

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, August 9, 2022 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Kyla Smith (KS); Kim Huseman (KH); Nate Powell-Palm (NPP); Mindee Jeffery (MJ) - observer

Absent: None

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

Agenda

- Review August 2, 2022 notes
- Oversight to Deter fraud: Acreage/mass balance of yields (ADB/NPP) - discuss proposal/vote
- Oversight to Deter fraud: Minimum Reporting Requirements/bills-of-lading (ADB/NPP) - discuss disc. doc/vote
- NOP Risk Mitigation Table review (KS) - discuss proposal/vote
- Organic and Climate-Smart Agriculture (Climate/Equity) (CD) - discuss discussion document/vote
- Additional Items
- Adjourn

Discussion

- **August 2, 2022 notes** were accepted as written, with one minor modification: The climate document will be a discussion document instead of a proposal, and the table below was updated.
- **NOP Risk Mitigation Table review (KS).** The lead summarized the additions/changes she made since the last discussion, and noted the addition of modifications regarding impartiality. The group discussed the proposal and voted to move it forward to the NOSB. The CACS did not receive many comments at the Spring meeting, but did receive a few that were specific and comprehensive.

Motion to accept the proposal on the NOP's risk mitigation table

Motion by: Kyla Smith

Seconded by: Nate Powell-Palm

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

- **Oversight to deter fraud - Acreage/mass balance of yields proposal (ADB/NPP).** The group discussed the proposal on acreage/mass balance of yields. The document focuses on two main aspects: how to avoid double counting acres, and small acres/parcels. The group also discussed the confidentiality and transparency of listing acreage on organic certificates, which would then be publicly available. The lead has some additional modifications to make based on feedback from members, and will add some background on taxonomy. One member felt they needed to do more research on some components of the proposal and therefore abstained from the vote.

Motion to accept the proposal on acreage/mass balance of yields

Motion by: Amy Bruch

Seconded by: Nate Powell-Palm

Yes: 5 No: 0 Abstain: 1 Recuse: 0 Absent: 0

- **Oversight to deter fraud: Minimum reporting requirements/universal bills-of-lading (NPP).** Community feedback indicated that universality is important, and so the CACS has broadened this topic to encompass more than just bills-of-lading. The group had a thoughtful conversation about making reporting requirements more uniform and consistent, resulting in better outcomes for inspectors,

certifiers, and operations. If the forms that inspectors use were more similar it would eliminate inconsistencies, and also aid with better more robust trace-back and mass balance activities.

Motion to accept the discussion document on minimum reporting requirements/universals bills-of-lading

Motion by: Nate Powell-Palm

Seconded by: Jerry D'Amore

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

- **Organic and Climate-Smart Agriculture (Climate/Equity) discussion document (NPP/CD).** The NOSB Chair built upon the previous iteration of the document and incorporated answers to the questions posed in the NOP memo. The goal of the document is to illustrate the strong connection that already exists between organic and climate smart agricultural practices, to ensure that organic is part of the conversation as the USDA initiative on climate and equity progresses. The lead will finalize the document and recirculate to CACS members, who will vote via email. Voting will close Friday, August 12 at 5:00 pm ET.

Motion to accept the discussion document on Organic and Climate-Smart Agriculture

Motion by: Nate Powell-Palm

Seconded by: Kyla Smith

Yes: 5 No: 0 Abstain: 1 Recuse: 0 Absent: 0

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

[Previous CACS Notes](#)

Future call schedule (2nd & 4th Tuesdays 2:00 PM ET | 11:00 AM PT, except where noted.)

August 2, 2022

Oversight to Deter fraud: Acreage/mass balance of yields (ADB/NPP) - discuss proposal/vote

Oversight to Deter fraud: Minimum Reporting Requirements/bills-of-lading (ADB/NPP) - discuss disc. doc/vote

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Organic and Climate-Smart Agriculture (Climate/Equity) (CD) - discuss discussion document/vote

August 9, 2022

September 6, 2022

September 13, 2022

October 11, 2022

November 1, 2022

November 8, 2022

December 6, 2022

December 13, 2022

Work Agenda

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Project	Contact	Doc Type	Notes*	Scheduled, Discussed, Voted	Target meeting
Oversight improvements to deter fraud: Modernization of organic traceability Fall 2022 1. Acreage/mass balance of yields (Prop) and 2. Minimum Reporting Requirements (DD)	ADB/NPP	Proposal, Discussion Doc	08.10.17 NOP Memo to CACS	6.14.22 7.12.22 8.2.22 8.9.22	Fall 2022
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal	TBD	TBD	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	TBD
Human Capital Management: NOSB technical support	JD	Proposal	07.31.20 NOP Memo to CACS	6.14.22 7.5.22 7.12.22	Fall 2022
NOP Risk Mitigation Table review	KS	Proposal	11.18.21 NOP Memo to NOSB . Assigned to CACS on 12.21.21 by Exec Cmte	6.14.22 7.5.22 7.12.22 8.9.22	Fall 2022
Organic and Climate-Smart Agriculture (Climate/Equity)	CD/NPP	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	7.5.22 7.12.22 8.2.22 8.9.22	Fall 2022

