

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 1, 2025 2:00 pm ET

Present: Kyla Smith (KS), Chair; Carolyn Dimitri (CD), Vice Chair; Amy Bruch (ADB); Kathryn Deschenes (KD)

Absent: Jo Miranda (JM); Allison Johnson (AJ); Cat McCluskey (CM)

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

Agenda

- Review March 11, 2025 notes
- Work Agenda Checkin
 - Seed - discuss framework for this item
 - Potential new work agenda requests
- Additional Items
- Adjourn

Discussion

- **March 11, 2025 notes** were accepted as written.
- **Work Agenda Check-in**
 - **Seed (CD) - discuss framework.** The lead and co-leads met to discuss the seed document framework. She indicated that there is a data discrepancy between the Organic Census and the Organic Integrity Database regarding acreage of pastureland, which they will explore more. The leads will schedule a call in date to discuss the framework and larger 'buckets' as well as the question of commercial availability. The group also touched on several other seed topics, including conventional seed vs organic; and the seed industry in general, which is concentrated and mainly consists of 4 companies.
 - **Potential new work agenda requests.** Deferred.
- **Additional Items.**
 - At the Spring meeting, the Residue Testing guidance doc/handbook updates, and the risk-based certification document could take priority for voting, as they have wide support and have been through several iterations.
 - The NOSB Chair note that she was working on her Organic System Plan (OSP) and the vast majority of her time was devoted seed documentation. She encouraged folks as they are working on the seed framework, to not make this task more difficult for farmers.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

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
Residue Testing for a Global Supply Chain: Guidance Review	KS/ADB	Proposal	Approved by Exec Cmmte/NOP 4.17.23	12.10.24 1.7.25 2.4.25 2.11.25	Spr 2025
Residue Testing for a Global Supply Chain: Regulation Review	KS/ADB	Discussion document	Approved by Exec Cmmte/NOP 4.17.23	12.10.24 1.7.25 2.4.25 2.11.25	Spr 2025
Risk-Based Certification	KS	Proposal	Approved by Exec Cmmte 6.18.23, and NOP 6.20.24	12.3.24 1.14.25 2.4.25	Spr 2025
Consistency in Organic Seed Use - Panel? - Guest speakers?	AJ/CD/CM	Proposal	Approved by Exec Cmmte 6.18.23, and NOP 6.20.24	12.10.24 1.14.25 4.1.25	Fall 2025

Spring 2025 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	March 28, 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	March 28, 2025	7.5
Public comment closes	April 28, 2025	3.5
NOP - Send compiled public comments to NOSB	April 29, 2025	3
Public comment webinars	Apr 22 & 24, 2025	1
Spring 2025 NOSB meeting - Virtual	Apr 29 - May 1, 2025	0

Final recommendations due	May 29, 2025	30 days post meeting
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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
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Fall 2025 NOSB meeting - Omaha, NE	Nov 4 - 6, 2025	0
Final recommendations due	Nov 28, 2025	~30 days post

Compliance, Accreditation & Certification Subcommittee (CACS) Notes
Tuesday, March 11, 2025 2:00 pm ET

Present: Kyla Smith (KS), Chair; Carolyn Dimitri (CD), Vice Chair; Amy Bruch (ADB); Allison Johnson (AJ); Cat McCluskey (CM)

Absent: Kathryn Deschenes (KD)

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

Agenda

- Review February 11, 2025 notes
- NOSB Chair update
- Organic Seed Growers Conference Debrief (Cat)
- Work Agenda Check in
 - Current work agenda
 - Potential work agenda requests
- Additional Items
- Adjourn

