

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

## **Compliance, Accreditation & Certification Subcommittee (CACs) Notes** **Tuesday, December 14, 2021 2:00 pm ET**

**Present:** Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Steve Ela (SE); Nate Powell-Palm (NPP); Kyla Smith (KS); Mindee Jeffery (MJ) - observer; Logan Petrey (LP) - observer

**Absent:**

**Staff:** Laura Gallagher (LG); Andrea Holm (AH)

### **Agenda**

- November 9<sup>th</sup>, 2021 notes
- Oversight improvements to deter fraud: Modernization of organic traceability infrastructure (ADB/NPP)
- Finalize Potential Work Agenda Topics (AB)
  - (1) Organic Links
  - (2) Human Capital NOSB support (CD/NPP)
  - (3) Equity and (4) Climate Change (CD)
  - (5) Universal Bill of Lading and (6) Mass Balance/Traceback
  - (7) Auditor Math Qualifications - Calculating Nitrogen
  - (8) Native Eco-Systems
- Additional Items
- Adjourn

### **Discussion**

- **November 9<sup>th</sup>, 2021 notes** were accepted as written
- **Oversight improvements to deter fraud: Modernization of organic traceability infrastructure (ADB/NPP)** - Members discussed block chain technology.
- **Finalize Potential Work Agenda Topics (ADB)** - For the suggested agenda items below, members discussed possible next steps, open docket options, and their capacity to complete documents before the next NOSB meeting. Members anticipate that the NOP Priorities Federal Register Notice may guide future conversation.
  - **(1) Organic Links** - The CACS Chair discussed opportunities for receiving feedback from stakeholder communities.
  - **(2) Human Capital NOSB Support (CD/NPP)** - Members discussed requesting support with the international acceptance portion of sunset reviews.
  - **(3) Equity and (4) Climate Change (CD)** - The lead will bring these topics back to CACS on a later call.
  - **(5) Universal Bill of Lading and (6) Mass Balance/Traceback** - Members discussed mass balance/traceback and the possibility of developing guidance or requirements for bills of lading to contain specific information. Members discussed organic recordkeeping requirements versus Food Safety Modernization Act (FSMA) recordkeeping requirements. CACS may develop a discussion document on this topic.
  - **(7) Auditor Math Qualifications - Calculating Nitrogen** - This potential NOSB Work Agenda topic was not discussed during the call.
  - **(8) Native Eco-Systems** - Members discussed the relationship between native eco-systems, organic wild crop regulations, and the Organic Foods Production Act (OFPA) language on the transition of land.
- **Additional Items** - None
- **The meeting was adjourned**

[Previous CACS Notes](#)

**Future call schedule (2<sup>nd</sup> Tuesday 2:00 PM ET | 11:00 AM PT, except where noted.)**

November 9, 2021

Debrief of Fall 2021 NOSB Meeting

December 14, 2021

Oversight improvements to deter fraud: Modernization of organic traceability infrastructure (ADB/NPP)

Finalize Potential Work Agenda Topics (AB)

- (1) Organic Links
- (2) Human Capital NOSB support (CD/NPP)
- (3) Equity and (4) Climate Change (CD)
- (5) Universal Bill of Lading and (6) Mass Balance/Traceback
- (7) Auditor Math Qualifications - Calculating Nitrogen
- (8) Native Eco-Systems

January 11, 2022

February 08, 2022

March 08, 2022

April 12, 2022

May 10, 2022

June 14, 2022

July 12, 2022

August 09, 2022

September 13, 2022

October 11, 2022

November 08, 2022

December 13, 2022

**Work Agenda**

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

Project	Contact	Doc Type	Notes*	Scheduled, Discussed, Voted	Target meeting
Oversight improvements to deter fraud: Modernization of organic traceability infrastructure	ADB/NPP	Discussion Document	<a href="#">08.10.17 NOP Memo</a> to CACS	11.9.21 12.14.21 TBD	Spr 2022
Human Capital Management: Inspector mentorship/apprenticeship/consistency proposal	TBD	TBD	<a href="#">07.31.20 NOP Memo</a> to CACS. <a href="#">Proposal</a> passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	TBD
Human Capital Management: NOSB support	CD/NPP	Proposal	<a href="#">07.31.20 NOP Memo</a> to CACS	11.9.21 12.14.21 TBD	Spr 2022

## Milestones

Spring 2022 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	~Nov 12, 2021
NOSB - Spring 2022 proposals due to NOP	Feb 16, 2022
New NOSB member training	TBD
NOP - Draft Spring 2022 NOSB meeting tentative agenda	Feb 2, 2022
NOP - Post proposals	Mar 3, 2022
Public comment closes	Apr 1, 2022
NOP - Send compiled public comments to NOSB	Apr 4, 2022
Public comment webinars	Apr 20 & 21, 2022
Spring 2022 NOSB meeting - Crystal City, VA	Apr 26 - 28, 2022
Final recommendations due	May 27, 2022

