions on a range of topics. In the farming community, the non-retail container labeling requirement is the part of SOE where farmers have the most questions. . The town hall also focused on recordkeeping for mass balance and traceback audits.
- **Weed Management (NL).** The Crops Subcommittee discussed the BBMF work agenda request earlier today and has chosen to not revisit the topic at this time. The Subcommittee Chair will send a response to the NOP soon. Given that decision, the CACS will not pursue the weed management topic at this time, as they want to work on those topics in tandem. They may revisit this at a later date if it can be re-coupled with BBMF as part of the BBMF sunset review or annotation change process. The group also talked about innovation, and the idea of solutions outside of BBMF.
- **Additional Items.**
 - **Handling standards.** The group will continue exploring the possibility of a new work agenda items related to handling standards after members finish taking the Organic Integrity Learning Center (OILC) training on "Keeping It Organic". A member suggested that this work agenda topic could also address post-harvest handling standards or guidance, to help improve consistency for

certifiers in evaluating substances and practices that occur after harvest and prior to further processing.

- **SOE and Retailers.** A member discussed the issue of large retailers perhaps not being able to meet the March 2024 implementation deadline, and whether or not they have a “soft landing” and a path to certification after that date. NOP is doing direct outreach to affected entities, and has asked that stakeholders identify anyone that should be included on that contact list. The CACS will ask NOP at the NOSB meeting about whether NOP will take a risk-based approach to assessing compliance after the SOE implementation date. A member identified one category of operation that he finds concerning, and that is a small-to-medium-sized distributors.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted.)

- September 12, 2023
- October 3, 2023
- October 10, 2023
- November 7, 2023
- November 14, 2023
- December 5, 2023
- December 12, 2023

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled/status	Target meeting
Oversight improvements to deter fraud: Minimum Reporting Requirements	ADB/NPP	HOLD	08.10.17 NOP Memo to CACS	8.1.23	TBD
Oversight improvements to deter fraud: Consistent Location Identification	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	7.11.23 8.1.23 8.8.23	Fall 2023
Oversight improvements to deter fraud: Residue Testing for a Global Supply Chain	ADB/NPP/NL/KH	Discussion document	Approved by Exec Cmmte/NOP 4.17.23	6.6.23 8.1.23 8.8.23	Fall 2023
Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	CD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.27.23 7.11.23	Fall 2023

Organic and Climate-Smart Agriculture: What and Why Organic?	JD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.6.23 7.11.23 8.1.23 8.8.23	Spr 2024
Opportunities in Organic: Improving Support for Organic Transition	AJ	Discussion document	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	6.27.23 7.11.23	Fall 2023

Milestones

Fall 2023 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	Jun 8, 2023
NOP - Draft Fall 2022 NOSB meeting agenda	Aug 4, 2023
NOSB - Fall 2023 proposals due to NOP	Aug 10, 2023
NOP - Post proposals	Aug 30, 2023
Public comment closes	Sep 28, 2023
NOP - Send compiled public comments to NOSB	~Oct 2, 2023
Public comment webinars	Oct 17 & 19, 2023
Fall 2023 NOSB meeting - Providence, RI	Oct 24 - 26, 2023
Final recommendations due	Nov 25, 2023

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, September 12, 2023 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Kim Huseman (KH); Nate Powell-Palm (NPP); Logan Petrey (LP); Nate Lewis (NL); Carolyn Dimitri (CD); Allison Johnson (AJ); Jerry D'Amore (JD); Mindee Jeffery (MJ) - observer

Absent: Kyla Smith (KS), Vice Chair

Staff: Michelle Arsenault (MA); Jo Mirenda (JM); Heather Kumar (HK)

Agenda

- Review September 5, 2023 notes
- NOSB Technical representative introduction
- Potential Work Agenda Items Review
 - a. Follow-up on handling standards post-SOE training (KS)
 - b. Ideas on a processed-based approach for plastics (NL)
 - c. Ideas for a framework for sharing organic community challenges/solutions with other agencies (NL); thoughts on a phase 2 examination of FSA/NRCS program offerings (CD)
 - d. SOE and retailers - discuss (JD)
- Additional Items
- Adjourn

Discussion

- **September 5, 2023** notes were accepted as written.
- **NOSB Technical representative introduction.** Heather Kumar is the new NOSB technical representative/ food technologist. Heather has been with the NOP for over a year and has a graduate degree in Food Safety Regulations, and has worked as a chemistry teacher and a lab technician.
- **Potential Work Agenda Items Review.** The CACS had a brainstorming session on its last call about potential work agenda items and revisited the topics.
 - a. **Follow-up on handling standards post-SOE training (KS).** Deferred to next call.
 - b. **Ideas on a processed-based approach for plastics (NL).** The NOP recently sent a memo to the Board asking them to revisit the previous NOSB recommendation on BBMF. The Crops Subcommittee received the work agenda item, and in parallel, the CACS is considering a potential framework to work on plastic more broadly across the organic system plan. A member suggested perhaps focusing on plastic as it relates to the weed management practice standards at §205.206 since that fits squarely in the purview of the NOSB. The lead will write a paragraph requesting a work agenda item, will share it with other members for wordsmithing, then forward it to the Executive team to discuss on the September 19 Executive call. Several members offered to assist/support the leads. The group also discussed divvying up the 7 questions in the BBMF memo and having CACS address some of them, because they seem broader than just Crops.
 - c. **Ideas on developing a framework for sharing organic community challenges/solutions with other agencies (NL).** As discussed last week, the group considered whether to use the crop insurance and research priorities proposals as a model for other issues such as cost-share. The CACS is seeking a framework or process by which they can connect stakeholders to other agencies, for example when stakeholders have concerns or solutions about cost-share, or crop insurance, because the NOSB is frequently seen as a conduit for anything having to do with organic. The group did not decide to advance this work agenda topic, but may revisit cost-share at a later date after the crop insurance document is complete.
 - d. **SOE and retailers (JD).** The lead noted that there wasn't much to add since the last discussion, but he continues to caution that the SOE implementation deadline of March 2024 may not be realistic for some companies. He is advocating for a "soft-landing" and clear guidance about how

to bring some of the entities into compliance if they cannot make the deadline. The CACS Chair previously mentioned the timeline involved in getting fully certified, and indicated that October would be the latest date to get started in order to meet the March 2024 deadline. Another member added that while the NOSB wants to be helpful, it is not the enforcement arm of the program. A member mentioned the recent OIG report regarding SOE:

<https://usdaoig.oversight.gov/reports/other/national-organic-program-strengthening-organic-enforcement>

The NOP reminded the group that the program will record updates and make them available in advance of the NOSB meeting, including updates from the Compliance and Enforcement (C & E) and Accreditation Divisions that will likely address the Program’s activities related to SOE Implementation. After watching the recordings, perhaps they can pose any specific questions about SOE implementation and enforcement to the NOP during the Q and A session at the NOSB meeting.

- **Additional Items.** None.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted.)

- September 5, 2023
- September 12, 2023
- October 3, 2023
- October 10, 2023
- November 7, 2023
- November 14, 2023
- December 5, 2023
- December 12, 2023

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: Minimum Reporting Requirements	ADB/NPP	HOLD	08.10.17 NOP Memo to CACS	8.1.23	TBD
Oversight improvements to deter fraud: Consistent Location Identification	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	7.11.23 8.1.23 8.8.23	Fall 2023
Oversight improvements to deter fraud: Residue Testing for a Global Supply Chain	ADB/NPP/NL/KH	Discussion document	Approved by Exec Cmmte/NOP 4.17.23	6.6.23 8.1.23 8.8.23	Fall 2023

Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	CD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.27.23 7.11.23	Fall 2023
Organic and Climate-Smart Agriculture: What and Why Organic?	JD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.6.23 7.11.23 8.1.23 8.8.23	Spr 2024
Opportunities in Organic: Improving Support for Organic Transition	AJ	Discussion document	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	6.27.23 7.11.23	Fall 2023

Milestones

Fall 2023 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	Jun 8, 2023
NOP - Draft Fall 2022 NOSB meeting agenda	Aug 4, 2023
NOSB - Fall 2023 proposals due to NOP	Aug 10, 2023
NOP - Post proposals	Aug 30, 2023
Public comment closes	Sep 28, 2023
NOP - Send compiled public comments to NOSB	~Oct 2, 2023
Public comment webinars	Oct 17 & 19, 2023
Fall 2023 NOSB meeting - Providence, RI	Oct 24 - 26, 2023
Final recommendations due	Nov 25, 2023

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Compliance, Accreditation & Certification Subcommittee (CACs) Notes

Tuesday, September 5, 2023 4:00 pm ET

Present: Amy Bruch (ADB), Chair; Kyla Smith (KS), Vice Chair; Kim Huseman (KH); Nate Powell-Palm (NPP); Logan Petrey (LP); Nate Lewis (NL); Carolyn Dimitri (CD); Allison Johnson (AJ); Jerry D'Amore (JD); Mindee Jeffery (MJ) - observer

Absent: None

Staff: Michelle Arsenault (MA); Jo Mirenda (JM)

Agenda

- Review August 8, 2023 notes
- Review work agenda/schedule
- Additional Items
- Adjourn

