Compliance, Accreditation & Certification Subcommittee (CACS) Notes
Tuesday December 11, 2018, 3:00 pm ET

Attending: Scott Rice (SR), Chair; Harriet Behar (HB); Rick Greenwood (RG); Lisa de Lima (LD); Emily Oakley (EO), Vice Chair; A-dae Romero-Briones (ARB); Ashley Swaffar (AS)
Absent: Tom Chapman (TC)
Staff: Michelle Arsenault (MA)

Agenda

- Integrity in the supply chain - further work
- Energy system infrastructure on organic farms.
- Other items
- Adjourn

Discussion

- Notes of November 13 were modified with some make minor language corrections to the section on Integrity in the supply chain.

- **Integrity in the supply chain.** During the last call the CACS members discussed potential areas to focus on as they move forward, given that topics addressed in the Fall 2017 NOSB recommendation could already be included in the upcoming NOP enforcement rulemaking. NOP previously provided a list of potential topics that the CACS could work on, and the group will reach out to JT to ask about revisiting this list. Additionally, the CACS Chair will reach out to other stakeholders for other areas of note. One significant area of concern is how to ensure any system governing the issuance of import certificates considers the fast moving nature of the produce sector, especially when it comes to trade with Mexico.

- **Energy system infrastructure on organic farms.** The CACS will discuss with the Executive team the request to add Energy system infrastructure on organic farms to its work agenda. The CACS Chair asked for additional feedback from members before the call on December 14.

- **Other items.**
  - **Grower groups.** During the last call, a member brought up comments from stakeholders regarding grower group certification and coordination with tribal governments. The NOP has a policy memo from 2011 on this in the handbook at the following link:
    The memo references two NOSB recommendations from 2002 and 2008 and notes that the program is drafting guidance. While still awaiting guidance on this topic, the NOP provided training at the 2015 accredited certifier training. The slides from this training can be found here:
    https://www.ams.usda.gov/sites/default/files/media/NOP%20Grower%20Groups%20Training.pdf. The CACS will ask the NOP for a status update on the December 14 Exec call
  - There is an **Accredited Certifier Association (ACA) training** in late January.
The meeting was adjourned

Previous CACS Notes

Future Call Schedule (2nd Tuesday 3:00 ET)
November 13, 2018
December 11, 2018
January 8, 2019
February 12, 2019
March 12, 2019
April 9, 2019
May 14, 2019
June 11, 2019
July 9, 2019
August 13, 2019
September 10, 2019
October 8, 2019
November 12, 2019
December 10, 2019

Work Agenda

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Spring 2019 Milestones

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Compliance, Accreditation & Certification Subcommittee (CACS) Notes
Tuesday November 13, 2018, 3:00 pm ET

Attending: Scott Rice (SR), Chair; Harriet Behar (HB); Rick Greenwood (RG); Lisa de Lima (LD); Emily Oakley (EO), Vice Chair
Absent: A-dae Romero-Briones (ARB); Tom Chapman (TC); Ashley Swaffar (AS)
Staff: Michelle Arsenault (MA); Clarissa Mathews (CM)

Agenda

• Review of Fall meeting
• Integrity in the supply chain - further work
• Energy system infrastructure on organic farms.
• Other items
• Adjourn

Discussion

• The briefly discussed the last set of CACS notes, feedback about recent tribal input and participation, and grower groups.
• Review of Fall meeting
  o NOP is holding a townhall on November 15 on the Learning Management System (LMS), and the CACS Chair encouraged members to attend. The CACS worked on this topic as part of its proposal on inspector qualifications, skills and training. NOP is seeking to gather community feedback.
  o The CACS received positive and supportive feedback on the import proposal at the Fall NOSB meeting
• Integrity in the supply chain - further work. The CACS suggested areas for future work that include integrity in the supply chain with regard to handling aspects unique to the fresh produce market vs. bulk grain. Potentially this could include reviewing and strengthening requirements for labeling of bulk boxes & labeling of packages to facilitate consistent and transparent linkages between certificate holders. A member added that tracking fresh produce can be an issue, as is storage and transportation, specifically with regard to potential contamination and commingling. The NOP encouraged the CACS to explore this area. The CACS Chair will reach out to stakeholders to get a sense of what they have already worked on with regard to this so the NOSB is not overlapping.
• Energy system infrastructure on organic farms. The Subcommittee is interested in getting practical, useful, tools and resources into the hands of certifiers, certified operations, and energy infrastructure interests so that a consistent, proactive approach is taken to ensure organic integrity. They are not seeking to dictate what energy activities can or cannot take place on/adjacent to an organic site, which would be outside the scope of NOSB and NOP authority.
  o Expert speakers regarding energy infrastructure. A member offered to invite colleagues that are experts in energy infrastructure to a future CACS call for discussions about energy and land use. Once/if this topic is added to the work agenda, the CACS will explore this as a possibility.
Members discuss hearing from those impacted and how that would inform their work.
- The Chair will develop a draft request to bring to the Executive Team before the December 14 call.

