

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 or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)  
Compliance, Accreditation & Certification Subcommittee Notes  
Tuesday, January 8, 2013, 3:00 pm EST**

**Attending:** Joe Dickson (Chair) (JD), Mac Stone (MS), John Foster (JFo), Harold Austin (HA), Barry Flamm (BF), Carmela Beck (CB), Tracy Favre (TF)

**Absent:** Jean Richardson (JR) (Vice Chair), Calvin Walker (CW)

**Staff:** Michelle Arsenault (MA), Emily Brown Rosen (EBR)

**Work Plan**

Project	Point Person	Status	Vote	Target Meeting
Calculating percentage of organic ingredients	MS/JR/JFo	Proposal. NOP is interested in how formulated "organic" products should be calculated		Spr 2013
Monitoring Practices and procedures for Organic System Plan (OSP) 205.201(a)	JFo	Discussion doc. On hold until Strict but Sensible is fleshed out		TBD
Sanitizers in 100% organic products	JFo	On hold. NOP will provide overview to CACS of food contact substances and processing aids in ~January 2013		TBD
<a href="#">Fall 2009 Guidance doc on Retail Certification</a>	HA/JD (not lead)	Discussion doc. Will look at previous NOSB recommendation and current conditions, and see if an additional recommendation would be helpful.	JD will recuse from vote	Fall 2013

**Agenda:**

- Approve minutes from December 19
- Discuss next steps for "Calculating % of organic ingredients" (JR/JFo).
- Retail Certification – status check

**Discussion:**

- Notes from the December 19 call were approved with no changes.
- The chair indicated that the retail certification document will be delayed until the fall 2013 meeting, pending the work by the OIG on this topic. The delay will be discussed on the ES call this coming Friday. The workplan table above was updated to reflect this.
- Calculating percentage (%) of organic ingredients. MS noted that there is an hour long session on this topic at the Accredited Certifiers Association (ACA) meeting next week in Orlando, FL, and suggested that it might be a good place to network with various people. The NOP suggested some edits and the chair noted those for JR, who is the lead person for this project. The members felt that

the document was getting very long, and suggested separating some of the units, and in support of that will do some editing via email and prepare this document for a vote on next call (January 22). JD will make some edits and forward them to the group in the next couple days. A member paraphrased an adage from Deputy Secretary Merrigan: “Don’t let perfect be the enemy of the good.”

- MS noted that the ACA training includes a discussion of the new initiative “Strict and Sensible” which he will debrief the group about on the January 22 call.
- A member asked about future workplan items for the CACS, and asked that MS keep an ear out for any ideas and feedback from the ACA training. The chair also asked that the group think about some ideas.

### **Future Scheduled Subcommittee Calls**

January 8, 2013 3:00 pm EST

Discuss/vote on Calculating % of organic ingredients (JR or JFo)

Discuss Retail Certification (delayed until fall 2013)

January 22, 2013 3:00 pm EST

Discuss/vote on Calculating % of organic ingredients

MS debrief about ACA training

February 12, 2013 3:00 pm EST - proposals due

February 26, 2013 3:00 pm EST

March 12, 2013 3:00 pm EST

March 26, 2013 3:00 pm EST

<b>Spring 2013 Milestones</b>	<b>Target date</b>
NOP – Complete tentative agenda	February 8, 2013
Spring 2013 proposals due to NOP	February 12, 2013
NOP - Post proposals, Publish FRN, Open public comment	February 19, 2013
Subcommittees submit tentative workplans to NOP	March 1, 2013
Discuss workplans on ES call	March 8, 2013
NOP provides written comments on workplans to NOSB	March 11, 2013
Public comment closes	March 19, 2013
NOP - Send compiled public comments to NOSB	March 25, 2013
Workplans finalized on ES call	March 29, 2013
Spring 2013 NOSB Meeting – Portland, OR	April 8-11, 2013

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**National Organic Standards Board (NOSB)  
Compliance, Accreditation & Certification Subcommittee Notes  
Tuesday, January 22, 2013, 3:00 pm EST**

**Attending:** Joe Dickson (Chair) (JD), Jean Richardson (JR) (Vice Chair), Mac Stone (MS), John Foster (JFo), Harold Austin (HA), Barry Flamm (BF), Tracy Favre (TF), Calvin Walker (CW)

**Absent:** Carmela Beck (CB)

**Staff:** Michelle Arsenault (MA), Emily Brown Rosen (EBR)

**Work Plan**

Project	Point Person	Status	Vote	Target Meeting
Calculating percentage of organic ingredients in multi-ingredient products	MS/JR/JFo	Proposal. NOP is interested in how formulated "organic" products should be calculated		Spr 2013
Monitoring Practices and procedures for Organic System Plan (OSP) 205.201(a)	JFo	Discussion doc. On hold until Strict but Sensible is fleshed out		TBD
Sanitizers in 100% organic products	JFo	On hold. NOP will provide overview to CACS of food contact substances and processing aids in ~January 2013		TBD
<a href="#">Fall 2009 Guidance doc on Retail Certification</a>	HA/JD (not lead)	Discussion doc. Will look at previous NOSB recommendation and current conditions, and see if an additional recommendation would be helpful.	JD will recuse from vote	Fall 2013

**Agenda:**

- Approve minutes from January 8
- Debriefing from of Accredited Certifiers Association (ACA) training
- Discuss next steps for "Calculating % of organic ingredients" (JR/JFo).

**Discussion:**

- Notes from the January 8 call approved with no changes.
- Note: ABS changed the title of "Calculating % of organic ingredients to Calculating % of organic ingredients in multi-ingredient products" based on input from one of the Subcommittee members
- Update on Sound but Sensible presentations from the ACA meeting in FL. MS summarized his experience at the ACA meeting which included session on outreach, education, user friendliness, Organic System Plans, and auditing, with a goal of streamlining paperwork. The ACA and NOP discussed how to use the penalty matrix, and what distinguishes minor from major noncompliance,

based on impact to organic integrity. A member asked if the topic of calculating percentage of ingredients was discussed and MS noted that it was, and it appears that the NOSB is on track with the proposal, especially with regard to water.

- Calculating % of organic ingredients in multi-ingredient products: the group discussed edits to the document and feels that it is nearing completion and will be ready for voting during the next call (February 12). The group consensus is that although there isn't a substantial problem, it does need to be documented. JR will incorporate the additional comments and circulate the document prior to the next call.

**Future Scheduled Subcommittee Calls**

January 22, 2013 3:00 pm EST

Discuss/vote on Calculating % of organic ingredients

MS debrief about ACA training

February 12, 2013 3:00 pm EST - proposals due

Vote on Calculating % of organic ingredients in multi-ingredient products

February 26, 2013 3:00 pm EST

March 12, 2013 3:00 pm EST

March 26, 2013 3:00 pm EST

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NOP – Complete tentative agenda	February 8, 2013
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**National Organic Standards Board (NOSB)  
Compliance, Accreditation & Certification Subcommittee Notes  
Tuesday, February 12, 2013, 3:00 pm ET**

**Attending:** Joe Dickson (Chair) (JD), Jean Richardson (JR) (Vice Chair), Mac Stone (MS), Harold Austin (HA), Tracy Favre (TF), Calvin Walker (CW), Carmela Beck (CB)

**Absent:** John Foster (JFo)

**Staff:** Michelle Arsenault (MA), Emily Brown Rosen (EBR)

**Work Plan**

Project	Point Person	Status	Vote	Target Meeting
Calculating percentage of organic ingredients in multi-ingredient products	MS/JR/JFo	Proposal. NOP is interested in how formulated "organic" products should be calculated	02 12 13	Spr 2013
Monitoring Practices and procedures for Organic System Plan (OSP) 205.201(a)	JFo	Discussion doc. On hold until Sound and Sensible is fleshed out		TBD
Sanitizers in 100% organic products	JFo	On hold. NOP will provide overview to CACS of food contact substances and processing aids in ~January 2013 -delayed		TBD
<a href="#">Fall 2009 Guidance doc on Retail Certification</a>	HA/JD (not lead)	Discussion doc. On hold until OIG provides more info about this item	JD will recuse from vote	Fall 2013
Potential item: How certifiers apply 205.206(e)	See JFo for more info	How certifiers apply 205.206(e) and judge the conditions appropriate to allow the use of a synthetic whatever		

**Agenda:**

- Review and approve notes from January 22 call
- Discuss and vote on Calculating % of organic ingredients in multi-ingredient products
- Discuss potential workplan items

**Discussion:**

- Notes from the January 22 call were approved with no changes.
- Calculating % of organic ingredients in multi-ingredient products. The members discussed some minor edits to the language in the document and proceeded to a vote.