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## **Compliance, Accreditation & Certification Subcommittee (CACs) Notes** **Tuesday, November 9, 2021 2:00 pm ET**

**Present:** Nate Powell-Palm (NPP), Chair; Amy Bruch (ADB); Steve Ela (SE); Kyla Smith (KS); Carolyn Dimitri (CD); Sue Baird (SB)

**Absent:** Rick Greenwood (RG), Vice Chair

**Staff:** Michelle Arsenault (MA); Laura Gallagher (LG); Jenny Tucker (JT); Andrea Holm (AH)

### **Agenda**

- October 12<sup>th</sup>, 2021 notes
- Debrief of Fall 2021 NOSB Meeting
- Additional items
- Adjourn

### **Discussion**

- **October 12<sup>th</sup>, 2021 notes** were accepted as written.
- **Debrief of Fall 2021 NOSB Meeting/Additional items.**
  - The group discussed the proposal on Human Capital Management: NOSB support and will postpone work until the NOP writes a statement of work to solicit proposals. The CACS will review the statement of work before it is posted and may post it to the open docket early, for the Spring 2022 meeting.
  - The CACS discussed the next steps for the discussion document on Oversight Improvements to Deter Fraud: Modernization of Organic Traceability Infrastructure presented at the October 2021 meeting. The lead indicated that given public comments they will write another discussion document for the Spring 2022 meeting.
  - Climate change letter proposal presented at October 2021 meeting. The lead expressed her appreciation for comments on organic's relationship with social justice and racial equity, and also recognized OFPA limitations with regard to this.
  - The NOSB Chair announced Amy Bruch as the new CACS Chair. The new Subcommittee rosters are under development and will be sent to the NOSB members soon.
  - The final proposals for the Spring 2022 meeting are due to the NOP by February 16, 2022. A member mentioned the public comments regarding a revision to the organic handling standards (§205.270-272). Since this is not a work agenda item, if the NOSB would like to work on this, they would have to go through the formal work agenda process to request it.
  - CACS discussed takeaways from the October 2021 NOSB meeting and possible future work agenda items. A member suggested a potential work agenda item to strengthen the oversight of NOP's accreditation process related to fraud, and the group will discuss it further. Another member suggested a discussion document on social justice in organic agriculture.
- **The meeting was adjourned.**

### **[Previous CACS Notes](#)**

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

October 12, 2021

November 9, 2021

December 14, 2021

January 11, 2022

February 08, 2022

March 08, 2022  
 April 12, 2022  
 May 10, 2022  
 June 14, 2022  
 July 12, 2022  
 August 09, 2022  
 September 13, 2022  
 October 11, 2022  
 November 08, 2022  
 December 13, 2022

### Work Agenda

Project	Contact	Status	Discussion, Voted	Target meeting
Oversight improvements to deter fraud: Modernization of organic traceability infrastructure.	ADB/NPP	Discussion document	11.9.21 12.14.21	Spr 2022
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal.	TBD	Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work.	TBD	TBD
Human Capital Management: NOSB support - Proposal	CD/NPP	NOP sent memo to CACS 07.31.20	11.9.21 12.14.21	Spr 2022

\*Discussed. \*Voted

Spring 2022 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	~Nov 12, 2021
NOSB - Spring 2022 proposals due to NOP	Feb 16, 2022
New NOSB member training	TBD
NOP - Draft Spring 2022 NOSB meeting tentative agenda	Feb 2, 2022
NOP - Post proposals	Mar 3, 2022
Public comment closes	Apr 1, 2022
NOP - Send compiled public comments to NOSB	Apr 4, 2022
Public comment webinars	Apr 20 & 21, 2022
Spring 2022 NOSB meeting - Crystal City, VA	Apr 26 - 28, 2022
Final recommendations due	May 27, 2022

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

## **Compliance, Accreditation & Certification Subcommittee (CACs) Notes** **Tuesday, October 12, 2021 2:00 pm ET**

**Present:** Nate Powell-Palm (NPP), Chair; Rick Greenwood (RG), Vice Chair; Amy Bruch (ADB)

**Absent:** Steve Ela (SE) ; Kyla Smith (KS); Carolyn Dimitri (CD); Sue Baird (SB)

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

### **Agenda**

- August 10 notes were approved via email
- Additional items
- Adjourn

### **Discussion**

- **August 10 notes** were approved via email
- **Additional items.**
  - Modernization of organic traceability infrastructure. The Chair noted that the comments were supportive of this document and had helpful feedback
  - Climate Change Letter. The Chair noted that commenters were supportive, and people seemed pleased with the letter and intent.
  - The NOP awarded nine projects for the Human Capital Management: Inspector mentorship/ apprenticeship/consistency call for proposals. The NOP has a communications rollout plan and plans to inform the community and NOSB as the project deliverables are completed.
  - The CACS Chair asked about NOP thoughts or guidance for the future status of remote inspections and will discuss this further on the Executive Team call.
- **The meeting was adjourned.**

### **[Previous CACS Notes](#)**

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

August 10, 2021

Oversight improvements to deter fraud: Modernization of organic traceability infrastructure (ADB) -