- Other items: None
- The meeting was adjourned

Previous CACS Notes

Future Call Schedule (2nd Tuesday 3:00 ET)
November 13, 2018
December 11, 2018
January 8, 2019
February 12, 2019
March 12, 2019
April 9, 2019
May 14, 2019
June 11, 2019
July 9, 2019
August 13, 2019
September 10, 2019
October 8, 2019
November 12, 2019
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Compliance, Accreditation & Certification Subcommittee (CACS) Notes
Tuesday October 9, 2018, 3:00 pm ET

Attending: Scott Rice (SR), Chair; Harriet Behar (HB); Rick Greenwood (RG); Ashley Swaffar (AS); Tom Chapman (TC); Lisa de Lima (LD); A-dae Romero-Briones (ARB)
Absent: Emily Oakley (EO), Vice Chair
Staff: Michelle Arsenault (MA); Jenny Tucker (JT)

Agenda

- Discuss public comments
  - Energy system infrastructure on organic farms.
- Other items
- Adjourn

Discussion

- Discuss public comments
  - Energy system infrastructure on organic farms. The Ohio Ecological Food and Farm Association (OEFFA) submitted comments at several of the past NOSB meetings and has had conversations with several NOSB members regarding the issue of energy systems infrastructure, including fracking and mitigation strategies. In addition to engaging the NOSB, OEFFA and other organizations have reached out to industry seeking solutions. This project is not currently on the CACS work agenda, and it not clear that this would fall under the authority of the USDA. The NOP and NOSB are supportive of this work and discussed possible opportunities for collaboration acknowledging that putting forth a rulemaking action or adding documents to the NOP handbook, such as instructions to certifiers, a policy statement, or guidance, may be difficult in the current regulatory environment. A member suggested that having the support of the Federal Government as an advocate, in whatever form, would be very helpful. The NOP added that advocating may not be an NOP/NOSB role but would be appropriate for an outside advocacy group. The NOP suggested several ways in which the CACS might approach the project, including engaging stakeholders and groups who are directly impacted by these issues to contact the NOP in written form. The CACS will continue to discuss this to determine how and if they can move forward on a formal work agenda request.
  - A member added that this project is about mitigation strategies to protect organic integrity. A possible vehicle could be a document on best practices from the ACAs.
  - Several members volunteered to co-lead the project.
- Other items
  - Learning Management System. The NOP has a contractor in place, and they are currently setting up infrastructure for the site.
  - Public comments. Members briefly discussed the written comments on the Fall 2018 proposals.
• The meeting was adjourned

**Previous CACS Notes**

**Future Call Schedule (2nd Tuesday 3:00 ET)**
October 9, 2018
November 13, 2018
December 11, 2018

**Work Agenda**

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**Fall 2018 Milestones**

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Compliance, Accreditation & Certification Subcommittee (CACS) Notes
Tuesday August 17, 2018, 3:00 pm ET

Attending: Scott Rice (SR), Chair; Harriet Behar (HB); Rick Greenwood (RG); Ashley Swaffar (AS); Tom Chapman (TC)
Absent: Emily Oakley (EO), Vice Chair; Lisa de Lima (LD); A-dae Romero-Briones (ARB)
Staff: Michelle Arsenault (MA)

Project                                      Contact        Status                                                                 Discussion, Vote        Meeting
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Criteria to establish risk-based accreditation oversight  SR, HB, TC  NOP memo, requesting the CACS add this to work agenda, sent to NOSB 08 10 17.  08 17 18  Proposal Fall 2018
Inspector qualifications, skills and training  HB  ---  08 17 18  Proposal Fall 2018
Analysis of feedback from the Spring 2018 import panel and comments.  TC  ---  08 28 18  Discussion doc Fall 2018

*Discussed  *Voted

Agenda

- Inspector Qualifications, Skills and Training (HB)
- Developing Framework/Criteria to establish risk-based accreditation oversight (SR)
- Analysis of feedback from the Spring 2018 panel and comments (TC)
- Other items
- Adjourn

Discussion

- Inspector Qualifications, Skills and Training (HB). Members reviewed the draft document and discussed the edits that were made since the last call.

