

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

National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee Notes
Tuesday, January 14, 2014, 3:00 pm ET

Attending: Carmela Beck, Chair (CB), Jean Richardson (JR), Harold Austin (HA), Wendy Fulwider (WF)
Absent: Joe Dickson, (Vice Chair) (JD), Mac Stone (MS), John Foster (JFo)
Staff: Michelle Arsenault (MA), Shannon Nally Yanessa (SNY)

Work Plan

Project	Contact	Status	Vote	Meeting
Fall 2009 Guidance doc on Retail Certification	HA/JD (not lead)	Making minor revisions of fall 2013 DD		Proposal Spr 2014
How certifiers apply 205.206(e)	JFo	Possible addition of questions for spring 2014		Proposal Spr 2014
Monitoring Practices and procedures for Organic System Plan (OSP) 205.201(a)	JFo	The NOP requested a briefing paper summarizing the issue that the CACS is proposing to work on. JFo sent email 12 10 13		TBD. Fall 2014?
Sound & Sensible (S & S)	MS	Summary/update from Subcommittee during meeting (no document for public comment)	NA	Spring 2014

Future potential projects

Project	Contact	Status	Vote	Meeting
Sanitizers in 100% organic products	JFo	On hold, pending draft NOP guidance.		TBD
Exclusion of water in calculating percentage of organic ingredients	JR	Proposal. How formulated "organic" products should be calculated. Waiting for guidance from NOP.		TBD

Agenda

- Approve notes from December 10 call
- Retail certification - discuss questions for posting next disc doc or proposal
- How certifiers apply 205.206(e) - discuss proposal for spring 2014
- Discuss S & S update/summary

Discussion

- The notes from the December 10 call were approved with no changes.
- Retail certification - discuss questions for posting next disc doc or proposal. The members discussed the status of this document and whether or not to proceed with it as another discussion document for the spring 2014 NOSB meeting, or whether to turn it into a proposal. Based on the public comment they already received, which was favorable, they feel that the document is ready to be written as a proposal and should have a document ready to review on the next call. This will also provide another opportunity for public comment. The intent of the proposal is to recommend education, training and oversight – but public comment could take this in another direction. A member asked if the others felt that there is currently enough clarity in the NOP regulations for retailers. A member responded that there are areas where the NOP could provide clarification, such as exemptions and exclusions. The NOP will provide feedback once the proposal is drafted. The workplan table above was changed to reflect this.
- How certifiers apply 205.206(e) - discuss proposal for spring 2014 – deferred to next call.
- Discuss S & S update/summary - deferred to next call.
- Exclusion of water in calculating percentage of organic ingredients –The principle reviewer asked for an update from the NOP as she is getting many specific questions from the certifier community. She noted that the community wants to understand the nuance and complexity involved because of them want to be in able to use the Organic seal, as opposed to the “made with organic label. She also noted that JFo is well versed in this area and will have useful input. SNY and JR will set up a call to discuss this in the next couple of weeks and will update the group on the next call.
- The meeting was adjourned.

Future Scheduled Subcommittee Calls

December 10, 2013 3:00 ET

January 14, 2014 3:00 ET

Retail certification - discuss questions for posting next disc doc or proposal

How certifiers apply 205.206(e) - discuss proposal for spring 2014. Deferred to next call

Discuss S & S update/summary. Deferred to next call

January 28, 2014 3:00 ET

Retail certification - discuss draft proposal

How certifiers apply 205.206(e) - discuss proposal for spring 2014

Discuss S & S update/summary

Exclusion of water in calculating percentage of organic ingredients - update from NOP

Propose new topics for fall 2014

February 11, 2014 3:00 ET

February 25, 2014 3:00 ET

March 11, 2014 3:00 ET

March 25, 2014 3:00 ET

April 8, 2014 3:00 ET

Spring 2014 Milestones	Target date
Subcommittee requests technical reports for Sunset 2016 substances	Jan 15, 2014
NOSB Training meeting	Feb 4 - 5, 2014
NOP – Complete tentative agenda	Feb 7, 2014
Spring 2014 proposals due to NOP	Feb 26, 2014
NOP - Post proposals, Publish FRN, Open public comment	Mar 10, 2014
Subcommittees submit tentative workplans to NOP	Mar 12, 2014
Discuss workplans on ES call	Mar 14, 2014
NOP provides written comments on workplans to NOSB	Mar 28, 2014
Public comment closes	Apr 8, 2014
Workplans finalized on ES call	Apr 11, 2014
NOP - Send compiled public comments to NOSB	Apr 14, 2014
Spring 2014 NOSB Meeting – San Antonio, TX	~Apr 28- May 1, 2014

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**National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee Notes
Tuesday, February 11, 2014, 3:00 pm ET**

Attending: Carmela Beck, Chair (CB), Jean Richardson (JR), Harold Austin (HA), Wendy Fulwider (WF), Mac Stone (MS), John Foster (JFo), Jay Feldman (JFe) - sitting in

Absent: Joe Dickson (JD), Vice Chair

Staff: Michelle Arsenault (MA), Shannon Nally Yanessa (SNY)