Discussion Doc - Discuss/Vote

Human Capital Management: NOSB support (CD) - Discuss/Vote

Proposal: Letter to Sec re: climate change initiatives (CD) - Discuss/Vote

September 14, 2021 - cancelled

October 12, 2021

November 9, 2021

December 14, 2021

## Work Agenda

Project	Contact	Status	Discussion, Voted	Target meeting
Oversight improvements to deter fraud: Modernization of organic traceability infrastructure.	NPP/ADB	Discussion document	6.8.21 7.13.21 7.27.21 8.10.21	Fall 2021
Human Capital Management: Inspector mentorship/apprenticeship/consistency proposal.	TBD	Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work.	TBD	TBD
Human Capital Management: NOSB support - Proposal	CD/NPP	NOP sent memo to CACS 07.31.20	5.11.21 6.8.21 7.13.21 8.10.21	Spr 2022
Proposal: Letter to Secretary re Climate Change initiatives	CD	NOP approved work agenda item 6.8.21	6.8.21 7.13.21 8.10.21	Fall 2021

\*Discussed. \*Voted

Fall 2021 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	Jun 3, 2021
NOSB Request for TRs for 2024 sunset materials	Jun 18, 2021
NOP - Draft Fall 2020 NOSB meeting tentative agenda	Jul 30, 2021
NOSB - Fall 2021 proposals due to NOP	Aug 13, 2021
NOP - Post proposals	On or before Sep 1, 2021
Discuss/finalize work agendas on ES call	Sep 21, 2021
Public comment closes	Sep 30, 2021
NOP - Send compiled public comments to NOSB	~Oct 4, 2021
Public comment webinars	Oct 12 & 14, 2021
Fall 2021 NOSB meeting - Sacramento, CA	Oct 19 - 21, 2021

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**Compliance, Accreditation & Certification Subcommittee (CACCS) Notes**  
**Tuesday, August 10, 2021 2:00 pm ET**

**Present:** Nate Powell-Palm (NPP), Chair; Rick Greenwood (RG), Vice Chair; Steve Ela (SE); Amy Bruch (ADB); Kyla Smith (KS); Carolyn Dimitri (CD); Sue Baird (SB)

**Absent:** None

**Staff:** Michelle Arsenault (MA)

**Agenda**

- Review July 27 notes
- Oversight improvements to deter fraud: Modernization of organic traceability infrastructure (ADB) - Discussion Doc - Discuss/Vote
- Human Capital Management: NOSB support (CD) - Discuss/Vote
- Proposal: Letter to Sec re: climate change initiatives (CD) - Discuss/Vote
- Additional items
- Adjourn

**Discussion**

- **The July 27 notes** were accepted as written.
- **Oversight improvements to deter fraud: Modernization of organic traceability infrastructure (ADB) - discussion document.** The CACS discussed the draft document that is meant to build on the Strengthening Organic Enforcement (SOE) rule. Members discussed aspects of the document such as certificates and transparency, the usefulness and maintenance of a database.

Motion to accept the discussion document on oversight improvements to deter fraud: Modernization of organic traceability infrastructure.

Motion by: ADB

Seconded by: NPP

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

- **Proposal: Human Capital Management: NOSB support (CD).** The CACS indicated that the feedback they received from commenters at the Spring 2021 meeting was helpful and was incorporated into the draft proposal. The CACS will provide a verbal update at the Fall 2021 meeting, and gather feedback from the rest of the Board, before proceeding to a proposal for the Spring 2022 meeting.

**Proposal: Letter to Sec re: climate change initiatives (CD).** The CACS posted the draft letter in the open docket and received comments from several stakeholder groups. The group made some minor revisions to the document before moving to a vote. A member asked about the USDA initiative and funding for transitioning and if the funding has to be spent by the end of the 2021 fiscal year.

Motion to accept the proposal/letter to the Secretary re: climate change initiatives

Motion by: NPP

Seconded by: KS

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

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

[Previous CACS Notes](#)

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

July 27, 2021 - Additional call

Oversight improvements to deter fraud: Modernization of organic traceability infrastructure (ADB) - Discuss

August 10, 2021

Oversight improvements to deter fraud: Modernization of organic traceability infrastructure (ADB) - Discussion Doc - Discuss/Vote

Human Capital Management: NOSB support (CD) - Discuss/Vote

Proposal: Letter to Sec re: climate change initiatives (CD) - Discuss/Vote

September 14, 2021 - cancelled

October 12, 2021

November 9, 2021

December 14, 2021

**Work Agenda**

Project	Contact	Status	Discussion, Voted	Target meeting
Oversight improvements to deter fraud: Modernization of organic traceability infrastructure.	NPP/ADB	Discussion document	6.8.21 7.13.21 7.27.21 8.10.21	Fall 2021
Human Capital Management: Inspector mentorship/apprenticeship/consistency proposal.	TBD	Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work.	TBD	TBD
Human Capital Management: NOSB support - Proposal	CD/NPP	NOP sent memo to CACS 07.31.20	5.11.21 6.8.21 7.13.21 8.10.21	Spr 2022
Proposal: Letter to Secretary re Climate Change initiatives	CD	NOP approved work agenda item 6.8.21	6.8.21 7.13.21 8.10.21	Fall 2021