  Motion to accept the proposal as guidance to the NOP on inspector qualifications, skills and training
  Motion by: HB
  Seconded by: RG
  Additional discussion: None
  Yes: 8   No: 0   Abstain: 0   Absent: 0   Recuse: 0

  The vote was left open for absent members, until Friday, August 24. The three additional votes are included in the vote tally above.
• **Developing a framework/criteria to establish risk-based accreditation oversight (SR).** The lead summarized the edits that were added since the last discussion and members suggested additional language before the CACS moved to a vote.

  Motion to accept the proposal on developing criteria to establish risk-based accreditation oversight.
  Motion by: SR
  Seconded by: AS
  Additional discussion: None
  Yes: 8  No: 0  Abstain: 0  Absent: 0  Recuse: 0

  The vote was left open for absent members, until Friday, August 24.
  Note: The three additional votes are included in the vote tally above.

• **Analysis of feedback from the Spring 2018 panel and comments (TC).** The lead will circulate the draft document next week with a request that Subcommittee members discuss and vote via email. If members feel the need to have a verbal discussion, the CACS may add a call on August 28.

• **Other items.** None.

• **The meeting was adjourned**

**Previous CACS Notes**

**Future Call Schedule (2nd Tuesday 3:00 ET)**

August 14, 2018
August 17, 2018 - Additional call
September 11, 2018
October 9, 2018
November 13, 2018
December 11, 2018

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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.

**Compliance, Accreditation & Certification Subcommittee (CACS) Notes**  
**Tuesday August 14, 2018, 3:00 pm ET**

**Attending:** Scott Rice (SR), Chair; Emily Oakley (EO), Vice Chair; Harriet Behar (HB); Rick Greenwood (RG); Ashley Swaffar (AS); A-dae Romero-Briones (ARB); Tom Chapman (TC)  
**Absent:** Lisa de Lima (LD)  
**Staff:** Jenny Tucker (JT), Michelle Arsenault (MA); Clarissa Mathews (CM), Devon Pattillo (DP)

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<td>Inspector Qualifications, Skills and Training (Learning management systems)</td>
<td>HB</td>
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*Discussed*  
*Voted*

### Agenda

- Learning management system (JT)  
- Inspector Qualifications, Skills and Training (HB)  
- Developing Framework/Criteria to establish risk-based accreditation oversight (SR)  
- Analysis of feedback from the Spring 2018 panel and comments (TC)  
- Other items  
- Adjourn

### Discussion

- **Learning management system (JT).** NOP is developing an online learning platform for certifiers, inspectors, etc. Other USDA departments are using this platform already and NOP is developing an organic training component. The goal is to fill any gaps in current training, and not to overlap or compete with other platforms or systems that are working well. In support of that the NOP has collaborated with other groups such as International Organic Inspectors Association (IOIA) and the Accredited Certifiers Association, Inc. (ACA) to develop the statement of work, which will be sent out for contracting bids. The CACS will support this effort by providing a recommendation to the NOP about useful content. The NOP expects about 40 modules, and hopes to roll this out in about 8-12 months. Members were supportive of this project.

- **Inspector Qualifications, Skills and Training (HB).** The lead summarized the draft proposal. Members discussed various aspects of the document and made modifications. The CACS will
circulate the modified document so everyone can see the changes, and will vote via email by COB Thursday, August 16. Note: votes were tallied via email and added below.

Motion to accept the proposal on Inspector Qualifications, Skills and Training
Motion by: HB
Seconded by: RG
Additional discussion: None
Yes: 8 No: 0 Abstain: 0 Absent: 0 Recuse: 0

- Developing Framework/Criteria to establish risk-based accreditation oversight (SR). Deferred to next call due to lack of time.

- Analysis of feedback from the Spring 2018 panel and comments. The CACS will post a summary document, seeking feedback about which topics or ideas they should focus on as they move forward with the proposal on imports and oversight. For Fall 2018, the CACS will likely develop a discussion document.

