

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 10, 2024 4:00 pm ET

Present: Kyla Smith (KS), Chair; Amy Bruch (ADB); Jerry D'Amore (JD); Allison Johnson (AJ); Carolyn Dimitri (CD), Vice Chair

Absent: Kim Huseman (KH); Nate Powell-Palm (NPP)

Staff: Michelle Arsenault (MA); Jo Mirenda (JM); Heather Kumar (HK)

Agenda

- Review December 3, 2024 notes
- Consistency in Organic Seed Use (AJ/CD) - discuss
- Residue Testing Framework (ADB/NPP/NL/KH) - discuss draft proposal
- Other business
- Adjourn

Discussion

- **December 3, 2024 notes** were accepted as written.
- **Consistency in Organic Seed Use (AJ/CD).** The Chair opened the floor for discussion about seed, and the goal for this document. The CACS previously discussed hosting a seed panel at the Spring 2025 meeting. The MS discussed induced metagenesis at its call today, and perhaps hosting a panel on seed breeding would be helpful to both Subcommittees. A member mentioned that they are anticipating two new reports at the beginning of the year, and perhaps it would be better to wait until then before moving ahead with a discussion document for the spring, and it would also be helpful to continue to collect information at the spring meeting. A member added that it would be helpful to hear from the USDA Economic Research Service (ERS), who could provide a broader framework on organic seed, before hearing from those who may have a more focused stake in the industry. Members supported this approach, and one of the leads offered to spend her winter break researching the literature as a basis for future CACS work. Members discussed the possibility of a panel or guest speakers, and also asked about outside groups or conferences who may be working on seed who would be helpful to engage with.
- **Residue Testing Framework (ADB/KS).** The leads shared the outline for the draft proposal and the group discussed various sections. One of the leads noted that she is on a working group for the Accredited Certifiers Association, and they are working on a decision-tree-type document identify potential gaps in guidance document 2613. The CACS talked about EPA tolerances/FDA action levels, as well as the need for alignment between many aspects such as the overarching policy memo, response to comments on policy memo, and the OILC course. NOP added context about the EPA tolerances and the known gaps. The group discussed reaching out to EPA for assistance and information, and NOP will follow up. Next steps: The leads will continue to meet to work on the framework document and will talk more with NOP about EPA tolerance tables.
- **Other business. None.**
- **The meeting was adjourned.**

[Previous CACS Notes](#)

December 3, 2024

Risk-Based Certification (KS) - discuss draft proposal

December 10, 2024

Consistency in Organic Seed Use (AJ/CD) - discuss

Residue Testing Framework (KS/ADB) - discuss draft proposal
January 7, 2025
Residue Testing Framework (KS/ADB) - discuss draft proposal
Residue Testing Framework - Regulation - discuss
January 14, 2025
Risk-Based Certification (KS) - discuss/vote proposal
Consistency in Organic Seed Use (AJ/CD) - discuss draft proposal
February 4, 2025
Residue Testing Framework (KS/ADB) - discuss/vote
Consistency in Organic Seed Use (AJ/CD) - discuss/vote proposal
February 11, 2025
March 4, 2025
March 11, 2025
April 1, 2025
April 8, 2025
May 6, 2025
May 13, 2025
June 3, 2025
June 10, 2025
July 1, 2025
July 8, 2025
August 5, 2025
August 12, 2025
September 2, 2025
September 9, 2025
October 7, 2025
October 14, 2025
November 4, 2025
November 11 - Veteran's Day
December 2, 2025
December 9, 2025

Work Agenda

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

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: Residue Testing Framework - Guidance	KS/ADB	Proposal	Approved by Exec Cmmte/NOP 4.17.23	12.10.24 1.7.25 2.4.25	Spr 2025
Oversight improvements to deter fraud: Residue Testing Framework - Regulation	KS/ADB	Discussion document	Approved by Exec Cmmte/NOP 4.17.23	12.10.24 1.7.25 2.4.25	TBD
Risk-Based Certification	KS	Proposal	Approved by Exec Cmmte 6.18.23, and NOP 6.20.24	12.3.24 1.14.25	Spr 2025

Consistency in Organic Seed Use - Panel? - Guest speakers?	AJ/CD	TBD	Approved by Exec Cmmte 6.18.23, and NOP 6.20.24	12.10.24 1.14.25 2.4.25	TBD
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Spring 2025 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~Jan 24, 2025	16 -20
NOP - Draft Spring 2025 NOSB meeting tentative agenda	Feb 7, 2025	~ 10
NOSB - Spring 2025 proposals due to NOP	Feb 13, 2025	~ 9
NOP - Post proposals	Mar 3, 2025	7.5
Public comment closes	Apr 2, 2025	3.5
NOP - Send compiled public comments to NOSB	Apr 5, 2025	3
Public comment webinars	Apr 22 & 24, 2025	1
Spring 2025 NOSB meeting - Tempe, AZ	Apr 29 - May 1, 2025	0
Final recommendations due	May 29, 2025	30 days post meeting

Fall 2025 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~May 15, 2025	24
NOP - Draft Fall 2025 NOSB meeting agenda	Aug 8, 2025	~11
NOSB - Fall 2025 proposals due to NOP	Aug 20, 2025	~9
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Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, December 3, 2024 4:00 pm ET

Present: Kyla Smith (KS), Chair; Carolyn Dimitri (CD), Vice Chair; Amy Bruch (ADB); Jerry D'Amore (JD); Allison Johnson (AJ)

Absent: Kim Huseman (KH); Nate Powell-Palm (NPP)

Staff: Michelle Arsenault (MA); Jo Mirenda (JM)

Agenda

- Review November 12, 2024 notes
- Risk-Based Certification (KS) - discuss draft proposal
- Other business
- Adjourn

Discussion

- **November 12, 2024 notes** were accepted as written.
- **Risk-Based Certification (KS).** The lead introduced the proposal on risk-based certification, and the group discussed the goal, purpose, previous public comments, and next steps. The lead will continue to work on the draft document based on feedback from the Subcommittee members and stakeholders, and the CACS will discuss it again in January.
- **Other business.** None.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

November 12, 2024

December 3, 2024

Risk-Based Certification (KS) - discuss draft proposal

December 10, 2024

January 7, 2025

Residue Testing Framework (ADB/NPP/NL/KH) - discuss draft proposal

January 14, 2025

Risk-Based Certification (KS) - discuss/vote proposal

Consistency in Organic Seed Use (AJ/CD) - discuss draft proposal

February 4, 2025

Residue Testing Framework (ADB/NPP/NL/KH) - discuss/vote

Consistency in Organic Seed Use (AJ/CD) - discuss/vote proposal

February 11, 2025

March 4, 2025

March 11, 2025

April 1, 2025

April 8, 2025

May 6, 2025

May 13, 2025

June 3, 2025

June 10, 2025
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Work Agenda

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Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, November 12, 2024 2:00 pm ET

Present: Kyla Smith (KS), Chair; Carolyn Dimitri (CD), Vice Chair; Amy Bruch (ADB); Jerry D'Amore (JD); Allison Johnson (AJ); Nate Lewis (NL);

Absent: Michelle Arsenault (MA); Kim Huseman (KH); Nate Powell-Palm (NPP)

Staff: Heather Kumar (HK); Jo Mirenda (JM)

Agenda

- Review September 10, 2024 notes
- Review October 1, 2024 notes
- Debrief from Fall meeting
- Discuss any proposed speakers to attend CACS calls
- Review work agenda and plan
- Other business
- Adjourn

Discussion

- **September 10, 2024 notes** were approved with a minor grammar correction.
- **October 1, 2024 notes** were approved.
- **Debrief from Fall meeting** – In general, members were pleased with the discussion and progress on CACS topics at the meeting. Crop Insurance proposal passed. Other topics will remain on work plan. Members appreciated the stakeholder feedback on Seeds and there is a lot of information to digest before determining next steps.
- **Discuss any proposed speakers to attend CACS calls**
 - For the Seed topic, members discussed options but are not sure yet what aspect of expertise is needed.
 - For Residue Testing, leads will plan to meet with a laboratory representative and update the subcommittee.
 - Members had previously discussed if a NIFA representative would be helpful to talk to. However, it may be more relevant to the Research Priorities work agenda topic which is outside of this subcommittee.
- **Review work agenda and plan**
 - Residue Testing and Risk-Based Certification topics have some cross-over so the leads will work together and coordinate as appropriate. Residue Testing will have a proposal for guidance, and a separate discussion document on regulatory updates (tightly scoped).
 - Consistency in Organic Seed Usage: Members discussed potential next steps and the need for additional information gathering to inform those steps before proceeding to a discussion document.
 - Organic Food System Capacity and Constraints – Members discussed if they want to pursue this topic that was previously put on hold. A member shared information about work that has been accomplished outside of the subcommittee that has essentially satisfied the scope of the original work agenda request. Members discussed if other issues should be considered for a new work agenda topic. The group decided to wait until new members are onboarded to revisit the discussion.
- **Other business** – Outgoing members thank the committee for its work. Members welcome and appreciate members that have stepped in to new leadership roles on the subcommittee.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted).