Discussion

- **February 11, 2025 notes** were accepted as written.
- **NOSB Chair update.**
 - The Spring NOSB meeting is postponed, and will be rescheduled. The Chair noted that she is encouraged by the transparency, and will strive to get information to the Board members and the public.
 - The meeting materials should be posted soon, even though the meeting date yet isn't set. Once the rescheduled meeting date is determined, the docket will open, and stakeholders can submit comments.
 - The Fall meeting should be on track for November. Depending on when the Spring meeting gets scheduled, it could be a short turn around time.
 - The NOSB Vice Chair will lead the March 18 Executive call, as the Chair will be travelling.
 - The NOSB will continue to move projects forward. In support of that, the NOP will build the templates for the Fall 2027 sunsets, and gather the list of substances for the 2028 sunsets as well. The Subcommittees will compile the list of TR requests for the 2028 sunsets to submit to NOP by June.
- **Organic Seed Growers Conference Debrief (CM).**
 - A member provided background and a summary of the Organic Seed Alliance's (OSA) Organic Seed Growers Conference, which was held in Oregon last week. The conference is held biennially, and there were about 450 in-person attendees, and 300 virtual attendees. The schedule included many pre-conference meetings focused on organic seed usage, excluded methods, consolidation, and intellectual property (IP), among others. Seed growers expressed frustration due to lack of revenue, and indicated that they are dropping varieties because production can be laborious and costly, organic certification is burdensome, and demand is not high enough. The NOSB is working on projects to address these issues.
 - Last week the National Organic Coalition & Organic Seed Alliance also held a listening session with organic farmers regarding organic seed costs. OSA heard from the seed producers and seed buyers about the challenges. Members added perspectives about organic seed from certifiers and growers.

- A member added that it could be helpful to identify crops where there is less harm, for example perishable vegetables vs. grains. The group agreed, while also acknowledging that seed is a vast topic and parsing it into segments might be difficult. A member shared the link to the State of Organic Seed Report, which breaks down the demographics such as organic growers, producers, etc.
- **Work Agenda Check in**
 - The Spring 2025 agenda includes documents related to current CACS work agenda topics including a proposal on risk-based certification, and two residue testing documents (one focused on updates to the regulation and one on the NOP guidance).
 - The group discussed the current work agenda topic on seed. The Subcommittee will continue to explore next steps. Even though it would be easier to bucket seed topics into smaller segments, it's a complex topic, and part of a system, so it might be difficult to parse out. The CACS discussed hosting guest speakers to talk about seed in the "interstitial" time.
 - Members discuss a potential request for a new work agenda topic related to commercial availability, which they had planned to send to the Executive Team for approval on next weeks call. At this time, the CACS will pause this topic and instead retain its focus on the seed topic.
- **Additional Items.** None.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

March 4, 2025 - cancelled

March 11, 2025

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Absent: Kyla Smith (KS), Chair; Kathryn Deschenes (KD)

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

Agenda

- Review February 4, 2025 notes
- Residue Testing - regulations discussion document (KS/ADB) - discuss/vote
- Residue Testing - guidance document proposal (KS/ADB) - discuss/vote
- Commercial availability work agenda request - discuss
- Additional Items
- Adjourn

Discussion

- **February 4, 2025 notes** were approved as written.
- **Residue Testing - regulations discussion document (KS/ADB).** The goals of the discussion document are to explore options for updating the regulations related to the definition of UREC (Unintended Residual Environmental Contamination), and the number and cost of sampling and testing. After a brief discussion, the CACS moved this to a vote.

Motion to accept the discussion document on residue testing - regulations

Motion by: ADB

Seconded by: CM

Yes: 4 No: 0 Abstain: 0 Recuse: 0 Absent: 2

- **Residue Testing - guidance document proposal (KS/ADB).** Since the last review, the leads made some proofreading edits and added a few public comments, highlighting those for discussion. The group discussed the goals of the document, which are intended to result in updates to the NOP Handbook and/or the Organic Integrity Learning Center. Members spoke about updating NOP guidance document 2611-1, which contains a list of target residues. The CACS feels the list is out of date and limited, and is hoping to provide the NOP with several options. If NOP maintains document 2611-1 then it would be helpful to reformat it.

Motion to accept the proposal on residue testing for a global supply chain guidance document

Motion by: ADB

Seconded by: CD

Yes: 4 No: 0 Abstain: 0 Recuse: 0 Absent: 2

- **Public engagement.** The group had a general discussion about the capacity of the community to provide thorough comments at the upcoming meeting.
- **Commercial availability work agenda request (CD).** The group reviewed the concept and outline for a work agenda request on meeting organic market demand. The lead highlighted the two issues with commercial availability that they are seeking to explore: incentives for finding organic supply and assessing availability when conducting sunset reviews. The CACS approved the work agenda request and will forward it to the Executive Committee for discussion and approval on the February 18 call. This topic is of interest to those looking to expand markets, and the CACS is looking forward to hearing

from the community to move this forward.