Milestones

Fall 2022 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	June 23, 2022
NOP - Draft Fall 2022 NOSB meeting agenda	Aug 5, 2022
NOSB - Fall 2022 proposals due to NOP	Aug 11, 2022
NOP - Post proposals	Aug 31, 2022
Public comment closes	Sep 29, 2022
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Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, August 2, 2022 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Kyla Smith (KS); Kim Huseman (KH); Nate Powell-Palm (NPP); Mindee Jeffery (MJ) - observer

Absent: None

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

Agenda

- Review July 12, 2022 notes
- Oversight to Deter fraud: Acreage/mass balance of yields (ADB/NPP) - discuss proposal/vote
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- Organic and Climate-Smart Agriculture (Climate/Equity) (CD) - discuss proposal/vote
- Additional Items
- Adjourn

Discussion

- **July 12, 2022 notes** were accepted as written
- **Oversight to Deter fraud proposal (ADB/NPP).** The CACS discussed the two components of this work agenda item: 1. A proposal on acreage/mass balance of yields and 2. A discussion document on minimum reporting requirements (formerly bills-of-lading).
 - Acreage/mass balance of yields (ADB). The CACS is proposing that acreage information be reported on organic certificates, which would aid in calculating approximate yields. The group discussed the taxonomy used to describe categories (livestock/crops/vegetables/fruits) and commodities and existing platforms that could be leveraged. NOP noted that the Organic Integrity Database (OID) includes a taxonomy that NOP invested significant work and resources in developing and that has been widely adopted by certifiers and data consumers. NOP noted that certifier reporting of acreage also decouples total acreage from commodity acreage. The lead will make some minor modifications to the draft document and the CACS will vote on the next call.
 - Minimum reporting requirements (formerly bills-of-lading) (NPP). The CACS briefly discussed this project, which has been rescoped to encompass more than just bills-of-lading. NPP will develop and circulate a draft later this week for discussion on the August 9 call.
- **Organic and Climate-Smart Agriculture (Climate/Equity) proposal (CD).** The lead sought feedback from NOSB members on a previous call and incorporated their comments into a draft document. The group had a robust conversation about the intent of the document, as emphasized in the NOP memo that tasked them with exploring "how organic can advance in tandem with climate-smart agriculture to support our planet and our farmers." Members suggested a proposal rather than a discussion document, and will include information demonstrating that organic farming is already climate-smart. A member also suggested making a connection between organic and other sectors of the food system. The audience for the proposal is the USDA and the organic community and trade. NPP will consult with the lead and will revise and recirculate the document before the next CACS call.
- **Additional Items.** None.
- **The meeting was adjourned**

[Previous CACS Notes](#)

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- Oversight to Deter fraud (ADB/NPP). Discuss acreage/mass balance of yields
- NOSB Tech Support (JD). Discuss proposal/vote
- Organic and Climate-Smart Agriculture (Climate/Equity). Discuss discussion document

August 2, 2022

- Oversight to Deter fraud: Acreage/mass balance of yields (ADB/NPP) - discuss proposal
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- Organic and Climate-Smart Agriculture (Climate/Equity) (CD) - discuss proposal

August 9, 2022

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Compliance, Accreditation & Certification Subcommittee (CACS) Notes **Tuesday, July 12, 2022 2:00 pm ET**

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Kyla Smith (KS); Kim Huseman (KH)

Absent: Nate Powell-Palm (NPP)

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

Agenda

- Review July 5, 2022 notes
- NOSB Tech Support (JD). Discuss proposal/vote
- Oversight to Deter Fraud (ADB/NPP). Discuss acreage/mass balance of yields
- Risk Mitigation Table (KS). Discuss
- Organic and Climate-Smart Agriculture (Climate/Equity). Discuss discussion document
- Additional Items
- Adjourn

Discussion

- **July 5, 2022 notes** were accepted as written
- **NOSB Tech Support (JD)**. The lead summarized the draft proposal, noting that there is overwhelming support among the community, NOSB, and NOP staff. The NOSB is putting forth suggestions for what could be completed by the technical support person/people, and will work with the NOP to refine the task list as needed. A member suggested some minor edits to the document for clarity, and the CACS moved to a vote. The proposal will be posted for public comment and will be on the agenda for the Fall 2022 NOSB meeting.

Motion to accept the proposal on NOSB technical support

Motion by: JD

Seconded by: KH

Yes: 5 No: 0 Abstain: 0 Absent: 1 Recuse: 0

- **Oversight to Deter Fraud (ADB/NPP)**. The lead summarized the work to date on the acreage/mass balance of yields project. Several CACS members met with staff from the California Department of Food and Agriculture (CDFA) to talk about best practices, since CDFA already has well-established processes and guidelines. The Subcommittee discussed reporting structure and challenges with flexibility as conditions change. The CACS noted a recent press release from the Department of Justice regarding organic grain fraud, and briefly discussed this in the context of organic certificates and inspections. The lead also mentioned potential difficulties with international oversight, although the Strengthening Organic Enforcement rule (SOE) will likely help.
- **Risk Mitigation Table (KS)**. The lead will draft a proposal based on feedback from NOP and CACS member and the Subcommittee will discuss it on the August 2 call.
- **Organic and Climate-Smart Agriculture (Climate/Equity) (CD)**. The lead is working on a draft document and asked for feedback from members by July 22. NOP highlighted two resources that the CACS may find helpful as they develop the document: the [memo](#) that NOP sent to the CACS in February, which contains specific guidance, and the [USDA-wide climate change activities](#). Members highlighted the benefits of the organic label as a multifaceted, systems-based approach, which positions it well in the climate-smart ag conversation. Such things as carbon capture, soil health, and the lack of pesticides and

chemicals, all factor into the issue. A member emphasized the importance of viewing it as a system, since it's much broader than just soil. The CACS will discuss the draft document on the August 2 call.