Discussion

- **August 8, 2023** notes were accepted as written.
- **Review work agenda/schedule.**
 - The CACS reviewed the work agenda, and discussed potential future work agenda items. There are several projects in progress that will be presented at the Spring meeting. The Chair highlighted the Strengthening Organic Enforcement (SOE) rule and possible projects connected to that, such as Oversight improvements to deter fraud: Minimum Reporting Requirements. A member mentioned a new training in the Organic Integrity Learning Center (OILC) regarding SOE called "Keep it Organic When Handling and Processing". She indicated that she would take the training and let the CACS know if there are answers to the question about how or whether SOE will impact organic handlers.
- **Additional Items.**
 - The group discussed plastic, which they view as a broad issue that encompasses more than just plastic mulch and covers for crop use. For example, it's a food packaging problem, as well as an agricultural production problem. Members posed questions to the group about whether this is something the NOSB can contribute to in a meaningful way, and what impact the NOSB could make given that the problem is widespread, and largely outside of organic agriculture. A member recommended that if they work on plastic, that it be done in the CACS instead of just Crops, and will think more about possible ways the NOSB could work on this. The NOP will be sending a work agenda request to the Crops Subcommittee soon, asking them to reconsider a previous NOSB recommendation on BBMF, given new information about biodegradability. The group discussed several aspects: community support for addressing this problem; the need for a holistic solution; the value in addressing pieces of the issue on plastic; the acknowledgement of the complexity due to the scope of the problem, most of which is outside of the USDA/NOSB authority. The group questioned whether the work is worth doing if it's outside OFPA's scope, and whether there is a path forward for this issue. A member suggested that if the CACS chooses to work on it, it would be beneficial to take an organic-systems-plan approach. One member noted that in her most recent inspection, her certifier asked specific questions about trash and recycling.
 - The group discussed the certification cost share program, and ways to make it more streamlined and more beneficial to farmers who need it. Members shared ideas that other organizations have been proposing, such as reallocating funds based on need to those farmers who see the cost-share as a lifeline; increasing the amount that beginning farmers receive; and making the process easier by giving funds directly to certifiers. A member noted that

- certification costs are rising, based on many factors such as transportation costs, staffing increases, etc. This effort could help reduce barriers to transition. The NOSB could characterize the problems and offer some possible solutions. CACS could approach the issue similarly to the crop insurance work agenda item: The Board doesn't need to solve the problem but could be a clearing house for what producers are saying and compile potential solutions. The group talked about developing a framework for how NOSB Recommendations on issues like this are shared with other federal agencies, in this case FSA, using the NOSB Research priorities and NIFA as a model. They may revisit this at a later date. NL will consider ideas for the framework.
- A member relayed concerns that large retailers/distributors will not meet the March 2024 SOE implementation deadline, and were unaware of who to contact for information. He questioned whether there could be an extension on the implementation date, or a soft landing for operations that don't meet the deadline. The CACS may discuss this at the Fall 2023 meeting if the issues are not resolved prior. The group questioned what happens if some entities in the supply chain do not meet the deadline to get certified. Do they receive a non-compliance and an opportunity to correct and come into compliance? A member mentioned that some producers are getting letters from their certifiers about identifying uncertified operations in their supply chain under penalty of fines for not doing so.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted.)

August 8, 2023

Enforcement: Residue Testing for a Global Supply Chain Discussion Document (ADB/NPP/NL/KH) - discuss/vote

Organic and Climate-Smart Agriculture: What and Why Organic? Discussion Document (ADB/NPP/JD) - discuss/vote

- September 5, 2023
- September 12, 2023
- October 3, 2023
- October 10, 2023
- November 7, 2023
- November 14, 2023
- December 5, 2023
- December 12, 2023

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled/status	Target meeting
Oversight improvements to deter fraud: Minimum Reporting Requirements	ADB/NPP	HOLD	08.10.17 NOP Memo to CACS	8.1.23	TBD

Oversight improvements to deter fraud: Consistent Location Identification	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	7.11.23 8.1.23 8.8.23	Fall 2023
Oversight improvements to deter fraud: Residue Testing for a Global Supply Chain	ADB/NPP/NL/KH	Discussion document	Approved by Exec Cmmte/NOP 4.17.23	6.6.23 8.1.23 8.8.23	Fall 2023
Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	CD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.27.23 7.11.23	Fall 2023
Organic and Climate-Smart Agriculture: What and Why Organic?	JD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.6.23 7.11.23 8.1.23 8.8.23	Spr 2024
Opportunities in Organic: Improving Support for Organic Transition	AJ	Discussion document	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	6.27.23 7.11.23	Fall 2023

Milestones

Fall 2023 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	Jun 8, 2023
NOP - Draft Fall 2022 NOSB meeting agenda	Aug 4, 2023
NOSB - Fall 2023 proposals due to NOP	Aug 10, 2023
NOP - Post proposals	Aug 30, 2023
Public comment closes	Sep 28, 2023
NOP - Send compiled public comments to NOSB	~Oct 2, 2023
Public comment webinars	Oct 17 & 19, 2023
Fall 2023 NOSB meeting - Providence, RI	Oct 24 - 26, 2023
Final recommendations due	Nov 25, 2023

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, August 8, 2023 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Kyla Smith (KS), Vice Chair; Jerry D'Amore (JD); Kim Huseman (KH); Nate Powell-Palm (NPP); Logan Petrey (LP); Nate Lewis (NL); Mindee Jeffery (MJ) – observer;

Absent: Carolyn Dimitri (CD); Allison Johnson (AJ)

Staff: Michelle Arsenault (MA); Jared Clark (JC)

Agenda

- Review August 1, 2023 notes
- Consistent Location Identification update
- Enforcement: Residue Testing for a Global Supply Chain Discussion Document (ADB/NPP/NL/KH) - discuss/vote
- Organic and Climate-Smart Agriculture: What and Why Organic Discussion Document (JD) - discuss/vote
- Additional Items
- Adjourn

Discussion

- **August 1, 2023** notes were accepted with several modifications to the discussion.
- **Consistent Location Identification:** The lead highlighted changes that were made to the document after the last call, and after the vote. Members approved the changes without opposition.
- **Enforcement: Residue Testing for a Global Supply Chain Discussion Document (ADB/NPP/NL/KH).** The lead highlighted changes that were included in the newest version of the document. The additional text was based on information from Strengthening Organic Enforcement (SOE) regarding contact contamination and certifier verification.

Motion to accept the discussion document Enforcement: Residue Testing for a Global Supply Chain

Motion by: NL

Seconded by: NPP

Yes: 7 No: 0 Abstain: 0 Recusal: 0 Absent: 2

- **Organic and Climate-Smart Agriculture: What and Why Organic Discussion Document (JD).** The Subcommittee had a robust conversation around this topic and decided to defer this document to the Spring 2024 meeting. The CACS may use the open docket after the Fall meeting to post the document for preliminary public comment, and then develop a document for discussion at the Spring 2024 NOSB meeting.
- **Additional Items.** None.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted.)

August 1, 2023

Enforcement: Residue Testing for a Global Supply Chain Discussion Document - discuss outline (ADB/NPP/NL/KH)

Modernizing Organic Infrastructure: Consistent Location Identification (ADB/NPP) - discuss/vote
 Organic and Climate-Smart Agriculture: What and Why Organic? Discussion Document (ADB/NPP/JD) - discuss

August 8, 2023

Enforcement: Residue Testing for a Global Supply Chain Discussion Document (ADB/NPP/NL/KH) - discuss/vote

Organic and Climate-Smart Agriculture: What and Why Organic? Discussion Document (ADB/NPP/JD) – discuss/vote

September 5, 2023

September 12, 2023

October 3, 2023

October 10, 2023

November 7, 2023

November 14, 2023

December 5, 2023

December 12, 2023

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: Minimum Reporting Requirements	ADB/NPP	HOLD	08.10.17 NOP Memo to CACS	8.1.23	TBD
Oversight improvements to deter fraud: Consistent Location Identification	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	7.11.23 8.1.23 8.8.23	Fall 2023
Oversight improvements to deter fraud: Residue Testing for a Global Supply Chain	ADB/NPP/NL/KH	Discussion document	Approved by Exec Cmmte/NOP 4.17.23	6.6.23 8.1.23 8.8.23	Fall 2023
Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	CD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.27.23 7.11.23	Fall 2023
Organic and Climate-Smart Agriculture: What and Why Organic?	JD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.6.23 7.11.23 8.1.23 8.8.23	Spr 2024
Opportunities in Organic: Improving Support for Organic Transition	AJ	Discussion document	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	6.27.23 7.11.23	Fall 2023

Milestones

Fall 2023 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	Jun 8, 2023
NOP - Draft Fall 2022 NOSB meeting agenda	Aug 4, 2023
NOSB - Fall 2023 proposals due to NOP	Aug 10, 2023
NOP - Post proposals	Aug 30, 2023
Public comment closes	Sep 28, 2023
NOP - Send compiled public comments to NOSB	~Oct 2, 2023
Public comment webinars	Oct 17 & 19, 2023
Fall 2023 NOSB meeting - Providence, RI	Oct 24 - 26, 2023
Final recommendations due	Nov 25, 2023

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Compliance, Accreditation & Certification Subcommittee (CACs) Notes

Tuesday, August 1, 2023 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Kyla Smith (KS), Vice Chair; Jerry D'Amore (JD); Carolyn Dimitri (CD); Kim Huseman (KH); Allison Johnson (AJ); Nate Powell-Palm (NPP); Logan Petrey (LP); Nate Lewis (NL); Mindee Jeffery (MJ) - observer

Absent: None

Staff: Michelle Arsenault (MA); Jo Mirenda (JM)

Agenda

- Review July 11, 2023 notes
- Modernizing Organic Infrastructure: Consistent Location Identification Proposal (ADB/NPP) - discuss/vote
- Enforcement: Residue Testing for a Global Supply Chain Discussion Document (ADB/NPP/NL/KH)
- Organic and Climate-Smart Agriculture: What and Why Organic Discussion Document (JD) - discuss/vote
- Additional Items
- Adjourn

Discussion

- **July 11, 2023** notes were accepted as written
- **Modernizing Organic Infrastructure - Consistent Location Identification Proposal (ADB/NPP).** This project received support at the Spring NOSB meeting. The group had a conversation about terminology. i.e., parcel vs. field vs. site, and decided to use the term "legal parcel" throughout the document. Members discussed implementation of the recommendation, and determined that this is a recommendation for NOP to provide guidance, instruction, or training to help certifiers be more consistent. . A member noted the connection to the Human Capital work, as it potentially could save certifiers time and resources. Another member raised a concern about confidentiality of information, and confirmed that the information would only be available to the operation's own certifier.

Motion to recommend that all accredited certifiers obtain consistent location information that can lead to GPS coordinates for all applicants for certification and certified operations (parcels, production units - grower groups, handling locations, importers, brokers, etc.).