- Other items. The CACS scheduled an extra call on August 17 at 11:00 PT/2:00 ET

The meeting was adjourned

Previous CACS Notes

Future Call Schedule (2nd Tuesday 3:00 ET)
July 24, 2018 additional call
August 14, 2018
August 17, 2018 - Additional call
September 11, 2018
October 9, 2018
November 13, 2018
December 11, 2018

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Compliance, Accreditation & Certification Subcommittee (CACS) Notes
Tuesday July 10, 2018, 3:00 pm ET

Attending: Emily Oakley (EO), Vice Chair; Lisa de Lima (LD); Harriet Behar (HB); Tom Chapman (TC); Rick Greenwood (RG)
Absent: Scott Rice (SR), Chair; Ashley Swaffar (AS); A-dae Romero-Briones (ARB)
Staff: Jenny Tucker (JT), Michelle Arsenault (MA)

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*Discussed  *Voted

Agenda

- Inspector Qualifications, Skills and Training (HB)
- Developing Framework/Criteria to establish risk-based accreditation oversight (SR).
- Other items.
- Adjourn

Discussion

- **Inspector Qualifications, Skills and Training (HB)**
  - The NOSB is not able to access the NOP Learning Management System (infrastructure for storing courses). The NOP noted that currently on the NOP website there is a page for organic training, primarily given to certifiers. The goal is to contract with a company to develop learning paths, identify availability of trainings, conduct analysis of gaps, and to convene a control Board to assess content. This project is related to strengthening oversight of enforcement, and NOP does not currently have funds to move forward.
  - The CACS discussed its role and what they could provide to the NOP for the Fall 2018 meeting. Ideas included a catalogue of training ideas, topics, and learning objectives. e.g. topic areas for dairy inspectors. Risk based oversight is also another area that the NOP is interested in.

- **Developing Framework/Criteria to establish risk-based accreditation oversight (SR).** Deferred to next call.
- **Other items.**
• Several members will be speaking to OEFFA to discuss fracking, and whether or not the NOSB will be able to scope this project within the USDA’s authority. NOP is considering ways in which this can be addressed.
• The Wild Farm Alliance has asked about next steps on the Native Ecosystem recommendation, and the CACS asked if there was anything that they can do at this time.

The meeting was adjourned

Previous CACS Notes

Future Call Schedule (2nd Tuesday 3:00 ET)
June 12, 2018
July 10, 2018
July 24, 2018 additional call
August 14, 2018
September 11, 2018
October 9, 2018
November 13, 2018
December 11, 2018

Fall 2018 Milestones | Target dates (tentative)
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NOP - Publish FRN, Open public comment | TBD
NOSB Request for TRs for 2021 sunset materials | Jun 6, 2018
New NOSB member training | July 18, 2018
NOP - Draft Fall 2018 NOSB meeting tentative agenda | Aug 9, 2018
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Fall 2018 NOSB meeting - Jacksonville, FL | Oct 24-26, 2018
National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee (CACS) Notes
Tuesday June 12, 2018, 3:00 pm ET

Attending: Scott Rice (SR), Chair; Emily Oakley (EO), Vice Chair; Ashley Swaffar (AS); Lisa de Lima (LD); A-dae Romero-Briones (ARB); Harriet Behar (HB); Tom Chapman (TC); Rick Greenwood (RG)
Absent: Jenny Tucker (JT)
Staff: Devon Pattillo (DP); Michelle Arsenault (MA)

Work Agenda

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*Discussed*  *Voted*

Agenda

- Inspector Qualifications, Skills and Training
- Developing Framework/Criteria to Establish Risk-based Accreditation Oversight.
- Other items
- Adjourn

Discussion

- **Inspector Qualifications, Skills and Training.** SR and HB will work on the inspector training portion, and could have a proposal ready for Fall.
- **Developing Framework/Criteria to Establish Risk-based Accreditation Oversight.** May not have a proposal for the Spring 2019 meeting. TC/LD will lead summary piece.
- **Strengthening Organic Enforcement.**
  - The NOP shared a presentation that was given at the OTA policy conference, as well as the regulatory agenda announcing the Strengthening Organic Enforcement proposed rule, which is on the regulatory agenda for Spring 2019. The proposed rule incorporates the previous NOSB recommendations on this topic.
  - The group discussed the content and format for the project. Many felt that a gap analysis would be a good starting point. The members also discussed risk analyses (geographic? A specific commodity?), and what the goal of such an analysis would be. The CACS feels that it doesn’t have comprehensive info regarding risk because the program hasn’t yet shared what it sees as threats.
- **Uncertified Handlers.** The CACS discussed uncertified handlers, and what to focus on in the document with regard to oversight.
- **Pareto Principle and organic trade.** The CACS Chair circulated a presentation from Silke Fuchshofen, one of the panelists from the April imports panel. Silke mentioned this topic in brief at the meeting but did not have time to share any further insights. The presentation covers her thoughts on how the Pareto Principle can be applied to the organic trade, be it unannounced.
inspections, identifying high risk criteria for accreditation or other areas relevant to NOSB discussions.