October 1, 2024

October 8, 2024 - cancel meeting

November 5, 2024 - cancel for election day

November 12, 2024

December 3, 2024

Risk-Based Certification (KS) - discuss draft proposal

December 10, 2024

January 7, 2025

Residue Testing Framework (ADB/NPP/NL/KH) - discuss draft proposal

January 14, 2025

Risk-Based Certification (KS) - discuss/vote proposal

Consistency in Organic Seed Use (AJ/CD) - discuss draft proposal

February 4, 2025

Residue Testing Framework (ADB/NPP/NL/KH) - discuss/vote

Consistency in Organic Seed Use (AJ/CD) - discuss/vote proposal

February 11, 2025

March 4, 2025

March 11, 2025

April 1, 2025

April 8, 2025

Work Agenda

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Spring 2025 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
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Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, October 1, 2024 2:00 pm ET

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

Absent: Allison Johnson (AJ), Vice Chair; Nate Lewis (NL); Nate Powell-Palm (NPP); Kim Huseman (KH)

Staff: Michelle Arsenault (MA); Heather Kumar (HK); Jo Mirenda (JM)

Agenda

- Review September 10, 2024 notes
- Fall meeting updates / planning
- Finalize Agenda
- Additional Items
- Adjourn

Discussion

- **Approval of the September 10, 2024** notes was deferred to the next call.
- **Fall meeting updates/planning.** The NOP updated the group on public comment, both written and oral. A member updated the group about the post-meeting field trip. Members talked briefly about the sunset reviews and how they will present them at the Fall meeting.
- **Finalize CACS work agenda.** The Chair reviewed the work agenda, cancelled the October 8 call to allow time for meeting preparation, and discussed future potential work agenda ideas. The group discussed the possibility of adding a project on treated wood and chose not to add it at this time given that it has been a busy regulatory year, and stakeholders continue to respond to new rules.
- **Additional Items.** None.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted).

October 1, 2024

October 8, 2024 - cancel meeting

November 5, 2024 - cancel for election day

November 12, 2024

December 3, 2024

Risk-Based Certification (KS) - discuss draft proposal

December 10, 2024

January 7, 2025

Residue Testing Framework (ADB/NPP/NL/KH) - discuss draft proposal

January 14, 2025

Risk-Based Certification (KS) - discuss/vote proposal

Consistency in Organic Seed Use (AJ/CD) - discuss draft proposal

February 4, 2025

Residue Testing Framework (ADB/NPP/NL/KH) - discuss/vote

Consistency in Organic Seed Use (AJ/CD) - discuss/vote proposal

February 11, 2025

March 4, 2025

March 11, 2025

April 1, 2025

April 8, 2025

Work Agenda

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Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: Residue Testing Framework	ADB/NPP/NL/KH	Discussion document	Approved by Exec Cmmte/NOP 4.17.23	6.4.24 6.25.24 7.30.24 8.13.24 1.7.25 2.4.25	Fall 2024
Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	NPP/ADB	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.4.24 7.2.24 7.9.24 7.30.24 8.6.24 8.13.24	Fall 2024
Organic Food System Capacity and Constraints	ADB/NPP	Proposal	Approved by Exec Cmmte 12.19.23, and NOP 1.16.24	6.4.24 7.2.24 7.30.24 8.6.24 8.13.24	TBD
Risk-Based Certification	KS	Discussion document	Approved by Exec Cmmte 6.18.23, and NOP 6.20.24	6.25.24 7.2.24 7.9.24 8.6.24 12.3.24 1.14.25	Fall 2024
Consistency in Organic Seed Use	AJ/CD	Discussion document	Approved by Exec Cmmte 6.18.23, and NOP 6.20.24	6.25.24 7.2.24 7.30.24 8.6.24 1.14.25 2.4.25	Fall 2024

Milestones

Fall 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~May 24, 2024	21
NOP - Draft Fall 2024 NOSB meeting agenda	Aug 2, 2024	~10
NOSB - Fall 2024 proposals due to NOP	Aug 14, 2024	~9
NOP - Post proposals	Aug 30, 2024	~7.5

Public comment closes	Sep 30, 2024	~4.5
NOP - Send compiled public comments to NOSB	~Oct 3, 2024	~2
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Final recommendations due	Nov 25, 2024	30 days post

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Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, September 3, 2024 2:00 pm ET

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

Absent: Nate Lewis (NL); Jo Mirenda (JM); Nate Powell-Palm (NPP)

Staff: Michelle Arsenault (MA); Heather Kumar (HK)

Agenda

- Review August 13, 2024 notes
- Discuss the NRCS fall mtg speaker + questions
- Discuss CACS speakers for the upcoming semester (customs broker, etc.)
- Review the Organic Food System Capacity and Constraints proposal
- Additional Items
- Adjourn

Discussion

- **August 13, 2024** notes were accepted as written.
- **NRCS Fall meeting speaker + questions.** The CACS discussed questions for the NRCS speaker, who was invited to speak at the Fall 2024 NOSB meeting. The CACS Chair will finalize the list of questions and will send questions to NOP to share with the speaker ahead of time.
- **CACS speakers for the upcoming semester.** The CACS discussed potential speakers to invite to CACS calls. Ideas included a customs broker to talk about residue testing, a speaker on organic seed/organic seed regulations, and someone from NIFA or a representative from the seed industry to address the process of moving from research to market for new seeds. A member also suggested a panel on seed at the Spring 2025 meeting, while acknowledging that the meeting agenda is already very full.

A member shared a citation for a resource regarding seeds: Sievers-Glotzbach, Stefanie, Julia Tschersich, Nina Gmeiner, Lea Kliem, and Anoush Ficiciyan. "Diverse Seeds – Shared Practices: Conceptualizing Seed Commons." *International Journal of the Commons* 14, no. 1 (2020): 418–38. <https://www.jstor.org/stable/27016574>.

- **Review the Organic Food System Capacity and Constraints proposal.** The CACS is pausing work on this project until after the Fall meeting.
- **Additional Items.**
 - The CACS will schedule dates to discuss its projects during the next CACS call.
 - A potential request on treated wood to address inconsistencies at 205.206(f)
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted).

August 13, 2024 (Fall proposals due Aug 14, 2024)

Organic Food System Capacity and Constraints proposal (ADB/NPP) - discuss/vote

Climate Induced Farming Risk and Crop Insurance proposal (NPP/ADB) - discuss/vote

Residue Testing for a Global Supply Chain discussion doc (ADB/NPP/NL/KH) - discuss/vote

September 3, 2024

September 10, 2024

Schedule discussion dates

October 1, 2024

October 8, 2024

November 5, 2024

November 12, 2024

December 3, 2024

December 10, 2024

January 7, 2025

January 14, 2025

February 4, 2025

February 11, 2025

March 4, 2025

March 11, 2025

April 1, 2025

April 8, 2025

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Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, August 13, 2024 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Allison Johnson (AJ), Vice Chair; Kyla Smith (KS); Jerry D'Amore (JD); Carolyn Dimitri (CD); Kim Huseman (KH); Nate Lewis (NL); Nate Powell-Palm (NPP)

Absent: None

Staff: Michelle Arsenault (MA); Jo Mirenda (JM); Heather Kumar (HK)

Agenda

- Review August 6, 2024 notes
- Organic Food System Capacity and Constraints proposal (ADB/NPP) - discuss/vote
- Climate Induced Farming Risk and Crop Insurance proposal (NPP/ADB) - discuss/vote
- Residue Testing for a Global Supply Chain discussion doc (ADB/NPP/NL/KH) - discuss/vote
- Additional Items
- Adjourn

Discussion

- **August 6, 2024** notes were accepted as written.
- **Climate Induced Farming Risk and Crop Insurance proposal (NPP/ADB).** The group reviewed the minor changes in the document made since the last discussion, made some additional formatting changes, and moved to a vote. The goal for this document is to pass along the information to the Risk Management Agency (RMA).

Motion to accept the proposal on Climate Induced Farming Risk and Crop Insurance

Motion by: ADB

Seconded by: NPP

Yes: 8 No: 0 Abstain: 0 Recuse: 0 Absent: 0

- **Organic Food System Capacity and Constraints proposal (ADB/NPP).** The lead noted the incorporation of comments from the NOP and other members since the last discussion, which were minor. The group discussed the changes, and the intended outcome, which is to send the document to the Secretary of Agriculture. A member just completed a 4-year study of economics related to organic, and noted that there are a few new people in the Economic Research Service (ERS) interested in and working on organic, and they are already engaged in this topic. The same member offered to share the work she sent to ERS. The Subcommittee decided to not send this document to the full Board for the Fall 2024 meeting, and instead may do some additional work and move it forward in Spring 2025. The CACS will talk more about this on the September 3 call.
- **Residue Testing for a Global Supply Chain discussion doc (ADB/NPP/NL/KH).** The lead highlighted the additions to the document since the last discussion and the group reviewed them and provided additional feedback. The overarching theme of the document is expanding the guidance for testing. The lead will modify and finalize for the Fall 2024 meeting.

Motion to accept the discussion document on Residue Testing for a Global Supply Chain

Motion by: ADB

Seconded by: NPP

Yes: 6 No: 0 Abstain: 2 Recuse: 0 Absent: 0

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

Previous CACS Notes

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted).