Motion by: ADB

Seconded by: NPP

Yes: 9 No: 0 Abstain:0 Recusal: 0 Absent: 0

- **Enforcement: Residue Testing for a Global Supply Chain Discussion Document (ADB/NPP/NL/KH).** The lead introduced the discussion document, which is meant to build on existing residue testing requirements to complement Strengthening Organic Enforcement (SOE). The concept is to modernize how certifiers conduct residue sampling along the supply chain. The current document includes a proposed framework to evaluate substances for testing, with an initial focus on two aspects: synthetic solvents used in oilseed extraction; and fumigants. It also includes questions to determine if and where gaps may exist. A member added that the timing may be interesting with the implementation date of SOE. The group had a robust conversation about the first iteration of the document. The lead will make some modifications based on today's conversation and the group will discuss and vote on the next call.
- **Organic and Climate-Smart Agriculture: What and Why Organic Discussion Document (ADB/NPP/JD).** The lead conveyed feedback from the NOP about the goal and scope of the document, emphasizing that it should be grounded in the "organic is climate smart" work agenda theme. The group reviewed the

newest iteration of the document, which was focused and condensed to one page. Members asked several questions and provided feedback to the lead. The CACS will discuss the document once more and vote on the next call.

Additional Items. The Oversight improvements to deter fraud: Minimum Reporting Requirements Proposal is on hold until SOE is implemented. The NOP corrected the table below to reflect that.

- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted.)

July 11, 2023

Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance (CD) - discuss/vote

Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic? (JD) - discuss/vote

Modernizing Organic Infrastructure - Consistent Location Identification (ADB/NPP) - discuss/vote

Opportunities in Organic: Support for Transitioning Producers (AJ) - discuss/vote

August 1, 2023

Enforcement: Residue Testing for a Global Supply Chain Discussion Document - discuss outline (ADB/NPP/NL/KH)

Modernizing Organic Infrastructure: Consistent Location Identification (ADB/NPP) - discuss/vote

Organic and Climate-Smart Agriculture: What and Why Organic? Discussion Document (ADB/NPP/JD) - discuss

August 8, 2023

Enforcement: Residue Testing for a Global Supply Chain Discussion Document (ADB/NPP/NL/KH) - discuss/vote

Organic and Climate-Smart Agriculture: What and Why Organic? Discussion Document (ADB/NPP/JD) – discuss/vote

September 5, 2023

September 12, 2023

October 3, 2023

October 10, 2023

November 7, 2023

November 14, 2023

December 5, 2023

December 12, 2023

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled/status	Target meeting
Oversight improvements to deter fraud: Minimum Reporting Requirements	ADB/NPP	HOLD	08.10.17 NOP Memo to CACS	8.1.23	TBD

Oversight improvements to deter fraud: Consistent Location Identification	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	7.11.23 8.1.23	Fall 2023
Oversight improvements to deter fraud: Residue Testing for a Global Supply Chain	ADB/NPP/NL/KH	Discussion document	Approved by Exec Cmmte/NOP 4.17.23	6.6.23 8.1.23 8.8.23	Fall 2023
Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	CD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.27.23 7.11.23	Fall 2023
Organic and Climate-Smart Agriculture: What and Why Organic?	JD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.6.23 7.11.23 8.1.23 8.8.23	Fall 2023
Opportunities in Organic: Improving Support for Organic Transition	AJ	Discussion document	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	6.27.23 7.11.23	Fall 2023

Milestones

Fall 2023 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	Jun 8, 2023
NOP - Draft Fall 2022 NOSB meeting agenda	Aug 4, 2023
NOSB - Fall 2023 proposals due to NOP	Aug 10, 2023
NOP - Post proposals	Aug 30, 2023
Public comment closes	Sep 28, 2023
NOP - Send compiled public comments to NOSB	~Oct 2, 2023
Public comment webinars	Oct 17 & 19, 2023
Fall 2023 NOSB meeting - Providence, RI	Oct 24 - 26, 2023
Final recommendations due	Nov 25, 2023

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Compliance, Accreditation & Certification Subcommittee (CACS) Notes **Tuesday, July 11, 2023 2:00 pm ET**

Present: Amy Bruch (ADB), Chair; Kyla Smith (KS), Vice Chair; Jerry D'Amore (JD); Carolyn Dimitri (CD); Kim Huseman (KH); Allison Johnson (AJ)

Absent: Nate Powell-Palm (NPP); Logan Petrey (LP); Nate Lewis (NL)

Staff: Michelle Arsenault (MA); Jo Mirenda (JM)

Agenda

- Review June 27, 2023 notes
- Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance (CD) - discuss/vote
- Opportunities in Organic: Improving Support for Organic Transition (AJ) - discuss/vote
- Modernizing Organic Infrastructure - Consistent Location Identification (ADB/NPP) - discuss/vote
- Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic (JD) - discuss
- Additional Items
- Adjourn

Discussion

- **June 27, 2023** notes were approved as written.
- **Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance (CD).** The group had a brief discussion about the minor edits that resulted from the last call, and moved to a vote.

Motion to accept the discussion document on Climate Induced Farming Risk and Crop Insurance

Motion by CD

Seconded by ADB

Yes: 6 No: 0 Abstain:0 Recusal: 0 Absent: 3

- **Opportunities in Organic: Improving Support for Organic Transition (AJ).** The lead summarized the changes made since the last discussion, which included language about barriers to transition, and made some modifications to the question regarding diversity and inclusion. A member noted that outreach can be a barrier and offered an example that there was an NRCS program offering grants for transition that was only open for 3 weeks and many farmers did not know about it. The group talked about the information they are interested in gathering and the most useful way to disseminate it. The CACS would like to send this document to the people that it impacts, and also to certifiers that don't necessarily participate in the NOSB process. The CACS views this as a way to build a movement, and trust, and a way to assist NOP in such activities.

Motion to accept the discussion document on Improving Support for Organic Transition

Motion by: AJ

Seconded by: KH

Yes: 6 No: 0 Abstain: 0 Recuse: 0 Absent: 3

- **Modernizing Organic Infrastructure - Consistent Location Identification (ADB/NPP).** The group discussed the document, and the lead highlighted the information that was added since the last conversation. The co-lead is supposed to make some edits, and the CACS will vote on the next call. The document proposes the collection of field information/GPS coordinates for parcels, additional land use affidavits, and verification on an annual basis about farm location. A member supported the broader

definition to include other operations and not just farms. Members supported the idea of this proposal being implemented by NOP as an instruction to certifiers/best practices, and believes that verification across the supply chain could help prevent fraud, and will complement SOE.

- **Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic (JD).** The lead reviewed the discussion document in its current form, and reviewed the five. The document identifies 5 competitive advantages that organic provides. Members offered feedback on the current iteration and feels there is value in having conversations with stakeholders as this moves forward. The goal is to tell the organic story to strengthen the label and to protect it. The group discussed challenges, like the idea of co-existence among other label claims, and would like this document to shore up organic and make sure it stays relevant. The lead will continue to modify the document and the CACS will talk more on next call.
- **Additional Items.** None
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted.)

June 27, 2023 - **note date change**

Opportunities in Organic: Support for Transitioning Producers (AJ) - discuss/vote
Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance - discuss

July 11, 2023

Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance (CD) - discuss/vote
Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic? (JD) - discuss/vote
Modernizing Organic Infrastructure - Consistent Location Identification (ADB/NPP) - discuss/vote
Opportunities in Organic: Improving Support for Organic Transition (AJ) - discuss/vote

August 1, 2023

Modernizing Organic Infrastructure - Consistent Location Identification (ADB/NPP) - discuss/vote
Enforcement: Residue Testing for a Global Supply Chain - discuss outline (ADB/NPP/NL/KH)
Oversight improvements to deter fraud: Minimum Reporting Requirements - discuss/vote
Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic? (JD) - discuss/vote

August 8, 2023

Enforcement: Residue Testing for a Global Supply Chain. Discuss outline (ADB/NPP/NL/KH) - discuss/vote

September 5, 2023

September 12, 2023

October 3, 2023

October 10, 2023

November 7, 2023

November 14, 2023

December 5, 2023

December 12, 2023

Work Agenda

***Highlight** indicates discussion. ***Highlight** indicates action needed. ***Highlight** indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: - Minimum Reporting Requirements	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	8.1.23	Fall 2023
Oversight improvements to deter fraud: Modernizing Organic Infrastructure - Consistent Location Identification	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	7.11.23 8.1.23	Fall 2023
Enforcement: Residue Testing for a Global Supply Chain.	ADB/NPP/NL/KH	Discussion document	Approved by Exec Cmmte/NOP 4.17.23	6.6.23 8.1.23 8.8.23	Fall 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance	CD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.27.23 7.11.23	Fall 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic?	JD/LP	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.6.23 7.11.23 8.1.23	Fall 2023
Opportunities in Organic: Improving Support for Organic Transition	AJ	Discussion document	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain active agenda item for future work	6.27.23 7.11.23	Fall 2023

Milestones

Fall 2023 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	Jun 8, 2023
NOP - Draft Fall 2022 NOSB meeting agenda	Aug 4, 2023
NOSB - Fall 2023 proposals due to NOP	Aug 10, 2023
NOP - Post proposals	Aug 30, 2023
Public comment closes	Sep 28, 2023
NOP - Send compiled public comments to NOSB	~Oct 2, 2023
Public comment webinars	Oct 17 & 19, 2023
Fall 2023 NOSB meeting - Providence, RI	Oct 24 - 26, 2023
Final recommendations due	Nov 25, 2023

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Compliance, Accreditation & Certification Subcommittee (CACs) Notes

Tuesday, June 27, 2023 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Kyla Smith (KS), Vice Chair; Kim Huseman (KH); Allison Johnson (AJ); Nate Lewis (NL); Carolyn Dimitri (CD); Mindee Jeffery (MJ) - observer

Absent: Jerry D'Amore (JD); Nate Powell-Palm (NPP); Logan Petrey (LP)

Staff: Michelle Arsenault (MA); Jo Mirenda (JM)

Agenda

- Review June 6, 2023 notes
- Opportunities in Organic: Support for Transitioning Producers (AJ) - discuss
- Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance - discuss
- Review work schedule
- Additional Items
- Adjourn

Discussion

- **June 6, 2023** notes were accepted as written.
- **Opportunities in Organic: Support for Transitioning Producers (AJ).** The lead summarized the draft document, and the group discussed the purpose of the document and the questions to stakeholders. The CACS wants to use the responses to guide follow-up actions that may inform recommendations to NOP. This could help to focus resources, and open parallel streams of work on equity and inclusion. A member indicated that there is already a large body of research as to why some operations have chosen to not be certified or have exited from organic transition or certification. A member suggested adding a question about long-term plans for farmers once they become certified. The lead will modify the list of questions based on the conversation, and the group will discuss this again on the next call. The CACS plans to post this in the open docket (AMS-NOP-23-0026) early to allow commenters more time to answer the questions.
- **Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance Discussion document.** The lead described the draft document she is developing. The document contains a summary of public comment from the last meeting, in which commenters conveyed personal experiences with crop insurance, and will also include a summary of data she gleaned from interviewing organic farmers, non-profits, researchers, and others, which she categorized by areas that were problematic. While there is nothing new or novel, the information is compiled in one place. The CACS will review the draft discussion document on the next call, and vote to send it to the full Board if ready. Members discussed other aspects of Crop insurance and the current drought that is affecting producers.
- **Review work schedule.** The group reviewed the schedule for the next couple of CACS calls.
- **Additional Items.** NL is meeting with a testing laboratory next month to discuss fraud detection and residue testing, which he feels will be helpful for inclusion in the discussion document on Enforcement: Residue Testing for a Global Supply Chain. Members also briefly discussed Strengthening Organic Enforcement (SOE) implementation and whether marketers/solicitors are required to be certified.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted.)

