

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 12, 2016, 4:30 pm ET**

**Attending:** Carmela Beck (CB), Chair; Jean Richardson (JR); Tom Chapman (TC); Jennifer Taylor (JT); A-dae Romero-Briones (AR); Ashley Swaffar (AS)

**Absent:** Scott Rice (SR); Nick Maravell (NM)

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

**Work Agenda**

Project	Contact	Status	Vote	Meeting
Assessment of Soil Conservation Practices	CBe/LD	On hold	NA	TBD

Future Potential Projects	Contact	Status	Vote	Meeting

**Agenda**

- Approve notes of August 11, 2015
- Assessment of Soil Conservation Practices (CBe)
- Worker welfare (JT)
- Adjourn

**Discussion**

- **The notes from August 11, 2015** were approved with no changes
- **Assessment of Soil Conservation Practices.** The group discussed the status of this document and how to move it forward. Both the CACS and NOP feel this is an important topic, but at this time the NOP suggests delaying further work until it can provide more guidance and resources to the CACS. An alternative approach is for the NOP to work on this project in collaboration with the NRCS and to not have the CACS work on it. NOP suggested that the group consult with one of the new NOSB members as she has experience in this area and with the NRCS. The CACS will continue this discussion on the next call.
- **Worker welfare (JT).** The group discussed the potential of adding to the work agenda a project on addressing organic farm worker health and welfare. Several members acknowledged that this is a weakness of the organic standards, but felt that it does not fit under OFPA and therefore the USDA does not have authority to regulate this. The member suggested that the group develop a way to address the health of organic farm workers, perhaps in terms of food safety or contamination. Members felt that this was addressed elsewhere and by other agencies. Another

CACS member suggested a discussion document or position statement so the community knows that it is a topic of interest for the NOSB.

- **Calculating % organic in multi-ingredient products.** A member asked about the status of the document that was sent to the NOP on April 11, 2013. The Subcommittee members urged the NOP to move this forward as they constantly receive feedback from stakeholders regarding this topic. The NOP indicated that the draft guidance should be sent back to the CACS soon. Additionally, the following documents are also near completion: Post harvest handling, biodiversity guidance, and classification of materials.
- **The meeting was adjourned**

[Previous CACS Notes](#)

**Future Call Schedule (2<sup>nd</sup> Tuesday 3:00 ET)**

December 8, 2015 3:00 ET - cancelled

January 12, 2016

February 9, 2016

Assessment of Soil Conservation Practices. Discuss status of document

March 8, 2016

April 12, 2016

May 10, 2016

June 14, 2016

July 12 2016

August 9, 2016

September 13, 2016

October 11, 2016

November 8, 2016

December 13, 2016

Spring 2016 Milestones	Target date
New NOSB member orientation	Feb 4, 2016
NOP - Complete Spring 2016 NOSB meeting tentative agenda	Feb 10, 2016
NOSB - Spring 2016 proposals due to NOP	Feb 26, 2016
NOP - Post proposals, Publish FRN, Open public comment	Mar 8, 2016
Discuss work agendas on ES call	Mar 11, 2016
Public comment webinars	??
Public comment closes	Apr 6, 2016
Work agendas finalized on ES call (last call before fall meeting)	Apr 8, 2016
NOP - Send compiled public comments to NOSB	Apr 11, 2016
Spring 2016 NOSB meeting – Washington, DC	Apr 25 - 27, 2016



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**National Organic Standards Board (NOSB)  
Compliance, Accreditation & Certification Subcommittee (CACS) Notes  
Tuesday February 9, 2016, 3:00 pm ET**

**Attending:** Carmela Beck (CB), Chair; Tom Chapman (TC); Jean Richardson (JR); A-dae Romero-Briones (AR); Ashley Swaffar (AS); Scott Rice (SR)

**Absent:** none

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

**Work Agenda**

Project	Contact	Status	Vote	Meeting
Assessment of Soil Conservation Practices	CBe/SR	Verbal update	NA	Spr 2016

Future Potential Projects	Contact	Status	Vote	Meeting

**Agenda**

- Approve notes of January 12, 2016
- Assessment of Soil Conservation Practices (CBe)
- Calculating % organic in multi-ingredient products - NOP update
- Adjourn

**Discussion**

- **The notes from January 12** were approved with no changes.
- **Assessment of Soil Conservation Practices.** Members discussed the relationship between NRCS and Oregon Tilth and opportunities with regard to soil conservation projects and organic agriculture. The group discussed the role of the CACS in moving this document forward, and agreed that at this time it is limited. Therefore the group feels the best path forward would involve training and education for certifiers, inspectors and producers. The Subcommittee will provide a verbal update on the status at the spring NOSB meeting.
- **Calculating % organic in multi-ingredient products.** The NOP updated the CACS about this project, noting that it is in progress, and should be sent through internal review soon. Members discussed the history and issues with the calculations of ingredients, and were encouraged that the project is making progress.
- **Other projects.** The group discussed other projects for potential addition to the CACS work agenda. Members will reach out to stakeholders and the NOP will review the status of the prior NOSB recommendation(s) regarding eligibility of products treated with sanitizers for the 100% organic label.