August 6, 2024

Risk-based Certification disc doc (KS) - discuss/vote

Consistency in Organic Seed Use disc doc (AJ/CD) - discuss/vote

Organic Food System Capacity and Constraints proposal (ADB/NPP) - discuss/vote

Climate Induced Farming Risk and Crop Insurance proposal (NPP/ADB) - discuss/vote

August 13, 2024 (Fall proposals due Aug 14, 2024)

Organic Food System Capacity and Constraints proposal (ADB/NPP) - discuss/vote

Climate Induced Farming Risk and Crop Insurance proposal (NPP/ADB) - discuss/vote

Residue Testing for a Global Supply Chain discussion doc (ADB/NPP/NL/KH) - discuss/vote

September 3, 2024

September 10, 2024

October 1, 2024

October 8, 2024

November 5, 2024

November 12, 2024

December 3, 2024

December 10, 2024

Work Agenda

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

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: Residue Testing Framework	ADB/NPP/NL/KH	Discussion doc	Approved by Exec Cmmte/NOP 4.17.23	6.4.24 6.25.24 7.30.24 8.13.24	Fall 2024
Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	NPP/ADB	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.4.24 7.2.24 7.9.24 7.30.24 8.6.24 8.13.24	Fall 2024
Organic Food System Capacity and Constraints	ADB/NPP	Proposal	Approved by Exec Cmmte 12.19.23, and NOP 1.16.24	6.4.24 7.2.24 7.30.24 8.6.24 8.13.24	Fall 2024
Risk-Based Certification	KS	Discussion document	Approved by Exec Cmmte 6.18.23, and NOP 6.20.24	6.25.24 7.2.24 7.9.24 8.6.24	Fall 2024

Consistency in Organic Seed Use	AJ/CD	Discussion document	Approved by Exec Cmmte 6.18.23, and NOP 6.20.24	6.25.24 7.2.24 7.30.24 8.6.24	Fall 2024
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Milestones

Fall 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~May 24, 2024	21
NOP - Draft Fall 2024 NOSB meeting agenda	Aug 2, 2024	~10
NOSB - Fall 2024 proposals due to NOP	Aug 14, 2024	~9
NOP - Post proposals	Aug 30, 2024	~7.5
Public comment closes	Sep 30, 2024	~4.5
NOP - Send compiled public comments to NOSB	~Oct 3, 2024	~2
Public comment webinars	Oct 15 & 17, 2024	1
Fall 2024 NOSB meeting - Portland, OR	Oct 22 - 24, 2024	0
Final recommendations due	Nov 25, 2024	30 days post

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 6, 2024 2:00 pm ET

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

Absent: Allison Johnson (AJ), Vice Chair

Staff: Michelle Arsenault (MA); Jo Mirenda (JM); Heather Kumar (HK)

Agenda

- Review July 30, 2024 notes
- Risk-based certification disc doc (KS) - discuss/vote
- Consistency in Organic Seed Use disc doc (AJ/CD) - discuss/vote
- Organic Food System Capacity and Constraints proposal (ADB/NPP) - discuss/vote
- Climate Induced Farming Risk and Crop Insurance proposal (NPP/ADB) - discuss/vote
- Additional Items
- Adjourn

Discussion

- **July 30, 2024** notes were accepted with several modifications.
- **Risk-based Certification discussion document (KS).** The group discussed and reviewed the suggested edits to the draft document. The lead will make the final edits and submit the document for the Fall meeting. The CACS moved to a vote.

Motion to accept the discussion document on the risk-based certification

Motion by: KS

Seconded by: NL

Yes: 7 No: 0 Abstain: 0 Recuse: 0 Absent: 1

- **Consistency in Organic Seed Use discussion document (CD/AJ).** The co-lead gave a brief summary of the document and previous public comment. The main goal of the document is to understand the current state of organic seed use, and to get a sense of the community sentiment about this topic. Members shared thoughts about the questions and moved to a vote.

Motion to accept the discussion document on Consistency in Organic Seed Use

Motion by: CD

Seconded by: JD

Yes: 7 No: 0 Abstain: 0 Recuse: 0 Absent: 1

- **Organic Food System Capacity and Constraints proposal (ADB/NPP).** The group discussed the draft document, and members made suggestions for inclusion. The group discussed the scope and audience for this document, and the leads will revisit the original work agenda request to make sure it aligns with the original intent. The CACS will continue the discussion on the next call and vote on the document.
- **Climate Induced Farming Risk and Crop Insurance proposal (NPP/ADB).** The CACS had a brief discussion about the proposal, and the lead highlighted additions. The CACS will discuss and vote on the next call.

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

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted).

July 30, 2024 - Additional call

Residue Testing for a Global Supply Chain discussion doc (ADB/NPP/NL/KH) - discuss
 Climate Induced Farming Risk and Crop Insurance proposal (NPP/ADB) - discuss
 Organic Food System Capacity and Constraints proposal (ADB/NPP) - discuss
 Risk-based certification disc doc (KS) - discuss

August 6, 2024

Risk-based Certification disc doc (KS) - discuss/vote
 Consistency in Organic Seed Use disc doc (AJ/CD) - discuss/vote
 Organic Food System Capacity and Constraints proposal (ADB/NPP) - discuss/vote
 Climate Induced Farming Risk and Crop Insurance proposal (NPP/ADB) - discuss/vote

August 13, 2024 (Fall proposals due Aug 14, 2024)

Organic Food System Capacity and Constraints proposal (ADB/NPP) - discuss/vote
 Climate Induced Farming Risk and Crop Insurance proposal (NPP/ADB) - discuss/vote
 Residue Testing for a Global Supply Chain discussion doc (ADB/NPP/NL/KH) - discuss/vote

September 3, 2024

September 10, 2024

October 1, 2024

October 8, 2024

November 5, 2024

November 12, 2024

December 3, 2024

December 10, 2024

Work Agenda

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

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: Residue Testing Framework	ADB/NPP/NL/KH	Discussion doc	Approved by Exec Cmmte/NOP 4.17.23	6.4.24 6.25.24 7.30.24 8.13.24	Fall 2024
Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	NPP/ADB	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.4.24 7.2.24 7.9.24 7.30.24 8.6.24 8.13.24	Fall 2024
Organic Food System Capacity and Constraints	ADB/NPP	Proposal	Approved by Exec Cmmte 12.19.23, and NOP 1.16.24	6.4.24 7.2.24 7.30.24 8.6.24 8.13.24	Fall 2024

Risk-Based Certification	KS	Discussion document	Approved by Exec Cmmte 6.18.23, and NOP 6.20.24	6.25.24 7.2.24 7.9.24 8.6.24	Fall 2024
Consistency in Organic Seed Use	AJ/CD	Discussion document	Approved by Exec Cmmte 6.18.23, and NOP 6.20.24	6.25.24 7.2.24 7.30.24 8.6.24	Fall 2024

Milestones

Fall 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
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Public comment webinars	Oct 15 & 17, 2024	1
Fall 2024 NOSB meeting - Portland, OR	Oct 22 - 24, 2024	0
Final recommendations due	Nov 25, 2024	30 days post

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, July 30, 2024 2:00 pm ET

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

Absent: Allison Johnson (AJ), Vice Chair

Staff: Michelle Arsenault (MA); Jo Mirenda (JM); Heather Kumar (HK)

Agenda

- Review July 9, 2024 notes
- Residue Testing for a Global Supply Chain proposal (ADB/NPP/NL/KH) - discuss
- Climate Induced Farming Risk and Crop Insurance proposal (NPP/ADB) - discuss
- Organic Food System Capacity and Constraints proposal (ADB/NPP) - discuss
- Risk-based certification disc doc (KS) - discuss
- Additional Items
- Adjourn

Discussion

- **July 9, 2024** notes were approved with minor edits.
- **Residue Testing for a Global Supply Chain discussion document (ADB/NPP/NL/KH).** The draft document is undergoing editing and members provided feedback since the last call. The CACS decided to put forth a discussion document instead of a proposal at the Fall 2024 to glean more feedback. Members discussed various aspects of residue testing, including that EPA tolerances don't cover non-food crops such as cotton, soil, or water. The CACS will discuss and vote on a future call.
- **Climate Induced Farming Risk and Crop Insurance proposal (NPP/ADB).** Once the CACS passes this proposal, the blueprint includes NOP passing it along to the Risk Management Agency (RMA), and possibly the Secretary. The lead made some minor modifications to the last version and the group discussed it briefly. A member suggested the addition for some introductory language highlighting the connection to climate change.
- **Organic Food System Capacity and Constraints proposal (ADB/NPP).** The lead noted minor updates since the last iteration. The group discussed the audience for this, which is likely the greater Agricultural Marketing Service (AMS) as they have a mandate to address climate change. A member added that the current document includes requests for USDA, as well as for the broader community, since some of it seems to fall outside the agency authority. The group discussed ways to make the document more robust and tighten the argument to better elucidate the goal.
- **Risk-based Certification disc doc (KS).** The group discussed the audience and path for this document. It's likely this will result in a training module for certifiers in the Organic Learning Center.
- **Additional Items. The group reiterated the following items/ideas:**
 - A member emphasized the need to identify the goals and audience for each document early in the process, and to keep that in mind as they progress.
 - The CACS will work to refine the path for the seed document: Either a recommendation for guidance or rulemaking.
 - The Chair will circulate draft documents by this Friday, so members have time to read them before the next call.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted).

July 9, 2024

Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss
Organic Food System Capacity and Constraints (ADB/NPP) - discuss
Risk-based Certification (KS) - discuss
Climate Induced Farming Risk and Crop Insurance (NPP/ADB) - discuss

July 16, 2024

CACS and Compliance and Enforcement (C & E) - Residue Testing discussion

July 30, 2024 - Additional call

Residue Testing for a Global Supply Chain discussion doc (ADB/NPP/NL/KH) - discuss
Climate Induced Farming Risk and Crop Insurance proposal (NPP/ADB) - discuss
Organic Food System Capacity and Constraints proposal (ADB/NPP) - discuss
Risk-based certification disc doc (KS) - discuss

August 6, 2024

Risk-based Certification disc doc (KS) - discuss/vote
Consistency in Organic Seed Use disc doc (AJ/CD) - discuss/vote
Organic Food System Capacity and Constraints proposal (ADB/NPP) - discuss/vote
Climate Induced Farming Risk and Crop Insurance proposal (NPP/ADB) - discuss/vote

August 13, 2024 (Fall proposals due Aug 14, 2024)

Residue Testing for a Global Supply Chain discussion doc (ADB/NPP/NL/KH) - discuss/vote