Work Plan

Project	Contact	Status	Vote	Meeting
Fall 2009 Guidance doc on Retail Certification	HA/JD (not lead)	Making minor revisions of fall 2013 DD	08 13 13	Proposal Spr 2014
How certifiers apply 205.206(e)	JFo	No changes as of 02 11 14	08 20 13	Proposal Spr 2014
Monitoring Practices and procedures for Organic System Plan (OSP) 205.201(a)	JFo	The NOP requested a briefing paper summarizing the issue that the CACS is proposing to work on. JFo sent email 12 10 13		TBD. Fall 2014?
Sound & Sensible (S & S)	MS	Summary/update from Subcommittee during meeting (no document for public comment)	NA	Spr 2014

Future potential projects

Project	Contact	Status	Vote	Meeting
Sanitizers in 100% organic products	JFo	On hold, pending draft NOP guidance.		TBD
Exclusion of water in calculating percentage of organic ingredients	JR	Proposal. How formulated "organic" products should be calculated. Waiting for guidance from NOP.		TBD

Agenda

- Approve notes from January 14 call
- Retail certification - discuss draft proposal
- How certifiers apply 205.206(e) - discuss proposal for spring 2014
- Discuss S & S update/summary
- Propose new topics for fall 2014

Discussion

- The notes from the January 14 call were approved with no changes.
- **Retail certification** - The primary reviewer had a work conflict and could not be on the call so the CACS Chair will send a request asking that he forward the document to the group for review prior to the Feb 25 call.
- **How certifiers apply 205.206(e)** - The lead reviewer did not receive any suggestions for additional questions from other members, so the proposal will go forth to the spring 2014 meeting with no revisions.
- **S & S update/summary** - MS will present a verbal summary of Sound & Sensible at the Spring NOSB meeting. The NOP was supportive of a verbal update/summary rather than a formal discussion document. The CACS feels that it is important to let the public know that their fall 2013 comments were reviewed and summarized, and would also like to include feedback from ACA's on the implementation of the Sound & Sensible principles. MS will send the other members talking points after the ACA training in San Diego next week so they can review them.
- **New topics for fall 2014** - the group discussed how to develop future topics for the fall 2014 workplan. MA will verify this process with the NOP.
- The meeting was adjourned.

Future Scheduled Subcommittee Calls

January 28, 2014 3:00 ET - cancelled

Retail certification - discuss draft proposal

How certifiers apply 205.206(e) - discuss proposal for spring 2014

Discuss S & S update/summary

Exclusion of water in calculating percentage of organic ingredients - update from NOP

Propose new topics for fall 2014

February 11, 2014 3:00 ET

Retail certification - discuss draft proposal –postponed to next call

How certifiers apply 205.206(e) - discuss proposal for spring 2014 -complete

Discuss S & S update/summary - revisit on Feb 25 after ACA training

Propose new topics for fall 2014

February 25, 2014 3:00 ET

Retail certification - discuss draft proposal/vote

Discuss S & S update/summary – (revisit after ACA training)

Discuss new topics for fall 2014

March 11, 2014 3:00 ET

March 25, 2014 3:00 ET

April 8, 2014 3:00 ET

Spring 2014 Milestones	Target date
Subcommittee requests technical reports for Sunset 2016 substances	Jan 15, 2014

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**National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee Notes
Tuesday, February 25, 2014, 3:00 pm ET**

Attending: Joe Dickson (JD), Vice Chair, Jean Richardson (JR), Harold Austin (HA), John Foster (JFo), Mac Stone (MS), Wendy Fulwider (WF)

Absent: Carmela Beck, Chair (CB)

Staff: Michelle Arsenault (MA), Shannon Nally Yanessa (SNY)

Workplan

Project	Contact	Status	Vote	Meeting
Fall 2009 Guidance doc on Retail Certification	HA/JD (not lead)	Making minor revisions of fall 2013 DD	08 13 13 Revised/revoted 02 25 14	Proposal Spr 2014
How certifiers apply 205.206(e)	JFo	No changes as of 02 11 14	08 20 13	Proposal Spr 2014
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Sound & Sensible (S & S)	MS	Summary/update from Subcommittee during meeting (no document for public comment)	NA	Spr 2014

Future Potential Project	Contact	Status	Vote	Meeting
Sanitizers in 100% organic products	JFo	On hold, pending draft NOP guidance.		TBD
Exclusion of water in calculating percentage of organic ingredients	JR	Proposal. How formulated "organic" products should be calculated. Waiting for guidance from NOP.		TBD

Agenda

- Approve notes from February 11, 2014
- Retail certification - discuss draft proposal
- Discuss S & S update/summary
- Propose new topics for fall 2014

Discussion

- The notes from the February 11, 2014 call were approved with no changes.
- **Retail certification** – The principle reviewer circulated a document prior to the call for the members to review. Many of the fall 2013 public comments were incorporated into this version of the document. This proposal recommends that NOP provide outreach to uncertified retailers in particular and identifies areas of the rule in need of clarification. The NOP asked about the differences between the current proposal and the 2009 NOSB recommendation, noting that it appears that they might have a slightly different focus. The 2009 recommendation, which was not implemented by the NOP, seems to focus more on marketing, where the 2014 proposal seems to focus more on certified and non-certified operations and what those operations can and cannot participate in. The lead reviewer noted that this is discussed in the background section of the proposal. Members were very supportive of the current version and the group moved to a vote.

VOTE on Retail Discussion Document:

Motion to accept the retail certification proposal

Motion by: JR

Seconded by: JFo

Discussion: none

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

The CACS will keep the vote open until COB Wednesday, February 26 so the absent members have the opportunity to vote.