### **Vote on Calc % Organic Ingredients.**

Motion to accept and forward to the full Board the proposal on Calculating % of organic ingredients in multi-ingredient products as amended

Motion by: JR

Seconded by: JD

Additional discussion: none

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

The Chair will make the final edits and send to MA for posting.

- Potential workplan items
  - The group discussed the retail certification guidance, which is currently on hold pending an OIG audit. JR noted that she recently attended a meeting where this was a major topic of discussion, where one of the areas of focus was the misrepresentation of the word organic at Farmers Markets. The members discussed the benefits of doing outreach and education as a means to prevent problems and asked if the USDA did outreach to conventional and other growers? The NOP provided a summary of some of the efforts that the USDA is making to reach out to farmers and connect farmers to USDA resources. MA will ask the Deputy Administrator about the OIG report status. (Update 02 13 13 - OIG has listed audit as a candidate audit for 2013, but it has not been initiated.).
  - Sanitizers in 100% organic products. MA will ask about the status of this item and report back to the group. (Update 02 13 13: The NOP update re: Sanitizers in 100% Organic products is delayed).
  - Members discussed Inspector training, and decided that this would be better suited for the NOP than for the CACS.
  - The group also discussed seeking suggestions from various segments of the community about potential workplan items. MS will ask ACA Board for suggestions.

### **Future Scheduled Subcommittee Calls**

February 12, 2013 3:00 pm EST - proposals due

Vote on Calculating % of organic ingredients in multi-ingredient products

February 26, 2013 3:00 pm EST-cancelled

March 12, 2013 3:00 pm EST

March 26, 2013 3:00 pm EST

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**National Organic Standards Board (NOSB)  
Compliance, Accreditation & Certification Subcommittee Notes  
Tuesday, March 12, 2013, 3:00 pm ET**

**Attending:** Joe Dickson (Chair) (JD), Jean Richardson (JR) (Vice Chair), Mac Stone (MS), Harold Austin (HA), Tracy Favre (TF), Calvin Walker (CW), John Foster (JFo)

**Absent:** Carmela Beck (CB)

**Staff:** Michelle Arsenault (MA), Emily Brown Rosen (EBR)

**Work Plan**

Project	Point Person	Status	Vote	Target Meeting
Calculating percentage of organic ingredients in multi-ingredient products	MS/JR/JFo	Proposal. NOP is interested in how formulated "organic" products should be calculated	02 12 13	Spr 2013
Monitoring Practices and procedures for Organic System Plan (OSP) 205.201(a)	JFo	Discussion doc. On hold until Sound and Sensible is fleshed out		TBD
Sanitizers in 100% organic products	JR/JFo	On hold. NOP will provide overview to CACS of food contact substances and processing aids in ~January 2013 -delayed		TBD
<a href="#">Fall 2009 Guidance doc on Retail Certification</a>	HA/JD (not lead)	Discussion doc.	JD will recuse from vote	Fall 2013
How certifiers apply 205.206(e)	JFo	Discussion doc with best practices and process view		Fall 2013
Sound and Sensible	MS			

**Agenda:**

- Review and approve notes from February 12 call
- Review comments on "Calculating percentage of organic ingredients..."

**Discussion:**

- Notes from the February 12 call approved with no changes
- Calculating percentage of organic ingredients- The Board hasn't received any comments yet, but in personal communications, a member received positive feedback with some minor suggestions about language or reformatting. Other members have received verbal feedback ahead of people submitting written comments.

- Workplan
  - Retail Certification - back on workplan because OIG will probably not take this up yet.
  - Sound and Sensible - discussion about this continues and although most of it is internal to NOP, the CACS would be a good vehicle to get this into the public realm. The group is unsure as to whether or not a discussion document is the best vehicle for this.
  - Sanitizers. The NOP indicated that there is consideration of development of a guidance document, but due to other priorities it will be delayed. Members felt that this is a topic that has profound implications to the community and the consensus was that it should be a workplan item. EBR asked what the group envisioned as the problem. Some members believe that sanitizers should not be considered processing aids (as NOP rule does) and believe that FDA does not consider them processing aids. [NOP notes that FDA does consider antimicrobials such as peracetic acid and sodium hypochlorite to be secondary direct food additives used for washing or peeling fruits or vegetables at 21 CFR173.315]. The group consensus is to keep it on the workplan so it does not drop off.
  - Potential item: How certifiers apply 205.206(e) – A member noted that often on Crops calls the bigger picture gets forgotten, and that these materials are not used in a vacuum. The feeling is that it would be useful to solicit comments from the certification community about 205.206(a-e) and how this applies to Crops Subcommittee materials. The NOP suggested that perhaps the questions can be phrased as “best practices”. A member added that this should be viewed as a process based system – and not just materials use. The group consensus is that this is an important topic and they would like to move forward with this item for the workplan. The Chair asked about presenting this on the next ES call. The group will discuss this further on next call and flush out idea for NOP consideration.

**Future Scheduled Subcommittee Calls**

February 26, 2013 3:00 pm EST- cancelled

March 12, 2013 3:00 pm EST

March 26, 2013 3:00 pm EST

Comments

Potential item: How certifiers apply 205.206(e)

Spring 2013 Milestones	Target date
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**National Organic Standards Board (NOSB)  
Compliance, Accreditation & Certification Subcommittee Notes  
Tuesday, May 10, 2013, 12:00 pm ET**

**Attending:** Jean Richardson (JR) (Vice Chair), Harold Austin (HA), Carmela Beck (CB), Mac Stone (MS), John Foster (JFo), Calvin Walker (CW)

**Absent:** Joe Dickson (Chair) (JD), Tracy Favre (TF)

**Staff:** Michelle Arsenault (MA), Emily Brown Rosen (EBR)

**Work Plan**

Project	Contact	Status	Vote	Meeting
<a href="#">Fall 2009 Guidance doc on Retail Certification</a>	HA/JD (not lead)	Discussion doc.	JD will recuse from vote	Fall 2013
How certifiers apply 205.206(e)	JFo	Discussion doc with best practices and process view		Fall 2013
Sound and Sensible	JR/MS	Discussion document?		Fall 2013
Monitoring Practices and procedures for Organic System Plan (OSP) 205.201(a)	JFo	Discussion doc. On hold until Sound and Sensible is fleshed out		TBD
Sanitizers in 100% organic products	JFo	On hold. NOP will provide overview to CACS of food contact substances and processing aids.		TBD
Exclusion of water in calculating percentage of organic ingredients	JR/JFo	Proposal. NOP is interested in how formulated "organic" products should be calculated		Fall 2014

**Agenda:**

- Review and approve notes from March 26 call
- Review workplan

**Discussion:**

- Notes from the March 26 call were approved with no changes
- Workplan:

- Sound and sensible - The NOP would like the NOSB ultimately to produce a recommendation, and the Subcommittee requested some written guidance from NOP before moving forward. EBR will let the Subcommittee know how to proceed.
- The NOP is working on guidance based on the Board Recommendation for calculating percentage of organic ingredients in multi-ingredient products, and may include guidance about 100% label use as impacted by use of sanitizers/antimicrobials. NOP will provide feedback to the CACS when it is finished.
- Exclusion of water in calculating percentage of organic ingredients - EBR will check with the program about this and let the group know how to proceed.
- The members clarified that the Retail Certification discussion document is going forward for the fall meeting.