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

[Previous CACS Notes](#)

Future call schedule (2nd & 4th Tuesdays 2:00 PM ET | 11:00 AM PT, except where noted.)

July 12, 2022

- Oversight to Deter fraud (ADB/NPP). Discuss acreage/mass balance of yields
- NOSB Tech Support (JD). Discuss proposal/vote
- Organic and Climate-Smart Agriculture (Climate/Equity). Discuss discussion document

August 2, 2022

- Oversight to Deter fraud (ADB/NPP). Discuss acreage/mass balance of yields; Bills-of-lading
- NOP Risk Mitigation Table review. Discuss proposal/vote
- Organic and Climate-Smart Agriculture (Climate/Equity) - discuss

August 9, 2022

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Compliance, Accreditation & Certification Subcommittee (CACs) Notes

Tuesday, July 5, 2022 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Kyla Smith (KS); Nate Powell-Palm (NPP)

Absent: Kim Huseman (KH)

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

Agenda

- Review June 14, 2022 notes
- Risk Mitigation Table (KS) - discuss in-scope/out-of-scope public comments from spring and finalize next steps
- Tech Support (JD) - review draft proposal
- Climate Memo (CD) - review framework
- Oversight to Deter fraud (ADB/NPP) - review best practices
- Additional Items
- Adjourn

Discussion

- **June 14, 2022 notes** were accepted as written.
- **Risk Mitigation Table (KS).** The lead summarized the discussion from the last CACS call, and the group reviewed the current list of items under consideration for the next iteration of the proposal. The CACS would like to invite Rebecca Claypool of NOP to the next CACS call as they finalize the list. The CACS will include items that it is not sure about, and let the NOP determine if they are appropriate and in-scope.
- **NOSB Tech Support Proposal (JD).** The lead circulated a draft document, which includes public comment the NOSB received on the Spring 2022 discussion document. The group discussed outstanding questions, including the potential source of technical support and Board autonomy. Members discussed the independence of using another department within USDA versus an outside entity. Although it seems counterintuitive, if NOP contracts with an outside entity, then it (NOP) would oversee the contract, scope of work, and deliverables.
- **Organic and Climate-Smart Agriculture (Climate/Equity) (CD).** The lead has had discussions with stakeholders and is reviewing literature, and will work on a draft document to bring to a future call. She views this project as iterative and incremental. The NOSB Chair added that the [initial memo from NOP](#) contained a lot of information, and it may be helpful to revisit it as they move forward. The CACS is aiming for a document that frames the issue to seek public comment and to facilitate conversations.
- **Oversight to Deter fraud (ADB/NPP).** Deferred to next call due to lack of time.
- **Additional Items.** The NOSB Vice chair has engaged in conversations with CDFA to discuss the current best practices on acreage reporting.
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future call schedule (2nd & 4th Tuesdays 2:00 PM ET | 11:00 AM PT, except where noted.)

July 5, 2022

July 12, 2022

Oversight to Deter fraud (ADB/NPP). Discuss acreage/mass balance of yields

NOSB Tech Support (JD). Discuss proposal/vote

Organic and Climate-Smart Agriculture (Climate/Equity). Discuss discussion document

August 2, 2022

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Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, June 14, 2022 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Mindee Jeffery (MJ); Kim Huseman (KH); Kyla Smith (KS); Nate Powell-Palm (NPP)

Absent: None

Staff: Michelle Arsenault (MA); Rebecca Claypool (RC); David Glasgow (DG)

Agenda

- Review May 10, 2022 notes
- NOP Risk Mitigation Table review (KS)
- NOSB tech support proposal (JD)
- Climate Memo framework discussion
- Acres on Certificates - Define boundaries of confidential business information
- Additional Items
- Adjourn