June 6, 2023

Enforcement: Residue Testing for a Global Supply Chain. Discuss outline (ADB/NPP/NL/KH)
Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic? - discuss

June 27, 2023 - **note date change**

Opportunities in Organic: Support for Transitioning Producers (AJ) - discuss/vote
Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance - discuss

July 11, 2023

Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance (CD) - discuss/vote
Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic? (JD) - discuss/vote
Modernizing Organic Infrastructure - Consistent Location Identification (ADB/NPP) - discuss/vote
Opportunities in Organic: Support for Transitioning Producers (AJ) - discuss/vote

August 1, 2023

Enforcement: Residue Testing for a Global Supply Chain - discuss outline (ADB/NPP/NL/KH)
Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic? - discuss/vote

August 8, 2023

Enforcement: Residue Testing for a Global Supply Chain. Discuss outline (ADB/NPP/NL/KH) - discuss/vote

September 5, 2023

September 12, 2023

October 3, 2023

October 10, 2023

November 7, 2023

November 14, 2023

December 5, 2023

December 12, 2023

Work Agenda

*Highlight indicates discussion. ***Highlight** indicates action needed. ***Highlight** indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled/status	Target meeting
Oversight improvements to deter fraud: - Minimum Reporting Requirements	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	TBD	Fall 2023
Oversight improvements to deter fraud: Modernizing Organic Infrastructure - Consistent Location Identification	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	7.11.23	Fall 2023
Enforcement: Residue Testing for a Global Supply Chain.	ADB/NPP/NL/KH	Discussion document	Approved by Exec Cmmte/NOP 4.17.23	6.6.23 8.1.23 8.8.23	Fall 2023
Organic and Climate-Smart Agriculture (Climate/Equity)	CD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.27.23 7.11.23	Fall 2023

- Climate Induced Farming Risk and Crop Insurance					
Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic?	JD/LP	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.6.23 7.11.23	Fall 2023
Opportunities in Organic: Support for Transitioning Producers	AJ	Discussion document	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	6.27.23 7.11.23	Fall 2023

Milestones

Fall 2023 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	Jun 8, 2023
NOP - Draft Fall 2022 NOSB meeting agenda	Aug 4, 2023
NOSB - Fall 2023 proposals due to NOP	Aug 10, 2023
NOP - Post proposals	Aug 30, 2023
Public comment closes	Sep 28, 2023
NOP - Send compiled public comments to NOSB	~Oct 2, 2023
Public comment webinars	Oct 17 & 19, 2023
Fall 2023 NOSB meeting - Providence, RI	Oct 24 - 26, 2023
Final recommendations due	Nov 25, 2023

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, June 6, 2023 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Kyla Smith (KS), Vice Chair; Kim Huseman (KH); Jerry D'Amore (JD); Allison Johnson (AJ); Nate Powell-Palm (NPP); Nate Lewis (NL)

Absent: Logan Petrey (LP); Carolyn Dimitri (CD)

Staff: Michelle Arsenault (MA); Jared Clark (JC); Laura Gallagher (LG)

Agenda

- Review May 9, 2023 notes
- Enforcement: Residue Testing for a Global Supply Chain. Discuss outline (ADB/NPP/NL/KH)
- Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic?
- Additional Items
- Adjourn

Discussion

- **May 9, 2023** notes were accepted as written.
- **The group said farewell to Laura Gallagher.** Laura will be focusing on other NOP duties, and will not join the CACS calls, but offered to assist when needed.
- **Enforcement: Residue Testing for a Global Supply Chain. Discuss outline (NL/ADB/NPP/KH).** The lead presented a draft framework for testing and the group had a robust discussion. The proposed framework has three "buckets": oversight, testing, response to positive results. The CACS will discuss And vote on the discussion document on the August 8 call.
- **Organic and Climate-Smart Agriculture (Climate/Equity) (JD) - What and Why Organic?** The CACS discussed the desire to coordinate segments of the community, so we are all working together to market the benefits of organic. The lead discussed the history of how this project evolved and the important aspects. The lead recently traveled to Europe and highlighted the fact that organic operations and stakeholders all have common concerns. Members discussed the proposed check-off program from several years ago. For the most part, the community or segments of the community were not supportive, as there was general skepticism about the benefits. A member added that some view checkoffs as corrupt and non-transparent. She added that the conversation and environment has changed and perhaps the landscape is different now, and perhaps they can discuss this in the context of what's important, and how the organic community can work collectively to promote organic.
- **Additional Items.** None.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted.)

May 9, 2023

Discuss status/scope for work agenda items

June 6, 2023

Enforcement: Residue Testing for a Global Supply Chain. Discuss outline (ADB/NPP/NL/KH)

Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic? - discuss

June 27, 2023 - **note date change**

Human Capital Management: Support for Transitioning Producers (AJ) - discuss/vote

Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance - discuss

Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic? - discuss
 July 11, 2023
 Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance - discuss/vote
 Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic? - discuss
 Modernizing Organic Infrastructure - Consistent Location Identification - discuss/vote
 August 1, 2023
 Enforcement: Residue Testing for a Global Supply Chain. Discuss outline (ADB/NPP/NL/KH)
 Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic? - discuss/vote
 August 8, 2023
 Enforcement: Residue Testing for a Global Supply Chain. Discuss outline (ADB/NPP/NL/KH) - discuss/vote
 September 5, 2023
 September 12, 2023
 October 3, 2023
 October 10, 2023
 November 7, 2023
 November 14, 2023
 December 5, 2023
 December 12, 2023

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled/status	Target meeting
Oversight improvements to deter fraud: - Minimum Reporting Requirements	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	TBD	Fall 2023
Oversight improvements to deter fraud: Modernizing Organic Infrastructure - Consistent Location Identification	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	7.11.23	Fall 2023
Enforcement: Residue Testing for a Global Supply Chain.	ADB/NPP/NL/KH	Discussion document	Approved by Exec Cmmte/NOP 4.17.23	6.6.23 8.8.23	Fall 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance	CD	Proposal?	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.27.23 7.11.23	Fall 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic?	JD/LP	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.6.23 6.27.23 7.11.23	Fall 2023

Opportunities in Organic: Support for Transitioning Producers	AJ	Discussion document	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	6.27.23	Fall 2023
---	----	---------------------	--	---------	-----------

Milestones

Fall 2023 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	~May 20, 2023
NOP - Draft Fall 2022 NOSB meeting agenda	Aug 4, 2023
NOSB - Fall 2023 proposals due to NOP	Aug 10, 2023
NOP - Post proposals	Aug 30, 2023
Public comment closes	Sep 28, 2023
NOP - Send compiled public comments to NOSB	~Oct 2, 2023
Public comment webinars	Oct 17 & 19, 2023
Fall 2023 NOSB meeting - Providence, RI	Oct 24 - 26, 2023
Final recommendations due	Nov 25, 2023

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, May 9, 2023 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Kim Huseman (KH); Jerry D'Amore (JD); Carolyn Dimitri (CD); Allison Johnson (AJ); Nate Powell-Palm (NPP); Mindee Jeffery (MJ) - observer; Nate Lewis (NL) - observer

Absent: Kyla Smith (KS), Vice Chair; Logan Petrey (LP)

Staff: Michelle Arsenault (MA); Jo Mirenda (JM)

Agenda

- Review April 11, 2023 notes
- Debrief from NOSB meeting
- Scope/status update
- Additional Items
- Adjourn

Discussion

- **April 11, 2023** notes were accepted as written with one minor grammar correction.
- **Debrief from NOSB meeting.**
 - The Chair praised the Subcommittee for the great discussion at the Spring meeting. She also praised the community for their engagement and feedback. A member echoed the sentiment that the meeting went well and is looking forward to the Fall meeting.
 - The CACS is anticipating future work agenda item requests that will have a structured format. Another member reflected on the meeting and which stakeholders showed up. Took to heart comments from stakeholders needing enough time to react to proposals. Would like to explore ways to get draft documents or questions to the public for preliminary feedback sooner.
 - Members discussed numerous ways to engage the community and give them more time to contribute and be heard.
 - The CACS will talk more at the Executive Committee meeting about ways to engage with the community between NOSB meetings.
- **Scope/status update.** The CACS scheduled discussions in preparation for the Fall 2023 meeting. See table below.
 - Consistent location ID. Will proceed as proposal for the Fall meeting.
 - Climate Induced Farming Risk and Crop Insurance. The lead will compile comments from the Spring meeting, and include that in a new discussion document for Fall, and plans to develop a proposal for Spring 2024. The group discussed the connection to the Farm Bill, and determined that timing is not critical. Another member suggested adding Crop Insurance to the work agenda and revisiting it once a year.
 - Residue testing. Several members discussed ideas about definitions and scope. The Strengthening Organic Enforcement Rule (SOE) provides supply chain transparency, and the NOP could move ahead with testing recommendations from the NOSB. A member suggested checking with other agencies (FDA and EPA) for residue testing protocols. Another member added that California has years of experience and a robust residue testing protocol.
- **Additional Items.** None.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted.)