**Future Scheduled Subcommittee Calls**

- May 28, 2013 3:00 pm ET  
JR out of office  
How certifiers apply 205.206(e) (JFo)  
Retail Certification (HA/JD)
- June 11, 2013 3:00 pm ET  
JR out of office
- June 25, 2013 3:00 pm ET  
Sanitizers in 100% organic products (EBR/JFo)
- July 9, 2013 3:00 pm ET  
Sound and Sensible (EBR)  
Exclusion of water (EBR/JR)
- July 23, 2013 3:00 pm ET
- August 13, 2013 3:00 pm ET
- August 27, 2013 3:00 pm ET
- September 10, 2013 3:00 pm ET
- September 24, 2013 3:00 pm ET
- October 8, 2013 3:00 pm ET

Fall 2013 Milestones	Target date
NOP – Complete tentative agenda	August 9, 2013
Fall 2013 proposals due to NOP	August 27, 2013
NOP - Post proposals, Publish FRN, Open public comment	September 3, 2013
Subcommittees submit tentative workplans to NOP	
Discuss workplans on ES call	
NOP provides written comments on workplans to NOSB	

Public comment closes	October 1, 2013
NOP - Send compiled public comments to NOSB	~October 7, 2013
Workplans finalized on ES call	October 11, 2013
Fall 2013 NOSB Meeting – Louisville, KY	October 21-24, 2013

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**National Organic Standards Board (NOSB)  
Compliance, Accreditation & Certification Subcommittee Notes  
Tuesday, May 28, 2013, 3:00 pm ET**

**Attending:** Joe Dickson (Chair) (JD), Harold Austin (HA), Carmela Beck (CB), Mac Stone (MS), John Foster (JFo)

**Absent:** Jean Richardson (JR) (Vice Chair), Tracy Favre (TF), Calvin Walker (CW)

**Staff:** Michelle Arsenault (MA), Emily Brown Rosen (EBR)

**Work Plan**

Project	Contact	Status	Vote	Meeting
<a href="#">Fall 2009 Guidance doc on Retail Certification</a>	HA/JD (not lead)	Discussion doc	JD will recuse from vote	Fall 2013
How certifiers apply 205.206(e)	JFo	Discussion doc with best practices and process view		Fall 2013
Sound and Sensible	JR/MS	Discussion document		Fall 2013
Monitoring Practices and procedures for Organic System Plan (OSP) 205.201(a)	JFo	Discussion doc. On hold until Sound and Sensible is fleshed out		TBD
Sanitizers in 100% organic products	JFo	On hold. NOP will provide overview to CACS of food contact substances and processing aids.		TBD
Exclusion of water in calculating percentage of organic ingredients	JR/JFo	Proposal. NOP is interested in how formulated "organic" products should be calculated		Fall 2014

**Agenda:**

- Review and approve notes from May 10 call
- Discuss status of workplan items

**Discussion:**

- Notes from the May 10 call were approved with no changes.
- The CACS is waiting for more info from the NOP about Sound & Sensible (S & S) and would like to know how to proceed and what the timeline is. If the target meeting is fall 2013, they need to start

soon. MS indicated that the project is still a bit nebulous, but the plan is for the CACS to produce a discussion document with a general discussion about S & S and any other content they would like to include. MS will lead this project.

- How certifiers apply 205.206(e) (JFo). JFo will write a rough draft with major questions and will circulate it prior to the group prior to the June 11 call.
- Retail Certification – (HA). JD provided some background information. The Subcommittee was in unanimous support of this as he has vast knowledge of this area. JD had chosen to abstain from voting but may reevaluate that decision. MS noted that he too is involved in the retail market but doesn't feel that he has a COI. The group discussed the potential perception of COI and chose to contact the NOP to ask for formal determination about this issue. The members discussed various aspects of retail certification that could be incorporated into this discussion document, including the issues of exemptions surrounding processing and packaging items in a retail facility and opportunities for use of the seal, etc. EBR suggested that the group might be thinking too broadly and it would be useful to narrow the parameters. JFo noted that processing is defined in §205.270, and the problem is the "onsite exclusion at 205.101(b)(2). The group discussed how to move forward since the NOP has not addressed the 2009 guidance, and now should determine the most useful products such as fact sheets, guidance and/or rule changes. EBR will check with NOP Compliance to see if there have been specific problems to date. Members discussed the Organic Trade Association proprietary training program called Good Organic Retail Practices (GORP) and whether or not it is current. A member asked about online retail sales and the potential of including that component in the discussion document. The retail establishment definition in the regulation addresses brick and mortar operations, but is silent on internet sales. The NOP asked that the group compile a list of questions so it can determine if they've been addressed elsewhere. The group discussed the inclusion of examples and principles in the discussion document which is very helpful when relaying information to the public. Another component of this document could include sanitizers. The group feels that the fundamental question is who is checking on compliance with adherence to 205.272 (contamination with prohibited substances and commingling), and asked the NOP if this is important or if there are more important issues to address. A member noted that non-compliance issues at farmers markets and false claims about certification are potential items for this document. HA and JD will work together on a draft document to compile questions, and the NOP will engage the Compliance Division to see if they have suggestions for other items to include.

### **Future Scheduled Subcommittee Calls**

May 28, 2013 3:00 pm ET

JR out of office

How certifiers apply 205.206(e) (JFo)

Retail Certification (HA/JD)

June 11, 2013 3:00 pm ET

How certifiers apply 205.206(e) (JFo)

MS - Exec summary on S & S

JR out of office

June 25, 2013 3:00 pm ET

Sanitizers in 100% organic products (EBR/JFo)

July 9, 2013 3:00 pm ET

Sound and Sensible (EBR)

Exclusion of water (EBR/JR)

July 23, 2013 3:00 pm ET

August 13, 2013 3:00 pm ET

August 27, 2013 3:00 pm ET

September 10, 2013 3:00 pm ET

September 24, 2013 3:00 pm ET

October 8, 2013 3:00 pm ET

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**National Organic Standards Board (NOSB)  
Compliance, Accreditation & Certification Subcommittee Notes  
Tuesday, June 11, 2013, 3:00 pm ET**

**Attending:** Joe Dickson (Chair) (JD), Harold Austin (HA), Carmela Beck (CB), John Foster (JFo), Tracy Favre (TF), Calvin Walker (CW)

**Absent:** Jean Richardson (JR) (Vice Chair), Mac Stone (MS), Emily Brown Rosen (EBR)

**Staff:** Michelle Arsenault (MA)

**Work Plan**

Project	Contact	Status	Vote	Meeting
<a href="#">Fall 2009 Guidance doc on Retail Certification</a>	HA/JD (not lead)	Discussion doc	JD will recuse from vote?	Fall 2013
How certifiers apply 205.206(e)	JFo	Discussion doc with best practices and process view		Fall 2013
Sound and Sensible	JR/MS	Discussion document		Fall 2013
Monitoring Practices and procedures for Organic System Plan (OSP) 205.201(a)	JFo	Discussion doc. On hold until Sound and Sensible is fleshed out		TBD
Sanitizers in 100% organic products	JFo? JR?	On hold, pending draft NOP guidance.		TBD
Exclusion of water in calculating percentage of organic ingredients	JR/JFo	Proposal. How formulated "organic" products should be calculated		Fall 2014

**Agenda**

- Review and approve notes from May 28 call
- How certifiers apply 205.206(e)
- Exec summary on S & S (MS)
- Retail Discussion Doc update (HA)

**Discussion**

- Notes from the May 28 call were approved with no changes.
- How certifiers apply 205.206(e): JFo circulated a draft document for the group to review and the group considered various aspects, including the goal for this document. Members discussed the usefulness of writing a discussion document first, with specific questions for certifiers, with the

intent of providing the NOP with guidance not a rule change. A member noted that the general record keeping requirement should be adequate but it might not be specific enough, and the inclusion of overarching guidance would help to give the general public more confidence about NOSB review. Members also felt that this could operate as an education tool as well. The group was supportive of moving this forward as a discussion document. JFo will pose some questions for discussion on the July 23 call

- Exec summary on S & S (MS) - postponed until June 25
- Retail Discussion Doc update (HA) - rescheduled for July 23
- Sanitizers in 100% organic products- MA will verify who is leading this review.