- **Fraud complaints.** The members discussed the process by which stakeholders file fraud complaints, noting that there is a gap in communication. SR will seek an update from the NOP about the status of the NOP peer review to ask if it addresses this issue.

- **Other items.**
  - The CACS will assign leads offline to various parts of the import documents.
  - **Fracking.** Stakeholders have inquired about the status of this project.
  - **Status/next steps on Native ecosystems.** The CACS is waiting until the NOP implements the first piece of the native ecosystems document before moving forward. The CACS will keep this on hold for now.
  - **Schedule.** Added call on July 24, 2018

- **The meeting was adjourned**

**Previous CACS Notes**

**Future Call Schedule (2nd Tuesday 3:00 ET)**
May 8, 2018
June 12, 2018
July 10, 2018
July 24, 2018 additional call
August 14, 2018
September 11, 2018
October 9, 2018
November 13, 2018
December 11, 2018

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National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee (CACS) Notes
Tuesday May 8, 2018, 3:00 pm ET

Attending: Scott Rice (SR), Chair; Emily Oakley (EO), Vice Chair; Ashley Swaffar (AS); Lisa de Lima (LD); A-dae Romero-Briones (ARB); Harriet Behar (HB)
Absent: Tom Chapman (TC); Michelle Arsenault (MA)
Staff: Devon Pattillo (DP); Jenny Tucker (JT)

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*Discussed  *Voted

Agenda

- Discuss approach for recommendations at the Fall meeting:
- Other items
- Adjourn

Discussion

- **Work agenda review:** The one entry on the current work agenda above encompasses several projects.
- **Oil and gas impacts (EO):** The members posed a question about adding this to agenda
- **Discuss approach for recommendations at the Fall meeting:** How to prioritize various topics and in light of potential regulatory actions? Possible areas of focus (JT):
  - Inspector qualifications and USDA-hosted training content (with CACS input on learning paths/curriculum);
  - HB is interested in exploring Blockchain and it would be supported by NOP, but it’s unclear what a recommendation might look like;
  - Unannounced accreditation audits of certifiers,
  - Recommendations related to risk-based accreditation and certification also of interest to CACS and Program (SR/JT);
  - Perishable industry is somewhat unique and may require separate work (LD), along with nonretail container requirements (SR);
  - Providing more information about APHIS/CBP regulations/procedures (SR).
- **Other items:** Discussed if additional calls are needed
- **Next steps:** Establish roles and tasks on the following two areas of focus
  - Inspector Qualifications, Skills and Training
  - Developing Framework/Criteria to Establish Risk-based Accreditation Oversight.
- **The meeting was adjourned**
Previous CACS Notes

Future Call Schedule (2nd Tuesday 3:00 ET)
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July 10, 2018
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National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee (CACS) Notes
Tuesday April 10, 2018, 3:00 pm ET

Attending: Scott Rice (SR), Chair; Emily Oakley (EO), Vice Chair; Ashley Swaffar (AS); Harriet Behar (HB); Lisa de Lima (LD); A-dae Romero-Briones (ARB)
Absent: Tom Chapman (TC)
Staff: Michelle Arsenault (MA)

Work Agenda

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*Discussed  *Voted

Agenda

- Import Panel - Questions/discussion points
- Discuss public comment
- Other items
- Adjourn

Discussion

- Import Panel - Questions/discussion points.
  - The CACS discussed various questions for the panelists and logistics for the import panel. The CACS will reformat the panels so that there is time at the end to bring all 9 of the panelists together for Q & A. In addition to the current list of questions, a member noted that she is interested in learning more about technology such as block chain.
  - SR will compile the questions and share them with the panelists ahead of time. He asked that members provide any additional questions by the end of the week.
Discuss public comment
  o Members discussed public comments about the proposal on native ecosystems.
  o OEFFA contacted the CACS Chair regarding fracking and impacts to operations that they certify. The CACS has discussed this previously and it is on hold at the moment. The Chair encouraged OEFFA to consider the current administration’s priorities, which are integrity and oversight.