ABS note: Both absent members voted via email and the above tally was changed to reflect their votes. Motion carries.

- **S & S update/summary** - MS briefed the group about the Accredited Certifiers Association (ACA) training that he recently attended. He felt the training was very well organized and managed, and he praised the NOP staff presentations. He noted that S&S was endemic in the NOP presentations, reflecting a system-wide approach that includes certifiers and NOP auditing/accreditation processes. MS proposed giving an S&S update at each NOSB meeting and opening the floor to other NOSB members to add comments. MS encouraged continuing communication and indicated that he would reach out to the other Subcommittee members for added input.
- **New topics for fall 2014** - The group discussed potential topics for future work projects, including guidance for inspections in light of the NOP Instruction on Technical Assistance §205.501(a) which talks about the difference between advice and consulting. The members feel that the NOSB could contribute to this topic because of the diverse experience and insight the members have. One member noted that there is actually a very narrow set of things that an inspector cannot do - the qualifier about giving advice to “overcome barriers to certification” is often overlooked. Others observed that inspectors may be wary of treading into consulting and are hesitant to explain the rule. CACS could produce a document to add clarity and also include example scenarios or case studies employing role play. MS noted that there was a listening session at the ACA training, although they heard few suggestions from the community about

topics that need to be addressed. The NOP didn't have suggestions for any pressing topics and will wait to see what the Subcommittee proposes. A member asked about the accreditation of material review organizations (MRO) as a topic and about the status of the NOP work in this area. The NOP will confirm whether the idea of accrediting MROs is currently under legal review and will let the group know on the next call. Each of the members offered to reach out to their respective communities and seek input and the members will discuss it on the next call.

- The meeting was adjourned.

Future Scheduled Subcommittee Calls

February 11, 2014 3:00 ET

Retail certification - discuss draft proposal –postponed to next call
 How certifiers apply 205.206(e) - discuss proposal for spring 2014 -complete
 Discuss S & S update/summary - revisit on Feb 25 after ACA training
 Propose new topics for fall 2014

February 25, 2014 3:00 ET

Retail certification - discuss draft proposal/vote
 Discuss S & S update/summary (revisit after ACA training)
 Discuss new topics for fall 2014

March 11, 2014 3:00 ET

Discuss new topics for fall 2014
 Update on accrediting MROs (NOP)

March 25, 2014 3:00 ET

April 8, 2014 3:00 ET

Spring 2014 Milestones	Target date
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**National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee (CACs) Notes
Tuesday, March 11, 2014, 3:00 pm ET**

Attending: Carmela Beck, Chair (CB), Jean Richardson (JR), Harold Austin (HA), John Foster (JFo), Mac Stone (MS)

Absent: Wendy Fulwider (WF), Joe Dickson (JD), Vice Chair

Staff: Michelle Arsenault (MA), Shannon Nally Yanessa (SNY)

Workplan

Project	Contact	Status	Vote	Meeting
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Future Potential Project	Contact	Status	Vote	Meeting
Sanitizers in 100% organic products	JFo	On hold, pending draft NOP guidance.		TBD
Exclusion of water in calculating percentage of organic ingredients	JR	Proposal. How formulated "organic" products should be calculated. Waiting for guidance from NOP.		TBD

Agenda

- Approve notes from February 25, 2014
- Discuss new topics for fall 2014
- Update on accrediting MROs (NOP)

Discussion

- The notes from the February 25, 2014 call were approved with no changes.
- **New topics for fall 2014.**
 - On the last CACS call the members discussed reaching out to their respective communities for feedback about topics they would like the NOSB to work on or address. Overall, there were not many suggestions at this time. Based on feedback from a certifier, one member noted that Sound and Sensible was working well for producers and handlers, but certifiers are still looking for additional things that they can do. In addition, the member heard that certifiers would like to be involved w/NOP document creation at an earlier stage at which time they could see a draft and offer input. The community was also interested in submitting comments to the NOP about the guidance documents. A member added that he received feedback regarding the backlog of projects that the NOP has. The community feels that it would be beneficial if the NOSB had a lighter workload so the program can finalize some projects, and added that this would also help with the impending 2017 Sunset review. The NOSB Chair suggested not adding any new workplan items, and to take advantage of the lull in workload for the PDS and CACS. The group discussed the idea of restructuring the Subcommittees to add people to the three Subcommittees that have a large list of sunset reviews. The Board Chair noted for example, that the Handling Subcommittee has a relatively small roster and is seeking help with their reviews.
 - Members also discussed reducing the number of CACS meetings to one per month. The CACS chose to cancel the meetings that occur on the second Tuesdays of each month and only meet on the fourth Tuesday. MA will send updates to the members.
- **Update on accrediting MROs (NOP)** - The NOP has a cross divisional team working on this which will report back to the Deputy Administrator. The NOP may provide an update to the Board at the April 2014 meeting. A member asked if any of the items will be brought to the Subcommittee for addition to the workplan or not, and NOP was unsure at this time.
- The meeting was adjourned.