**Future Scheduled Subcommittee Calls**

June 11, 2013 3:00 pm ET

How certifiers apply 205.206(e) (JFo)

MS - Exec summary on S & S – postponed until June 25

JR out of office

June 25, 2013 3:00 pm ET

MS - Exec summary on S & S

Sanitizers in 100% organic products (EBR/JFo?)

July 9, 2013 3:00 pm ET

Sound and Sensible (EBR)

Exclusion of water (EBR/JR)

July 23, 2013 3:00 pm ET

Retail Certification (HA)

How certifiers apply 205.206(e) - Discuss questions to include in DD

August 13, 2013 3:00 pm ET

August 27, 2013 3:00 pm ET

September 10, 2013 3:00 pm ET

September 24, 2013 3:00 pm ET

October 8, 2013 3:00 pm ET

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**National Organic Standards Board (NOSB)  
Compliance, Accreditation & Certification Subcommittee Notes  
Tuesday, June 25, 2013, 3:00 pm ET**

**Attending:** Joe Dickson (Chair) (JD), Harold Austin (HA), Carmela Beck (CB), John Foster (JFo), Tracy Favre (TF), Calvin Walker (CW), Mac Stone (MS)

**Absent:** Jean Richardson (JR) (Vice Chair)

**Staff:** Michelle Arsenault (MA), Emily Brown Rosen (EBR)

**Work Plan**

Project	Contact	Status	Vote	Meeting
<a href="#">Fall 2009 Guidance doc on Retail Certification</a>	HA/JD (not lead)	Discussion doc	JD will recuse from vote?	Fall 2013
How certifiers apply 205.206(e)	JFo	Discussion doc with best practices and process view		Fall 2013
Sound and Sensible	JR/MS	Discussion document		Fall 2013
Monitoring Practices and procedures for Organic System Plan (OSP) 205.201(a)	JFo	Discussion doc. On hold until Sound and Sensible is fleshed out		TBD
Sanitizers in 100% organic products	JFo? JR?	On hold, pending draft NOP guidance.		TBD
Exclusion of water in calculating percentage of organic ingredients	JR/JFo	Proposal. How formulated "organic" products should be calculated		Fall 2014

**Agenda**

- Approve notes from June 11 call
- Sanitizers in 100% Organic Products (JFo)
- Quick 205.206(e) update, if necessary (JFo)
- Executive Summary on Sound and Sensible CACS participation (MS)
  
- **Discussion**
- Notes from the June 11, 2013 call were approved with no changes
- Sanitizers in 100% Organic Products (JFo) – The group reviewed the past NOSB discussion document (March 2012) and noted that it was very well written and comprehensive. Members discussed

sanitizers and processing aids, including whether or not they are distinct. The NOP noted that they view microbial aids as processing aids, and that use on food for control of microorganisms is regulated differently than sanitizers used to clean equipment, which are considered food contact substances. Antimicrobials used in direct food contact are generally classed by FDA as secondary direct food additives. To that end, a member asked if oranges would be disqualified from the 100% organic claim if they were dropped in a sanitizing bath. The NOP noted that this was discussed in the document from the spring 2013 meeting entitled “Calculating % of organic ingredients in 100% organic products”. The HS has proposed that sanitizers (and antimicrobials ) be separated into their own section on the National List, which would clarify substance classification, and what was or wasn’t an ingredient. The NOP will provide some background references regarding FDA and EPA regulation. Members then discussed the need for this document, and there was wide support for moving forward. In support of that JFo will write up a discussion document highlighting the antimicrobial/sanitizer language differences and will present it on the next call.

- Update on “How certifiers apply 205.206(e)”. The group discussed possible questions to include in the discussion document on this topic. The Subcommittee is seeking comments on this subject from the general public, and in particular the certification community on the following questions: 1. What do you require of applicants and certified operators in their OSP with respect to their compliance with §205.206(e)? 2. What verification from the operator do you require in support of their compliance with § 205.206(e), either during review of the OSP or at the inspection? 3. What information do you require when an operator needs to amend their OSP on short notice when pest pressure unpredictably rises beyond their decision threshold? JFo asked the group to review the questions, and to add any others they thought would be helpful.
- Executive Summary on Sound and Sensible. MS discussed his thoughts on Sound & Sensible, and how the CACS may be able to participate. There are various layers to this initiative, and while it is still not clear what the discussion document would include, one member suggested framing the challenges and difficulties in order to solicit feedback. This initiative seeks to remedy several difficulties, including making the system more user friendly, and reducing paperwork burdens without compromising the integrity of the process.

### **Future Scheduled Subcommittee Calls**

June 25, 2013 3:00 pm ET

MS - Exec summary on S & S

Sanitizers in 100% organic products (EBR/JFo?)

July 9, 2013 3:00 pm ET

Sound and Sensible (MM/SNY)

Exclusion of water (SNY/JR)

July 23, 2013 3:00 pm ET

Retail Certification (HA)

How certifiers apply 205.206(e) - Discuss questions to include in DD

August 13, 2013 3:00 pm ET

August 27, 2013 3:00 pm ET

September 10, 2013 3:00 pm ET

September 24, 2013 3:00 pm ET

October 8, 2013 3:00 pm ET

Fall 2013 Milestones	Target date
NOP – Complete tentative agenda	August 9, 2013
Fall 2013 proposals due to NOP	August 27, 2013
NOP - Post proposals, Publish FRN, Open public comment	September 3, 2013
Subcommittees submit tentative workplans to NOP	
Discuss workplans on ES call	
NOP provides written comments on workplans to NOSB	
Public comment closes	October 1, 2013
NOP - Send compiled public comments to NOSB	~October 7, 2013
Workplans finalized on ES call	October 11, 2013
Fall 2013 NOSB Meeting – Louisville, KY	October 21-24, 2013

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**National Organic Standards Board (NOSB)  
Compliance, Accreditation & Certification Subcommittee Notes  
Tuesday, July 9, 2013, 3:00 pm ET**

**Attending:** Joe Dickson (Chair) (JD), Harold Austin (HA), John Foster (JFo), Tracy Favre (TF), Calvin Walker (CW), Mac Stone (MS), Jean Richardson (JR) (Vice Chair)

**Absent:** Carmela Beck (CB)

**Staff:** Michelle Arsenault (MA), Shannon Nally Yanessa (SNY)

**Work Plan**

Project	Contact	Status	Vote	Meeting
<a href="#">Fall 2009 Guidance doc on Retail Certification</a>	HA/JD (not lead)	Discussion doc	JD will recuse from vote?	Fall 2013
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Monitoring Practices and procedures for Organic System Plan (OSP) 205.201(a)	JFo	Discussion doc. On hold until Sound and Sensible is fleshed out		TBD
Sanitizers in 100% organic products	JFo	On hold, pending draft NOP guidance.		TBD
Exclusion of water in calculating percentage of organic ingredients	JR	Proposal. How formulated "organic" products should be calculated. Waiting for guidance from NOP.		Fall 2014

**Agenda**

- Approve notes from June 25 call
- Sound and Sensible (MS/SNY)
- Exclusion of water (SNY/JR)
  