Members had a larger discussion about stakeholder participation and global seed supply. A member indicated that there is data in the Ag census about using organic seed - and it seems no one is using these data. The NOP added that as they move this to the Executive Committee for approval, they should keep two things in mind: How the impact relates back to the original problem they are attempting to solve; and how this relates to the work on the consistency in Organic Seed Use document.

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

Previous CACS Notes

February 4, 2025

Risk-Based Certification (KS) - discuss/vote

Residue Testing (KS/ADB) - discuss/vote

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

February 11, 2025

Residue Testing - regulations discussion document (KS/ADB) - discuss/vote

Residue Testing - guidance document proposal (KS/ADB) - discuss/vote

Commercial availability work agenda request - discuss

March 4, 2025

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Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, February 4, 2025 4:00 pm ET

Present: Kyla Smith (KS), Chair; Carolyn Dimitri (CD), Vice Chair; Amy Bruch (ADB); Kathryn Deschenes (KD); Allison Johnson (AJ)

Absent: Jo Mirenda (JM); Cat McCluskey (CM)

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

Agenda

- Review January 14, 2025 notes
- Risk-Based Certification (KS) - discuss
- Residue Testing (KS/ADB) - discuss/vote
- Commercial Availability work agenda request - review?
- Other business
- Adjourn

Discussion

- **January 14, 2025 notes** were approved with revisions to the section on the consistency in Organic seed use section.
- **Risk-Based Certification (KS).** The lead summarized the draft proposal and changes that were made since the last call. She highlighted the goals and what they are asking NOP to do with the recommendation. Members offered thoughts about the participation of the certifier community, and where there may be opportunities to share information about this proposal. The CACS moved to a vote.

Motion to accept the risk-based certification proposal

Motion by: KS

Seconded by: ADB

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

- **Residue Testing - Regulations discussion document (KS/ADB).** The lead gave a brief summary of the document that is focused on the regulations. She highlighted several areas, such as a change in the definition for Unavoidable Residual Environmental Contamination (UREC), and language about exclusion from sale. The lead will finalize the document, and the CACS will vote on the next call.
- **Residue Testing - guidance document proposal (KS/ADB).** The lead gave a brief summary of the proposal, and the group discussed the ability to make updates to the training modules in the Organic Integrity Learning Center vs. Handbook guidance documents. The co-leads will work more on the draft, and will recirculate it to members before the next call, on which the CACS will vote.
- **Commercial Availability work agenda request.** Deferred to next call.
- **Other business.** None.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

January 14, 2025

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

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

February 4, 2025

Risk-Based Certification (KS) - discuss/vote

Residue Testing (KS/ADB) - discuss/vote

February 11, 2025

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Residue Testing - guidance document proposal (KS/ADB) - discuss/vote

Commercial Availability work agenda request - discuss

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Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, January 14, 2025 2:00 pm ET

Present: Kyla Smith (KS), Chair; Amy Bruch (ADB); Allison Johnson (AJ); Jerry D'Amore (JD); Kim Huseman (KH); Cat McCluskey (CM) - observer

Absent: Carolyn Dimitri (CD), Vice Chair; Nate Powell-Palm (NPP)

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

Agenda

- Review January 7, 2025 notes
- Risk-Based Certification (KS) - discuss draft proposal
- Consistency in Organic Seed Use (AJ/CD) - discuss draft proposal
- Other business
- Adjourn