April 11, 2023

Guest speaker - NOP Trade Systems Director Jon Veley. Discuss Soybean imports and CBP Opportunities in Organic: Support for Transitioning Producers (AJ). Discuss draft Review Public comment

May 2, 2023 - cancelled

May 9, 2023

Discuss status/scope for work agenda items

June 6, 2023

Enforcement: Residue Testing for a Global Supply Chain. Discuss outline (ADB/NPP/NL/KH) Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic?

June 13, 2023

Human Capital Management: Support for Transitioning Producers (AJ). Discuss/Vote

July 11, 2023

What/Why Organic (JD) - Status update

August 1, 2023

August 8, 2023

September 5, 2023

September 12, 2023

October 3, 2023

October 10, 2023

November 7, 2023

November 14, 2023

December 5, 2023

December 12, 2023

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled/status	Target meeting
Oversight improvements to deter fraud: - Minimum Reporting Requirements	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	TBD	Fall 2023
Oversight improvements to deter fraud: Modernizing Organic Infrastructure - Consistent Location Identification	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	7.11.23	Fall 2023
Enforcement: Residue Testing for a Global Supply Chain.	ADB/NPP/NL/KH	Discussion document	Approved by Exec Cmmte/NOP 4.17.23	6.6.23	Fall 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - Organic IS climate smart	NPP	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22. Voted on and passed at Spring 2023 meeting.		NA

Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance	CD	Proposal?	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.6.23 7.11.23	Fall 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic?	JD/LP	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.13.23 7.11.23	Fall 2023
Human Capital Management: Opportunities in Organic: Support for Transitioning Producers	AJ	Discussion document	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	6.13.23	Fall 2023

Milestones

Fall 2023 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	~May 20, 2023
NOP - Draft Fall 2022 NOSB meeting agenda	Aug 4, 2023
NOSB - Fall 2023 proposals due to NOP	Aug 10, 2023
NOP - Post proposals	Aug 30, 2023
Public comment closes	Sep 28, 2023
NOP - Send compiled public comments to NOSB	~Oct 2, 2023
Public comment webinars	Oct 17 & 19, 2023
Fall 2023 NOSB meeting - Providence, RI	Oct 24 - 26, 2023
Final recommendations due	Nov 25, 2023

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Compliance, Accreditation & Certification Subcommittee (CACs) Notes

Tuesday, April 11, 2023 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Kyla Smith (KS), Vice Chair; Kim Huseman (KH); Jerry D'Amore (JD); Carolyn Dimitri (CD); Logan Petrey (LP); Allison Johnson (AJ); Nate Powell-Palm (NPP); Mindee Jeffery (MJ) - observer

Absent: None

Staff: Jon Veley (Guest Speaker); Michelle Arsenault (MA); Laura Gallagher (LG)

Agenda

- Review April 4, 2023 notes
- Guest speaker - NOP Trade Systems Director Jon Veley. Discuss Soybean imports and CBP
- Human Capital Management: Support for Transitioning Producers (AJ). Discuss draft and name
- Review Public comment
- Additional Items
- Adjourn

Discussion

- **April 4, 2023** notes were accepted as written.
- **Guest speaker - NOP Trade Systems Director Jon Veley.** Soybean imports and CBP. Jon introduced himself, and the AMS Trade Division. The Trade Division was started in 2016, and Jon was recruited from CBP, who partnered with AMS to work on cargo issues to improve enforcement. AMS has launched a new program on bulk commodities (grain). The Trade Division does unannounced inspections at ports, where they sample and send to the [USDA lab in Gastonia, NC](#) for testing. AMS is conducting a number of actions, but often the information isn't released to the public until any court proceedings are completed. Members engaged in Q and A with Jon. A member asked why the current structure or rules might not be stringent enough and why it would need to change. Additionally, if the CACS were to work on the topic of strengthening enforcement with respect to grain, what would the goal of the document be? The group discussed the testing requirement of 5% and ideally would like to see it increased. A member suggested they may want to invite Peyton Ferrier to a future CACS call. Peyton is an economist at USDA, who has expertise in this area of economics, and he could inform them about analyses that factor into decision making, such as testing requirements.
 - A member asked where one could access public information about sampling results. NOP will follow up.
 - Since SOE implementation isn't complete yet, the CACS Chair would like to get ahead of any potential issues, and feels that working on a proposal for testing requirements might be an area that could use some work. She added that she has read SOE and feels that this could build a complimentary pipeline and would rather not wait until there is a problem.
- **Opportunities in Organic: Support for Transitioning Producers (AJ).** The CACS is interested in working on organic transition, and feels that the NOSB could serve as conduit between industry and NOP. The proposed work may contain a 3-pronged approach: 1. Partnership with certifiers 2. Financial support for transitioning farmers; and 3. Market development grants. The CACS would like to move ahead with a discussion document for the Fall meeting that includes discussion of barriers and goals for building a broad and diverse organic community. A member added that the climate document seems to fit under diversity and inclusion and would like to emphasize that they are already working on that piece.
- **Review Public comment.** The CACS briefly discussed public comments.
- **Additional Items.** The group renamed the Human Capital Management: Support for Transitioning Producers to Opportunities in Organic: Support for Transitioning Producers
 - The CACS asked for a progress report on their previous recommendation for NOSB technical support, and will ask about that during the next Executive call. TOPP has been priority, so there may not have been much movement.

- The CACS is interested in inviting someone from the Equity Commission to speak on a future CACS call. <https://www.usda.gov/equity-commission>
- **The meeting was adjourned.**

Previous CACS Notes

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted.)

April 4, 2023

What/why organic (JD) - discuss draft

April 11, 2023

Guest speaker - NOP Trade Systems Director Jon Veley. Discuss Soybean imports and CBP Opportunities in Organic: Support for Transitioning Producers (AJ). Discuss draft Review Public comment

May 2, 2023 - cancelled

May 9, 2023

Discuss outline for work agenda request on testing

June 6, 2023

June 13, 2023

Opportunities in Organic: Support for Transitioning Producers (AJ). Discuss/Vote

July 11, 2023

What/Why Organic (JD) - Status update

August 1, 2023

August 8, 2023

September 5, 2023

September 12, 2023

October 3, 2023

October 10, 2023

November 7, 2023

November 14, 2023

December 5, 2023

December 12, 2023

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: - Minimum Reporting Requirements	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	12.6.22 12.13.22	Fall 2023
Oversight improvements to deter fraud: - Parcel Identification Modernizing Organic Infrastructure Consistent Location Identification	ADB/NPP	Discussion document	08.10.17 NOP Memo to CACS	12.6.22 12.13.22 1.3.23 2.7.23 2.14.23	Spr 2023

Organic and Climate-Smart Agriculture (Climate/Equity) - Organic IS climate smart	NPP	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22 2.14.23	Spr 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance	CD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22 1.10.23 2.7.23 2.14.23	Spr 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic?	JD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22 1.3.23 2.14.23 3.7.23 7.11.23	Fall 2023
Human Capital Management: Opportunities in Organic Support for Transitioning Producers	AJ	Discussion document	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	4.11.23 6.13.23	Fall 2023

Milestones

Spring 2023 Milestones	Target dates (tentative)	Weeks PTM (prior to)
NOP - Publish FRN, Open public comment	Feb 14, 2023	10 weeks
NOSB - Spring 2023 proposals due to NOP	Feb 14, 2023	10 weeks
New NOSB member training	TBD	
NOP - Draft Spring 2023 NOSB meeting tentative agenda	Feb 3, 2023	
NOP - Post proposals	Mar 6, 2023	7.5
Public comment closes	Apr 5, 2023	3.5
NOP - Send compiled public comments to NOSB	Apr 7, 2023	3
Public comment webinars	Apr 18 & 20, 2023	1 week
Spring 2023 NOSB meeting - Atlanta, GA	Apr 25 - 27, 2023	
Final recommendations due	May 25, 2023	

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, April 4, 2023 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Kyla Smith (KS), Vice Chair; Kim Huseman (KH); Jerry D'Amore (JD); Carolyn Dimitri (CD); Mindee Jeffery (MJ) - observer

Absent: Logan Petrey (LP); Allison Johnson (AJ); Nate Powell-Palm (NPP)

Staff: Michelle Arsenault (MA); Laura Gallagher (LG)

Agenda

- Review March 14, 2023 notes
- Review schedule - plan and schedule all topics
- Review spring mtg (travel, agenda, comments).
- Review potential work agenda item on enforcement: testing/analysis and prep for next week's guest, Jon Veley (NOP - former CBP experience)
- Status update on enforcement: minimum reporting requirements/SOE
- Status update - What/Why Organic
- Additional Items
- Adjourn

Discussion

- **March 14, 2023** notes were accepted with a minor change to the conversation about soybean import issues.
- **Review schedule - plan and schedule all topics.**
Support for Transitioning Producers (AJ). The lead will be circulating some ideas for this project and the CACS will discuss on the April 11 call.
- **Review spring mtg (travel, agenda, comments).** The CACS briefly reviewed the Spring meeting schedule, and discussed the three meeting agenda items for the Spring 2023 meeting and discussion time for each.
- **Review potential work agenda item on enforcement: testing/analysis and prep for next week's guest speaker, Jon Veley.** The group discussed what this project could or would look like, the problem they are trying to solve. The NOP suggested thinking about how this would be implemented. i.e., Would it be a new rule, guidance to certifiers, etc., or is it something the NOP already has authority over? Members discussed how to move forward, and would like to present something to the Executive Committee on the April 17 call.
- **Status update on enforcement: minimum reporting requirements/SOE (NPP).** Deferred to next call.
- **Status update - What/Why Organic (JD).** Deferred to next call.
- **Additional Items.** None.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted.)