\*Discussed. \*Voted

Fall 2021 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	Jun 3, 2021
NOSB Request for TRs for 2024 sunset materials	Jun 18, 2021
NOP - Draft Fall 2020 NOSB meeting tentative agenda	Jul 30, 2021
NOSB - Fall 2021 proposals due to NOP	Aug 13, 2021
NOP - Post proposals	On or before Sep 1, 2021

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## **Compliance, Accreditation & Certification Subcommittee (CACCS) Notes** **Tuesday, July 27, 2021 2:00 pm ET**

**Present:** Nate Powell-Palm (NPP), Chair; Steve Ela (SE); Amy Bruch (ADB); Kyla Smith (KS); Carolyn Dimitri (CD); ; Sue Baird (SB)

**Absent:** Rick Greenwood (RG), Vice Chair

**Staff:** Michelle Arsenault (MA); Jennifer Tucker (JT)

### **Agenda**

- Review July 13 notes
- Oversight improvements to deter fraud: Modernization of organic traceability infrastructure (ADB) - Discuss.
- Additional items
- Adjourn

### **Discussion**

- **The July 13 notes** were accepted as written.
- **Oversight improvements to deter fraud: Modernization of organic traceability infrastructure (ADB).** With this discussion document, the CACS intends to advance the work that has already been included in the strengthening organic enforcement rule (SOE). The CACS will focus its efforts on four areas: readdressing the topic of transaction certificates; introducing additional considerations for improved tools for human capital assessments; USDA interagency partnerships; and lastly, nitrogen balancing. Members discussed cost of certification, and possible ways to support smaller farmers. A member indicated that integrity is paramount among small producers, and that cost can be an issue. The NOP noted that the cost associated with transaction certificates was one reason it was not included in the SOE rule and noted that an industry-led blockchain could be a possible solution that could be discussed.
- **Additional items.** None.
- **The meeting was adjourned.**

### [Previous CACS Notes](#)

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

July 13, 2021

Proposal: Letter to Sec re: climate change initiatives (CD) - Discuss

Human Capital Management: NOSB support (CD) - Discuss

Oversight improvements to deter fraud: Modernization of organic traceability infrastructure (ADB) - Discuss

July 27, 2021 - Additional call

Oversight improvements to deter fraud: Modernization of organic traceability infrastructure (ADB) - Discuss

August 10, 2021

Oversight improvements to deter fraud: Modernization of organic traceability infrastructure (ADB) - Discussion Doc - Discuss/Vote

Human Capital Management: NOSB support (CD) - Discuss/Vote

Proposal: Letter to Sec re: climate change initiatives (CD) - Discuss/Vote

September 14, 2021  
 October 12, 2021  
 November 9, 2021  
 December 14, 2021

**Work Agenda**

Project	Contact	Status	Discussion, Voted	Target meeting
Oversight improvements to deter fraud: Modernization of organic traceability infrastructure.	NPP/ADB	Discussion document	6.8.21 7.13.21 7.27.21 8.10.21	Fall 2021
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal.	TBD	Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work.	TBD	TBD
Human Capital Management: NOSB support - Proposal	CD/NPP	NOP sent memo to CACS 07.31.20	5.11.21 6.8.21 7.13.21 8.10.21	Fall 2021
Proposal: Letter to Secretary re Climate Change initiatives	CD	NOP approved work agenda item 6.8.21	6.8.21 7.13.21 8.10.21	Fall 2021

\*Discussed. \*Voted

Fall 2021 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	Jun 3, 2021
NOSB Request for TRs for 2024 sunset materials	Jun 18, 2021
NOP - Draft Fall 2020 NOSB meeting tentative agenda	Jul 30, 2021
NOSB - Fall 2021 proposals due to NOP	Aug 13, 2021
NOP - Post proposals	On or before Sep 1, 2021
Discuss/finalize work agendas on ES call	Sep 21, 2021
Public comment closes	Sep 30, 2021
NOP - Send compiled public comments to NOSB	~Oct 4, 2021
Public comment webinars	Oct 12 & 14, 2021
Fall 2021 NOSB meeting - Sacramento, CA	Oct 19 - 21, 2021

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## **Compliance, Accreditation & Certification Subcommittee (CACCS) Notes** **Tuesday, July 13, 2021 2:00 pm ET**

**Present:** Nate Powell-Palm (NPP), Chair; Rick Greenwood (RG), Vice Chair; Steve Ela (SE); Sue Baird (SB); Amy Bruch (ADB); Kyla Smith (KS); Carolyn Dimitri (CD); Mindee Jeffery (MJ) - observer