[Previous CACS Notes](#)

Future Call Schedule:

February 25, 2014 3:00 ET

Retail certification - discuss draft proposal/vote

Discuss S & S update/summary (revisit after ACA training)

Discuss new topics for fall 2014

March 11, 2014 3:00 ET

Discuss new topics for fall 2014

Update on accrediting MROs (NOP)

March 25, 2014 3:00 ET

Discuss Public Comments

April 22, 2014 3:00 ET

May 27, 2014 3:00 ET

Spring 2014 Milestones	Target date
Subcommittee requests technical reports for Sunset 2016 substances	Jan 15, 2014
NOSB Training meeting	Feb 4 - 5, 2014
NOP – Complete tentative agenda	Feb 7, 2014
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**National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee (CACs) Notes
Tuesday April 21, 2014, 3:00 pm ET**

Attending: Carmela Beck, Chair (CB), Harold Austin (HA), John Foster (JFo), Jean Richardson (JR), Joe Dickson (JD), Vice Chair, Wendy Fulwider (WF)

Absent: Mac Stone (MS)

Staff: Michelle Arsenault (MA), Shannon Nally Yanessa (SNY)

Workplan

Project	Contact	Status	Vote	Meeting
Fall 2009 Guidance doc on Retail Certification	HA/JD (not lead)	Making minor revisions of fall 2013 DD	08 13 13 Revised/ revoted 02 25 14	Proposal Spr 2014
How certifiers apply 205.206(e)	JFo	No changes as of 02 11 14	08 20 13	Discussion doc Spr 2014
Monitoring Practices and procedures for Organic System Plan (OSP) 205.201(a)	JFo	The NOP requested a briefing paper summarizing the issue that the CACS is proposing to work on. JFo sent email 12 10 13		TBD. Fall 2014?
Sound & Sensible (S & S)	MS	Summary/update from Subcommittee during meeting (no document for public comment)	NA	Spr 2014

Future Potential Project	Contact	Status	Vote	Meeting
Sanitizers in 100% organic products	JFo	On hold, pending draft NOP guidance.		TBD
Exclusion of water in calculating percentage of organic ingredients	JR	Proposal. How formulated "organic" products should be calculated. Waiting for guidance from NOP.		TBD
Assessment of Soil Conservation Practices		NOP sent memo requesting that NOSB work on this project 04 25 14	TBD	

Agenda

- Approve notes from March 11, 2014
- Discuss Public Comments
- Verify who is presenting what and in what format at the NOSB meeting (MA)
- Verify workplan for fall 2014

Discussion

- The notes from the March 11, 2014 call were approved with no changes.
- Discuss Public Comments
 - Retail Certification. Members discussed the comments, noting that they were substantive and informative. One member noted that some of the comments were out of the scope of the NOSB proposal and could/would require a rule change.
 - 205.206(e). The group discussed the comments addressing terminology in the discussion document and noted that overall the commenters were supportive. The goal of this discussion document, which was mistakenly labeled as a proposal, is to determine to what degree certifiers are already implementing 205.206(e) and to offer clarity on that process. Based on the outcome at the spring meeting, the CACS will perhaps craft a proposal asking the NOP to clarify parts of this section for the fall 2014 meeting (i.e., that input materials be reviewed in the context of §205.206(e)).
 - Sound & Sensible (S & S). The CACS will deliver a brief update at the spring NOSB meeting on S & S and how it originated and what it resulted in.
- The members verified who is presenting what and in what format at the NOSB meeting
- The group verified the draft workplan for fall 2014
- The meeting was adjourned.

[Previous CACS Notes](#)

Future Call Schedule:

March 11, 2014 3:00 ET

Discuss new topics for fall 2014

Update on accrediting MROs (NOP)

March 25, 2014 3:00 ET

Discuss Public Comments-cancelled

April 21, 2014 3:00 ET

Discuss Public Comments

Verify who is presenting what and in what format at the NOSB meeting (MA)

May 27, 2014 3:00 ET

Spring 2014 Milestones	Target date
Subcommittee requests technical reports for Sunset 2016 substances	Jan 15, 2014
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**National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee (CACS) Notes
Tuesday May 27, 2014, 3:00 pm ET**

Attending: Carmela Beck, Chair (CB), Vice Chair, Harold Austin (HA), John Foster (JFo), Jean Richardson (JR), Mac Stone (MS)

Absent: Joe Dickson (JD), Wendy Fulwider (WF)

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

Workplan

Project	Contact	Status	Vote	Meeting
How certifiers apply 205.206(e)	JFo			Proposal Fall 2014
Assessment of Soil Conservation Practices	CBe/JFo	NOP sent memo 04 25 14 requesting the NOSB work on this project		Discussion document Fall 2014

Future Potential Project	Contact	Status	Vote	Meeting

Agenda

- Approve notes from April 21, 2014
- How certifiers apply 205.206(e) follow up
- Guidance on Retail Certification follow up
- Discuss Assessment of Soil Conservation Practices workplan item (NOP)

Discussion

- **The notes from the April 21, 2014** were approved with no changes.
- **How certifiers apply 205.206(e) - follow up.** The group discussed how to go forward with this item which was presented as a discussion document at the spring 2014 meeting. There wasn't much feedback from the community, so the group was unsure whether to proceed or not. EBR will seek information from the program and report back to the group June 10.
- **Guidance on Retail Certification follow up** - The group discussed the status of this document after the spring 2014 meeting. The CACS Chair will seek feedback from the NOP to see if there's a need for any clarification or additional information in order to implement the recommendation.
- **Assessment of Soil Conservation Practices (EBR)** - The CACS and NOP discussed various ideas for this workplan item including the format (discussion document versus proposal), the scope (national or regional or in between) and the goal. Members discussed the differences between soil conservation practices and soil management practices which are different in scope. The NOP suggested narrowing the scope to start and broadening out if needed as the project progresses.