- **Discussion**
- Notes from the June 25, 2013 call were approved with no changes.
- Shannon Nally Yanessa, the new technical representative for the CACS, introduced herself and was welcome by the group.
- Sound and Sensible (MS) – MS circulated a draft document to the group and discussed various components that are still being revised. MS noted that the Accredited Certifiers Association, Inc (ACA) has a working group composing a document that potentially could be folded into this

discussion document. The intent of the discussion doc is to lay out the process of Sound and Sensible (S & S) and includes many questions for public comment and feedback. MS asked that the members add or alter any of the questions. SNY added that the NOP sent an information collection notice via the insider asking for feedback about the paperwork burden, and the comments are due by August 27. The comment period is open on Regulations.gov and SNY will summarize and send any comments to the group so they can be incorporated. MS noted that the NOP had originally included a penalty matrix but it was not included in this document because it was not well received by the community. The S & S initiative is being embraced by the community and the group feels it is important that the CACS and NOSB promote it to keep the public alerted. CW added that it would be useful to add some more discussion points around streamlining record keeping. MS asked that members send in any comments or suggestions, and upon a recommendation from one of the members, include case studies or specific examples. Members emphasized the importance of including the appropriate level of detail in the guidance because certifiers often have variable levels of background knowledge and don't necessarily know which questions to ask. As to bullet point 4 under background, (Operators required to fill out redundant forms and documents), a member noted that this is probably not the result of NOP policy but instead there seems to be a connection between excess paperwork and certifier qualifications. The same member asked that a reference or recognition for integrity of the product be included in the background section even though this is a process based document. The lead reviewer noted that although this initiative has a lot of support, they don't want to give the impression that the certification process isn't working now. This initiative is a means to improve and streamline the process. MS will continue to edit and revise the document and asked that members send in any comments.

- Exclusion of water (SNY/JR) - JR noted that they were waiting for some guidance from the NOP because the topic is complex and there are many conflicting ways to calculate percent organic water. The problem they would like to see addressed is that currently there is no accessible single source for people to verify consistency in calculation methods. At the spring 2013 NOSB meeting, the NOSB asked that the NOP work on this guidance. SNY stated that the NOP had initially asked the NOSB to work on this, but reconsidered. SNY suggested that the NOP take the lead and address this issue when updating the NOP policy for calculating the percentage of organically produced ingredients. CACS opted to keep this on its workplan citing the informative public comments and the desire to work with NOP to provide input on this topic.

### **Future Scheduled Subcommittee Calls**

July 9, 2013 3:00 pm ET

Sound and Sensible (MS/SNY)

Exclusion of water (SNY/JR)

July 23, 2013 3:00 pm ET

Retail Certification (HA) – discuss/vote?

How certifiers apply 205.206(e) - Discuss questions to include in DD

August 13, 2013 3:00 pm ET

S & S (discuss next draft)

August 27, 2013 3:00 pm ET

Sanitizers in 100% organic products - draft proposal

September 10, 2013 3:00 pm ET

September 24, 2013 3:00 pm ET

October 8, 2013 3:00 pm ET

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**National Organic Standards Board (NOSB)  
Compliance, Accreditation & Certification Subcommittee Notes  
Tuesday, July 23, 2013, 3:00 pm ET**

**Attending:** Joe Dickson (Chair) (JD), Harold Austin (HA), John Foster (JFo), Tracy Favre (TF), Calvin Walker (CW), Jean Richardson (JR) (Vice Chair), Carmela Beck (CB)

**Absent:** Mac Stone (MS)

**Staff:** Michelle Arsenault (MA), Shannon Nally Yanessa (SNY)

**Work Plan**

Project	Contact	Status	Vote	Meeting
<a href="#">Fall 2009 Guidance doc on Retail Certification</a>	HA/JD (not lead)	Discussion doc	JD will recuse from vote?	Fall 2013
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Monitoring Practices and procedures for Organic System Plan (OSP) 205.201(a)	JFo	Discussion doc. On hold until Sound and Sensible is fleshed out		TBD
Sanitizers in 100% organic products	JFo	On hold, pending draft NOP guidance.		TBD
Exclusion of water in calculating percentage of organic ingredients	JR	Proposal. How formulated "organic" products should be calculated. Waiting for guidance from NOP.		Fall 2014

**Agenda**

- Approve notes from July 9 call
- Retail Certification (HA) – discuss/vote?
- How certifiers apply 205.206(e) (JFo) - Discuss questions to include in DD

**Discussion**

- Notes from the July 9, 2013 call accepted with no changes.
- Retail Certification (HA) - discuss/vote? The members discussed the questions in the draft document and made minor revisions to the language, including the section on 205.201(b)(2) (exclusions). The group feels this topic needs clarification as there appears to be some inconsistency among certifiers with regard to the definition of "retail food establishment". The group wanted to know how the

NOP views this and how it is interpreted. Members also expressed an interest in identifying which Accredited Certifying Agents (ACAs) are collecting information about internet sales. Members discussed several other questions and how best to word them to solicit feedback from the public. They agreed that it would be helpful to include examples of different retail scenarios that have raised questions about certification requirements. The group reiterated that this document is not intended to prompt regulatory change, but for educational purposes to spread awareness of activities that should be certified. HA will incorporate the comments and suggestions into the document and send the revised version to the members prior to the next call, with the intention of voting on this on the August 13 call.

- How certifiers apply 205.206(e) (JFo) - postponed to next meeting

**Future Scheduled Subcommittee Calls**

July 23, 2013 3:00 pm ET

Retail Certification (HA) – discuss/vote?

How certifiers apply 205.206(e) - Discuss questions to include in DD

August 13, 2013 3:00 pm ET

Retail Certification (HA) - vote

How certifiers apply 205.206(e) (JFo)- Discuss latest draft/questions/vote?

S & S (MS) - Discuss next draft/vote?

August 27, 2013 3:00 pm ET

Sanitizers in 100% organic products - draft proposal – on hold?

September 10, 2013 3:00 pm ET

September 24, 2013 3:00 pm ET

October 8, 2013 3:00 pm ET

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**National Organic Standards Board (NOSB)  
Compliance, Accreditation & Certification Subcommittee Notes  
Tuesday, August 13, 2013, 3:00 pm ET**

**Attending:** Joe Dickson (Chair) (JD), John Foster (JFo), Tracy Favre (TF), Jean Richardson (JR) (Vice Chair), Carmela Beck (CB), Mac Stone (MS)

**Absent:** Harold Austin (HA), Calvin Walker (CW)

**Staff:** Michelle Arsenault (MA), Shannon Nally Yanessa (SNY)

**Work Plan**

Project	Contact	Status	Vote	Meeting
<a href="#">Fall 2009 Guidance doc on Retail Certification</a>	HA/JD (not lead)	Discussion doc	08 13 13	Fall 2013
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Sanitizers in 100% organic products	JFo	On hold, pending draft NOP guidance.		TBD
Exclusion of water in calculating percentage of organic ingredients	JR	Proposal. How formulated "organic" products should be calculated. Waiting for guidance from NOP.		Fall 2014

**Agenda**

- Approve notes from July 23 call
- Retail Certification (HA) – vote
- How certifiers apply 205.206(e) (JFo) - Discuss latest draft/questions/vote?
- S & S (MS) - Discuss next draft/vote?

**Discussion**

- Notes from the July 23, 2013 call accepted with no changes.

Retail Certification (HA) - vote. The group discussed the document and the language that was changed and recirculated since the last call. The language that was added was minor and meant to

solicit public comment about consumer expectations. The members discussed the certification exception in light of on line retailers and the NOP noted that their stance is that businesses that operate exclusively on-line do not qualify for the retailer exemption or exclusion from certification.

### **Vote on Retail Certification**

Motion to approve the Retail Certification document as presented

Motion by: JR

Seconded by: JFo

Discussion: The Executive summary will state that consumers have confidence in the Organic logo and that the process currently in place is vigorous.

Yes: 7 No: 0 Abstain: 0 Absent: 1 Recuse: 0 . The Subcommittee will leave the vote open to allow absent member to vote via email. NOTE: HA voted via email and his vote was added above.