**Absent:** None

**Staff:** Michelle Arsenault (MA); Jennifer Tucker (JT)

### **Agenda**

- Review June 8 notes
- Proposal: Letter to Sec re: climate change initiatives (CD) - Discuss
- Human Capital Management: NOSB support (CD) - Discuss
- Oversight improvements to deter fraud: Modernization of organic traceability infrastructure - Discuss
- Additional items
- Adjourn

### **Discussion**

- **The June 8 notes** were accepted as written with no additional contributions or amendments.
- **Proposal: Letter to the Secretary re: climate change initiatives (CD).** The CACS members discussed the draft document. The lead highlighted the gaps in research, and members contributed ideas for modifications, such as adding language about mandates from OFPA, and a discussion of transition grants. The lead will modify the draft document and the CACS will post it in the open comment docket in Regulations.gov to get some early feedback from stakeholders before they vote on the document during the next call.
- **Human Capital Management: NOSB support (JT).** The NOP received a number of responses for its request for proposals for Human Capital Management, but none included providing support for the NOSB. The CACS is working on a draft proposal that includes a list of possible projects, and will prioritize them for discussion and vote on the next Subcommittee call. After the Fall meeting, if the NOSB passes the proposal, the NOP will put out a call for proposals.
- **Oversight improvements to deter fraud: Modernization of organic traceability infrastructure (ADB).** The lead described the current draft document and after additional discussion by the group will modify and recirculate it for discussion on the next call.
- **Additional items.** The CACS added an extra call on July 27.
- **The meeting was adjourned.**

### [Previous CACS Notes](#)

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

June 8, 2021

July 13, 2021

Proposal: Letter to Sec re: climate change initiatives (CD) - Discuss

Human Capital Management: NOSB support (CD) - Discuss

Oversight improvements to deter fraud: Modernization of organic traceability infrastructure (ADB) - Discuss

July 27, 2021 - Additional call

Oversight improvements to deter fraud: Modernization of organic traceability infrastructure (ADB) - Discuss/Vote

Human Capital Management: NOSB support (CD) - Discuss

August 10, 2021

Human Capital Management: NOSB support (CD) - Discuss/Vote

Proposal: Letter to Sec re: climate change initiatives (CD) - Discuss/Vote

September 14, 2021

October 12, 2021

November 9, 2021

December 14, 2021

## Work Agenda

Project	Contact	Status	Discussion, Voted	Target meeting
Oversight improvements to deter fraud: Modernization of organic traceability infrastructure.	NPP/ADB	Discussion document	6.8.21 7.13.21 7.27.21	Fall 2021
Human Capital Management: Inspector mentorship/apprenticeship/consistency proposal.	TBD	Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work.	TBD	TBD
Human Capital Management: NOSB support - Proposal	CD/NPP	NOP sent memo to CACS 07.31.20	5.11.21 6.8.21 7.13.21 7.27.21 8.10.21	Fall 2021
Proposal: Letter to Secretary re Climate Change initiatives	CD	NOP approved work agenda item 6.8.21	6.8.21 7.13.21 8.10.21	Fall 2021

\*Discussed. \*Voted

Fall 2021 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	Jun 3, 2021
NOSB Request for TRs for 2024 sunset materials	Jun 18, 2021
NOP - Draft Fall 2020 NOSB meeting tentative agenda	Jul 30, 2021
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## **Compliance, Accreditation & Certification Subcommittee (CACS) Notes** **Tuesday, June 8, 2021 2:00 pm ET**

**Present:** Nate Powell-Palm (NPP), Chair; Steve Ela (SE); Amy Bruch (ADB); Kyla Smith (KS); Carolyn Dimitri (CD); Rick Greenwood (RG), Vice Chair

**Absent:** Sue Baird (SB)

**Staff:** Michelle Arsenault (MA); Jennifer Tucker (JT); Laura Gallagher (LG)

### **Agenda**

- Review May 11 notes
- Human Capital Management: NOSB support (CD).
- Discuss drafting a discussion document on climate change (CD)
- Fraud prevention/enforcement in grain supply chain (ADB)
- Additional items
- Adjourn

### **Discussion**

- **May 11 notes** were accepted as written.
- **Human Capital Management: NOSB support (CD).** The Subcommittee discussed the project to enlist support for the NOSB and proposed a list of tasks or activities that could be performed by the support project team. The NOP is considering entering into a cooperative agreement with a non-profit organization or University if one is identified through the current Request for Applications or a future call for proposals. The organization would determine who to hire for the project. NOP has included in the RFP the tasks the NOSB is seeking help with. Members discussed broadening the scope beyond agriculture schools, to such things as schools of public health. One member offered that his University has an Institute of Environment and Sustainability and students would be interested and engaged in organic-related work.
- **Discussion document on climate change (CD).** The group discussed writing a letter to USDA Secretary Vilsack regarding the Biden Administrations priorities on climate change. The NOSB would like to express its support and highlight the existing USDA resources, including Organic, that perhaps are being underutilized. The CACS will write a proposal for the Fall meeting, which would be posted for public comment and voted on by the NOSB at the Fall meeting. If the proposal passes, the output would be a proposal/recommendation that would include a letter that the NOP would forward to the Secretary.
- **Fraud prevention/enforcement in the grain supply chain (ADB).** A member drafted a presentation on the modernization of organic enforcement and oversight, and the group discussed various components in anticipation of the rule on Strengthening Organic Enforcement (SOE). NOP provided some feedback and encouraged the group to continue to discuss the topic. Although the CACS is not working on a specific document at the moment, it may provide an update at the Fall NOSB meeting.
- **Additional items.** None.
- **The meeting was adjourned.**

