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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 The NOP indicated that the draft guidance should be sent back to the CACS soon.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 (2nd 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 (2nd 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 (2nd 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
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 19, 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 April 12, 2016, 3:00 pm ET

Attending: Carmela Beck (CB), Chair; Jean Richardson (JR); Ashley Swaffar (AS); Scott Rice (SR); A-dae Romero-Briones, Vice Chair (AR)
Absent: Tom Chapman (TC)
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
In-field, annual evaluations of inspectors update (NOP 2027)	JR	Approved 04 21 16		Fall 2016

Agenda

- Approve March 8, 2016 notes
- In-field, annual evaluations of inspectors update
- Review public comment if applicable
- Peer review of NOP by ANSI
- Other items

Discussion

- **The notes from March 8** were approved with no changes.
- **In-field, annual evaluations of inspectors update (NOP 2027) (JR).** The group discussed the issues and justification for why they are requesting this work agenda item regarding the requirement for yearly evaluations of inspectors. The NOP spoke with staff from the Accreditation and International Activities Division (AIA) briefly about the request from the CACS, as they have just revised this guidance. A member noted that the 2011 NOSB recommendation included a three-year review timeline, and it is unclear why the NOP did not adopt that recommendation. AIA will discuss this and provide feedback. The NOP feels that the requirement for annual in-field inspector evaluations are a critical part of certification quality management. Certifiers are supportive of the concept of field audits, and agree it is improving the system. However, they want more flexibility, and for it to be risk-based so the logistics will be less burdensome. Certifiers would appreciate more explanation of the specific problem this requirement is meant to address. . . The CACS feels strongly that it continue to explore this topic to glean feedback from the certification community. The CACS will draft a letter to NOP asking for clarification, and asked that someone from AIA to address their concerns on a future call.
- **Peer review of NOP by American National Standards Institute (ANSI).** The NOSB put forth a recommendation in 2014 for a peer review process, and the audit is underway. Two current

NOSB members have been approached about assisting with the audit, but are unsure if they will be selected. The audit is scheduled to be completed by August 2016, at which time ANSI will deliver a report to the NOP.

- **Other items. The CACS w**ill discuss future work agenda topics on the May call. A member suggested adding calls to the schedule if they add work agenda items and need more discussion time.
- **The meeting was adjourned**

Previous CACS Notes

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

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 16, 2016
Discuss work agendas on ES call	Mar 11, 2016
Public comment closes	Apr 14, 2016
Work agendas finalized on ES call (last call before fall meeting)	Apr 8, 2016
NOP - Send compiled public comments to NOSB	Apr 18, 2016
Public comment webinars	Apr 19, 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 May 10, 2016, 3:00 pm ET

Attending: Carmela Beck (CB), Chair; A-dae Romero-Briones, Vice Chair (AR); Harriet Behar (HB); Tom Chapman (TC); Jean Richardson (JR); Scott Rice (SR); Tracy Favre (TF); Jesse Buie - observer
Absent: Ashley Swaffar (AS)
Staff: Emily Brown Rosen (EBR), Michelle Arsenault (MA)
Guest: Cheri Courtney (CC), Director, Accreditation and International Activities (AIA)

Work Agenda

Project	Contact	Status	Vote	Meeting
In-field, annual evaluations of inspectors update (NOP 2027)	JR	Approved 04 21 16		Fall 2016

Agenda

- Approve April 12, 2016 notes
- Instruction 2027 In-Field, Annual Inspector Evaluations Overview (ALL)
- Notifying operators via their certifier of sunset materials that were not renewed at sunset (HB)
- Other items

Discussion

- **The notes from April 12** were approved with no changes.
- **Instruction 2027: In-Field, Annual Inspector Evaluations Overview (ALL).** Cheri Courtney, director of the NOP's Accreditation and International Activities (AIA), joined the call to discuss the NOP 2027 Instruction, which is an instruction for personnel performance evaluations. NOP views the inspectors as extremely vital to organic integrity, and annual evaluations are both important and required. The group discussed the reasons and goals for yearly evaluations, and while all agree that in-field evaluations are critical, requiring them to be done yearly is seen by some as a burden to organic certifiers, both logistically and financially. The NOP is aware that reaching the goal of auditing 100% of inspectors each year is burdensome and is working with certifiers to attain this goal. During public comment at the April 2016 NOSB meeting, stakeholders suggested that evaluations be conducted using a risk-based method, as opposed to trying to reach a goal of 100 % evaluations every year. Members also discussed public comments, the need for data collection from the community, and consistency and uniformity across certifiers. Members were welcomed to contact AIA for additional questions or discussion. The next step will include reaching out to the Accredited Certifiers Association (ACA) with a request for data. The leads will update the CACS on the next call.
- **Notifying operators via their certifier of sunset materials that were not renewed at sunset (HB).** A member circulated a draft document with justification for adding this project to the CACS work agenda. The member feels there is a breakdown in communication between certifiers and organic stakeholders, and the message about sunset materials that are no longer

allowed in organic is not being adequately or systematically relayed. The group discussed the idea and need for this project and will reach out to the Accredited Certifiers Association (ACA) and other groups to see if this is necessary or useful. A member suggested an informal process of communication via the ACAs, which could be implemented much quicker than having the NOSB develop a recommendation for guidance or instruction from the NOP.

- **The meeting was adjourned**

Previous CACS Notes

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

April 12, 2016
May 10, 2016
June 14, 2016
Instruction 2027 In-Field, Annual Inspector Evaluations Overview (JR/SR)
Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB)
July 12 2016
August 9, 2016
September 13, 2016
October 11, 2016
November 8, 2016
December 13, 2016

Fall 2016 timeline chart coming soon.