September 3, 2024

September 10, 2024

October 1, 2024

October 8, 2024

November 5, 2024

November 12, 2024

December 3, 2024

December 10, 2024

Work Agenda

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

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: Residue Testing Framework	ADB/NPP/NL/KH	Discussion doc	Approved by Exec Cmmte/NOP 4.17.23	6.4.24 6.25.24 7.30.24 8.13.24	Fall 2024
Organic and Climate- Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	NPP/ADB	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.4.24 7.2.24 7.9.24 7.30.24 8.6.24	Fall 2024
Organic Food System Capacity and Constraints	ADB/NPP	Proposal	Approved by Exec Cmmte 12.19.23, and NOP 1.16.24	6.4.24 7.2.24 7.30.24 8.6.24	Fall 2024

Risk-Based Certification	KS	Discussion document	Approved by Exec Cmmte 6.18.23, and NOP 6.20.24	6.25.24 7.2.24 7.9.24 8.6.24	Fall 2024
Consistency in Organic Seed Use	AJ/CD	Discussion document	Approved by Exec Cmmte 6.18.23, and NOP 6.20.24	6.25.24 7.2.24 7.30.24 8.6.24	Fall 2024

Milestones

Fall 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
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Fall 2024 NOSB meeting - Portland, OR	Oct 22 - 24, 2024	0
Final recommendations due	Nov 25, 2024	30 days post

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, July 9, 2024 2:00 pm ET

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

Absent: Allison Johnson (AJ), Vice Chair; Nate Powell-Palm (NPP)

Staff: Michelle Arsenault (MA); Jo Mirenda (JM); Heather Kumar (HK)

Agenda

- Review July 2, 2024 notes
- Organic Food System Capacity and Constraints (ADB/NPP) - discuss
- Risk-based Certification (KS) - discuss
- Climate Induced Farming Risk and Crop Insurance (NPP/ADB) - discuss
- Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss
- Additional Items.
- Adjourn

Discussion

- **July 2, 2024** notes were accepted with minor revisions.
- **Organic Food System Capacity and Constraints (ADB/NPP).** Deferred to next call.
- **Risk-based Certification discussion document (KS).** The lead summarized the draft document and outstanding issues. She asked for feedback and will incorporate suggestions for the next iteration. The lead author and CACS Chair have a meeting scheduled next week with the NOP Accreditation Division Director, Robert Yang, to discuss risk-based certification since Strengthening Organic Enforcement (SOE) was implemented. The CACS wants to ensure they aren't duplicating work or trying to solve a problem that doesn't exist. The lead confirmed that the ACA best practices documents, cited in the discussion document, are not publicly available to commenters, and will ask the ACA if it's possible to attach them as an appendix. The NOP suggested another resource to consider - the SOE Preamble that identifies examples of risk-assessment criteria - <https://www.federalregister.gov/d/2020-14581/p-478>. The lead will make edits and recirculate the draft document for the next call.
- **Climate Induced Farming Risk and Crop Insurance (ADB/NPP).** The lead summarized the current status of the document, and public comments from the Spring. The group discussed the complex nature of T-Yields, the farm bill, the role of the Risk Management Agency (RMA) and advocacy groups, and how to make crop insurance work better for organic farmers and RMA. A member suggested that given the complexity of T Yields, it may be more effective for RMA to hold listening sessions for different regions of the country, if that's possible. The lead offered to reach out to RMA and ask. The premise for the document, which could be presented as a letter to the Secretary, is to apply fairness across agriculture (both conventional and organic) with regard to crop insurance.
- **Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH).** Deferred to later call.
- **Additional Items.**
 - The NOP Compliance & Enforcement Division staff will meet with the CACS to talk about residue testing in an effort to move this topic forward. The meeting is scheduled for Wednesday, July 17.
 - The NOP updated the names of the leads for the Crop insurance project.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted).

July 2, 2024

Consistency in Organic Seed Use Discussion (AJ/CD) - discuss
Climate Induced Farming Risk and Crop Insurance (NPP/ADB) - discuss
Risk-based Certification (KS) - discuss

July 9, 2024

Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss
Organic Food System Capacity and Constraints (ADB/NPP) - discuss
Risk-based Certification (KS) - discuss
Climate Induced Farming Risk and Crop Insurance (NPP/ADB) - discuss

July 17, 2024

CACS and Compliance and Enforcement (C & E) - Residue Testing discussion

August 6, 2024

Risk-based Certification disc doc (KS) - discuss/vote
Consistency in Organic Seed Use disc doc (AJ/CD) - discuss/vote
Organic Food System Capacity and Constraints proposal (ADB/NPP) - discuss/vote
Climate Induced Farming Risk and Crop Insurance proposal (NPP/ADB) - discuss/vote

August 13, 2024 (Fall proposals due Aug 14, 2024)

Residue Testing for a Global Supply Chain proposal (ADB/NPP/NL/KH) - discuss/vote

September 3, 2024

September 10, 2024

October 1, 2024

October 8, 2024

November 5, 2024

November 12, 2024

December 3, 2024

December 10, 2024

Work Agenda

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

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
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Organic and Climate- Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	NPP/ADB	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.4.24 7.2.24 7.9.24 8.6.24	Fall 2024
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Risk-Based Certification	KS	Discussion document	Approved by Exec Cmmte 6.18.23, and NOP 6.20.24	6.25.24 7.2.24 7.9.24 8.6.24	Fall 2024
Consistency in Organic Seed Use	AJ/CD	Discussion document	Approved by Exec Cmmte 6.18.23, and NOP 6.20.24	6.25.24 7.2.24 8.6.24	Fall 2024

Milestones

Fall 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
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Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy/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, July 2, 2024 2:00 pm ET

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

Absent: Nate Lewis (NL)

Staff: Michelle Arsenault (MA); Jo Mirenda (JM); Heather Kumar (HK)

Agenda

- Review June 25, 2024 notes
- C&E meeting schedule - date confirmation
- Organic Food System Capacity and Constraints (ADB/NPP) - discuss
- Consistency in Organic Seed Use (AJ/CD) - discuss
- Risk-based Certification (KS) - discuss
- Climate Induced Farming Risk and Crop Insurance (NPP/ADB) - discuss
- Additional Items
- Adjourn

Discussion

- **June 25, 2024** notes were accepted as written.
- **C & E meeting schedule - date confirmation.** The CACS and members of the NOP Compliance and Enforcement (C & E) Division are planning to meet to talk about residue testing, so as the CACS works on its document they aren't overlapping or reproducing work that has already been done. The CACS Chair will confirm the dates once it's finalized.
- **Organic Food System Capacity and Constraints (ADB/NPP).** The lead summarized the lingering issues regarding the proposal and the group discussed how to move forward. Given the effort and money that the NOP has invested in TOPP, The CACS feels it's important to identify any barriers that may exist. The leads will circulate the draft proposal for discussion on July 9 call.
- **Consistency in Organic Seed Use (AJ/CD).** The leads summarized the history and context of previous NOSB recommendations. The main premise for the work was the need for continuous improvement on commercial availability. **The CACS is proposing to build on previous NOSB work, and will include the previous documents so they can collect feedback from stakeholders.** To that end, the lead mapped out questions for stakeholders to inform the Board's work. A member noted new EU regulations setting a target date of 2027 for organic seed use. The EU has also set up an expert panel. The group discussed possible barriers and concerns with using the EU model, and several members suggested modifications such as reframing the document to focus on the US and not the EU. The group also discussed the set up and maintenance of a seed database, which is better supported by the private sector and not the Federal Government. The CACS will discuss this again on August 6.
- **Risk-based Certification (KS).** The lead summarized the draft discussion document, highlighting current resources, issues, and potential gaps. She also mentioned setting up a meeting with Robert Yang of the NOP Accreditation Division, to talk more about this.
- **Climate Induced Farming Risk and Crop Insurance (NPP/ADB).** The lead summarized the current iteration of the proposal and the group discussed top priorities. The lead made note of the recent publication of a new rule on Crop Insurance. Members asked questions about Rural Management Agency (RMA) and what the goal is for the final recommendation. i.e., will this be a letter to RMA or a letter to the Secretary?
- **Additional Items.** None.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted).

June 4, 2024

June 25, 2024. Note date change

Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss

July 2, 2024

Consistency in Organic Seed Use Discussion (AJ/CD) - discuss

Climate Induced Farming Risk and Crop Insurance (NPP/ADB) - discuss

Risk-based Certification (KS) - discuss

July 9, 2024

Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss

Organic Food System Capacity and Constraints (ADB/NPP) - discuss

Risk-based Certification (KS) - discuss

Climate Induced Farming Risk and Crop Insurance (NPP/ADB) - discuss

July 17, 2024

CACS and Compliance and Enforcement (C & E) - Residue Testing discussion

August 6, 2024

Risk-based Certification (KS) - discuss/vote

Consistency in Organic Seed Use (AJ/CD) - discuss/vote

Organic Food System Capacity and Constraints (ADB/NPP) - discuss/vote

Climate Induced Farming Risk and Crop Insurance (NPP/ADB) - discuss/vote

August 13, 2024 (Fall proposals due Aug 14, 2024)

Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss/vote

September 3, 2024

September 10, 2024

October 1, 2024

October 8, 2024

November 5, 2024

November 12, 2024

December 3, 2024

December 10, 2024

Work Agenda

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

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Oversight improvements to deter fraud: Residue Testing Framework	ADB/NPP/NL/KH	Proposal, Discussion docs	Approved by Exec Cmmte/NOP 4.17.23	6.4.24 6.25.24 7.9.24 8.13.24	Fall 2024
Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	NPP/ADB	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.4.24 7.2.24 7.9.24 8.6.24	Fall 2024

Organic Food System Capacity and Constraints	ADB/NPP	Proposal	Approved by Exec Cmmte 12.19.23, and NOP 1.16.24	6.4.24 7.2.24 7.9.24 8.6.24	Fall 2024
Risk-Based Certification	KS	Discussion Document	Approved by Exec Cmmte 6.18.23, and NOP 6.20.24	6.25.24 7.2.24 7.9.24 8.6.24	Fall 2024
Consistency in Organic Seed Use	AJ/CD	Discussion Document	Approved by Exec Cmmte 6.18.23, and NOP 6.20.24	6.25.24 7.2.24 8.6.24	Fall 2024