### [Previous CACS Notes](#)

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

May 11, 2021

June 8, 2021

July 13, 2021

Proposal: Letter to Secretary re: climate change initiatives (CD) - Discuss

Human Capital Management: NOSB support (CD) - Discuss

August 10, 2021

September 14, 2021

October 12, 2021

November 9, 2021

December 14, 2021

### Work Agenda

Project	Contact	Status	Discussion, Voted	Target meeting
Oversight improvements to deter fraud	TBD	On hold, pending publication of proposed rule on Strengthening organic enforcement (SOE)	6.8.21	TBD
Human Capital Management: Inspector mentorship/apprenticeship/consistency proposal.	TBD	Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work.	TBD	TBD
Human Capital Management: NOSB support - Proposal	CD/NPP	NOP sent memo to CACS 07.31.20	5.11.21 6.8.21 7.13.21	Fall 2021
Proposal: Letter to Secretary re Climate Change initiatives	CD	NOP approved work agenda item 6.8.21	6.8.21 7.13.21	Fall 2021

\*Discussed. \*Voted

Fall 2021 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	~Jun 3, 2021
NOSB Request for TRs for 2024 sunset materials	Jun 18, 2021
NOP - Draft Fall 2020 NOSB meeting tentative agenda	Jul 30, 2021
NOSB - Fall 2021 proposals due to NOP	Aug 13, 2021
NOP - Post proposals	On or before Sep 1, 2021
Discuss/finalize work agendas on ES call	Sep 21, 2021
Public comment closes	Sep 30, 2021
NOP - Send compiled public comments to NOSB	~Oct 4, 2021
Public comment webinars	Oct 12 & 14, 2021
Fall 2021 NOSB meeting - Sacramento, CA	Oct 19 - 21, 2021

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

## **Compliance, Accreditation & Certification Subcommittee (CACCS) Notes** **Tuesday, May 11, 2021 2:00 pm ET**

**Present:** Nate Powell-Palm (NPP), Chair; Sue Baird (SB); Steve Ela (SE); Amy Bruch (ADB); Kyla Smith (KS); Carolyn Dimitri (CD)

**Absent:** Rick Greenwood (RG), Vice Chair

**Staff:** Michelle Arsenault (MA); Jennifer Tucker (JT); Laura Gallagher (LG)

### **Agenda**

- Review April 13 notes
- Debrief from April 2021 NOSB meeting
- Assign discussion dates for work agenda items
- Human Capital Management: NOSB support - Discuss
- Additional items
  - Outcome: Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal
- Adjourn

### **Discussion**

- **April 13 notes** were accepted as written.
- **Debrief from April 2021 NOSB meeting.**
  - The CACS Chair indicated that the organic community is excited by the request for proposals (RFP) seeking applicants to work on the human capital projects. The RFP identified 6 projects including one on NOSB support.
- **Human Capital Management: NOSB support.**
  - The group discussed the second Human Capital Management project for NOSB support and is looking forward to receiving proposals. The NOSB Chair noted the importance of Board members maintaining independence and ownership of their work while allowing for support. The group discussed possible areas for support staff to contribute including literature searches, synthesis of background and historical NOSB data, compiling background information to review substances that are due to sunset for the first time, international use information, etc. The lead volunteered to synthesize and interpret the comments from the Spring meeting. The CACS members also discussed values to consider such as biases and organic experience. The NOP noted that the application deadline is July 2 and the program will have a better idea of the path forward once it assesses the proposals.
- **Assign discussion dates for work agenda items**
  - Human Capital Management will continue to be an open work agenda item until the CACS determines it is completed.
- **Additional items.**
  - The group discussed the revocation of India's organic certification and the timeline involved.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

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

- April 13, 2021
- May 11, 2021
- June 8, 2021
- July 13, 2021
- August 10, 2021
- September 14, 2021
- October 12, 2021
- November 9, 2021
- December 14, 2021

**Work Agenda**

Project	Contact	Status	Discussion, Voted	Target meeting
Oversight improvements to deter fraud	TBD	On hold, pending publication of proposed rule on Strengthening organic enforcement (SOE)	TBD	TBD
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal.	TBD	Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work.	TBD	TBD
Human Capital Management: NOSB support - Proposal	CD/NPP	NOP sent memo to CACS 07.31.20	5.11.21 6.8.21	Fall 2021