Discussion

- **May 10, 2022 notes** were accepted as written.
- **NOP Risk Mitigation Table review (KS).** Rebecca Claypool and David Glasgow joined the call to discuss the NOP Risk Mitigation Table proposal. The NOP asked the NOSB to review the table because there was an update to the ISO standards, which changed how accreditation bodies manage risk for impartiality. The CACS presented a document to the full NOSB at the Spring 2022 meeting, which was sent back to the Subcommittee for additional work. The document is intended for accreditation bodies, and some of the comments the NOSB received were outside of scope. The CACS is going to work on a document for the Fall meeting and will acknowledge concerns they heard from commenters. The NOP added that this is a living document and can be updated as needed.
- **NOSB tech support proposal (JD).** The NOP and organic stakeholders are supportive of this work agenda item. The lead will have a draft document ready for the next call. Outstanding questions for discussion include the following:
 - Where should support come from? Internal or external?
 - Would NOSB lose autonomy seeking outside help?
 - What are the costs involved and are ? Is this an issue? DG provided some feedback about possible issues.
- **Climate Memo framework discussion (CD).** The CACS will work on this project during the next meeting. The group discussed the idea of inviting guests to future calls. A member offered to share a link to a hearing occurring tomorrow in which the OFRF is participating.
- **Acres on Certificates - Define boundaries of confidential business information (CBI) (ADB).** The CACS discussed CBI and how organic could be more transparent. Members discussed data collection, which some agencies do, and the need for data collection for the purposes of enforcement and identifying risk. NOP noted that it doesn't collect acreage data unless it's for enforcement activities. NOP also highlighted the risk management aspect, and reminded the group that organic is an opt-in standard. Members also discussed how this could impact different sectors of the organic community, and how it would apply to international equivalency agreements. The NOSB Vice Chair shared a link to a document from the California Department of Food and Ag (CDFA) as a reminder that CA has already done a lot of work on this realm.

Additional Items. The CACS added an extra call each month, and discussed moving it from the 4th Tuesday to a different week and day. NOP will search for a couple of options and let the group know.

The meeting was adjourned

[Previous CACS Notes](#)

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June 14, 2022

NOSB tech support proposal

June 28, 2022

July 12, 2022

July 26, 2022

August 9, 2022

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NOP - Send compiled public comments to NOSB	~Oct 3, 2022
Public comment webinars	Oct 18 & 20, 2022
Fall 2022 NOSB meeting - Sacramento, CA	Oct 25 - 27, 2022
Final recommendations due	Nov 25, 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, May 10, 2022 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Nate Powell-Palm (NPP); Mindee Jeffery (MJ); Kim Huseman (KH)

Absent: Kyla Smith (KS)

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

Agenda

- Review April 12, 2022 notes
- Debrief from Spring 2022 NOSB meeting.
- Discuss ideas for the framework for the climate work agenda item
- Brainstorm additional topics for work agenda for the upcoming semester
- Finalize CACS meeting schedule
- Additional Items. June 14 or May 10 talk through RMT.
- Adjourn

Discussion

- **April 12, 2022 notes** were accepted as written.
- **Debrief from Spring 2022 NOSB meeting.**
 - The Chair thanked the group for their flexibility at the meeting to continue the discussion of the Modernization of organic traceability later in the meeting.
 - Oversight improvements to deter fraud: Modernization of organic traceability Fall 2022: The CACS discussed decoupling two topics within this project: Acreage and universal bills-of-lading. The intent is to aggregate acreage information into the organic certificate, and with regard to the bills-of-lading piece, the intent is to improve usability and standardization. The lead will look more closely at the confidential business information (CBI) component, and NOP will seek feedback from within the USDA from personnel who can speak to CBI, such as technology and privacy officers. The group also discussed the idea of a universal Organic System Plan (OSP), which has mixed certifier support, crop insurance, and the cost share program. The NOSB Chair asked about inviting Natural Resources Conservation Service(NRCS) or Farm Service Agency (FSA) to a future call to discuss.
 - NOSB tech support (JD). The lead summarized the feedback from the Spring meeting, and laid out the possible paths forward. The two main questions/concerns are how to fund NOSB tech support, and how to protect the Board's autonomy. The organic community was supportive of the project.
 - Risk Mitigation Table. NOP is reviewing the public comments to determine if the scope of the Risk Mitigation Table needs to be revised or updated. If so, the NOP may ask the CACS to continue work on this.
- **Climate work agenda item (CD).** The CACS would like to reach out to the community seeking ideas for what this project could and should look like. Given that climate change is a broad topic, the group will put some boundaries on it. The lead will sketch out some directions and present that to the CACS on a future call.
- **Additional topics for work agenda.** The CACS has a full schedule and will not add any new topics at this time.
- **Finalize CACS meeting schedule.** The CACS would like to add meeting time each month and discussed adding 30 minutes to the current call, which also requires swapping the CACS call with the Materials Subcommittee call. The NOP will work with the CACS to find a solution.

- **Additional Items.** The CACS is interested in inviting guest speakers to the calls to provide feedback on the climate change discussion. A member reminded the group of an upcoming organic farming research day at USDA, being held in Beltsville, MD and virtually, and noted that Michel Cavigelli, a soil scientist with ARS, who is leading the field day, would be a valuable speaker.
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future call schedule (2nd & 4th Tuesdays 2:00 PM ET | 11:00 AM PT, except where noted.)