- How certifiers apply 205.206(e) (JFo) - A new draft will be circulated this week so the group can discuss and perhaps vote on the August 27 call. JFo asked that the members send him any additional questions for the discussion document that pertain to the ACA community.
- S & S (MS) – MS discussed the framework and the intended content for the discussion document and will send the document to the group later this week. In preparation he has collected feedback from various entities, including the NOP and certifiers and identified areas that could improve efficiency of the certification process. JFo will send some language from 205.101b to the group (from 2010 recommendation) that he felt would be helpful to include in this document. A member felt that the intro was too long and that enforcing National List annotations should not be included, so she will make some edits and send it to MS for consideration. The members will discuss this further via email between now and the next call. Members agreed to an additional call next Tuesday, August 20, to go over this document

### **Future Scheduled Subcommittee Calls**

August 13, 2013 3:00 pm ET

Retail Certification (HA) - vote

How certifiers apply 205.206(e) (JFo) - Discuss latest draft/questions/vote?

S & S (MS) - Discuss next draft/vote?

August 20, 2013 S & S (MS)

S & S (MS) - Discuss draft/vote?

August 27, 2013 3:00 pm ET

How certifiers apply 205.206(e) (JFo) - Finish discussion/vote

S & S (MS) - Discuss draft/vote

September 10, 2013 3:00 pm ET

September 24, 2013 3:00 pm ET

October 8, 2013 3:00 pm ET

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**National Organic Standards Board (NOSB)  
Compliance, Accreditation & Certification Subcommittee Notes  
Tuesday, August 20, 2013, 4:00 pm ET**

**Attending:** Joe Dickson (Chair) (JD), John Foster (JFo), Tracy Favre (TF), Mac Stone (MS), Harold Austin (HA)

**Absent:** Jean Richardson (JR) (Vice Chair), Calvin Walker (CW), Carmela Beck (CB)

**Staff:** Michelle Arsenault (MA), Shannon Nally Yanessa (SNY)

**Work Plan**

Project	Contact	Status	Vote	Meeting
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Sanitizers in 100% organic products	JFo	On hold, pending draft NOP guidance.		TBD
Exclusion of water in calculating percentage of organic ingredients	JR	Proposal. How formulated "organic" products should be calculated. Waiting for guidance from NOP.		Fall 2014

**Agenda**

- Approve notes from August 13 call
- How certifiers apply 205.206(e) (JFo) - Discuss latest draft/questions/vote?
- Sound & Sensible (S & S) (MS) - Discuss next draft/vote?

**Discussion**

- Notes from the August 13, 2013 call were not approved. Deferred to the August 27 call.
- How certifiers apply 205.206(e) (JFo) – JFo circulated a new version of the document in which he incorporated edits by other members of the Subcommittee. Members briefly discussed the edits and proceeded to vote.

### **Vote on How certifiers apply 205.206(e)**

Motion to approve and forward to the NOSB the August 19<sup>th</sup> version of the discussion document on how certifiers apply 205.206(e). CW and JR cast their votes via email 08 20 13.

Motion by: JFo

Seconded by: JD

Discussion: none

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

- Sound & Sensible (S & S) (MS) – MS asked the NOP to provide data about the number of ACAs worldwide and number of certified operations for inclusion in the document. Members discussed the document and made various edits to the formatting and language. MS will incorporate the suggested edits and send out a new document tomorrow for the group to review, and the members will vote on the next CACS call (August 27). The NOP suggested the inclusion of specific examples, and clarification about what input the group is seeking.

### **Future Scheduled Subcommittee Calls**

August 20, 2013 4:00 pm ET - additional call

How certifiers apply 205.206(e) (JFo) - Finish discussion?/vote? - done

S & S (MS) - Discuss draft

August 27, 2013 3:00 pm ET

S & S (MS) - Discuss final draft/vote

September 10, 2013 3:00 pm ET

September 24, 2013 3:00 pm ET

October 8, 2013 3:00 pm ET

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**National Organic Standards Board (NOSB)  
Compliance, Accreditation & Certification Subcommittee Notes  
Tuesday, August 27, 2013, 4:00 pm ET**

**Attending:** Joe Dickson (Chair) (JD), Tracy Favre (TF), Mac Stone (MS), Harold Austin (HA), Carmela Beck (CB)

**Absent:** John Foster (JFo), Calvin Walker (CW), Jean Richardson (JR) (Vice Chair)

**Staff:** Michelle Arsenault (MA), Shannon Nally Yanessa (SNY)

**Work Plan**

Project	Contact	Status	Vote	Meeting
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Sanitizers in 100% organic products	JFo	On hold, pending draft NOP guidance.		TBD
Exclusion of water in calculating percentage of organic ingredients	JR	Proposal. How formulated "organic" products should be calculated. Waiting for guidance from NOP.		Fall 2014

**Agenda**

- Approve notes from August 13 & 20 call
- Sound & Sensible (S & S) (MS) - Discuss next draft/vote?

**Discussion**

- Notes from the August 13, 2013 call approved with no changes
- Notes from the August 20, 2013 call approved with no changes
- Sound & Sensible (S & S) (MS) – MS discussed the purpose behind this document which is so the NOSB can inform the entire community about the conversation occurring around this initiative. The Subcommittee Chair asked if the Board’s role is as a conduit for information or to provide advice. Initially this was envisioned as a conduit, but with the addition of questions for the public commenters, it metamorphosed into advice. Ultimately, MS explained that this document is intended to generate input from various stakeholders that would be helpful to the NOP. MS

discussed various sections of the document that were recently edited. The document had been revised to include the farmers’ perspective for each issue area covered. The group was supportive of the document and felt that it would garner useful and insightful feedback.

**Vote on Sound and Sensible**

Motion: To accept the Sound and Sensible Initiative Discussion Document as presented on the August 27 call.

Motion by: MS

Seconded by: HA

Discussion: none

Yes: 6 No: 0 Abstain: 0 Absent: 2 Recuse: 0 (JFo voted Y via email and vote tally was changed to reflect that)

**Future Scheduled Subcommittee Calls**

August 20, 2013 4:00 pm ET - additional call

How certifiers apply 205.206(e) (JFo) - Finish discussion?/vote? - done

S & S (MS) - Discuss draft

August 27, 2013 3:00 pm ET

S & S (MS) - Discuss final draft/vote - done

September 10, 2013 3:00 pm ET

Workplans

September 24, 2013 3:00 pm ET

October 8, 2013 3:00 pm ET

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Compliance, Accreditation & Certification Subcommittee Notes  
Tuesday, September 24, 2013, 3:00 pm ET**

**Attending:** Joe Dickson (Chair) (JD), Jean Richardson (JR) (Vice Chair), Mac Stone (MS), Harold Austin (HA), Carmela Beck (CB), John Foster (JFo), Calvin Walker (CW)

**Absent:** Tracy Favre (TF)

**Staff:** Michelle Arsenault (MA), Shannon Nally Yanessa (SNY)

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Exclusion of water in calculating percentage of organic ingredients	JR	Proposal. How formulated "organic" products should be calculated. Waiting for guidance from NOP.		Fall 2014

**Agenda**

- Approve notes from August 27 call
- Discuss public comments

**Discussion**

- Notes from the August 27, 2013 call approved with no changes
- The group briefly discussed the lack of comments thus far, and will defer this conversation to the next call, October 8.
- The Chair noted that he would be participating in a panel at the upcoming Natural Products Expo East conference in Baltimore, MD and would be talking about the Retail Certification Guidance document as a representative of the NOSB.
- The meeting was adjourned

### **Future Scheduled Subcommittee Calls**

September 10, 2013 3:00 pm ET - canceled

Workplans

September 24, 2013 3:00 pm ET

Public comment

October 8, 2013 3:00 pm ET

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**National Organic Standards Board (NOSB)  
Compliance, Accreditation & Certification Subcommittee Notes  
Friday, November 15, 2013, 2:30:00 pm ET**