Other items. None
The meeting was adjourned

Previous CACS Notes

Future Call Schedule (2nd Tuesday 3:00 ET)
March 13, 2018
April 10, 2018
May 8, 2018
June 12, 2018
July 10, 2018
August 14, 2018
September 11, 2018
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**National Organic Standards Board (NOSB)**  
**Compliance, Accreditation & Certification Subcommittee (CACS) Notes for CACS**  
**Tuesday March 13, 2018, 3:00 pm ET**

**Attending:** Scott Rice (SR), Chair; Emily Oakley (EO), Vice Chair; Ashley Swaffar (AS); Harriet Behar (HB); Tom Chapman (TC)  
**Absent:** Lisa de Lima (LD); A-dae Romero-Briones (ARB)  
**Staff:** Michelle Arsenault (MA); Jenny Tucker (JT)

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*Discussed  *Voted

### Agenda

- Approve notes from February 13, 2018  
- Approve notes from February 27, 2018  
- Discuss import panel logistics  
- Other items  
- Adjourn

### Discussion

- **Notes from February 13, 2018** were approved with no changes.  
- **Notes from February 27, 2018** were approved with no changes.  
- **Discuss import panel logistics.** The group reviewed the list of potential panelists and the NOP will reach out to them with an initial invitation.  
  - SR will seek a potential panelist who has expertise as a foreign certifier.  
  - The CACS will continue to develop questions for the panel.
- The NOP will finalize the panelist list by March 15.
- The NOP will host a preparation meeting on Monday, April 16 to run through logistics with the panelists, the NOSB Chair, and the moderator (SR).

- Other items. None
- The meeting was adjourned

**Previous CACS Notes**

**Future Call Schedule (2nd Tuesday 3:00 ET)**

- February 27, 2018 - additional call
- March 13, 2018
- April 10, 2018
- May 8, 2018
- June 12, 2018
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National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee (CACS) Notes for CACS
Tuesday February 27, 2018, 3:00 pm ET

Attending: Scott Rice (SR), Chair; Emily Oakley (EO), Vice Chair; Harriet Behar (HB); Ashley Swaffar (AS); Lisa de Lima (LD); Tom Chapman (TC)
Absent: A-dae Romero-Briones (ARB)
Staff: Michelle Arsenault (MA); Jenny Tucker (JT); Devon Pattillo (DP)

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Agenda

- Approve notes from February 13, 2018
- Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB)
- Imports (All)
- Other items
- Adjourn

Discussion

- Approval of the notes from February 13, 2018 were deferred
- Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB). The CACS discussed the addition of an appendix of resources, and the lead will add that, and submit to the NOP. Vote recorded below.
Motion to approve the proposal on Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production.
Motion by: HB
Seconded by: EO
Additional discussion: none
Yes: 5  No: 1  Abstain: 0  Absent: 1  Recuse: 0

- **Import oversight discussion document.** The group discussed the draft document and contributions made by each of the Subcommittee members and NOP. TC will make some edits and submit the final document to the NOP.

  Motion to accept the document on import oversight
  Motion by: TC
  Seconded by: AS
  Additional discussion: none
  Yes: 6  No: 0  Abstain: 0  Absent: 1  Recuse: 0

- **Other items.** None
- **The meeting was adjourned**

**Previous CACS Notes**

**Future Call Schedule (2nd Tuesday 3:00 ET)**
February 13, 2018
  Inspector qualifications (SR)
  Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB)
February 27, 2018 - additional call
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Compliance, Accreditation & Certification Subcommittee (CACS) Notes for CACS
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Agenda

- Approve notes from January 30, 2018
- Imports (All)
- Inspector Qualifications (SR)
- Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB)
- Other items
- Adjourn

Discussion

- Notes from January 30, 2018, were approved with no changes.
- Imports (All). The NOP will be sending the panelist invitation letter to the NOSB, so they can share it with the certifier community.
- Inspector Qualifications (SR). The lead noted that the NOP was supportive of sharing the work that IOIA completed for the NOP regarding inspector training, and the CACS discussed how best
to include this in the document. The group moved to a vote. The chair will finalize the document and forward it to NOP for posting.