Members also discussed incorporating biodiversity into the document. Another member added that they may find as they open this discussion for public input that soil erosion is not a problem on organic farms. Ideas for the document included clarification of natural resources protection, and what that means when it comes to soil management. The goal is to develop a discussion document to solicit public input on requirements for conservation practices on organic farms. They also envision this product as something that could be used for certifier training. CBe and JFo will write a template and circulate it to the members as a starting point, and the group will draw on other NOSB members who have backgrounds in soil science (TF, and FT) as well as JFe. Additionally, MS will ask Sarah Brown of the Natural Resource Conservation Service (NRCS), who spoke at the April NOSB meeting, to participate in a CACS call on June 10. A member suggested that the International Organic Inspectors Association (IOIA) may also be a useful resource.

- The meeting was adjourned.

[Previous CACS Notes](#)

Future Call Schedule:

April 21, 2014 3:00 ET

Discuss Public Comments

Verify who is presenting what and in what format at the NOSB meeting (MA)

May 15, 2014 3:00 ET - rescheduled to May 27

May 27, 2014 3:00 ET

June 10, 2014 3:00 ET

Guest speaker - Sarah Brown (NRCS)

How certifiers apply 205.206(e) - follow up.

Retail certification - Post meeting follow-up from NOP (does NOP need any additional feedback or clarification from the CACS)

July 8, 2014 3:00 ET

August 12, 2014 3:00 ET

September 9, 2014 3:00 ET

October 14, 2014 3:00 ET

Fall 2014 Milestones	Target date
NOSB Subcommittee requests technical reports for Sunset 2017	Jul 15, 2014
NOP - Complete tentative agenda	Aug 7, 2014
NOSB - Fall 2014 proposals due to NOP	Aug 27, 2014
NOP - Post proposals, Publish FRN, Open public comment	Sep 8, 2014
NOSB Subcommittees - submit tentative workplans to NOP	Sept 11, 2014
Discuss workplans on ES call	Sept 12, 2014

Public comment closes	Oct 7, 2014
Workplans finalized on ES call (last call before fall mtg)	Oct 17, 2014
NOP - Send compiled public comments to NOSB	Oct 13, 2014
Fall 2014 NOSB Meeting – Louisville, KY	Oct 27 - Oct 31

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**National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee (CACs) Notes
Tuesday June 10, 2014, 3:00 pm ET**

Attending: Carmela Beck, Chair (CB), Vice Chair, Harold Austin (HA), John Foster (JFo), Jean Richardson (JR), Joe Dickson (JD), Wendy Fulwider (WF)

Absent: Mac Stone (MS)

Guest: Sarah Brown, Natural Resources Conservation Service (NRCS)

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

Workplan

Project	Contact	Status	Vote	Meeting
How certifiers apply 205.206(e)	JFo	CACS considers this item to be complete and will remove it from the workplan.		NA
Assessment of Soil Conservation Practices	CBe/JFo	NOP sent memo 04 25 14 requesting the NOSB work on this project		Discussion document Fall 2014

Future Potential Projects	Contact	Status	Vote	Meeting
Guidance on Retail Certification		Waiting for NOP feedback to determine if there is more work that needs to be completed		TBD

Agenda

- Approve notes from May 27, 2014
- Guest speaker - Sarah Brown (NRCS)
- Biodiversity draft guidance update (EBR)
- How certifiers apply 205.206(e) - follow up.
- Retail certification - Post meeting follow-up from NOP (does NOP need any additional feedback or clarification from the CACS?)

Discussion

- **The notes from the May 27, 2014** were approved with some minor clarifications and edits to the conversation about soil management vs. soil conservation. A member noted that soil management encompasses a broader scope than soil conservation.
- **Guest Speaker** - Ms. Brown discussed the NRCS's interest and involvement in organic practices, noting that the topics of tillage and soil erosion are of interest. The group discussed various aspects of this, including levels of erosion and compliance with organic principles. The scope of the problem (i.e. local, regional or national) is not well known at this time. The concern is that

the standard is vague and therefore there is variance in the assessment process regarding what constitutes a non-compliance and how such things are measured. The crux of the problem seems to be the unclear delineation between erosion and non-erosion. A member noted that it would be useful to get feedback from certifiers about whether they are issuing non-compliance notices. Currently the NRCS is working with the NOP to link Organic System Plans (OSP) with a conservation plan. Several members feel that the first step should be to determine if there is a problem with soil management and conservation, and if so, how widespread. In support of that, members felt that the best approach would be to conduct a survey. The NOP will seek input from the Deputy Administrator about how to request information about erosion problems from the NRCS, who has these data.