**Attending:** Joe Dickson (Chair) (JD), Jean Richardson (JR) (Vice Chair), Mac Stone (MS), Harold Austin (HA), Carmela Beck (CB), John Foster (JFo), Tracy Favre (TF)

**Absent:** Calvin Walker (CW)

**Staff:** Michelle Arsenault (MA), Shannon Nally Yanessa (SNY)

**Work Plan** (Will be replaced with updated version after November Executive Call)

Project	Contact	Status	Vote	Meeting
<a href="#">Fall 2009 Guidance doc on Retail Certification</a>	HA/JD (not lead)	Proposal	08 13 13	Spring 2014
How certifiers apply 205.206(e)	JFo	Discussion doc with best practices and process view	08 20 13	Fall 2013 Meeting cancelled
Sound and Sensible	JR/MS	Discussion document	08 27 13	Fall 2013 Meeting cancelled
Monitoring Practices and procedures for Organic System Plan (OSP) 205.201(a)	JFo	Discussion doc. On hold until Sound and Sensible is fleshed out		TBD
Sanitizers in 100% organic products	JFo	On hold, pending draft NOP guidance.		TBD
Exclusion of water in calculating percentage of organic ingredients	JR	Proposal. How formulated "organic" products should be calculated. Waiting for guidance from NOP.		Fall 2014

**Agenda**

- Approve notes from September 24 call
- Fall 2013 documents:
  - Retail Certification discussion document.
  - How certifiers apply 205.206(e)
- 2014 Workplan

**Discussion**

- Notes from the September 24, 2013 call were approved as is.
- Fall 2013 documents:
  - Discussion document on Retail Certification. Members discussed whether or not to go forth with a proposal based on the public comment that was already received. The members

collectively chose to move it to a proposal for the spring 2014 meeting, and the NOP concurred. The status and meeting date were changed in the table above to reflect this decision.

- How certifiers apply 205.206(e). The NOP asked about the goal of this document, if the Subcommittee chooses to move it to the proposal stage. The lead reviewer noted that the outcome is seen as non-regulatory, and that they are only seeking clarification or reemphasis from the program regarding this. The group decided to move this document to the proposal stage.
- The CACS would like to invite Melissa Bailey, Director of Standards and/or the Deputy Administrator to participate in the next CACS call to discuss the workplan items that were removed as they are not entirely clear why the Sound & Sensible (S & S) and Calculating Percentage of Ingredients documents were removed from the workplan. The NOP indicated that they are “working on guidance about the Calculating Percentage of Ingredients document and no additional work is needed from the Board at this time”, and the Subcommittee would like further conversation and clarification. MS noted that the S & S document feels incomplete and would like to discuss it further with the program. A member suggested an additional topic that might be addressed in S & S: the burden of certification is not always attributed to regulation, but in some cases, how certifiers carry out certification. The members agreed that there needs to be a summary or some sort of wrap-up in a public venue. MA will forward a meeting request to the Standards Director and the Deputy Administrator for the next CACS call.
- The CACS Chair asked if there were any other items that members would like to add to the workplan or perhaps pursue in the future, and asked that people bring any suggestions to the next call. A member noted that since the near future will be subsumed with Sunset reviews, perhaps having discussions about broader scoped topics will be welcome and warranted, and that the CACS is well suited to think about such things. The workplan table has been updated with the 2014 workplan items and will replace the one above in the next set of notes. Additionally, a 2014 milestone timeline has been added below and will replace the fall 2013 milestones.
- HA noted that he would stay on the CACS and lead the presentation at the spring 2013 NOSB meeting on the Retail Document.
- The meeting was adjourned

### **Future Scheduled Subcommittee Calls**

October 8, 2013 3:00 pm ET (CANCELLED)

November 15, 2013 3:00 ET (rescheduled from the 12<sup>th</sup>)

November 26, 2013 3:00 ET

Suggestions for additional workplan items

December 10, 2013 3:00 ET

<b>Fall 2013 Milestones</b>	<b>Target date</b>
NOP – Complete tentative agenda	August 9, 2013
Fall 2013 proposals due to NOP	August 27, 2013
NOP - Post proposals, Publish FRN, Open public comment	September 3, 2013
Subcommittees submit tentative workplans to NOP	September 11, 2013
Discuss workplans on ES call	September 13, 2013
NOP provides written comments on workplans to NOSB	September 23, 2013
Public comment closes	October 1, 2013
NOP - Send compiled public comments to NOSB	~October 7, 2013
Workplans finalized on ES call	CANCELLED
Fall 2013 NOSB Meeting – Louisville, KY	CANCELLED

<b>Spring 2014 Milestones</b>	<b>Target date</b>
Subcommittee requests technical reports for Sunset 2016 substances	Jan 15, 2014
NOSB Training meeting	Feb 4 - 5, 2014
NOP – Complete tentative agenda	Feb 7, 2014
Fall 2013 proposals due to NOP	Feb 26, 2014
NOP - Post proposals, Publish FRN, Open public comment	Mar 10, 2014
Subcommittees submit tentative workplans to NOP	Mar 12, 2014
Discuss workplans on ES call	Mar 14, 2014
NOP provides written comments on workplans to NOSB	Mar 28, 2014
Public comment closes	Apr 8, 2014
Workplans finalized on ES call	Apr 11, 2014
NOP - Send compiled public comments to NOSB	Apr 14, 2014
Spring 2014 NOSB Meeting – San Antonio, TX	~Apr 28- May 1, 2014

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 or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)  
Compliance, Accreditation & Certification Subcommittee Notes  
Tuesday, November 26, 2013, 3:00 pm ET**

**Attending:** Joe Dickson (JD) (2013 Chair), Carmela Beck (CB) (2014 Chair), Jean Richardson (JR) (Vice Chair), Mac Stone (MS), Harold Austin (HA), John Foster (JFo),

**Transition members:** Tracy Favre (TF) - Calvin Walker (CW)

**Absent:** Wendy Fulwider (WF)

**Staff:** Michelle Arsenault (MA), Shannon Nally Yanessa (SNY)

**Work Plan**

Project	Contact	Status	Vote	Meeting
<a href="#">Fall 2009 Guidance doc on Retail Certification</a>	HA/JD (not lead)			Proposal Spring 2014
How certifiers apply 205.206(e)	JFo			Proposal Spring 2014
Monitoring Practices and procedures for Organic System Plan (OSP) 205.201(a)	JFo	The NOP requests that the NOSB provide a briefing paper that summarizes the issue that the Subcommittee is proposing to work on.		TBD

**Agenda**

- Approve notes from November 15 call
- Discuss work plan changes (SYN)
- Spring Agenda Proposals: Retail and 205.206(e)
- Discuss additional ideas for longer term work plan items

**Discussion**

- Notes from the November 15 approved with no changes.
- Changes to work plan (SNY).
  - Sound & Sensible – The NOP indicated that this document was removed from the workplan because they thought the only intent was to generate public comment, which they have received, and it was not clear that there were further plans beyond that. The NOP would be interested in hearing the Subcommittee’s ideas for follow up work – such as a short white paper for the spring 2014 meeting as MS suggested. CACS will summarize the public comments (with assistance from MA and SNY) and provide a statement as to the status. MS offered to write a short summary document for the spring meeting.
  - A member reminded the NOP that the CACS is awaiting two responses from them: guidance about Exclusion of Water in Calculating Percentages of Organic Ingredients and guidance about Sanitizers in 100% Organic Products, for which the Processing and Handling communities are also eager. NOP indicated that they removed the Sanitizers in 100% Organic Products because

there are other NOP and NOSB priorities that supersede this project at this time, and the CACS Chair asked if the Deputy Administrator could provide some additional information about this. MA will invite her to the next CACS call. The NOP indicated that with regard to the Exclusion of Water in Calculating Percentages of Organic Ingredients they are trying to determine the scope of the guidance before they can move forward. They are actively seeking advice and input from other USDA divisions and are trying to address and incorporate questions and complaints that the program has received. The CACS would like to keep it on the workplan so it doesn't get discarded and the Subcommittee can continue to press the NOP to move forward with this. SNY offered to update the group in mid-December and will provide periodic updates.