Motion to accept the document on inspector qualifications
Motion by: HB
Seconded by: AS
Additional discussion: none
Yes: 7   No: 0   Abstain: 0   Absent: 0   Recuse: 0

- **Import oversight**. The group discussed various broad topics as identified in the December email from the NOP as they determined what questions to put forth for public comment in relation to the import panel. The CACS will review the potential questions on the 27th and submit the document for posting.
- **Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB)**. The lead requested feedback from the Subcommittee members so she can continue to develop the document.
- **Other items**. None
- **The meeting was adjourned**

Previous CACS Notes

**Future Call Schedule (2nd Tuesday 3:00 ET)**

January 30, 2018 - additional call
  Imports discussion (ALL)
  Inspector qualifications (SR)
  Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB)

February 13, 2018
  Inspector qualifications (SR)
  Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB)

February 27, 2018 - additional call
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National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee (CACS) Notes for CACS
Tuesday January 30, 2018, 3:00 pm ET

Attending: Scott Rice (SR), Chair; Emily Oakley (EO), Vice Chair; Harriet Behar (HB); Tom Chapman (TC); Ashley Swaffar (AS); Lisa de Lima (LD); Dave Mortensen (DM) - observer
Absent: A-dae Romero-Briones (ARB)
Staff: Michelle Arsenault (MA)

Work Agenda

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<td>Import Oversight</td>
<td>ALL</td>
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<td>Spr 2018</td>
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*Discussed *Voted

Agenda

- Approve notes from January 23, 2018
- Imports (All)
- Inspector Qualifications (SR)
- Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB)
- Other items
- Adjourn

Discussion

- Notes from January 23, 2018, (sent on January 12) were approved with no changes.
- Imports (All). The CACS Chair shared information about the panel at the recent EcoFarm conference, and noted that there was a lot of interest from stakeholders. The NOSB Chair will reach out to NOP about the status of the invitations for prospective panelists.
- Inspector Qualifications (SR). Several members and the NOP provided feedback on the draft proposal, and the group discussed it. The lead will make modifications to the document and recirculate it for discussion on the next CACS call.
Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB). The members will discuss this on the next call in the event that it will go forward to the Spring meeting.

Other items. None.

The meeting was adjourned

Previous CACS Notes

Future Call Schedule (2nd Tuesday 3:00 ET)
January 23, 2018 - additional call
Imports discussion (ALL)
Inspector qualifications (SR)
Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB)

January 30, 2018 - additional call
Imports discussion (ALL)
Inspector qualifications (SR)
Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB)

February 13, 2018
February 27, 2018 - additional call
March 13, 2018
April 10, 2018
May 8, 2018
June 12, 2018
July 10, 2018
August 14, 2018
September 11, 2018
October 9, 2018
November 13, 2018
December 11, 2018

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Attendees: Scott Rice (SR), Chair; Emily Oakley (EO), vice chair; Harriet Behar (HB); Lisa de Lima (LD); A-dae Romero-Briones (ARB); Ashley Swaffar (AS)
Absent: Tom Chapman (TC)
Staff: Jenny Tucker (JT); Michelle Arsenault (MA)

Project | Contact | Status | Discussion, Vote | Meeting
--- | --- | --- | --- | ---
Inspector qualifications proposal | SR | Approved for addition to work agenda 04 21 16. Referred back to CACS at Spr 2017 meeting | Dec 12, Jan 9, Jan 23 | Spr 2018
Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production proposal | HB | Approved for addition to work agenda 07 15 16. Verbal update Fall 2016. DD Spr 2017. Proposal Fall 2017. Referred back to CACS at Fall 2017 meeting | Nov 28, Jan 23 | Spr 2018
Imports | ALL | Memo sent to NOSB 08 10 17. | Nov 28, Jan 9, Jan 23 | Spr 2018

*Discussed  *Voted

Agenda

- Approve notes from January 9, 2018
- Imports (All)
- Inspector Qualifications (SR)
- Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB)
- Other items
- Adjourn

Discussion

- **Notes from** January 9, 2018 were approved with no changes.
- **Imports (All).** The NOP shared a timeline for panel preparation prior to the last call. Members provided some feedback and the group discussed such things as enforcement ability. One goal for the panel is to determine what industry and certifiers are currently doing, and where they see gaps that could be addressed. The NOP asked that the Board members provide suggestions for possible panelists. Several members noted that there are many conferences and in-person
opportunities in the coming weeks to convey this information to the community. The NOP will send the invitation letter to the NOSB for use at conferences.

- **Inspector Qualifications (SR).** The lead is drafting a document and will share it with the group on the next call. The primary challenge is focusing the scope of a very large topic. Members discussed the issue of scale, a potential licensing system for inspectors which would create more uniform standards, and perhaps subcategories for inspectors. For example, a member noted that she is certified as a livestock inspector although she is not necessarily knowledgeable about dairy operations. The group discussed whether they will produce a proposal or discussion document, and will determine what will have the most impact on integrity. The CACS Chair will send out a draft document before the next call. Several members offered assistance in drafting the document.