April 12, 2022

May 10, 2022

June 14, 2022

NOSB tech support proposal

June 28, 2022

July 12, 2022

July 26, 2022

August 9, 2022

August 23, 2022

September 13, 2022

September 27, 2022

October 11, 2022

November 8, 2022

November 22, 2022

December 13, 2022

December 27, 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 Fall 2022	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	5.10.22	Fall 2022
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal	TBD	TBD	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	TBD
Human Capital Management: NOSB technical support	JD	Proposal	07.31.20 NOP Memo to CACS	5.10.22 6.14.22	Fall 2022
NOP Risk Mitigation Table review	KS	Proposal	11.18.21 NOP Memo to NOSB . Assigned to CACS on 12.21.21 by Exec Cmte	5.10.22	Fall 2022

Organic and Climate-Smart Agriculture (Climate/Equity)	CD	Discussion Document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.14.22	Fall 2022
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Milestones

Fall 2022 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	~May 20, 2022
NOP - Draft Fall 2022 NOSB meeting agenda	Aug 5, 2022
NOSB - Fall 2022 proposals due to NOP	Aug 11, 2022
NOP - Post proposals	Aug 31, 2022
Public comment closes	Sep 29, 2022
NOP - Send compiled public comments to NOSB	~Oct 3, 2022
Public comment webinars	Oct 18 & 20, 2022
Fall 2022 NOSB meeting - Sacramento, CA	Oct 25 - 27, 2022
Final recommendations due	Nov 25, 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, April 12, 2022 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Nate Powell-Palm (NPP); Kyla Smith (KS); Mindee Jeffery (MJ)

Absent: None

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

Agenda

- Review March 8, 2022 14, 2022 notes
- Review upcoming oral comments and board meeting agenda
- Discuss ideas for the framework for the climate work agenda item
- Brainstorm additional topics for work agenda for the upcoming semester
- Finalize updated CACS meeting schedule
- Additional Items
- Adjourn

Discussion

- **March 8, 2022 notes** were accepted as written.
- **Review written comments and board meeting agenda.**
 - NOSB technical support: The CACS received a number of comments on the NOSB technical support document. Commenters addressed the topics thoughtfully, and the CACS is looking forward to further discussion at the NOSB meeting. The group discussed how other USDA agencies would factor into the decision if the Board were to choose to seek technical support from within the USDA. Members also discussed benefits and challenges of chooses external versus internal assistance.
 - Risk management table: The CACS received detailed comments and looks forward to discussing this more at the NOSB meeting. The CACS will summarize the comments and forward those along with the recommendation to NOP after the meeting.
 - Modernization of organic traceability: The lead posed questions to the group regarding the document and feedback from the community regarding acreage reporting, non-compliances, information sharing, etc.
- **Framework for the climate work agenda item.** The CACS received comments despite the fact that there is no document yet. The NOP sent a memo to the CACS in February asking them to work on a climate change project, and the CACS will discuss the topic on a future call. Members are supportive of making sure organic is at the forefront of the conversation. The group also discussed the possibility of holding an expert panel at a future NOSB meeting. NOP supports this idea. A member cautioned the group about gaps in research, and about difficulties when comparing the US to the EU. After the Spring meeting, the CACS will discuss the scope the project.
- A member shared a link to an upcoming organic farming research event being held in Maryland (and virtually) by a soil scientist at the USDA Agricultural Research Service (ARS), which will include discussions on future organic research topics.
- **Additional topics for work agenda for the upcoming semester.** Deferred to later call.
- **Finalize CACS meeting schedule.** The CACS would like to either add an additional call each month or add 30 minutes to its existing call. In order to add 30 extra minutes, it would require swapping the call time with the Materials Subcommittee and starting a half-hour earlier. Another option would be to hold an additional meeting on a different day of the week. NOP will check with the MS Chair and members.
- **Additional Items.** None.
- **The meeting was adjourned**

[Previous CACS Notes](#)

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

- March 8, 2022
- April 12, 2022
- May 10, 2022
- June 14, 2022
- July 12, 2022
- August 9, 2022
- September 13, 2022
- October 11, 2022
- November 8, 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 Spring 2022	ADB/NPP	Discussion Document	08.10.17 NOP Memo to CACS	11.9.21 12.14.21 1.11.22 1.25.22 2.14.22	Spr 2022
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal	TBD	TBD	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	TBD
Human Capital Management: NOSB technical support	JD	Discussion Document	07.31.20 NOP Memo to CACS	11.9.21 12.14.21 1.11.22 1.25.22 2.14.22	Spr 2022
NOP Risk Mitigation Table review	KS	Proposal	11.18.21 NOP Memo to NOSB . Assigned to CACS on 12.21.21 by EC	1.25.22 2.8.22	Spr 2022
Organic and Climate-Smart Agriculture (Climate/Equity)	CD	Discussion Document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	1.11.22 1.25.22	Fall 2022

Milestones

Spring 2022 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	Mar 3, 2022
NOSB - Spring 2022 proposals due to NOP	Feb 16, 2022

New NOSB member training	Mar 16 - 18, 2022
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 19 & 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, March 8, 2022 2:00 pm ET**

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Nate Powell-Palm (NPP)

Absent: Kyla Smith (KS)

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

Agenda

- Review February 14, 2022 notes
- Review spring meeting agenda
- Review climate letter - confirm that CACS committee will work on this
- Additional Items
- Adjourn