- **Spring Agenda Proposals:**
  - Retail Certification Guidance document. HA will maintain leadership for this work item, and will present it at the spring NOSB meeting. HA and JD will discuss the public comments and how to move forward.
  - 205.206(e) – The group discussed reviewing this discussion document in light of the decision by the NOP to conclude the Board's Sound & Sensible work. MS will develop a synopsis and the group will consider options such as reassessing or finalizing.
- **Additional ideas for longer term work plan items.** Members discussed the need to keep items visible and on the workplan so they do not drop off, and suggested adding a separate table to the notes as a placeholder. The phrase "parking lot ideas" was used to represent a table for workplan items that are on hold, or will be worked on beyond the next NOSB meeting. A member noted that there was a past workplan item on the list about conducting oversight of the NOP. This was mentioned several times by public commenters in the Sound and Sensible comments, and is part of the Sound and Sensible initiative. The group discussed whether or not this oversight was mandated by OFPA, but MA was unable to locate such language with the exception of one reference on [page 26 of the PPM](#). The NOP noted that the program is currently undergoing a peer review by ANSI, which was mentioned briefly on the Executive call on November 15, and will update the CACS about the details. Additionally, there will be some information in the next NOP newsletter about this. The group may propose adding this as a future workplan item.
- JD passed the Chairship of the CACS to the incoming Chair and thanked the members for their intelligence, collegiality, dedication and hard work.
- The meeting was adjourned

### **Future Scheduled Subcommittee Calls**

November 15, 2013 3:00 ET (rescheduled from the 12<sup>th</sup>)

November 26, 2013 3:00 ET

Suggestions for additional workplan items

December 10, 2013 3:00 ET

Spring 2014 Milestones	Target date
Subcommittee requests technical reports for Sunset 2016 substances	Jan 15, 2014
NOSB Training meeting	Feb 4 - 5, 2014
NOP – Complete tentative agenda	Feb 7, 2014
Fall 2013 proposals due to NOP	Feb 26, 2014

NOP - Post proposals, Publish FRN, Open public comment	Mar 10, 2014
Subcommittees submit tentative workplans to NOP	Mar 12, 2014
Discuss workplans on ES call	Mar 14, 2014
NOP provides written comments on workplans to NOSB	Mar 28, 2014
Public comment closes	Apr 8, 2014
Workplans finalized on ES call	Apr 11, 2014
NOP - Send compiled public comments to NOSB	Apr 14, 2014
Spring 2014 NOSB Meeting – San Antonio, TX	~Apr 28- May 1, 2014

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 or regulations. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**National Organic Standards Board (NOSB)**  
**Compliance, Accreditation & Certification Subcommittee Notes**  
**Tuesday, December 10, 2013, 3:00 pm ET**

**Attending:** Carmela Beck, Chair (CB), Joe Dickson, (Vice Chair) (JD), Jean Richardson (JR) Mac Stone (MS), Harold Austin (HA), John Foster (JFo)

**Absent:** Wendy Fulwider (WF), Shannon Nally Yanessa (SNY)

**Staff:** Michelle Arsenault (MA), Jenny Tucker (JTU)

**Work Plan**

Project	Contact	Status	Vote	Meeting
<a href="#">Fall 2009 Guidance doc on Retail Certification</a>	HA/JD (not lead)			Disc doc or proposal? Spring 2014
How certifiers apply 205.206(e)	JFo	Proposal		Spring 2014
Monitoring Practices and procedures for Organic System Plan (OSP) 205.201(a)	JFo	The NOP requests that the NOSB provide a briefing paper summarizing the issue that the Subcommittee is proposing to work on.		TBD
Sound & Sensible (S & S)	MS	Summary/update from Subcommittee during meeting (no document for public comment)	NA	Spring 2014

**Future potential projects**

Project	Contact	Status	Vote	Meeting
Sanitizers in 100% organic products	JFo	On hold, pending draft NOP guidance.		TBD
Exclusion of water in calculating percentage of organic ingredients	JR	Proposal. How formulated "organic" products should be calculated. Waiting for guidance from NOP.		TBD

**Agenda**

- Approve notes from November 26 call
- Designate Vice Chair
- Discuss work plan (JTU)
- Discuss NOP Peer review (JTU)

- Retail certification comment summary

## Discussion

- The notes from the November 26 were approved with no changes.
- **Vice Chair designation.** Joe Dickson was appointed the CACS Vice Chair.
- **Workplan tracking.** The NOP responded positively to a request to add a second table to the notes to maintain “possible future projects” as long as it is kept separate from the active approved workplan table. CACS is interested in keeping track of mid- and long-term goals and feels this is a good organizational process. MA added the new table above.
- **NOP peer review.** JTU noted that a peer review of the NOP’s accreditation program is required as part of its quality system; one is currently underway and is currently being conducted by ANSI (American National Standards Institute). In 2011, NIST (National Institute of Standards and Technology) did a peer review of the NOP which resulted in a list of proposed corrective actions. The NOP took multiple actions as a result of the review, and the program evolved based on the feedback. ANSI’s 2013 peer review will involve document reviews, onsite interviews, and witness audits; and is scoped to cover the full accreditation management program. The NOP anticipates that the review will be complete in summer 2014 and will release a public document to summarize the review and next steps.
- **Sound & Sensible (S & S).** MS noted that the Accredited Certifying Agents (ACAs) and the organic community are seeking some sort of finalization or summary about this topic. The NOP replied that there are many documents in the Handbook that are being updated to reflect sound and sensible principles. Sound and sensible will be also be incorporated into the spring certifier training, and this work will continue into the future. The NOP is aware that certifiers continue to seek clarity and specifics about the initiative and will continue to do outreach to support these needs. The group discussed having an update or brief summary document for the spring NOSB meeting, so that the Board can continue to support the importance of the sound and sensible model.
- **Retail certification document.** The group discussed the fall 2013 public comments, noting that there was wide support for this idea. The overall sense is that the level of awareness and education about compliance issues is high for certified operations but not necessarily for uncertified operations. The CACS would like to talk with the program about outreach efforts for volunteer certification for retailers to help bring people into the program and into compliance. The members also discussed the fact that because there is not a category for retail establishments, they are categorized as processors. The Subcommittee discussed revising the fall 2013 proposal based on the public comments and perhaps adding questions for the next posting to glean more information about the idea of having retailers get certified. They also noted that perhaps regulatory changes are the end goal after all. The group discussed the history of this decision, and a member thought it was based on the market and the possible exclusion of large retailers and the notion that perhaps large retailers would see certification as a barrier and would opt to not sell organic at all. A member asked if the landscape had changed since the 1990s when the rule was written, and asked if this would be worth revisiting.
- The meeting was adjourned

### **Future Scheduled Subcommittee Calls**

November 26, 2013 3:00 ET

Suggestions for additional workplan items

December 10, 2013 3:00 ET

January 14, 2014 3:00 ET

Retail certification –discuss questions for posting next disc doc or proposal

How certifiers apply 205.206(e) – discuss proposal for spring 2014

Discuss S & S update/summary

January 28, 2014 3:00 ET

February 11, 2014 3:00 ET

February 25, 2014 3:00 ET

March 11, 2014 3:00 ET

March 25, 2014 3:00 ET

April 8, 2014 3:00 ET

<b>Spring 2014 Milestones</b>	<b>Target date</b>
Subcommittee requests technical reports for Sunset 2016 substances	Jan 15, 2014
NOSB Training meeting	Feb 4 - 5, 2014
NOP – Complete tentative agenda	Feb 7, 2014
Fall 2013 proposals due to NOP	Feb 26, 2014
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