March 14, 2023

Oversight improvements to deter fraud: Minimum Reporting Requirements proposal (ADB/NPP)

April 4, 2023

What/why organic (JD) - discuss draft

April 11, 2023

Guest speaker - NOP Trade Systems Director Jon Veley. Discuss Soybean imports and CBP Human Capital Management: Support for Transitioning Producers (AJ). Discuss draft Review Public comment

May 2, 2023 - cancelled

May 9, 2023

Discuss outline for work agenda request on testing

June 6, 2023

June 13, 2023

Human Capital Management: Support for Transitioning Producers (AJ). Discuss/Vote

July 11, 2023

What/Why Organic (JD) - Status update

August 1, 2023

August 8, 2023

September 5, 2023

September 12, 2023

October 3, 2023

October 10, 2023

November 7, 2023

November 14, 2023

December 5, 2023

December 12, 2023

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: - Minimum Reporting Requirements	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	12.6.22 12.13.22	Fall 2023
Oversight improvements to deter fraud: - Parcel Identification Modernizing Organic Infrastructure Consistent Location Identification	ADB/NPP	Discussion document	08.10.17 NOP Memo to CACS	12.6.22 12.13.22 1.3.23 2.7.23 2.14.23	Spr 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - Organic IS climate smart	NPP	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22 2.14.23	Spr 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance	CD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22 1.10.23 2.7.23 2.14.23	Spr 2023

Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic?	JD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22 1.3.23 2.14.23 3.7.23 7.11.23	Fall 2023
Human Capital Management: Inspector mentorship/ apprenticeship/consistency - Support for Transitioning Producers	AJ	Discussion document	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	4.11.23	Fall 2023

Milestones

Spring 2023 Milestones	Target dates (tentative)	Weeks PTM (prior to)
NOP - Publish FRN, Open public comment	Feb 14, 2023	10 weeks
NOSB - Spring 2023 proposals due to NOP	Feb 14, 2023	10 weeks
New NOSB member training	TBD	
NOP - Draft Spring 2023 NOSB meeting tentative agenda	Feb 3, 2023	
NOP - Post proposals	Mar 6, 2023	7.5
Public comment closes	Apr 5, 2023	3.5
NOP - Send compiled public comments to NOSB	Apr 7, 2023	3
Public comment webinars	Apr 18 & 20, 2023	1 week
Spring 2023 NOSB meeting - Atlanta, GA	Apr 25 - 27, 2023	
Final recommendations due	May 25, 2023	

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, March 14, 2023 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Kyla Smith (KS), Vice Chair; Kim Huseman (KH); Logan Petrey (LP); Allison Johnson (AJ)

Absent: Nate Powell-Palm (NPP); Jerry D'Amore (JD); Carolyn Dimitri (CD)

Staff: Michelle Arsenault (MA); Laura Gallagher (LG)

Agenda

- Review March 7, 2023 notes
- Schedule Work Agenda Items for Spring/Summer
- Oversight improvements to Deter Fraud: Strengthening Organic Enforcement (SOE) work agenda item (NPP/ADB)
- Additional Items
- Adjourn

Discussion

- **March 7, 2023** notes were accepted with a minor change.
- **Schedule Work Agenda Items for Spring/Summer.** The group reviewed the schedule for the next few months, and discussed the Human Capital Management: Support for Transitioning Producers (AJ). The lead will have an outline or draft for the April 11 call and will connect with NOP to refine the focus and gather resources.
- **Oversight improvements to Deter Fraud: SOE work agenda items (NPP/ADB).** The group discussed potential work agenda items stemming from the final SOE rule. The Chair would like to get out ahead of any potential failure points and prevent them, rather than reacting to them. A member noted that given the implementation date of the rule, there may not be time to do that. Members talked about areas where the NOSB could contribute to be most helpful or meaningful. A member asked about the possibility of holding a panel at the Fall meeting regarding an update on SOE implementation. The NOSB leadership team will talk more about that at the Exec call.
- **Additional Items.**
 - Soybean import issues. The Chair proposed that the CACS work on a project to address issues with soybean imports, such as testing at point-of-entry. Members discussed various challenges including the added burden for certifiers who would have to be available to institute the testing. Currently, certifiers have a protocol to test 5% and they get to choose when or where testing happens. Additionally, if an outside entity pulls the sample to test, then it may not be enforceable because the certifier was not in control of the sample through the entire chain of custody. Members suggested other ideas as well. The CACS will extend an invitation to Jon Veley of the NOP to join a future CACS call to talk about Customs and Border Protections' (CBP) roles and abilities).
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted.)

March 7, 2023

March 14, 2023

April 4, 2023

What/why organic (JD) - discuss draft

April 11, 2023

Guest Jon Veley of NOP. Discuss Soybean imports And CBP

Review Public comment

Human Capital Management: Support for Transitioning Producers (AJ). Discuss draft

May 2, 2023 - cancelled

May 9, 2023

June 6, 2023

June 13, 2023

Human Capital Management: Support for Transitioning Producers (AJ). Discuss/Vote

July 11, 2023

August 1, 2023

August 8, 2023

September 5, 2023

September 12, 2023

October 3, 2023

October 10, 2023

November 7, 2023

November 14, 2023

December 5, 2023

December 12, 2023

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: - Minimum Reporting Requirements	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	12.6.22 12.13.22	Fall 2023
Oversight improvements to deter fraud: - Parcel Identification Modernizing Organic Infrastructure Consistent Location Identification	ADB/NPP	Discussion document	08.10.17 NOP Memo to CACS	12.6.22 12.13.22 1.3.23 2.7.23 2.14.23	Spr 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - Organic IS climate smart	NPP	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22 2.14.23	Spr 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance	CD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22 1.10.23 2.7.23 2.14.23	Spr 2023

Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic?	JD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22 1.3.23 2.14.23 3.7.23 4.4.23	Fall 2023
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal - Support for Transitioning Producers	AJ	Discussion document	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	4.11.23	Fall 2023

Milestones

Spring 2023 Milestones	Target dates (tentative)	Weeks PTM (prior to)
NOP - Publish FRN, Open public comment	Feb 14, 2023	10 weeks
NOSB - Spring 2023 proposals due to NOP	Feb 14, 2023	10 weeks
New NOSB member training	TBD	
NOP - Draft Spring 2023 NOSB meeting tentative agenda	Feb 3, 2023	
NOP - Post proposals	Mar 6, 2023	7.5
Public comment closes	Apr 5, 2023	3.5
NOP - Send compiled public comments to NOSB	Apr 7, 2023	3
Public comment webinars	Apr 18 & 20, 2023	1 week
Spring 2023 NOSB meeting - Atlanta, GA	Apr 25 - 27, 2023	
Final recommendations due	May 25, 2023	

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Compliance, Accreditation & Certification Subcommittee (CACs) Notes

Tuesday, March 7, 2023 4:00 pm ET

Present: Amy Bruch (ADB), Chair; Kim Huseman (KH); Nate Powell-Palm (NPP); Carolyn Dimitri (CD); Jerry D'Amore (JD); Mindee Jeffery - observer

Absent: Logan Petrey (LP); Kyla Smith (KS), Vice Chair; Allison Johnson (AJ)

Staff: Michelle Arsenault (MA); Laura Gallagher (LG)

Agenda

- Review February 14, 2023 notes
- Review the Calendar for Spring /Summer (All)
- Discuss what/why organic (JD)
- Oversight improvements to Deter Fraud: SOE work agenda item (NPP/ADB)
- Additional Items
- Adjourn

Discussion

- **February 14, 2023** notes were accepted as written.
- **Review the Calendar for Spring /Summer (All).** The Chair summarized the overall picture of workflow for the next few months.
- **What/why organic (JD).** The lead summarized the draft document and emphasized the ultimate goal, which is to identify, communicate, and celebrate the accomplishments of the organic industry. He added that there is a good story to tell, but no one is telling it. Members contributed thoughts and ideas about the content, such as making sure the language is precise and accurate, and that it articulates the positive aspects of "why organic". A member noted that organic can be challenging to market because there's a broad range of stakeholders that all have different reasons for participating, and the benefits for each are diverse. The group also discussed the potential for a check-off program, which would require legislation and farm bill negotiations, and also how the Transition to Organic Partnership Program (TOPP) program could help share messaging. A member added that the structure of the document is great but would like to provide a clear actionable goal to promote voluntary functional governance. The CACS is excited to continue the positive conversation at the Spring meeting and hear feedback from stakeholders.
- **Oversight improvements to Deter Fraud: SOE work agenda item (NPP/ADB).** Deferred to next call.
- **Additional Items.** None
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted.)

February 14, 2023

Oversight improvements to deter fraud: Modernizing Organic Infrastructure - Consistent Location Identification discussion document - discuss/vote

Organic and Climate-Smart Agriculture (Climate/Equity) - Organic IS climate smart proposal - discuss/vote

Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance discussion document - discuss/vote

March 7, 2023

March 14, 2023

Oversight improvements to deter fraud: Minimum Reporting Requirements proposal (ADB/NPP)

April 4, 2023
 April 11, 2023
 May 2, 2023 - cancelled
 May 9, 2023
 June 6, 2023
 June 13, 2023
 July 11, 2023
 August 1, 2023
 August 8, 2023
 September 5, 2023
 September 12, 2023
 October 3, 2023
 October 10, 2023
 November 7, 2023
 November 14, 2023
 December 5, 2023
 December 12, 2023

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: - Minimum Reporting Requirements	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	12.6.22 12.13.22 3.14.23	Fall 2023
Oversight improvements to deter fraud: - Parcel Identification Modernizing Organic Infrastructure Consistent Location Identification	ADB/NPP	Discussion document	08.10.17 NOP Memo to CACS	12.6.22 12.13.22 1.3.23 2.7.23 2.14.23	Spr 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - Organic IS climate smart	NPP	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22 2.14.23	Spr 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance	CD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22 1.10.23 2.7.23 2.14.23	Spr 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic?	JD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22 1.3.23	Fall 2023

				2.7.23 2.14.23	
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal - Support for Transitioning Producers	AJ	Discussion document	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	Fall 2023

Milestones

Spring 2023 Milestones	Target dates (tentative)	Weeks PTM (prior to)
NOP - Publish FRN, Open public comment	Feb 14, 2023	10 weeks
NOSB - Spring 2023 proposals due to NOP	Feb 14, 2023	10 weeks
New NOSB member training	TBD	
NOP - Draft Spring 2023 NOSB meeting tentative agenda	Feb 3, 2023	
NOP - Post proposals	Mar 6, 2023	7.5
Public comment closes	Apr 5, 2023	3.5
NOP - Send compiled public comments to NOSB	Apr 7, 2023	3
Public comment webinars	Apr 18 & 20, 2023	1 week
Spring 2023 NOSB meeting - Atlanta, GA	Apr 25 - 27, 2023	
Final recommendations due	May 25, 2023	

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, February 14, 2023 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Kyla Smith (KS), Vice Chair; Kim Huseman (KH); Allison Johnson (AJ); Nate Powell-Palm (NPP); Carolyn Dimitri (CD); Jerry D'Amore (JD); Mindee Jeffery - observer

Absent: Logan Petrey (LP)

Staff: Michelle Arsenault (MA); Laura Gallagher (LG)

Agenda

- Review February 7, 2023 notes
- Oversight improvements to deter fraud: Parcel Identification - discuss/vote
- Organic and Climate-Smart Agriculture (Climate/Equity) - Organic IS climate smart - discuss/vote
- Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance - discuss/vote
- Additional Items
- Adjourn

Discussion

- **February 7, 2023** were accepted as written.
- **Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance discussion document.** The lead emphasized that the purpose of the document is to solicit feedback. She incorporated feedback from other members and the group moved to a vote. The CACS chair encouraged members to advertise the document, so they get a wide swath of stakeholders' comments.