Discussion

- **February 14, 2022 notes** were accepted as written.
- **Review spring meeting agenda.** The CACS discussed the three agenda items for the Spring meeting. They have one hour for two discussion documents and one proposal
- **Review climate letter (CD).** The NOSB Chair confirmed that the CACS committee will work on this topic for the upcoming semester. The lead has some upcoming meetings and will be discussing both climate change and equity and will bring that info back to the CACS. NOP added that the memo was based on a framework from the previous CACS work, similar to the import oversight and human capital projects, which are longer-term "umbrella" work agenda items.
- **Additional Items.**
 - NOSB Current and Past, was a topic that a CACS member proposed, but for now they will table it. The CACS may talk more about it when they meet in person, rather than virtually.
 - A member mentioned that crop insurance is an issue that needs to be addressed, even though it is not under the purview of NOSB or NOP, it is important to discuss its relationship to organic, and potential barriers. The member added that it could be a good fit with the climate-smart-ag initiative. Another member added that crop insurance is very complicated and important, and proposed a crop insurance panel or NOP-hosted educational webinars.
 - The CACS discussed a possible research priority on crop insurance to assess what is currently out there, what gaps exist, and what the barriers are. This may be a great question to ask NIFA at the spring NOSB meeting. Perhaps the Risk Management Agency (RMA) could guest speak on a future CACS call. The NOSB Chair will formulate question(s) for NIFA, and will also try to tie risk management into climate change and crop Insurance.
 - The CACS will discuss swapping call times with the PDS, in order to give the CACS more time to meet. If that does not work, they may add a second call each month.
- **The meeting was adjourned**

[Previous CACS Notes](#)

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

February 14, 2022 (Monday - Additional call)

NOSB tech-support discussion doc (JD) - discuss/vote

Oversight improvements to deter fraud: Modernization of Supply Chain Traceability discussion doc (ADB/NP) - discuss/vote

NOSB Current and Past (CD) - discuss

- March 8, 2022
- April 12, 2022
- May 10, 2022
- June 14, 2022
- July 12, 2022
- August 9, 2022
- September 13, 2022
- October 11, 2022
- November 8, 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 Spring 2022	ADB/NPP	Discussion Document	08.10.17 NOP Memo to CACS	11.9.21 12.14.21 1.11.22 1.25.22 2.14.22	Spr 2022
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal	TBD	TBD	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	TBD
Human Capital Management: NOSB technical support	JD	Discussion Document	07.31.20 NOP Memo to CACS	11.9.21 12.14.21 1.11.22 1.25.22 2.14.22	Spr 2022
NOP Risk Mitigation Table review	KS	Proposal	11.18.21 NOP Memo to NOSB . Assigned to CACS on 12.21.21 by EC	1.25.22 2.8.22	Spr 2022
Climate/Equity	CD	Discussion Document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS XX.XX.XX	1.11.22 1.25.22	Fall 2022

Milestones

Spring 2022 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	Mar 3, 2022
NOSB - Spring 2022 proposals due to NOP	Feb 16, 2022
New NOSB member training	Mar 16-18, 2022

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 19 & 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 **Monday, February 14, 2022 2:00 pm ET**

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Nate Powell-Palm (NPP); Kyla Smith (KS)

Absent: None

Staff: Michelle Arsenault (MA)

Agenda

- Review February 8, 2022 notes
- NOSB tech-support discussion doc (JD) - discuss/vote
- Oversight improvements to deter fraud: Modernization of Supply Chain Traceability Spring 2022 discussion doc (ADB/NP) - discuss/vote
- NOSB Current and Past (CD) - discuss
- Adjourn

Discussion

- **February 8, 2022 notes** were accepted as written.
- **NOSB tech-support discussion document (JD).** The lead summarized the document, noting the modifications made based on feedback since the last call. The CACS moved to a vote on the document and will forward it to the NOP for posting at the Spring meeting.

Motion to accept the discussion document on NOSB technical support

Motion by: JD

Seconded by: KS

Additional Discussion: None

Yes: 5 No: 0 Abstain: 0 Absent: 0 Recuse: 0

- **Oversight improvements to deter fraud: Modernization of Supply Chain Traceability Spring 2022 discussion document (ADB/NP).** The group discussed the draft document, made some minor edits, and moved to a vote. The CACS will post this document for the Spring meeting.

Motion to accept the discussion document on Oversight Improvements to Deter Fraud: Modernization of Supply Chain Traceability Spring 2022

Motion by: ADB

Seconded by: NPP

Additional Discussion: None

Yes: 5 No: 0 Abstain: 0 Absent: 0 Recuse: 0

- **NOSB Current and Past (CD).** The lead explained the impetus behind the idea for this document, which is two-fold: to inform new members and remind other members about the broader NOSB mandate; and to seek historical information about the sunset process and what the resolution was after the lawsuit and court ruling. The lead also noted the value in having the conversation as a full Board. The group discussed how to move forward, if at all, and will discuss this on the next call.
- **Additional Items.** None.
- **The meeting was adjourned**

[Previous CACS Notes](#)

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

February 8, 2022

- Review January 11, 2022 notes
- Review January 25, 2022 notes
- NOSB tech-support doc (JD) - discuss/vote
- Risk Management Table (KS) - discuss/vote
- Oversight improvements to deter fraud: Modernization of Supply Chain Traceability (ADB/NP) - discuss/vote
- Climate Change/Equity Update (CD) - discuss/vote

February 14, 2022 (Monday - Additional call)