Milestones

Fall 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~May 24, 2024	21
NOP - Draft Fall 2024 NOSB meeting agenda	Aug 2, 2024	~10
NOSB - Fall 2024 proposals due to NOP	Aug 14, 2024	~9
NOP - Post proposals	Aug 30, 2024	~7.5
Public comment closes	Sep 30, 2024	~4.5
NOP - Send compiled public comments to NOSB	~Oct 3, 2024	~2
Public comment webinars	Oct 15 & 17, 2024	1
Fall 2024 NOSB meeting - Portland, OR	Oct 22 - 24, 2024	0
Final recommendations due	Nov 25, 2024	30 days post

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, June 25, 2024 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Allison Johnson (AJ), Vice Chair; Kyla Smith (KS); Nate Lewis (NL); Jerry D'Amore (JD); Carolyn Dimitri (CD); Kim Huseman (KH); Nate Powell-Palm (NPP)

Absent: None

Staff: Michelle Arsenault (MA); Jo Mirenda (JM); Heather Kumar (HK)

Agenda

- Review June 4, 2024 notes
- Risk-based Certification Discussion (KS)
- Consistency in Organic Seed Use Discussion (AJ/CD)
- Review schedule
- Residue testing framework overview (ADB/NPP/NL/KH)
- Organic food system capacity and constraints (ADB/NPP)
- Additional Items
- Adjourn

Discussion

- **June 4, 2024** notes were approved as written.
- **Risk-Based Certification discussion (KS).** The NOP approved this work agenda item on June 20, and also mentioned that Robert Yang, the Director of the Accreditation Division would be a good resource as they work on risk assessment. The CACS would like to extend an invitation to Robert Yang to join a future call. Members are interested in hearing about the result of NOP's desk audit of certifier policies for implementing Strengthening Organic Enforcement (SOE) risk assessment requirements. There isn't a standalone document in the Handbook pertaining to this, but it is incorporated into various areas, such as a course in the OILC (Learning Center Course: NOP-230 Risk-Based Oversight). The CACS views risk assessment as a longer-term project. The group discussed the outcome of this project, specifically whether it would be incorporated into the NOP handbook guidance documents or implemented in some other way, and what the timeline would be.
- **Consistency in Organic Seed Use Discussion (AJ/CD).** The NOP approved the addition of this work agenda item on June 20. The CACS plans to write a draft incorporating/referencing the two outstanding NOSB recommendations from 2018 and 2019 to seek public comment at the Fall meeting. The group discussed the timeline for adding guidance documents to the handbook, which depends on when the final recommendations are complete.
- **Review schedule.** The group reviewed the discussion schedule for the next few calls.
- **Residue testing framework overview (ADB/NPP/NL/KH).** NL summarized the work plan for this project. The project has two components: 1) updating Handbook documents on residue testing, and 2) updating the organic regulations for residue testing. There are four guidance documents in the NOP Handbook that could be updated. Examples of some proposed changes: updates to sampling procedures; lab selection criteria; and the prohibited pesticides list. The group also discussed hosting NOP staff from the Compliance and Enforcement Division at a future call, to present ongoing work on residue testing. This will help inform the CACS as to where they need to focus so they aren't duplicating work, and will inform their decision about seeking research help from the NOP's Food Technologist. In addition to guidance updates the CACS is also considering a separate piece that could lead to rulemaking, related to the frequency of residue testing and/or the thresholds for exclusion from organic sale.
- **Organic Food System Capacity and Constraints (ADB/NPP).** Deferred to next call.

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

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted).

June 4, 2024

June 25, 2024. Note date change

Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss

July 2, 2024

Consistency in Organic Seed Use Discussion (AJ/CD) - discuss

Climate Induced Farming Risk and Crop Insurance - discuss

Risk-based Certification - discuss

July 9, 2024

Residue Testing for a Global Supply Chain - discuss

Organic Food System Capacity and Constraints - discuss/vote

August 6, 2024

Climate Induced Farming Risk and Crop Insurance - discuss/vote

August 13, 2024 (Fall proposals due Aug 14, 2024)

Residue Testing for a Global Supply Chain - discuss/vote

September 3, 2024

September 10, 2024

October 1, 2024

October 8, 2024

November 5, 2024

November 12, 2024

December 3, 2024

December 10, 2024

Work Agenda

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

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: Residue Testing Framework	ADB/NPP/NL/KH	Proposal, Discussion docs	Approved by Exec Cmmte/NOP 4.17.23	6.4.24 6.25.24 7.9.24 8.13.24	Fall 2024
Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	CD/ADB	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.4.24 7.2.24 8.6.24	Fall 2024
Organic Food System Capacity and Constraints	ADB/NPP	Proposal	Approved by Exec Cmmte 12.19.23, and NOP 1.16.24	6.4.24 7.9.24	Fall 2024

Risk-Based Certification	KS	Discussion	Approved by Exec Cmmte 6.18.23, and NOP 6.20.24	6.25.24 7.2.24	Fall 2024
Consistency in Organic Seed Use	AJ/CD	Discussion	Approved by Exec Cmmte 6.18.23, and NOP 6.20.24	6.25.24 7.2.24	Fall 2024

Milestones

Fall 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
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Fall 2024 NOSB meeting - Portland, OR	Oct 22 - 24, 2024	0
Final recommendations due	Nov 25, 2024	30 days post

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, June 4, 2024 2:00 pm ET

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

Absent: Kim Huseman (KH)

Staff: Michelle Arsenault (MA); Jo Mirenda (JM); Heather Kumar (HK)

Agenda

- Review May 14, 2024 notes
- Oversight improvements to deter fraud: Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH)
- Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance (ADB/CD)
- Organic Food System Capacity and Constraints (ADB/NPP)
- Potential new work agenda items
- Additional Items
- Adjourn

Discussion

- **May 14, 2024** notes were accepted with minor modifications.
- **Reviewed the overall schedule.** The CACS schedule allows for multiple conversations of each topic before the deadline to submit proposals.
- **Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance (ADB).** The lead gave a brief summary of comments from the Spring NOSB meeting, and the group discussed the plans for the document for the Fall meeting. A member suggested the addition of examples that represent a diversity of crop types and don't solely focus on grains.
- **Oversight improvements to deter fraud: Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH).** The co-leads met to discuss the road map for the future proposals and discussion documents, and will likely split the project into two paths: 1) work on updating the guidance documents for residue testing, including the existing documents in the NOP Handbook and possibly a new guidance document with risk factors/decision tree for residue sampling, and 2) work on updating the NOP regulations for residue testing, including the frequency of residue testing and the EPA tolerance threshold when products are excluded from organic sale.
- **Organic Food System Capacity and Constraints (ADB/NPP).** The CACS didn't receive much stakeholder feedback from the Spring meeting. The Subcommittee discussed market data, indicating that the data is lacking - mainly on the demand side. A member noted that USDA does not publish data for demand-side, and that information is supplied by industry. The USDA's Market News Office does collect some data. CACS is seeking ways to initiate the conversation with industry and will include a targeted set of questions asking about an organic version of the demand reports.
- **Potential new work agenda items.**
 - Risk based certification (KS). The CACS reviewed a framework for assessing risk, and discussed whether to develop a work agenda item. The goal would be to streamline work for certifiers and operations, and make it more consistent. The group will write up a draft work agenda request that could lead to a discussion document for the Fall 2024 meeting, with issues/problems/possible outcomes to gauge interest.
 - Organic seed use (AJ/CD). The CACS discussed a work agenda item on Organic seed, as it appears the percentage of use in the US is low. The lead noted that EU regulations recently changed to require transition to 100% organic seed by 2036. Given that the commercial availability clause has been around for a long time and doesn't seem to be working well, the

CACS would like to write a proposal to offer solutions about use and requirements. Members offered feedback and posed questions, such as looking at seed from a handling perspective rather than from a grower's perspective. Who would benefit and who might not? What are the end goals? NOP noted that it is also talking about this topic, and asked how the CACS could build on the previous NOSB recommendations (from 2018 and 2019). The CACS will rescope the request to include feedback from today's call, and will discuss this again on the next call, with the goal of submitting it to the Exec Team for approval as soon as possible.

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

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted).