Motion to accept the discussion document on Climate Induced Farming Risk and Crop Insurance

Motion by: NPP

Seconded by: KH

Yes: 6 No: 0 Abstain: 0 Recuse: 0 Absent: 2

- **Organic and Climate-Smart Agriculture (Climate/Equity) - Organic IS climate smart proposal - discuss/vote.** The lead indicated that the community was supportive of this project and during the last NOSB comment period, didn't have suggestions for additions. This version is nearly identical to the previous version, and the CACS will present this proposal to the full board at the Spring meeting. The group discussed information to include in the cover letter.

Motion to accept the proposal on Organic and Climate-Smart Agriculture (Climate/Equity) - Organic IS climate smart

Motion by: NPP

Seconded by: ADB

Yes: 6 No: 0 Abstain: 0 Recuse: 0 Absent: 2

- **Oversight improvements to deter fraud: Modernizing Organic Infrastructure - Consistent Location Identification discussion document.** Formerly called Parcel Identification. The lead summarized the

document, and the group discussed such things as universality, international standardization, and the fact that the GPS system is governed by the new Space Force agency. Members also discussed where the information could be housed and will continue that conversation. The group modified some of the questions included in the document and will post this discussion document for public comment for the Spring meeting.

Motion to accept the discussion document on Modernizing Organic Infrastructure - Consistent Location Identification

Motion by: ADB

Seconded by: CD

Yes: 7 No: 0 Abstain: 0 Recuse: 0 Absent: 1

- **Additional Items.** Members discussed general Board procedures, the upcoming Farm Bill negotiations, and OFPA.
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted.)

February 7, 2023

Organic and Climate-Smart Agriculture discussion doc - What and Why Organic? (JD) - discuss/vote

Oversight to Deter fraud: Parcel Identification discussion doc (ADB/NPP) - discuss/vote

Organic and Climate-Smart Agriculture - Climate Induced Farming Risk and Crop Insurance discussion doc - discuss/vote

Organic and Climate-Smart Agriculture - Organic IS climate smart proposal - discuss/vote

February 14, 2023

Oversight improvements to deter fraud: Modernizing Organic Infrastructure - Consistent Location Identification discussion document - discuss/vote

Organic and Climate-Smart Agriculture (Climate/Equity) - Organic IS climate smart proposal - discuss/vote

Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance discussion document - discuss/vote

March 7, 2023

Oversight improvements to deter fraud: Minimum Reporting Requirements proposal (ADB/NPP)

March 14, 2023

April 4, 2023

April 11, 2023

May 2, 2023

May 9, 2023

June 6, 2023

June 13, 2023

July 11, 2023

August 1, 2023

August 8, 2023

September 5, 2023

September 12, 2023

October 3, 2023

October 10, 2023

November 7, 2023
 November 14, 2023
 December 5, 2023
 December 12, 2023

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: - Minimum Reporting Requirements	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	12.6.22 12.13.22 3.7.23	Fall 2023
Oversight improvements to deter fraud: - Parcel Identification Modernizing Organic Infrastructure Consistent Location Identification	ADB/NPP	Discussion document	08.10.17 NOP Memo to CACS	12.6.22 12.13.22 1.3.23 2.7.23 2.14.23	Spr 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - Organic IS climate smart	NPP	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22 2.14.23	Spr 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance	CD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22 1.10.23 2.7.23 2.14.23	Spr 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic?	JD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22 1.3.23 2.7.23 2.14.23	Fall 2023
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal - Support for Transitioning Producers.	AJ	Discussion document	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	Fall 2023

Milestones

Spring 2023 Milestones	Target dates (tentative)	Weeks PTM (prior to)
NOP - Publish FRN, Open public comment	Feb 14, 2023	10 weeks
NOSB - Spring 2023 proposals due to NOP	Feb 14, 2023	10 weeks

New NOSB member training	TBD	
NOP - Draft Spring 2023 NOSB meeting tentative agenda	Feb 3, 2023	
NOP - Post proposals	Mar 6, 2023	7.5
Public comment closes	Apr 5, 2023	3.5
NOP - Send compiled public comments to NOSB	Apr 7, 2023	3
Public comment webinars	Apr 18 & 20, 2023	1 week
Spring 2023 NOSB meeting - Atlanta, GA	Apr 25 - 27, 2023	
Final recommendations due	May 25, 2023	

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, February 7, 2023 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Kyla Smith (KS), Vice Chair; Kim Huseman (KH); Allison Johnson (AJ); Nate Powell-Palm (NPP); Carolyn Dimitri (CD); Jerry D'Amore (JD); Mindee Jeffery - observer

Absent: Logan Petrey (LP)

Staff: Michelle Arsenault (MA); Laura Gallagher (LG)

Agenda

- Review January 10, 2023 notes
- Organic and Climate-Smart Agriculture discussion doc - What and Why Organic? (JD) - discuss/vote
- Organic and Climate-Smart Agriculture - Climate Induced Farming Risk and Crop Insurance discussion doc (CD/NPP) - discuss/vote
- Oversight to Deter fraud: Parcel Identification discussion doc (ADB/NPP) - discuss/vote
- Organic and Climate-Smart Agriculture - Organic IS climate smart proposal (NPP) - discuss/vote
- Additional Items
- Adjourn

Discussion

- **January 10, 2023** were accepted as written.
- **Organic and Climate-Smart Agriculture discussion doc - What and Why Organic? (JD).** Deferred to Fall meeting in order to refine the document. The CACS will discuss this at a later date.
- **Organic and Climate-Smart Agriculture - Climate Induced Farming Risk and Crop Insurance discussion doc (CD/NPP).** The group discussed the document, the intended audience, and the ultimate goal. In its current iteration, the document will be used to solicit information and establish first steps. The group discussed the relationship to the Farm Bill and the Risk Management Agency (RMA). The lead will make some edits based on feedback and the CACS will vote on the document on the February 14 call.
- **Oversight to Deter fraud: Parcel Identification discussion doc (ADB/NPP).** The lead introduced the document and noted that she has incorporated some of the information from the newly published Strengthening Organic Enforcement (SOE) rule into the document. The group discussed the content, the goals for this project, and stakeholder feedback. The lead will make edits based on the conversation and the CACS will recirculate the document for discussion and vote on the February 14 call.
- **Organic and Climate-Smart Agriculture - Organic IS climate smart proposal (NPP).** Deferred to next call.
- **Additional Items.** None
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted.)

January 10, 2023

Oversight to Deter fraud: Minimum Reporting Requirements (ADB/NPP)

Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic? (JD)

Organic and Climate-Smart Agriculture (Climate/Equity) - Climate induced farming risk and crop Insurance (CD/NPP)

February 7, 2023

Organic and Climate-Smart Agriculture discussion doc - What and Why Organic? (JD) - discuss/vote

Oversight to Deter fraud: Parcel Identification discussion doc (ADB/NPP) - discuss/vote

Organic and Climate-Smart Agriculture - Climate Induced Farming Risk and Crop Insurance discussion doc - discuss/vote

Organic and Climate-Smart Agriculture - Organic IS climate smart proposal - discuss/vote

February 14, 2023

Oversight improvements to deter fraud: Parcel Identification - discuss/vote

Organic and Climate-Smart Agriculture (Climate/Equity) - Organic IS climate smart - discuss/vote

Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance - discuss/vote

March 7, 2023

Oversight improvements to deter fraud: Minimum Reporting Requirements proposal

March 14, 2023

April 4, 2023

April 11, 2023

May 2, 2023

May 9, 2023

June 6, 2023

June 13, 2023

July 11, 2023

August 1, 2023

August 8, 2023

September 5, 2023

September 12, 2023

October 3, 2023

October 10, 2023

November 7, 2023

November 14, 2023

December 5, 2023

December 12, 2023

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: - Minimum Reporting Requirements	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	12.6.22 12.13.22 3.7.23	Fall 2023
Oversight improvements to deter fraud: - Parcel Identification	ADB/NPP	Discussion document	08.10.17 NOP Memo to CACS	12.6.22 12.13.22 1.3.23 2.7.23 2.14.23	Spr 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - Organic IS climate smart	NPP	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22 2.14.23	Spr 2023

Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance	CD/NPP	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22 1.10.23 2.7.23 2.14.23	Spr 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic?	JD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22 1.3.23 2.7.23	Fall 2023
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal - Support for Transitioning Producers.	TBD	Discussion document	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	Fall 2023