- NOSB tech-support discussion doc (JD) - discuss/vote
- Oversight improvements to deter fraud: Modernization of Supply Chain Traceability discussion doc (ADB/NP) - discuss/vote
- NOSB Current and Past (CD) - discuss

March 8, 2022

April 12, 2022

May 10, 2022

June 14, 2022

July 12, 2022

August 9, 2022

September 13, 2022

October 11, 2022

November 8, 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 Spring 2022	ADB/NPP	Discussion Document	08.10.17 NOP Memo to CACS	11.9.21 12.14.21 1.11.22 1.25.22 2.14.22	Spr 2022
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal	TBD	TBD	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	TBD
Human Capital Management: NOSB technical support	JD	Discussion Document	07.31.20 NOP Memo to CACS	11.9.21 12.14.21 1.11.22 1.25.22 2.14.22	Spr 2022

NOP Risk Mitigation Table review	KS	Proposal	11.18.21 NOP Memo to NOSB . Assigned to CACS on 12.21.21 by EC	1.25.22 2.8.22	Spr 2022
Climate/Equity	CD	Discussion Document	Approved by Exec Cmmte/NOP 1.18.22	1.11.22 1.25.22	Fall 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 19 & 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, February 8, 2022 2:00 pm ET**

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

Absent: None

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

Agenda

- Review January 11, 2022 notes
- Review January 25, 2022 notes
- NOSB tech-support discussion document (JD) - discuss/vote
- Risk Management Table (KS) - discuss/vote
- Oversight improvements to deter fraud: Modernization of Supply Chain Traceability (ADB/NP) - discuss/vote
- NOSB (CD) - discuss/vote
- Adjourn

Discussion

- **January 11, 2022 notes** were accepted as written.
- **January 25, 2022 notes** were accepted as written.
- **NOSB tech-support discussion document (JD).** The lead summarized the draft document noting the two tasks in front of the CACS and NOSB. First, to confirm that the NOSB does want technical assistance and whether that assistance should come from the USDA or from the non-profit/university community. The CACS will submit a discussion document for the Spring 2022 meeting. The lead will circulate a revised draft for vote on February 14.
- **Risk Mitigation Table Review (KS).** The lead thanked the members for feedback and the CACS moved to a vote on the proposal.

Motion to accept the proposal on NOP's Risk Mitigation Table

Motion by: KS

Seconded by: NPP

Yes: 5 No: 0 Abstain: 0 Absent: 0 Recuse: 0

- **Oversight improvements to deter fraud: Modernization of Supply Chain Traceability Discussion Document (ADB/NP).** The leads circulated a draft discussion document and the CACS discussed it. The CACS added an additional call on February 14 to complete the vote.
- **NOSB Current and Past (CD).** A member proposed a topic for conversation regarding the role of the NOSB, based on the initial intent of OFPA. The CACS discussed the idea and what the goal of this would be. A member noted that if the goal is to suggest changes to OFPA, that would require negotiations within the framework of the Farm Bill and Congress. The CACS will talk more about this on the February 14 call.
- **Additional Items.** The CACS added a call on February 14 to complete two votes.
- **The meeting was adjourned**

[Previous CACS Notes](#)

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

January 25, 2022

NOP Risk Mitigation Table - Assign lead/Discuss

February 08, 2022

Review January 11, 2022 notes

Review January 25, 2022 notes

NOSB tech-support doc (JD) - discuss/vote

Risk Management Table (KS) - discuss/vote

Oversight improvements to deter fraud: Modernization of Supply Chain Traceability (ADB/NP) - discuss/vote

Climate Change/Equity Update (CD) - discuss/vote

February 14, 2022 (Monday - Additional call)

NOSB tech-support discussion doc (JD) - discuss/vote

Oversight improvements to deter fraud: Modernization of Supply Chain Traceability discussion doc (ADB/NP) - discuss/vote

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/Supply Chain Verification	ADB/NPP	Discussion Document	08.10.17 NOP Memo to CACS	11.9.21 12.14.21 1.11.22 1.25.22 2.14.22	Spr 2022
Human Capital Management: Inspector mentorship/apprenticeship/consistency proposal	TBD	TBD	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	TBD
Human Capital Management: NOSB support	JD	Discussion Document	07.31.20 NOP Memo to CACS	11.9.21 12.14.21 1.11.22 1.25.22 2.14.22	Spr 2022

NOP Risk Mitigation Table review	KS	Proposal	11.18.21 NOP Memo to NOSB . Assigned to CACS on 12.21.21 by EC	1.25.22 2.8.22	Spr 2022
Climate/Equity	CD	Discussion Document	Approved by Exec Cmmte/NOP 1.18.22	1.11.22 1.25.22	Fall 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
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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, January 25, 2022 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Nate Powell-Palm (NPP); Kyla Smith (KS)

Absent: None

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

Agenda

- NOSB tech-support doc review update (JD)
- Climate Change/Equity Update (CD)
- Risk Management Table (KS) [NOP Memo to NOSB - Risk Mitigation Table \(usda.gov\)](#)
- Supply Chain Verification Update (ADB/NP)
- Additional Items
- Adjourn