May 14, 2024

Schedule Next Semesters Work

June 4, 2024

June 25, 2024. **Note date change**

Residue Testing for a Global Supply Chain - discuss

Organic Food System Capacity and Constraints - discuss

July 2, 2024

Climate Induced Farming Risk and Crop Insurance - discuss

July 9, 2024

Residue Testing for a Global Supply Chain - discuss

Organic Food System Capacity and Constraints - discuss/vote

August 6, 2024

Climate Induced Farming Risk and Crop Insurance - discuss/vote

August 13, 2024 (Fall proposals due Aug 14, 2024)

Residue Testing for a Global Supply Chain - discuss/vote

September 3, 2024

September 10, 2024

October 1, 2024

October 8, 2024

November 5, 2024

November 12, 2024

December 3, 2024

December 10, 2024

Work Agenda

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

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: Residue Testing for a Global Supply Chain	ADB/NPP/NL/KH	Proposal, Discussion docs	Approved by Exec Cmmte/NOP 4.17.23	6.4.24 6.25.24 7.9.24 8.13.24	Fall 2024

Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	CD/ADB	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.4.24 7.2.24 8.6.24	Fall 2024
Organic Food System Capacity and Constraints	ADB/NPP	Proposal	Approved by Exec Cmmte 12.19.23, and NOP 1.16.24	6.4.24 6.25.24 7.9.24	Fall 2024

Milestones

Fall 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
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NOSB - Fall 2024 proposals due to NOP	Aug 14, 2024	~9
NOP - Post proposals	Aug 30, 2024	~7.5
Public comment closes	Sep 30, 2024	~4.5
NOP - Send compiled public comments to NOSB	~Oct 3, 2024	~2
Public comment webinars	Oct 15 & 17, 2024	1
Fall 2024 NOSB meeting - Portland, OR	Oct 22 - 24, 2024	0
Final recommendations due	Nov 25, 2024	30 days post

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 14, 2024 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Allison Johnson (AJ), Vice Chair; Kyla Smith (KS); Nate Lewis (NL); Jerry D'Amore (JD); Carolyn Dimitri (CD)

Absent: Kim Huseman (KH); Nate Powell-Palm (NPP)

Staff: Michelle Arsenault (MA); Jo Mirenda (JM); Heather Kumar (HK)

Agenda

- Review April 9, 2024 notes
- Spring meeting debrief
- Discuss work plan and schedule
- Potential new work agenda items
- Punch list items for future
- Additional Items
- Adjourn

Discussion

- **April 9, 2024** notes were approved with no changes.
- **Spring meeting debrief.** The group had a conversation about the NOSB meeting, including in-person public comments, the number of people in attendance, and the hybrid meeting flow.
- **Discuss work plan and schedule.** Deferred.
- **Potential new work agenda items. Seed/Risk**
 - Two members suggested a potential project on seeds, which is a topic that they feel crosscuts several Subcommittees (Crops/CACS/Materials). The group briefly discussed the purpose and goal of the project, and will continue to develop the idea, with the intention of bringing it to the June Executive call for approval.
 - Members discussed a 'spectrum of action' for work on Strengthening Organic Enforcement (SOE) implementation. Specifically, how to formalize the sentiment that they want to keep the farmer burden/risk low. A member mentioned the usefulness of having an economist work on this issue, who could use an analytical framework to assess the risk. She suggested a few resources such as ERS. Another member reminded the group that there are two modules in the Organic Learning Center on risk and record keeping. The risk module is more focused on fraud and how to apply risk. Perhaps the CACS can work on suggestions for the NOP for the learning center. Members also discussed possible work on SOE that would assist certifiers. The CACS will continue to discuss this.
- **Punch list items for possible future work.**
 - Parasiticides. The CACS discussed a possible project to look at certification, which is broader than just parasiticides for use in Livestock.
 - Compost, as it relates to residue testing and inputs.
- **Additional Items.** None.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted).

May 7, 2024 - cancelled

May 14, 2024

Schedule Next Semesters Work

June 4, 2024

June 25, 2024. **Note date change**

July 2, 2024

July 9, 2024

August 6, 2024

August 13, 2024 (Fall proposals due Aug 14, 2024)

September 3, 2024

September 10, 2024

October 1, 2024

October 8, 2024

November 5, 2024

November 12, 2024

December 3, 2024

December 10, 2024

Work Agenda

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

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: Residue Testing for a Global Supply Chain	ADB/NPP/NL/KH	Proposal	Approved by Exec Cmmte/NOP 4.17.23		Fall 2024
Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	ADB	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22		Fall 2024
Organic Food System Capacity and Constraints	NPP	Proposal	Approved by Exec Cmmte 12.19.23, and NOP 1.16.24		Fall 2024

Milestones

Fall 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~May 24, 2024	21
NOP - Draft Fall 2024 NOSB meeting agenda	Aug 2, 2024	~10
NOSB - Fall 2024 proposals due to NOP	Aug 14, 2024	~9
NOP - Post proposals	Aug 30, 2024	~7.5
Public comment closes	Sep 30, 2024	~4.5
NOP - Send compiled public comments to NOSB	~Oct 3, 2024	~2

Public comment webinars	Oct 15 & 17, 2024	1
Fall 2024 NOSB meeting - Portland, OR	Oct 22 - 24, 2024	0
Final recommendations due	Nov 25, 2024	30 days post

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 9, 2024 2:00 pm ET

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

Absent: Nate Powell-Palm (NPP)

Staff: Michelle Arsenault (MA); Jo Mirenda (JM); Heather Kumar (HK); Esu Obu (EO)

Agenda

- Review March 12, 2024 notes
- Discuss Upcoming Mtg and Public Comments
- Additional Work Agenda Items? please circulate the work scope in advance to sc.
- Schedule Next Semesters Work Plan
- Additional Items
- Adjourn

Discussion

- **March 12, 2024** notes were approved with a minor change.
- **Discuss upcoming meeting and public comments.** The group discussed written comments in general, and highlighted CACS focused comments. The CACS is looking forward to engaging with commenters on the webinars and during the in-person meeting. Commenters noted that they didn't have enough time to comment, given the overlap with the SOE implementation date. e.g. if there are proposals that they didn't have time to comment on, will there be another opportunity. The CACS Chair noted that some commenters mentioned farm bill priorities in the comments about residue testing. The NOSB Chair will instruct oral commenters to focus on the issues in front the NOSB, as they do not have purview over farm bill initiatives.
- **Additional Work Agenda Items?** A member suggested a work agenda item on guidance to certifiers about the use of sanitizers in livestock operations. Members will keep an eye out for additional topics.
- **Schedule Next Semesters Work Plan.** Deferred to May call.
- **Additional Items.**
 - NOP all-hands meeting conflicts with the June 11 calls. CACS will move its call to June 25.
 - The CACS is collaborating with the PDS on DEIA issues.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted).

March 12, 2024

April 2, 2024 - cancelled

April 9, 2024

May 7, 2024 - cancelled

May 14, 2024

Schedule Next Semesters Work

June 4, 2024

June 25, 2024. **Note date change**

July 2, 2024

July 9, 2024
 August 6, 2024
 August 13, 2024 (Fall proposals due Aug 14, 2024)
 September 3, 2024
 September 10, 2024
 October 1, 2024
 October 8, 2024
 November 5, 2024
 November 12, 2024
 December 3, 2024
 December 10, 2024

Work Agenda

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

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: Residue Testing for a Global Supply Chain	ADB/NPP/NL/KH	Discussion Document	Approved by Exec Cmmte/NOP 4.17.23	11.14.23 1.23.24 2.13.24	Spr 2024
Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	CD	Discussion Document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	2.6.24 2.13.24	Spr 2024
Opportunities in Organic: Improving Support for Organic Transition	AJ	Proposal	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	12.12.23 1.9.24 2.13.24	Spr 2024
Organic Food System Capacity and Constraints	CD	Discussion Document	Approved by Exec Cmmte 12.19.23, and NOP 1.16.24	1.23.24 2.13.24	Spr 2024

Milestones

Spring 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~Nov 17, 2023	16 - 20
NOP - Draft Spring 2024 NOSB meeting tentative agenda	Feb 9, 2024	~ 10
NOSB - Spring 2024 proposals due to NOP	Feb 15, 2024	~ 9
NOP - Post proposals	Mar 5, 2024	7.5
Public comment closes	Apr 3, 2024	3.5
NOP - Send compiled public comments to NOSB	Apr 5, 2024	3

Public comment webinars	Apr 23 & 25, 2024	1
Spring 2024 NOSB meeting - Milwaukee, WI	Apr 29 - May 1, 2024	0
Final recommendations due	May 29, 2024	30 days post meeting

Fall 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~May 24, 2024	21
NOP - Draft Fall 2024 NOSB meeting agenda	Aug 2, 2024	~10
NOSB - Fall 2024 proposals due to NOP	Aug 14, 2024	~9
NOP - Post proposals	Aug 30, 2024	~7.5
Public comment closes	Sep 30, 2024	~4.5
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Public comment webinars	Oct 15 & 17, 2024	1
Fall 2024 NOSB meeting - Portland, OR	Oct 22 - 24, 2024	0
Final recommendations due	Nov 25, 2024	30 days post

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Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, March 12, 2024 2:00 pm ET

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

Absent: Kim Huseman (KH)

Staff: Michelle Arsenault (MA); Jo Mirenda (JM); Heather Kumar (HK); Esu Obu (EO)

Agenda

- Review February 13, 2024 notes
- Review Workflow
- Discuss Upcoming Semester
- Additional Items
- Adjourn

Discussion

- **February 13, 2024** notes were accepted with a correction to the bullet on organic transition. The CACS will discuss/clarify the scoping of this project at the next Executive call meeting.
- **Review Workflow.**
 - The group discussed the list of projects for the Spring meeting, and the items that will remain on the work agenda for the Fall. The CACS will use the next call to plan the roadmap for the next year.
 - Members agreed that having an outline for documents prior to drafting a discussion document or proposal could be helpful.
 - The NOSB Chair added that it's important to remember that members have different expertise and varying levels of background knowledge and it's important to give people time to read the documents before having to vote on them.
- **Discuss Upcoming Semester.**
 - The Chair discussed inviting speakers to future CACS calls, and will be more cognizant of timing, so it doesn't disrupt the workflow and due dates.
 - Members were invited to share feedback and thoughts on the workflow and process. Members noted that sharing goals and outcomes of projects is important, so everyone is on the same page. Additionally, being iterative and providing updates as projects evolve are important. Another member shared ideas for coordinating and cross-collaboration between Subcommittees. A third member mentioned that CACS could benefit from this approach since it works on projects that often incorporate opinions and gray areas. He also added that "caucusing" is a good idea, as long as it involves all the Subcommittee members, to minimize confusion and miscommunication.
 - The CACS Chair highlighted the importance of having an Organic Policy Advisor at USDA. Many of the CACS work agenda items are complex and would benefit from having someone at the USDA who could share them across offices.
 - The group discussed the Food Technologists and are interested in getting a status update. The lead author recommended that members re-read the [Fall 2022 NOSB recommendation](#) and would like to have a broader conversation about the process, and ways to improve it. The group will also start developing more work requests for Food Technologists. The CACS will continue discussing this at its next meeting.
- **Additional Items.** None.
- **The meeting was adjourned.**

Previous CACS Notes

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted).