- **Biodiversity draft guidance update (EBR)** - The NOP is currently working on draft guidance on Biodiversity and the guidance may overlap with the Assessment of Soil Conservation Practices leading to duplication of work by the CACS. The members discussed the possibility of putting this on hold until the data on soil conservation practices data are collected from the NRCS. The group feels the best place to begin is with a discussion document that could include questions for the community about the scope of the problem. CBe and JFo will draft a document and circulate it to the group for discussion on the next call. The NOP asked that as the CACS goes forth they should determine the goal of the document and how this information will translate to identification of the problem, and/or directives about how to improve it.
- **How certifiers apply 205.206(e) follow up.** The feedback from the public was helpful and the group feels that the project is complete. They will remove any future work from the workplan (see table above for update).
- **Guidance on Retail Certification follow up** - The NOP has a large data set on this topic, but it is not structured in one retail user-friendly document. As a first step, the NOP will gather the information in one place then seek help from the CACS when, or if, there is more work needed.
- A member asked about the use of annotations and how the Board should manage this going forth. The group discussed best practices and appropriate use of annotations and asked the NOP to discuss this internally. The CACS would like to add a workplan item to address this issue although this isn't guidance on which the NOP would seek public comment as it pertains to the rulemaking process.
- The meeting was adjourned.

[Previous CACS Notes](#)

Future Call Schedule:

May 27, 2014 3:00 ET

June 10, 2014 3:00 ET

Guest speaker - Sarah Brown (NRCS)

How certifiers apply 205.206(e) - follow up.

Retail certification - Post meeting follow-up from NOP (does NOP need any additional feedback or clarification from the CACS?)

July 8, 2014 3:00 ET

Discuss Assessment of Soil Conservation Practices draft discussion document

Discuss best practices and use of annotations in proposals

August 12, 2014 3:00 ET

September 9, 2014 3:00 ET

October 14, 2014 3:00 ET

Fall 2014 Milestones	Target date
NOSB Subcommittee requests technical reports for Sunset 2017	Jul 15, 2014
NOP - Complete tentative agenda	Aug 7, 2014
NOSB - Fall 2014 proposals due to NOP	Aug 27, 2014
NOP - Post proposals, Publish FRN, Open public comment	Sep 8, 2014
NOSB Subcommittees - submit tentative workplans to NOP	Sept 11, 2014
Discuss workplans on ES call	Sept 12, 2014
Public comment closes	Oct 7, 2014
Workplans finalized on ES call (last call before fall mtg)	Oct 17, 2014
NOP - Send compiled public comments to NOSB	Oct 13, 2014
Fall 2014 NOSB Meeting – Louisville, KY	Oct 27 - Oct 31

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

**National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee (CACS) Notes
Tuesday July 8, 2014, 3:00 pm ET**

Attending: Carmela Beck, Chair (CB), Vice Chair, Harold Austin (HA), John Foster (JFo), Jean Richardson (JR), Wendy Fulwider (WF)

Absent: Mac Stone (MS), Joe Dickson (JD)

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

Workplan

Project	Contact	Status	Vote	Meeting
Assessment of Soil Conservation Practices	CBe/JFo	NOP sent memo 04 25 14 requesting the NOSB work on this project		Discussion document Fall 2014

Future Potential Projects	Contact	Status	Vote	Meeting
Guidance on Retail Certification		Waiting for NOP feedback to determine if there is more work that needs to be completed		TBD
Best practices and use of annotations in proposals	HA	NOP discussed topic on Executive call June 11, 2014. CACS will send a formal request to NOP to add this to the workplan.		Discussion document Spring 2015

Agenda

- Approve notes from June 10, 2014
- Discuss Assessment of Soil Conservation practices draft discussion document
- Discuss best practices and use of annotations in proposals

Discussion

- **The notes from the June 10, 2014** were approved with no changes.
- **Assessment of Soil Conservation practices.** The group discussed the draft document that was circulated prior to the call. JR will edit some of the questions to make them more targeted; CBe and JFo will edit content and the group will resume discussion on the next call.
- **Best practices and use of annotations in proposals.** A draft document was circulated prior to call and the group reviewed and discussed it. A member asked about materials with annotations and if such things complicate enforceability by certifiers and the NOP. The goal of this discussion document is to provide clarity or instruction on the use of annotations and the CACS will target the spring 2015 meeting. A member suggested that perhaps this is a better fit for the PDS and not the CACS. The NOP requested that the CACS send a formal request to add this to the workplan.
- The meeting was adjourned.

[Previous CACS Notes](#)

Future Call Schedule:

June 10, 2014 3:00 ET

Guest speaker - Sarah Brown (NRCS)

How certifiers apply 205.206(e) - follow up.

Retail certification - Post meeting follow-up from NOP (does NOP need any additional feedback or clarification from the CACS?)

July 8, 2014 3:00 ET

Discuss Assessment of Soil Conservation Practices draft discussion document

Discuss best practices and use of annotations in proposals

August 12, 2014 3:00 ET

Discuss Assessment of Soil Conservation Practices draft discussion document

Discuss best practices and use of annotations in proposals (status of NOP response?)