Discussion

- **NOSB tech-support doc review update (JD).** The lead expressed support for this work given the workload of the NOSB. Members discussed several facets of the project including barriers to finding the appropriate expertise, and the perception that the NOSB does not have autonomy from the NOP. The CACS is considering the pros and cons of seeking support from non-profits/universities, versus a department within the USDA, but outside of NOP. The discussion document will include an excerpt from the NOPs statement of work and the CACS will seek feedback from the organic stakeholders at the Spring 2022 NOSB Meeting.
- **NOP Risk Mitigation Table.** KS will lead this project and is seeking feedback from the other Subcommittee members. The CACS intends on presenting a discussion document at the Spring 2022 NOSB meeting to gather feedback from stakeholders before sending its response to the NOP.
- **Climate Change/Equity Update (CD).** The lead indicated that this project is vast, and she is still working on scoping, but may produce a brief discussion document for the Spring NOSB meeting to introduce the topic and start a discussion. The NOP will be sending the CACS a work agenda item on this topic, which may initiate a document for the Fall 2022 meeting.
- **Supply Chain Verification Update (ADB/NPP).** The leads indicated that this is a work in progress and the group had a robust conversation about best practices and next steps for aspects such as tech support for the community and how enhanced data collection could possibly assist in identifying fraud. Members discussed the use of the Organic Integrity Database to input data, and the benefits and challenges associated with that. A member noted that the Strengthening Organic Enforcement (SOE) rule does have data requirements that may address this need, and it might be better to wait until it is published before they move forward.
- **Additional Items.** None
- **The meeting was adjourned**

[Previous CACS Notes](#)

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

January 11, 2022

January 25, 2022

NOP Risk Mitigation Table - Assign lead/Discuss

February 08, 2022

Review January 11, 2022 notes

Review January 25, 2022 notes

NOSB tech-support doc (JD) - discuss/vote

Risk Management Table (KS) - discuss/vote

Oversight improvements to deter fraud: Supply Chain Verification Update (ADB/NP) - discuss/vote

Climate Change/Equity Update (CD) - discuss/vote

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/Supply Chain Verification	ADB/NPP	Discussion Document	08.10.17 NOP Memo to CACS	11.9.21 12.14.21 1.11.22 1.25.22 2.8.22	Spr 2022
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal	TBD	TBD	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	TBD
Human Capital Management: NOSB support	JD	Discussion Document	07.31.20 NOP Memo to CACS	11.9.21 12.14.21 1.11.22 1.25.22 2.8.22	Spr 2022
NOP Risk Mitigation Table review	KS	Discussion Document	11.18.21 NOP Memo to NOSB . Assigned to CACS on 12.21.21 by EC	1.25.22 2.8.22	Spr 2022
Climate/Equity	CD	Discussion Document	Approved by Exec Cmmte/NOP 1.18.22	1.11.22 1.25.22 2.8.22	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 19 & 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, January 11, 2022 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.

Absent: None

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

Agenda

- Review December 14, 2021 notes
- Tech-Support for NOSB RFA (CD/NPP)
- Climate/Equity (CD)
- Oversight Improvements to deter fraud (ADB/NPP)
- NOP Risk Mitigation Table (Assigned to CACS 12.21.21) - Assign lead/Discuss
- Additional Items
- Adjourn

Discussion

- **December 14, 2021 notes** were accepted with a minor correction.
- **Tech-Support for NOSB RFA (CD/NPP).** The NOP drafted a proposal seeking assistance for the NOSB members, and the CACS will review the draft and provide feedback. The group discussed whether to seek assistance from non-profits and outside organizations, or to solicit help from within the government/USDA, but outside of NOP/AMS.
- **Climate/Equity (CD).** The lead introduced the issues that the Board proposes to address with this project and will write a request to add this to the CACS work agenda. The Chair will forward the request to the Executive team for discussion on the January 18 call. Members discussed possible topics and content for consideration.
- **Oversight Improvements to deter fraud (ADB/NPP).** The lead summarized feedback from the community from the Fall meeting regarding goals, outstanding questions, and the focus going forward. The CACS discussed whether to produce a document for the Spring meeting or to wait until other external pieces move ahead, specifically the final rule for Strengthening Organic Enforcement (SOE).
- **NOP Risk Mitigation Table (Assigned to CACS 12.21.21).** Deferred to January 25 call.
- **Additional Items.** None.
- **The meeting was adjourned**

[Previous CACS Notes](#)

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

December 14, 2021

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

Finalize Potential Work Agenda Topics (AB)

January 11, 2022

January 25, 2022

NOP Risk Mitigation Table - Discuss

February 08, 2022

March 08, 2022

April 12, 2022

May 10, 2022
 June 14, 2022
 July 12, 2022
 August 09, 2022
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Work Agenda

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Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal	TBD	TBD	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	TBD
Human Capital Management: NOSB support	CD/NPP	DD/Proposal?	07.31.20 NOP Memo to CACS	11.9.21 12.14.21 1.11.22 2.8.22	Spr 2022
NOP Risk Mitigation Table review	TBD	TBD	11.18.21 NOP Memo to NOSB . Assigned to CACS on 12.21.21 by EC	1.25.22	Spr 2022
Climate/Equity	CD	TBD	Pending approval by Exec Cmmte/NOP.	1.11.22 2.8.22	TBD

Milestones

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