February 13, 2024

Climate Induced Farming Risk and Crop Insurance (CD/AJ) - discuss/vote

Improving Support for Organic Transition (AJ) - discuss/vote

Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss/vote

Organic Food System Capacity and Constraints Disc doc (CD) - discuss/vote

March 5, 2024 - cancelled

March 12, 2024

April 2, 2024

April 9, 2024

May 7, 2024

May 14, 2024

June 4, 2024

June 11, 2024

July 2, 2024

July 9, 2024

August 6, 2024

August 13, 2024 (Fall proposals due Aug 14, 2024)

September 3, 2024

September 10, 2024

October 1, 2024

October 8, 2024

November 5, 2024

November 12, 2024

December 3, 2024

December 10, 2024

Work Agenda

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

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
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Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	CD	Discussion Document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	2.6.24 2.13.24	Spr 2024
Opportunities in Organic: Improving Support for Organic Transition	AJ	Proposal	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active	12.12.23 1.9.24 2.13.24	Spr 2024

			agenda item for future work		
Organic Food System Capacity and Constraints	CD	Discussion Document	Approved by Exec Cmmte 12.19.23, and NOP 1.16.24	1.23.24 2.13.24	Spr 2024

Milestones

Spring 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~Nov 17, 2023	16 - 20
NOP - Draft Spring 2024 NOSB meeting tentative agenda	Feb 9, 2024	~ 10
NOSB - Spring 2024 proposals due to NOP	Feb 15, 2024	~ 9
NOP - Post proposals	Mar 5, 2024	7.5
Public comment closes	Apr 3, 2024	3.5
NOP - Send compiled public comments to NOSB	Apr 5, 2024	3
Public comment webinars	Apr 23 & 25, 2024	1
Spring 2024 NOSB meeting - Milwaukee, WI	Apr 29 - May 1, 2024	0
Final recommendations due	May 29, 2024	30 days post meeting

Fall 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~May 24, 2024	21
NOP - Draft Fall 2024 NOSB meeting agenda	Aug 2, 2024	~10
NOSB - Fall 2024 proposals due to NOP	Aug 14, 2024	~9
NOP - Post proposals	Aug 30, 2024	~7.5
Public comment closes	Sep 30, 2024	~4.5
NOP - Send compiled public comments to NOSB	~Oct 3, 2024	~2
Public comment webinars	Oct 15 & 17, 2024	1
Fall 2024 NOSB meeting - Portland, OR	Oct 22 - 24, 2024	0
Final recommendations due	Nov 25, 2024	30 days post

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 13, 2024 4:00 pm ET

Present: Amy Bruch (ADB), Chair; Allison Johnson (AJ), Vice Chair; Kyla Smith (KS); Nate Lewis (NL); Jerry D'Amore (JD); Kim Huseman (KH); Nate Powell-Palm (NPP)

Absent: Carolyn Dimitri (CD)

Staff: Michelle Arsenault (MA); Jo Mirenda (JM); Heather Kumar (HK); Esu Obu (EO)

Agenda

- Review February 6, 2024 notes
- Climate Induced Farming Risk and Crop Insurance (CD) - discuss/vote
- Improving Support for Organic Transition (AJ) - discuss/vote
- Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss/vote
- Organic Food System Capacity and Constraints Disc doc (CD) - discuss/vote
- Additional Items
- Adjourn

Discussion

- **February 6, 2024** notes were modified and approved by the Subcommittee.
- **Climate Induced Farming Risk and Crop Insurance discussion document (ADB for CD/AJ).** The CACS Chair recapped the recent conversations the Subcommittee members had, and the revisions to the original discussion document. The CACS moved to a vote and will present the discussion document to the full Board at the April 2024 meeting.

Motion to accept the discussion document on Climate Induced Farming Risk and Crop Insurance

Motion by: ADB

Seconded by: NL

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

- **Improving Support for Organic Transition proposal (AJ).** The lead presented the draft document, noting the updates since the last CACS meeting. The NOP and CACS discussed various aspects such as the role of the NOSB, the ultimate goal for this document, who the audience(s) is/are, how NOP would implement the recommendations, what the best format would be, and how it could be successful. The lead noted that the document contains aspects that are already being carried out in the TOPP program, and highlighted that the Organic Transition Initiative (OTI) is a bigger umbrella. The CACS is seeking to collect public input, so it can convey stakeholder feedback to the USDA in an effort to improve the feedback loop among different agencies, such as NOP, NRCS, FSA, etc. This role would typically belong to the USDA Organic Policy Advisor, however, that position is currently vacant. The NOSB Chair asked if the document would be better framed as a letter to the Secretary? Members suggested minor edits, and the CACS moved to a vote.

Motion to accept the proposal on Improving Support for Organic Transition

Motion by: AJ

Seconded by: JD

Yes: 7 No: 0 Abstain: 0 Recuse: 0 Absent: 1

- **Residue Testing for a Global Supply Chain discussion document (NL/ADB/NPP/KH).** The lead provided a brief summary of the document and the CACS moved to a vote on the discussion document. The lead will finalize the document and send it to the NOP for the Spring meeting.

Motion to accept the discussion document on Residue Testing for a Global Supply Chain

Motion by: NL

Seconded by: KH

Yes: 7 No: 0 Abstain: 0 Recuse: 0 Absent: 1

- **Organic Food System Capacity and Constraints discussion document (NPP for CD).** The group discussed the current version of the document and questions to stakeholders, and made minor edits. The NOP reminded the group of the work agenda scoping request. The CACS moved to a vote and will finalize the document and send it to the NOP for the Spring meeting.

Motion to accept the discussion document on Organic Food System Capacity and Constraints

Motion by: NPP

Seconded by: ADB

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

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

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted).

February 6, 2024

Climate Induced Farming Risk and Crop Insurance (CD/AJ) - discuss/vote

Improving Support for Organic Transition (AJ) - discuss/vote

Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss/vote

Organic Food System Capacity and Constraints Disc doc (CD) - discuss/vote

February 13, 2024

Climate Induced Farming Risk and Crop Insurance (CD/AJ) - discuss/vote

Improving Support for Organic Transition (AJ) - discuss/vote

Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss/vote

Organic Food System Capacity and Constraints Disc doc (CD) - discuss/vote

March 5, 2024

Possible speaker

March 12, 2024

April 2, 2024

April 9, 2024

Work Agenda

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

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: Residue Testing for a Global Supply Chain	ADB/NPP/NL/KH	Discussion Document	Approved by Exec Cmmte/NOP 4.17.23	11.14.23 1.23.24 2.13.24	Spr 2024
Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	CD	Discussion Document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	2.6.24 2.13.24	Spr 2024
Opportunities in Organic: Improving Support for Organic Transition	AJ	Proposal	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	12.12.23 1.9.24 2.13.24	Spr 2024
Organic Food System Capacity and Constraints	CD	Discussion Document	Approved by Exec Cmmte 12.19.23, and NOP 1.16.24	1.23.24 2.13.24	Spr 2024

Milestones

Spring 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~Nov 17, 2023	16 - 20
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NOP - Send compiled public comments to NOSB	Apr 5, 2024	3
Public comment webinars	Apr 23 & 25, 2024	1
Spring 2024 NOSB meeting - Milwaukee, WI	Apr 29 - May 1, 2024	0
Final recommendations due	May 29, 2024	30 days post meeting

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 6, 2024 4:00 pm ET

Present: Amy Bruch (ADB), Chair; Allison Johnson (AJ), Vice Chair; Carolyn Dimitri (CD); Kyla Smith (KS); Nate Lewis (NL); Jerry D'Amore (JD); Nate Powell-Palm (NPP); Kim Huseman (KH)

Absent: None

Staff: Michelle Arsenault (MA); Jo Mirenda (JM); Heather Kumar (HK); Esu Obu (EO)

Agenda

- Review January 23, 2024 notes
- Climate Induced Farming Risk and Crop Insurance (CD) - discuss/vote
- Improving Support for Organic Transition (AJ) - discuss/vote
- Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss/vote
- Organic Food System Capacity and Constraints Disc doc (CD) - discuss/vote
- Additional Items
- Adjourn

Discussion

- **The January 23, 2024** notes were approved with no changes.
- **Climate Induced Farming Risk and Crop Insurance discussion document (CD).** The document was originally a proposal, and the CACS has decided to put it forth as a discussion document for the Spring meeting instead. The group spent the call discussing and debating the scope and goals of the crop insurance project. A representative from the Risk Management Agency (RMA) spoke at the Fall 2023 NOSB meeting and noted that the current program is not well suited to assist organic producers, and the NOSB is in a better position to translate the needs of organic farmers specifically. Several members made suggestions for how to move this document forward. One member suggested splitting the document in two: one with the interview data, and one with recommendations to RMA. The CACS will review and vote on the documents on the next call.
- Improving Support for Organic Transition (AJ). Deferred to next call.
- Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH). Deferred to next call. The Residue testing document will be a discussion document rather than a proposal.
- Organic Food System Capacity and Constraints Disc doc (CD). Deferred to next call.
- **Additional Items.** None.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted).