\*Discussed. \*Voted

Fall 2021 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	~May 14, 2021
NOSB Request for TRs for 2024 sunset materials	Jun 18, 2021
NOP - Draft Fall 2020 NOSB meeting tentative agenda	Jul 30, 2021
NOSB - Fall 2021 proposals due to NOP	Aug 13, 2021
NOP - Post proposals	On or before Sep 1, 2021
Discuss/finalize work agendas on ES call	Sep 21, 2021
Public comment closes	Sep 30, 2021
NOP - Send compiled public comments to NOSB	~Oct 4, 2021
Public comment webinars	Oct 12 & 14, 2021
Fall 2021 NOSB meeting - Sacramento, CA	Oct 19 - 21, 2021

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**Compliance, Accreditation & Certification Subcommittee (CACs) Notes**  
**Tuesday, April 13, 2021 2:00 pm ET**

**Present:** Nate Powell-Palm (NPP), Chair; Rick Greenwood (RG), Vice Chair; Sue Baird (SB); Steve Ela (SE); Amy Bruch (ADB); Kyla Smith (KS); Carolyn Dimitri (CD)

**Absent:** None

**Staff:** Michelle Arsenault (MA); Jennifer Tucker (JT); Laura Gallagher (LG)

**Agenda**

- Discuss Public Comments
- Prep for Spring 2021 NOSB Meeting
- Additional items
- Adjourn

**Discussion**

- **Discuss Public Comments/Prep for Spring 2021 NOSB Meeting.**
  - Members discussed the public comments for the human capital documents, as well as the general process for summarizing and presenting comments. A member noted that there was general support and agreement about the human capital documents.
- **Additional items.**
  - The request for applications regarding the human capital project cooperative agreement is in progress and should be published soon. There will be a 60-day application period.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

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

March 9, 2021 - cancelled

April 13, 2021

May 11, 2021

June 8, 2021

July 13, 2021

August 10, 2021

September 14, 2021

October 12, 2021

November 9, 2021

December 14, 2021

## Work Agenda

Project	Contact	Status	Discussion, Voted	Target meeting
Oversight improvements to deter fraud	TBD	On hold, pending publication of proposed rule on Strengthening organic enforcement (SOE)	TBD	TBD
Human Capital Management: Inspector mentorship/ apprenticeship/consistency (SB/NPP) - Proposal	SB	NOP sent memo to CACS 07.31.20	11.10.20 12.08.20 01.12.20 2.9.21	Spr 2021
Human Capital Management: NOSB support - Discussion Doc.	SE/NPP	NOP sent memo to CACS 07.31.20	11.10.20 12.08.20 01.12.20	Spr 2021

\*Discussed. \*Voted

Spring 2021 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	Feb 18, 2021
NOSB - Spring 2021 proposals due to NOP	Feb 18, 2021
New NOSB member training	Feb 3-5, 2021
NOP - Draft Spring 2021 NOSB meeting tentative agenda	Feb 2, 2021
NOP - Post proposals	Mar 3, 2021
Public comment closes	Apr 1, 2021
NOP - Send compiled public comments to NOSB	Apr 6, 2021
Public comment webinars	Apr 20 & 22, 2021
Spring 2021 NOSB meeting - Virtual	Apr 28 - 30, 2021

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**Compliance, Accreditation & Certification Subcommittee (CACs) Notes**  
**Tuesday, February 9, 2021 2:00 pm ET**

**Present:** Nate Powell-Palm (NPP), Chair; Sue Baird (SB); Steve Ela (SE); Amy Bruch (ADB); Kyla Smith (KS); Carolyn Dimitri (CD)

**Absent:** Rick Greenwood (RG), Vice Chair

**Staff:** Michelle Arsenault (MA); Jennifer Tucker (JT); Laura Gallagher (LG)

**Agenda**

- Review January 12 notes
- Human Capital Management (SR): Proposal - inspector mentorship/apprenticeship/consistency (SB/NPP) - discuss/vote
- Additional items
- Adjourn

**Discussion**

- **January 12 notes** were accepted as written.
- **Human Capital Management: Proposal - inspector mentorship/apprenticeship/consistency (SB/NPP).** Members discussed the draft document and several key issues such as potential added costs for operations. The NOP is hoping to support the Human Capital Management project by publishing a call for proposals for cooperative agreements. Due to the government contracting process the NOSB and NOP will move at a slightly different pace, and the NOP hopes to publish the call for proposals after the spring NOSB meeting. This is a positive, as it will allow the NOSB to introduce the idea and hear stakeholder feedback. The CACS members discussed minor modifications to the proposal and moved to a vote.