Milestones

Spring 2023 Milestones	Target dates (tentative)	Weeks PTM (prior to)
NOP - Publish FRN, Open public comment	~Nov 10, 2022	
NOSB - Spring 2023 proposals due to NOP	Feb 14, 2023	10 weeks
New NOSB member training	TBD	
NOP - Draft Spring 2023 NOSB meeting tentative agenda	Feb 3, 2023	
NOP - Post proposals	Mar 6, 2023	7.5
Public comment closes	Apr 5, 2023	3.5
NOP - Send compiled public comments to NOSB	Apr 7, 2023	3
Public comment webinars	Apr 18 & 20, 2023	1 week
Spring 2023 NOSB meeting - Atlanta, GA	Apr 25 - 27, 2023	
Final recommendations due	May 25, 2023	

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, January 10, 2023 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Kyla Smith (KS), Vice Chair; Kim Huseman (KH); Allison Johnson (AJ); Nate Powell-Palm (NPP); Logan Petrey (LP); Carolyn Dimitri (CD); Mindee Jeffery - observer

Absent: Jerry D'Amore (JD)

Staff: Michelle Arsenault (MA); Laura Gallagher (LG)

Agenda

- Review January 3, 2023 notes
- Oversight to Deter fraud: Minimum Reporting Requirements (ADB/NPP)
- Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic? (JD)
- Organic and Climate-Smart Agriculture (Climate/Equity) - Climate induced farming risk and crop Insurance (CD/NPP)
- Meeting time
- Additional Items
- Adjourn

Discussion

- **January 3, 2023** were accepted as written.
- **Oversight to Deter fraud: Minimum Reporting Requirements (ADB/NPP).** Deferred until the final rule for Strengthening Organic Enforcement (SOE) is published, and given the timeline, the CACS may push the proposal to the Fall 2023 meeting.
- **Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic? (JD).** The lead is working with other members as he develops this discussion document, and will add it to the agenda for the next CACS call.
- **Organic and Climate-Smart Agriculture (Climate/Equity) - Climate induced farming risk and crop Insurance (CD/NPP).** The primary intent of this project is to lay out the state of research, address adoption of crop insurance by organic farmers, and to ask questions for public comment. The group discussed various issues with crop insurance for organic and transitioning farmers, including barriers, risk management, and areas for improvement. The lead would like to seek additional information from the National Agricultural Statistics Service (NASS) about the newest survey data. CACS members were supportive of this project, as it is of great interest to the entire community. A member noted that the timing is perfect with regard to the development of the farm bill, and having a document for the Spring NOSB meeting would be most helpful, although a Fall document would also be useful. The CACS would like to have a document that will assist stakeholders that do advocacy work. The CACS also discussed the connection to the TOPP program (Transition to Organic Partnership Program) and transition funding.
- **Meeting time.** The CACS is seeking an alternate meeting time to replace the 2nd Tuesday meeting to accommodate everyone's schedules. The Chair asked that members look at their calendars and provide feedback about the best options.
- **Additional Items.** None
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted.)

January 3, 2023

January 10, 2023

- Oversight to Deter fraud: Minimum Reporting Requirements (ADB/NPP)
- Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic? (JD)
- Organic and Climate-Smart Agriculture (Climate/Equity) - Climate induced farming risk and crop Insurance (CD/NPP)

February 7, 2023

- Organic and Climate-Smart Agriculture discussion doc - What and Why Organic? (JD) - discuss/vote
- Oversight to Deter fraud: Parcel Identification discussion doc (ADB/NPP) - discuss/vote
- Organic and Climate-Smart Agriculture - Climate Induced Farming Risk and Crop Insurance discussion doc (CD/NPP) - discuss/vote
- Organic and Climate-Smart Agriculture - Organic IS climate smart proposal (NPP) - discuss/vote

February 14, 2023

March 7, 2023

Oversight improvements to deter fraud: Minimum Reporting Requirements proposal

March 14, 2023

April 4, 2023

April 11, 2023

May 2, 2023

May 9, 2023

June 6, 2023

June 13, 2023

July 11, 2023

August 1, 2023

August 8, 2023

September 5, 2023

September 12, 2023

October 3, 2023

October 10, 2023

November 7, 2023

November 14, 2023

December 5, 2023

December 12, 2023

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: - Minimum Reporting Requirements	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	12.6.22 12.13.22 3.7.23	Fall 2023
Oversight improvements to deter fraud: - Parcel Identification	ADB/NPP	Discussion document	08.10.17 NOP Memo to CACS	12.6.22 12.13.22 1.3.23 2.7.23	Spr 2023

Organic and Climate-Smart Agriculture (Climate/Equity) - Organic IS climate smart	NPP	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22 2.7.23	Spr 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - Climate Induced Farming Risk and Crop Insurance	CD/NPP	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22 1.10.23 2.7.23	Spr 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic?	JD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22 1.3.23 2.7.23	Spr 2023
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal - Support for Transitioning Producers.	TBD	Discussion document	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	Fall 2023

Milestones

Spring 2023 Milestones	Target dates (tentative)	Weeks PTM (prior to)
NOP - Publish FRN, Open public comment	~Nov 10, 2022	
NOSB - Spring 2023 proposals due to NOP	Feb 14, 2023	10 weeks
New NOSB member training	TBD	
NOP - Draft Spring 2023 NOSB meeting tentative agenda	Feb 3, 2023	
NOP - Post proposals	Mar 6, 2023	7.5
Public comment closes	Apr 5, 2023	3.5
NOP - Send compiled public comments to NOSB	Apr 7, 2023	3
Public comment webinars	Apr 18 & 20, 2023	1 week
Spring 2023 NOSB meeting - Atlanta, GA	Apr 25 - 27, 2023	
Final recommendations due	May 25, 2023	

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/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

Compliance, Accreditation & Certification Subcommittee (CACs) Notes

Tuesday, January 3, 2023 4:00 pm ET

Present: Amy Bruch (ADB), Chair; Kyla Smith (KS), Vice Chair; Jerry D'Amore (JD); Kim Huseman (KH); Allison Johnson (AJ); Nate Powell-Palm (NPP); Logan Petrey (LP); Carolyn Dimitri (CD); Mindee Jeffery - observer

Absent: None

Staff: Michelle Arsenault (MA); Laura Gallagher (LG)

Agenda

- Review December 13, 2022 notes
- Executive Meeting Recap
- Oversight to Deter fraud: Parcel Identification (ADB/NPP)
- Work Agenda Request: Overview of "Why organic" (JD)
- Additional Items
- Adjourn

Discussion

- **December 13, 2022** were accepted as written
- **Executive Meeting Recap.** The CACS Chair presented four work agenda items to the Executive Committee during the December call and all four were approved by both the Executive team and the NOP. See table below.
- **Oversight to Deter fraud: Parcel Identification (ADB/NPP).** The lead presented background information about parcels and reporting such info to the Farm Service Agency (FSA). The group discussed collection and consistency in data, various existing processes, regulations, guidance, etc., and will discuss this more with the intention of bringing a discussion document to the Spring 2023 meeting. The NOP added that the word field is defined in § 205.2, and parcel is not, and for consistency it might be helpful to use the word field.
- **Work Agenda Request: Overview of "Why organic" (JD).** The lead described the proposed project and members discussed the goals and the way forward. The NOSB and stakeholders are seeking a way to promote organic better. The CACS Chair added that the National Organic Program does not receive marketing dollars even though it is part of the Agricultural Marketing Service (AMS). The lead asked for feedback from each member, so he can incorporate it into the draft discussion document for the Spring 2023 meeting. Tangential to the discussion about "why organic?", the group discussed add-on labels, such as regenerative agriculture, and its relationship to the National Organic Program.
- **Additional Items.** The leads for the following projects will circulate drafts before the weekend, and the CACS will discuss them during the January 10 call: Oversight improvements to deter fraud: Minimum Reporting Requirements; What and Why Organic?; and Climate Induced Farming Risk and Crop Insurance.
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted.)

December 13, 2022

January 3, 2023

January 10, 2023

Oversight to Deter fraud: Parcel Identification (ADB/NPP)

Oversight to Deter fraud: Minimum Reporting Requirements (ADB/NPP)

Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic? (JD)

Organic and Climate-Smart Agriculture (Climate/Equity) - Climate induced farming risk and crop Insurance (CD/NPP)

February 7, 2023

Oversight to Deter fraud: Parcel Identification (ADB/NPP)

Organic and Climate-Smart Agriculture (Climate/Equity) - Organic IS climate smart

February 14, 2023

March 7, 2023

March 14, 2023

April 4, 2023

April 11, 2023

May 2, 2023

May 9, 2023

June 6, 2023

June 13, 2023

July 11, 2023

August 1, 2023

August 8, 2023

September 5, 2023

September 12, 2023

October 3, 2023

October 10, 2023

November 7, 2023

November 14, 2023

December 5, 2023

December 12, 2023

Work Agenda

*Highlight indicates discussion. *Highlight indicates action needed. *Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: - Minimum Reporting Requirements	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	12.6.22 12.13.22 1.17.23	Spr 2023
Oversight improvements to deter fraud: - Parcel Identification	ADB/NPP	Discussion document	08.10.17 NOP Memo to CACS. Approved by Exec Cmmte/NOP 12.20.22	12.6.22 12.13.22 1.3.23 1.17.23 2.7.23	Spr 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - Organic IS climate smart	NPP	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22	Spr 2023

Organic and Climate-Smart Agriculture (Climate/Equity) - Climate induced farming risk and crop Insurance	CD/NPP	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22 1.17.23	Spr 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - What and Why Organic?	JD	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22 1.3.23 1.17.23	Spr 2023
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal - Support for Transitioning Producers	TBD	Discussion document	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	Fall 2023

Milestones

Spring 2023 Milestones	Target dates (tentative)	Weeks PTM (prior to)
NOP - Publish FRN, Open public comment	~Nov 10, 2022	
NOSB - Spring 2023 proposals due to NOP	Feb 14, 2023	10 weeks
New NOSB member training	TBD	
NOP - Draft Spring 2023 NOSB meeting tentative agenda	Feb 3, 2023	
NOP - Post proposals	Mar 6, 2023	7.5
Public comment closes	Apr 5, 2023	3.5
NOP - Send compiled public comments to NOSB	Apr 7, 2023	3
Public comment webinars	Apr 18 & 20, 2023	1 week
Spring 2023 NOSB meeting - Atlanta, GA	Apr 25 - 27, 2023	
Final recommendations due	May 25, 2023	