- **Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB).** The lead reviewed comments from the Fall 2017 NOSB meeting proposal, and proposed some language for the next iteration of the document. This could include ways to document ecosystems, both national and international, guidance about how to find this information, and a list of questions that could be put in an Organic System Plan. The group also discussed the placement of this guidance within OFPA and the regulation.

- **Other items.** None
- **The meeting was adjourned**

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**Previous CACS Notes**

**Future Call Schedule (2nd Tuesday 3:00 ET)**

January 9, 2018
- Imports discussion (ALL)
- Inspector qualifications (SR)
- Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB)

January 23, 2018 - additional call
- Imports discussion (ALL)
- Inspector qualifications (SR)
- Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB)

January 30, 2018 - additional call
- Imports discussion (ALL)
- Inspector qualifications (SR)
- Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB)

February 13, 2018
- Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB)

February 27, 2018 - additional call

March 13, 2018

April 10, 2018

May 8, 2018

June 12, 2018

July 10, 2018

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

National Organic Standards Board (NOSB)
Compliance, Accreditation & Certification Subcommittee (CACS) Notes
Tuesday January 9, 2018, 3:00 pm ET

Attending: Scott Rice (SR), Chair; Harriet Behar (HB); Lisa de Lima (LD); A-dae Romero-Briones (ARB); Ashley Swaffar (AS)
Absent: Emily Oakley (EO), vice chair; Tom Chapman (TC)
Staff: Jenny Tucker (JT); Devon Pattillo (DP); Michelle Arsenault (MA)

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*Discussed  *Voted

Agenda

- Approve notes from December 12, 2017
- Imports (All)
- Inspector Qualifications (SR)
- Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB)
- Other items
- Adjourn

Discussion

- **Notes from** December 12, 2017 were approved with no changes
- **Imports (JT).** Imports continues to be a high priority for the NOP. In preparation for the imports panel at the Spring 2018 NOSB meeting, the NOP sent a proposed timeline to the CACS for associated tasks, and the group reviewed it. The NOP asked for feedback from the group about high level goals for the panel to help guide the solicitation of volunteers via the certifier community. The CACS members suggested the following: those that have experience with organic imports, certifiers, brokers, and industry members; folks that could identify weaknesses and solutions or gaps in existing resources for certifiers. A member suggested short-term
solutions on oversight. The group discussed a wide array of topics they felt could be useful, including data solutions/data reporting, inventory systems to track yields, and residue and/or GMO testing. JT will synthesize this information to deliver to certifiers, to solicit potential panelists. The NOP also asked the NOSB members to suggest potential panelists, so it is a collaborative effort. Likely they will invite four (4) people. As per the timeline, the NOP would like to seat the panel by mid-to-late March. The NOP encouraged the CACS members to connect any projects they are currently working on to imports. For example, the inspector qualifications proposal. The CACS feels this project is a piece of the larger project on imports, and will work to reframe it.

- **Inspector Qualifications (SR).** The lead emphasized that this topic is important to organic integrity, and while there has been a lot of work done in this area already, by such organizations as the Accredited Certifiers Association (ACA) and International Organic Inspectors Association (IOIA), there are areas where the CACS can contribute. As noted above, the NOP suggested the CACS connect this project to the imports project. The group discussed potential areas on which to focus, such as scale of operations and scope, improvements in best practices for inspectors, better evaluation tools, and remedial training. A member noted that one challenge is the lack of enough qualified inspectors. The lead will work on reframing this to tie it to integrity and imports. The CACS is unsure whether to develop another discussion document at this time.

- **Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB).** The lead asked for feedback on the draft document she circulated, ideally before the next CACS call.

- **Other items.**
- **The meeting was adjourned**

**Previous CACS Notes**

**Future Call Schedule (2nd Tuesday 3:00 ET)**
December 26, 2017 - cancelled
Imports discussion (ALL)
Inspector qualifications (SR)
Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB)

January 9, 2018
Imports discussion (ALL)
Inspector qualifications (SR)
Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB)

January 23, 2018 - additional call
Imports discussion (ALL)
Inspector qualifications (SR)
Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB)

January 30, 2018 - additional call
Imports discussion (ALL)
Inspector qualifications (SR)
Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB)

February 13, 2018
February 27, 2018 - additional call
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