Motion to accept the proposal on Human Capital Management: Inspector mentorship/apprenticeship/consistency

Motion by: SB

Seconded by: KS

Yes: 6 No: 0 Abstain: 0 Absent: 1 Recuse: 0

- **Additional items.** The group cancelled the March 9 call.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

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

January 12, 2021

February 9, 2021

Inspector mentorship/apprenticeship/consistency (SB/NPP) - Discuss/vote

March 9, 2021 - cancelled

April 13, 2021

May 11, 2021

June 8, 2021

July 13, 2021

August 10, 2021  
 September 14, 2021  
 October 12, 2021  
 November 9, 2021  
 December 14, 2021

**Work Agenda**

Project	Contact	Status	Discussion, Voted	Target meeting
Oversight improvements to deter fraud	TBD	On hold, pending publication of proposed rule on Strengthening organic enforcement (SOE)	TBD	TBD
Human Capital Management: Inspector mentorship/ apprenticeship/consistency (SB/NPP) - Proposal	SB	NOP sent memo to CACS 07.31.20	11.10.20 12.08.20 01.12.20 2.9.21	Spr 2021
Human Capital Management: NOSB support - Discussion Doc.	SB/NPP	NOP sent memo to CACS 07.31.20	11.10.20 12.08.20 01.12.20	Spr 2021

\*Discussed. \*Voted

Spring 2021 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	Nov 15, 2020
NOSB - Spring 2021 proposals due to NOP	Feb 18, 2021
New NOSB member training	TBD
NOP - Draft Spring 2021 NOSB meeting tentative agenda	Feb 2, 2021
NOP - Post proposals	Mar 3, 2021
Public comment closes	Apr 1, 2021
NOP - Send compiled public comments to NOSB	Apr 6, 2021
Public comment webinars	Apr 20 & 22, 2021
Spring 2021 NOSB meeting - Crystal City, VA	Apr 28 - 30, 2021

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

## **Compliance, Accreditation & Certification Subcommittee (CACCS) Notes** **Tuesday, January 12, 2021 2:00 pm ET**

**Present:** Nate Powell-Palm (NPP), Chair; Rick Greenwood (RG), Vice Chair; Sue Baird (SB); Emily Oakley (EO); Scott Rice (SR), Chair; Steve Ela (SE); Amy Bruch (ADB) - observer; Kyla Smith (KS) - observer; Carolyn Dimitri (CD) - observer

**Absent:** A-dae Romero-Briones (ARB)

**Staff:** Michelle Arsenault (MA); Jennifer Tucker (JT); Laura Gallagher (LG)

### **Agenda**

- Review December 8 notes
- Human Capital Management (SR)
- Additional items
- Adjourn

### **Discussion**

- **December 8 notes** were accepted as written.
- **Human Capital Management (EO, NPP): Supporting the Work of the NOSB.** The lead circulated a draft discussion document, which includes questions for public comment. Stakeholders have expressed strong support for the idea of engaging assistance for the NOSB. The goal is to provide support with the technical and rule writing. The NOP added that if this is approved and moves forward, the program would use a contractual cooperative agreement and would manage the contract. As such, it would not create an extra burden for NOSB members who are volunteers. A member added that the idea of potentially engaging graduate students was well received by his University. The CACS will reassign the project when the current lead completes her term on the Board.

Motion to accept the discussion document on Supporting the Work of the NOSB

Motion by: EO

Seconded by: SR

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

- **Human Capital Management: Inspector mentorship/apprenticeship/consistency (SB/NPP).** The lead reached out to several members of the inspector community, including current inspectors, and inspectors who have left the industry, to glean feedback about issues and problems that the NOSB could possibly address. Several areas were identified such as time constraints due to travel, the perception that organic inspectors are not professional, and the lack of consistency between certifiers and inspection reports. Members suggested some minor edits to the questions in the draft document. The lead will incorporate the suggestions and the CACS will vote on the document on the next call.
- **Additional items.** None.
- **The meeting was adjourned.**

### [Previous CACS Notes](#)

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

December 8, 2020

January 12, 2021

February 9, 2021

Inspector mentorship/apprenticeship/consistency (SB/NPP) - Discuss/vote

March 9, 2021

April 13, 2021

May 11, 2021

June 8, 2021

July 13, 2021

August 10, 2021

September 14, 2021

October 12, 2021

November 9, 2021

December 14, 2021

### Work Agenda

Project	Contact	Status	Discussion, Voted	Target meeting
Oversight improvements to deter fraud	SR	On hold, pending publication of proposed rule on Strengthening organic enforcement (SOE)	TBD	TBD
Human Capital Management: Inspector mentorship/apprenticeship/consistency (SB/NPP) - Proposal	EO/SB	NOP sent memo to CACS 07.31.20	11.10.20 12.08.20 01.12.20 2.9.21	Spr 2021
Human Capital Management: NOSB support (EO) - Discussion Doc.	EO/SB	NOP sent memo to CACS 07.31.20	11.10.20 12.08.20 01.12.20	Spr 2021

\*Discussed. \*Voted

Spring 2021 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	Nov 15, 2020
NOSB - Spring 2021 proposals due to NOP	Feb 18, 2021
New NOSB member training	TBD
NOP - Draft Spring 2021 NOSB meeting tentative agenda	Feb 2, 2021
NOP - Post proposals	Mar 3, 2021
Public comment closes	Apr 1, 2021
NOP - Send compiled public comments to NOSB	Apr 6, 2021
Public comment webinars	Apr 20 & 22, 2021
Spring 2021 NOSB meeting - Crystal City, VA	Apr 28 - 30, 2021