

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

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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
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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

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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

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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

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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

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