- The meeting was adjourned

[Previous CACS Notes](#)

**Future Call Schedule (2<sup>nd</sup> Tuesday 3:00 ET)**

January 12, 2016

February 9, 2016

Assessment of Soil Conservation Practices. Discuss status of document

March 8, 2016

Assessment of Soil Conservation Practices. Discuss verbal summary for spring meeting.

Discuss 100% organic label

April 12, 2016

May 10, 2016

June 14, 2016

July 12 2016

August 9, 2016

September 13, 2016

October 11, 2016

November 8, 2016

December 13, 2016

Spring 2016 Milestones	Target date
New NOSB member orientation	Feb 29, 2016
NOP - Complete Spring 2016 NOSB meeting tentative agenda	Feb 10, 2016
NOSB - Spring 2016 proposals due to NOP	Feb 26, 2016
NOP - Post proposals, Publish FRN, Open public comment	Mar 8, 2016
Discuss work agendas on ES call	Mar 11, 2016
Public comment closes	Apr 6, 2016
Work agendas finalized on ES call (last call before fall meeting)	Apr 8, 2016
NOP - Send compiled public comments to NOSB	Apr 11, 2016
Public comment webinars	Apr 18, 2016
Spring 2016 NOSB meeting – Washington, DC	Apr 25 - 27, 2016

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**National Organic Standards Board (NOSB)  
Compliance, Accreditation & Certification Subcommittee (CACS) Notes  
Tuesday March 8, 2016, 3:00 pm ET**

**Attending:** Carmela Beck (CB), Chair; A-dae Romero-Briones, Vice Chair (AR); Tom Chapman (TC); Jean Richardson (JR); Ashley Swaffar (AS); Scott Rice (SR)

**Absent:** none

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

**Work Agenda**

Project	Contact	Status	Vote	Meeting
Assessment of Soil Conservation Practices	CBe/SR	Verbal update	NA	Spr 2016

Future Potential Projects	Contact	Status	Vote	Meeting

**Agenda**

- Approve notes of February 9, 2016
- Assessment of Soil Conservation Practices. Discuss verbal summary for spring meeting.
- In-field, annual evaluations of inspectors
- Calculating percentage organic in multi-ingredient products
- Other items
- Adjourn

**Discussion**

- **The notes from February 9** were approved with no changes.
- **Assessment of Soil Conservation Practices (SR).** The lead sent a draft summary document to the CACS members for review. The document included a comprehensive history of the work-to-date as well as suggestions for moving forward. The CACS will present a brief verbal overview at the spring 2016 NOSB meeting, and will enter the document into the official record during the meeting.
- **In-field, annual evaluations of inspectors (JR).** A member suggested a topic for the CACS work agenda regarding the NOP Instruction 2027 dated August 3 2013 (<https://www.ams.usda.gov/sites/default/files/media/2027.pdf>). As a longtime inspector, the member feels that the requirement for annual on-site inspector evaluations is not aligned with Sound and Sensible principles and could have a negative impact on organic certification. She feels that it is logistically complex, very expensive for certifiers, and it does not appear to give discretion to certifiers. A member added information from a Certifiers perspective in support of

this viewpoint. The CACS will submit a request to the NOP to add this to the work agenda as a discussion document for the fall 2016 NOSB meeting.

- **Calculating percentage organic in multi-ingredient products.** The NOSB asked for an update on the status of the proposed guidance document, in response to the NOSB 2013 recommendation. Guidance is currently under development, and the NOP asked for examples of issues that may be of concern. Members expressed concern about lack of consistency in verification of percentages, particularly for single ingredient products, which may be over 95% organic but lack documentation to prove this. Members also noted continuing problems in calculating percentages for liquid products such as soups or almond beverages.
- **100% organic label claim.** The NOP will send some information and links to prior NOSB work on this topic.
- **Other items** - none
- **The meeting was adjourned**

[Previous CACS Notes](#)

**Future Call Schedule (2<sup>nd</sup> Tuesday 3:00 ET)**

February 9, 2016

Assessment of Soil Conservation Practices. Discuss status of document

March 8, 2016

Assessment of Soil Conservation Practices. Discuss verbal summary for spring meeting.

Discuss 100% organic label

April 12, 2016

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Public comment webinars	Apr 19, 2016
Spring 2016 NOSB meeting – Washington, DC	Apr 25 - 27, 2016