September 9, 2014 3:00 ET

October 14, 2014 3:00 ET

Fall 2014 Milestones	Target date
NOSB Subcommittee requests technical reports for Sunset 2017	Jul 15, 2014
NOP - Complete tentative agenda	Aug 7, 2014
NOSB - Fall 2014 proposals due to NOP	Aug 27, 2014
NOP - Post proposals, Publish FRN, Open public comment	Sep 8, 2014
NOSB Subcommittees - submit tentative workplans to NOP	Sept 11, 2014
Discuss workplans on ES call	Sept 12, 2014
Public comment closes	Oct 7, 2014
Workplans finalized on ES call (last call before fall mtg)	Oct 17, 2014
NOP - Send compiled public comments to NOSB	Oct 13, 2014
Fall 2014 NOSB Meeting – Louisville, KY	Oct 27 - Oct 31

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

**National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee (CACs) Notes
Tuesday August 12, 2014, 3:00 pm ET**

Attending: Carmela Beck, Chair (CB), Jean Richardson (JR), Wendy Fulwider (WF),

Absent: John Foster (JFo), Mac Stone (MS), Harold Austin, Vice Chair (HA), Joe Dickson (JD)

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

Workplan

Project	Contact	Status	Vote	Meeting
Assessment of Soil Conservation Practices	CBe/JFo	NOP sent memo 04 25 14 requesting the NOSB work on this project	08 28 14	Discussion document Fall 2014

Future Potential Projects	Contact	Status	Vote	Meeting
Guidance on Retail Certification		Waiting for NOP feedback to determine if there is more work that needs to be completed		TBD
Best practices and use of annotations in proposals	HA	NOP discussed topic on Executive call June 11, 2014. Waiting for formal request from NOP		Discussion document Spring 2015

Agenda

- Approve notes from July 8, 2014
- Discuss Assessment of Soil Conservation practices draft discussion document
- Discuss best practices and use of annotations in proposals

Discussion

- **The notes from the July 8, 2014** were approved with minor changes.
- **Assessment of Soil Conservation practices.** The members briefly discussed the feedback from the NRCS, contributions from other Board members and whether or not the group would like to include a discussion about no-till practices. The NOP suggested adding the some references to the document that were cited in the NOP memo to the Board dated April 25, 2014. The Chair will edit the document, and recirculate it for a vote by the Subcommittee members;

Vote completed 08 28 14:

Motion: To accept the Assessment of Soil Conservation practices draft discussion document

Motion by: CBe

Seconded by: JD

Y: 6 N: 0 Absent: 1 Abstain: 0 Recuse: 0

Motion carries

- **Best practices and use of annotations in proposals.** HA sent the Deputy Administrator an email request August 09, 2014, asking that this project be added to the workplan.
- The meeting was adjourned.

[Previous CACS Notes](#)

Future Call Schedule:

July 8, 2014 3:00 ET

Discuss Assessment of Soil Conservation Practices draft discussion document

Discuss best practices and use of annotations in proposals

August 12, 2014 3:00 ET

Discuss Assessment of Soil Conservation Practices draft discussion document

Discuss best practices and use of annotations in proposals (status of NOP response?)

September 9, 2014 3:00 ET - cancelled

October 14, 2014 3:00 ET

Fall 2014 Milestones	Target date
NOSB Subcommittee requests technical reports for Sunset 2017	Jul 15, 2014
NOP - Complete tentative agenda	Aug 7, 2014
NOSB - Fall 2014 proposals due to NOP	Aug 27, 2014
NOP - Post proposals, Publish FRN, Open public comment	Sep 8, 2014
NOSB Subcommittees - submit tentative workplans to NOP	Sept 11, 2014
Discuss workplans on ES call	Sept 12, 2014
Public comment closes	Oct 7, 2014
Workplans finalized on ES call (last call before fall mtg)	Oct 17, 2014
NOP - Send compiled public comments to NOSB	Oct 13, 2014
Fall 2014 NOSB Meeting – Louisville, KY	Oct 27 - Oct 31

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**National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee (CACs) Notes
Tuesday October 14, 2014, 3:00 pm ET**

Attending: Carmela Beck, Chair (CB), Harold Austin, Vice Chair (HA), Jean Richardson (JR), Wendy Fulwider (WF), John Foster (JFo), Joe Dickson (JD)

Absent: Mac Stone (MS)

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

Workplan

Project	Contact	Status	Vote	Meeting
Assessment of Soil Conservation Practices	CBe/JFo	NOP sent memo 04 25 14 requesting the NOSB work on this project	08 28 14	Discussion document Fall 2014

Future Potential Projects	Contact	Status	Vote	Meeting
Guidance on Retail Certification		Waiting for NOP feedback to determine if there is more work that needs to be completed		TBD
Best practices and use of annotations in proposals	HA	NOP discussed topic on Executive call June 11, 2014. Waiting for formal request from NOP		Discussion document Spring 2015

Agenda

- Approve notes of August 12, 2014
- Discuss public comments
- Adjourn

Discussion

- **The notes from the August 12, 2014** were approved with no changes
- Public Comments - The group discussed the summary of the public comments the CACS Chair circulated prior to the call. Many of the commenters urged the CACS to broaden its scope and consider biodiversity in addition to soil conservation. A member noted that they will address these comments to let the public know that the NOP provided the scope for the document
- The CACS rescheduled the November 11 meeting
- The meeting was adjourned.

[Previous CACS Notes](#)

Future Call Schedule:

August 12, 2014 3:00 ET

Discuss Assessment of Soil Conservation Practices draft discussion document

Discuss best practices and use of annotations in proposals (status of NOP response?)