January 23, 2024

Climate Induced Farming Risk and Crop Insurance (CD) - discuss
Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss
Organic Food System Capacity and Constraints (CD) - discuss

February 6, 2024

Climate Induced Farming Risk and Crop Insurance (CD) - discuss/vote
Improving Support for Organic Transition (AJ) - discuss/vote
Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss/vote
Organic Food System Capacity and Constraints Disc doc (CD) - discuss/vote

February 13, 2024
 March 5, 2024
 Possible speaker
 March 12, 2024
 April 2, 2024
 April 9, 2024

Work Agenda

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

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: Residue Testing for a Global Supply Chain	ADB/NPP/NL/KH	Discussion Document	Approved by Exec Cmmte/NOP 4.17.23	11.14.23 1.23.24 2.13.24	Spr 2024
Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	CD	Discussion Document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	2.6.24 2.13.24	Spr 2024
Opportunities in Organic: Improving Support for Organic Transition	AJ	Proposal	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	12.12.23 1.9.24 2.13.24	Spr 2024
Organic Food System Capacity and Constraints	CD	Discussion Document	Approved by Exec Cmmte 12.19.23, and NOP 1.16.24	1.23.24 2.13.24	Spr 2024

Milestones

Spring 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~Nov 17, 2023	16 - 20
NOP - Draft Spring 2024 NOSB meeting tentative agenda	Feb 9, 2024	~ 10
NOSB - Spring 2024 proposals due to NOP	Feb 15, 2024	~ 9
NOP - Post proposals	Mar 5, 2024	7.5
Public comment closes	Apr 3, 2024	3.5
NOP - Send compiled public comments to NOSB	Apr 5, 2024	3
Public comment webinars	Apr 23 & 25, 2024	1
Spring 2024 NOSB meeting - Milwaukee, WI	Apr 29 - May 1, 2024	0
Final recommendations due	May 29, 2024	30 days post meeting

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 23, 2024 4:00 pm ET

Present: Amy Bruch (ADB), Chair; Allison Johnson (AJ), Vice Chair; Carolyn Dimitri (CD); Kyla Smith (KS); Nate Lewis (NL); Jerry D'Amore (JD); Nate Powell-Palm (NPP); Kim Huseman (KH)

Absent: None

Staff: Michelle Arsenault (MA); Jo Mirenda (JM); Heather Kumar (HK); Esu Obu (EO)

Agenda

- Review January 9, 2024 notes
- Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss draft
- Organic Food System Capacity and Constraints (formerly Market Development) (CD) - discuss discussion document
- Climate Induced Farming Risk and Crop Insurance (CD) - discuss draft
- Additional Items
- Adjourn

Discussion

- **January 9, 2024** notes were accepted as written.
- **Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH).** The lead summarized the current iteration of the document which focuses on residue testing as it relates to the rollout of the Strengthening Organic Enforcement (SOE) rule. The document proposes suggestions for sampling and testing, and the co-leads are seeking information about adverse actions, which they may incorporate into the document as appropriate. In this document, they are not proposing to change the regulations or handbook. The co-leads are meeting with NOP staff from the Compliance and Enforcement Division next week at the Accredited Certifiers Association (ACA) training to talk about the proposal and explore ideas. Members discussed various aspects of the proposal and offered ideas for consideration. Topics included: Not making things unnecessarily complex for certifiers; potential unintended consequences; the possibility of adding a training module to the Organic Integrity Learning Center; the need to keep in mind that we have a global supply chain; and the need to be mindful and methodical; and that this dovetails with the Strengthening Organic Enforcement (SOE) and the Transition to Organic Partnerships Program (TOPP). The CACS will finalize the proposal on the February 6 call.
- **Organic Food System Capacity and Constraints (formerly Market Development) (CD).** The lead introduced the draft discussion document, in which the Subcommittee asks the community to provide feedback about infrastructure and marketplace challenges in the organic food system. The ultimate goal is to provide suggestions for areas of research to the Economic Research Service that would support and promote organic markets and future market development grants.
- **Climate Induced Farming Risk and Crop Insurance (CD).** Deferred to next call.
- **Additional Items.** None.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted).

January 9, 2024

Climate Induced Farming Risk and Crop Insurance (CD) - discuss draft

Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss draft

January 23, 2024

Climate Induced Farming Risk and Crop Insurance (CD) - discuss

Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss

Organic Food System Capacity and Constraints (CD) - discuss

February 6, 2024

Climate Induced Farming Risk and Crop Insurance (CD) - discuss/vote

Improving Support for Organic Transition (AJ) - discuss/vote

Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss/vote

Organic Food System Capacity and Constraints Disc doc (CD) - discuss/vote

February 13, 2024

March 5, 2024

Possible speaker

March 12, 2024

April 2, 2024

April 9, 2024

Work Agenda

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

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Oversight improvements to deter fraud: Residue Testing for a Global Supply Chain	ADB/NPP/NL/KH	Proposal	Approved by Exec Cmmte/NOP 4.17.23	11.14.23 1.23.24 2.6.24	Spr 2024
Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	CD	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	2.6.24	Spr 2024
Opportunities in Organic: Improving Support for Organic Transition	AJ	Proposal	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	12.12.23 1.9.24 2.6.24	Spr 2024
Organic Food System Capacity and Constraints	CD	Discussion Document	Approved by Exec Cmmte 12.19.23, and NOP 1.16.24	1.23.24 2.6.24	Spr 2024

Milestones

Spring 2024 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~Nov 17, 2023	16 - 20

NOP - Draft Spring 2024 NOSB meeting tentative agenda	Feb 9, 2024	~ 10
NOSB - Spring 2024 proposals due to NOP	Feb 15, 2024	~ 9
NOP - Post proposals	Mar 5, 2024	7.5
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NOP - Send compiled public comments to NOSB	Apr 5, 2024	3
Public comment webinars	Apr 23 & 25, 2024	1
Spring 2024 NOSB meeting - Milwaukee, WI	Apr 29 - May 1, 2024	0
Final recommendations due	May 29, 2024	30 days post meeting

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 9, 2024 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Allison Johnson (AJ), Vice Chair; Carolyn Dimitri (CD); Kyla Smith (KS); Nate Lewis (NL); Jerry D'Amore (JD); Mindee Jefferey (MJ) - observer

Absent: Nate Powell-Palm (NPP); Kim Huseman (KH)

Staff: Michelle Arsenault (MA); Jo Mirenda (JM); Heather Kumar (HK)

Agenda

- Review December 12, 2023 notes
- Guest Speakers - Kate Mendenhall (OFA): Equity and Racial Justice in Organic Transition; Ryann Monteiro (OFA)
- Improving Support for Organic Transition (AJ) - discuss
- Climate Induced Farming Risk and Crop Insurance (CD) - discuss draft
- Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss draft
- Organic Food System Capacity and Constraints (formerly Market Development) (CD) - discuss updated work agenda request
- Additional Items
- Adjourn

Discussion

- **December 12, 2023** notes were accepted as written.
- **Guest Speaker** - Kate Mendenhall (OFA): Equity and Racial Justice in Organic Transition; Ryann Monteiro (OFA). Kate and Ryann provided an update about the Transition to Organic Partnership Program (TOPP) program, and what the central tenants are for racial diversity, identifying systemic racism, and barriers to organic transition & certification, acknowledging geographic barriers, and a country that is culturally and regionally diverse. Ryann added that racial equity and BIPOC (black, indigenous, and other people of color) are not the same. The 2022 Organic Farmers Association (OFA) report contains much of the information presented today, and the 2023 report will be available soon. <https://organicfarmersassociation.org/dei/>
Both Kate and Ryann fielded questions from the CACS members, and the group discussed topics such as how to improve the process for certification, and how to expand the tent while still maintaining the integrity of the organic certificate. A member asked about NOSB's role, given that the OFPA directs the NOSB to engage with certified operations and operators, and they aren't really positioned to solve issues with barriers to certification. A member suggested that giving voice to the issues could be helpful. Another member added that the organic industry and advocates, who are in a position to influence legislation might be in a stronger position. The group also discussed availability of resources, looking at grower groups as a potential model for resource sharing, market risk, building institutional knowledge and expertise in technical support, and international models, such as Denmark, who uses an integrated model for organic agriculture.
- **Improving Support for Organic Transition (AJ)**. The lead circulated a draft in December, and will integrate some of the information from today's discussion into the next iteration, which will be discussed again in February.
- **Climate Induced Farming Risk and Crop Insurance (CD)**. Deferred to next call.
- **Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH)**. Deferred to next call.

- **Organic Food System Capacity and Constraints (formerly Market Development) (CD) updated work agenda request.** The CACS Chair submitted the work agenda request to the NOP and is awaiting a response about whether it is approved. Given the timeline, the CACS may not have time to work on this for the Spring meeting. Members had a brief discussion about the goal of the document. A member feels that it is within the scope of the NOSB to identify important topics that the USDA and Economic Research Service could work on that would benefit organic stakeholders.
- **Additional Items.** None.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

Future call schedule (1st & 2nd Tuesdays 4:00 PM & 2:00 PM ET, except where noted).

December 12, 2023

Possible Guest Speaker (NRCS) - Transition to organic

Improving Support for Organic Transition (AJ) - discuss draft

Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss draft

January 9, 2024

Climate Induced Farming Risk and Crop Insurance (CD) - discuss draft

Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss draft

January 23, 2024

Climate Induced Farming Risk and Crop Insurance (CD) - discuss

Improving Support for Organic Transition (AJ) - discuss

Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss

Organic Food System Capacity and Constraints (CD) - discuss

February 6, 2024

Climate Induced Farming Risk and Crop Insurance (CD) - discuss/vote

Improving Support for Organic Transition (AJ) - discuss/vote

Residue Testing for a Global Supply Chain (ADB/NPP/NL/KH) - discuss/vote

Organic Food System Capacity and Constraints (CD) - discuss

February 13, 2024

March 5, 2024

Possible speaker

March 12, 2024

April 2, 2024

April 9, 2024

Work Agenda

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Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
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Organic and Climate-Smart Agriculture: Climate Induced Farming Risk and Crop Insurance	CD	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	2.6.24	Spr 2024
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Milestones

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