Discussion

- **January 7, 2025 notes** were approved with minor changes
- **Risk-Based Certification (KS).** The lead reached out to several stakeholders and NOP staff to discuss EU models and how this current NOSB work would dovetail. She highlighted the definition section of the document and opened the floor for feedback. Members shared ideas and made suggestions for minor clarifications. A member added that risk assessment and fraud mitigation are two very different things, and perhaps that would assist in organizing the document. The lead will incorporate the changes, and the group will finalize this on a future call. The lead noted that she will be on a panel at the upcoming Accredited Certifiers Association (ACA) Training, and may have some additional thoughts or language to add to the document after that. The lead invited additional feedback via phone or shared document.
- **Consistency in Organic Seed Use (AJ/CD).**
The CACS continues research and outreach on this topic for the Fall 2025 meeting.
- **Commercial Availability (AJ/CD).**
The group discussed a work agenda request on commercial availability. The CACS would like to request a work agenda item to look at expanding organic commercial availability requirements, and how to improve enforcement of the requirements. A member mentioned that she participated in an industry panel on said topic, and recommended the resources that were shared. She also offered to connect the lead author to the presenters. The goal of the document may be a rulemaking change to section 205.605, and perhaps additional guidance for certifiers. The Chair added that it's important to keep in mind potential international ramifications and effects on smaller operations.
- **Other business.** None.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

January 7, 2025

Residue Testing - Guidance (KS/ADB) - discuss draft proposal

Residue Testing - Regulation (KS/ADB) - discuss discussion doc

January 14, 2025

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

Consistency in Organic Seed Use (AJ/CD) - discuss
February 4, 2025
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NOP - Send compiled public comments to NOSB	Oct 14, 2025	~3
Public comment webinars	Oct 28 & 30, 2025	1
Fall 2025 NOSB meeting - Omaha, NE	Nov 4 - 6, 2025	0
Final recommendations due	Nov 28, 2025	~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, January 7, 2025 4:00 pm ET

Present: Kyla Smith (KS), Chair; Carolyn Dimitri (CD), Vice Chair; Amy Bruch (ADB); Allison Johnson (AJ); Nate Powell-Palm (NPP); Cat McCluskey (CM) - observer

Absent: Jerry D'Amore (JD); Kim Huseman (KH)

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

Agenda

- Review December 10, 2024 notes
- Residue Testing Guidance (KS/ADB) - discuss draft proposal
- Residue Testing Regulation (KS/ADB) - discuss next steps
- Other business
- Adjourn

Discussion

- **December 10, 2024 notes** were approved as written.
- **Residue Testing Guidance proposal (KS/ADB).** The leads divided the work for this project between them. One lead will focus on updating the NOP guidance documents 2610, 2611, 2611-1 and the other will focus on updates to NOP guidance document 2613. The group discussed how best to structure the guidance document and how to make it evergreen. Members provided feedback and suggested edits to various sections of the draft proposal, and the leads will incorporate them into the final document for review on the next call.
- **Residue Testing Regulation discussion document (ADB/KS).** The discussion document focuses on §205.671 with the goal of clarifying the regulations to make sure 'exclusion from sale' practices are consistent, and include actions against willful applications of prohibited substances. The group discussed the draft document, and will discuss and vote on a final version during a future call.
- **Other business.** A member expressed interest in working on a discussion document on commercial availability. In support of that, she will prepare a work agenda request for CACS discussion on the next call. Once the CACS finalizes it, it will be forwarded to the Executive Committee for approval. Members discussed various components that could be incorporated into the discussion document.
- **The meeting was adjourned.**

Previous CACS Notes

December 10, 2024

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

Residue Testing (KS/ADB) - discuss draft proposal

January 7, 2025

Residue Testing - Guidance (KS/ADB) - discuss draft proposal

Residue Testing - Regulation (KS/ADB) - discuss discussion doc

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 (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 - 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 - Regulation	KS/ADB	Discussion document	Approved by Exec Cmmte/NOP 4.17.23	12.10.24 1.7.25 2.4.25	Spr 2025
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

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
NOP - Post proposals	Sept 8, 2025	~8
Public comment closes	Oct 8, 2025	~4
NOP - Send compiled public comments to NOSB	Oct 14, 2025	~3
Public comment webinars	Oct 28 & 30, 2025	1
Fall 2025 NOSB meeting - Omaha, NE	Nov 4 - 6, 2025	0
Final recommendations due	Nov 28, 2025	~30 days post