September 9, 2014 3:00 ET - cancelled

October 14, 2014 3:00 ET

November 25, 2014 3:00 ET

Fall 2014 Milestones	Target date
NOSB Subcommittee requests technical reports for Sunset 2017	Jul 15, 2014
NOP - Complete tentative agenda	Aug 7, 2014
NOSB - Fall 2014 proposals due to NOP	Aug 27, 2014
NOP - Post proposals, Publish FRN, Open public comment	Sep 8, 2014
NOSB Subcommittees - submit tentative workplans to NOP	Sept 11, 2014
Discuss workplans on ES call	Sept 12, 2014
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Workplans finalized on ES call (last call before fall mtg)	Oct 17, 2014
NOP - Send compiled public comments to NOSB	Oct 13, 2014
Fall 2014 NOSB Meeting – Louisville, KY	Oct 27 - Oct 31

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

**National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee (CACS) Notes
Tuesday November 25, 2014, 3:00 pm ET**

Attending: Carmela Beck, Chair (CB), Harold Austin, Vice Chair (HA), John Foster (JFo), Lisa de Lima (LD) - sitting in, Tom Chapman (TC) - sitting in

Absent: Mac Stone (MS), Joe Dickson (JD), Jean Richardson (JR), Wendy Fulwider (WF), Nick Maravell (NM), Jennifer Taylor (JT)

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

Workplan

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

Future Potential Projects	Contact	Status	Vote	Meeting
Guidance on Retail Certification		Waiting for NOP feedback to determine if there is more work that needs to be completed		TBD
Best practices and use of annotations in proposals	HA	NOP discussed topic on Executive call June 11, 2014. Waiting for formal request from NOP. Moved to Policy Development Subcomm		NA
Peer Review	JFo/?	Added to CACS at Fall 2014 NOSB meeting		Spr 2015

Agenda

- Approve notes of October 14, 2014
- Discuss the Soil Conservation Practices Assessment Discussion Document, including Public Comment, and spring 2015 Proposal. Assign lead for proposal
- Discuss the NOP Accreditation Peer Review Process Memo and Assign Lead for Discussion Document
- Adjourn

Discussion

- **The notes from the October 14, 2014** were approved with no changes.
- **Soil Conservation Practices Assessment Discussion Document.** The members discussed the status of the document and how to move forward. The CACS received lots of feedback during

the public comment period, which contained a theme regarding more training, without necessarily providing details. The group discussed various paths forward and whether or not it would merit further work to create guidance and deliver this to the certification community. The NOP suggested looking at the draft guidance on biodiversity, due to be released soon, to assess whether there are any gaps that need to be addressed. The NOP also suggested that the next steps could include a review of the document and subsequent comments to determine if the questions that the NOP put forth in the memo were answered. A member suggested adding the comments that were delivered during the meeting as well. Another member noted that it would be useful to create a narrative of the public comments from the matrix that the CACS Chair created. This could then be used to aid in putting forth suggestions, taking into account whether or not the changes can be implemented by the NOP. The Chair will work with others on this and the group will continue the discussion on the next call.

- **NOP Accreditation Peer Review Process.** The NOP recently sent a memo to the NOSB tasking them with reviewing the draft instructions for the peer review process and putting forth a proposal in response to the draft. The members discussed the history of the peer review process, including findings from past audits by OIG (2010) and ANSI (2014), language in the regulation, and three previous recommendations from past Boards. JFo will do an initial review of the materials and spearhead the project, and will transfer it to a continuing member once he rotates off the NOSB in January.
- **It was noted that one of the CACS work agenda items,** best practices and use of annotations in proposals, was transferred to the Policy Development Subcommittee. See table above.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future Call Schedule

October 14, 2014 3:00 ET
 November 25, 2014 3:00 ET
 December 9, 2014 3:00 ET
 January 13, 2015 3:00 ET
 February 10, 2015 3:00 ET
 March 10, 2015 3:00 ET
 April 14, 2015 3:00 ET

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

Public comment closes	Apr 6, 2015
Work agendas finalized on ES call (last call before spring mtg)	Apr 10, 2015
NOP - Send compiled public comments to NOSB	Apr 13, 2015
Spring 2015 NOSB meeting - La Jolla, CA	Week of April 27 - 31

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

**National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee (CACS) Notes
Tuesday December 9, 2014, 3:00 pm ET**

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

Workplan

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

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

Agenda

- Approve notes of November 25, 2014
- Discuss Peer Review
- Adjourn

Discussion

- **The notes from November 25, 2014** were approved with no changes
- **Peer Review** - The NOP sent a memo to the NOSB asking that the CACS review the peer review procedures and provide guidance and input. The NOP noted that although it has been conducting audits as outlined in OFPA, it seeks to formalize the process and make it more transparent. The lead reviewed three prior NOSB comments regarding the Peer Review Panel (PRP) and noted that the most pertinent of the documents is the 2001 NOSB recommendation which provides substantive information and suggestions. The CACS intends on developing a proposal for the NOP and the organic community for the spring 2015 NOSB meeting. The group discussed various components that will be addressed in their recommendation, such as the size and makeup of the panel, qualifications for panel members, duration of service, and the charge for the panel. The lead asked that members review section [3a of NOP memo](#) and provide any comments or opinions so the group can move forward with the proposal for the next CACS call. JT offered to take the lead on this project when JFo rotates off the Board in January. And will also collaborate with the new Board members; Tom Chapman and Lisa de Lima.
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future Call Schedule

November 25, 2014 3:00 ET

December 9, 2014 3:00 ET

January 13, 2015 3:00 ET

February 10, 2015 3:00 ET

March 10, 2015 3:00 ET

April 14, 2015 3:00 ET

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