

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 (CACs) Notes
Tuesday January 10, 2017, 3:00 pm ET**

Attending: Scott Rice (SR), Chair; Harriet Behar (HB); Jean Richardson (JR); Emily Oakley (EO); Tom Chapman (TC); A-dae Romero-Briones (ARB)
Absent: Carmela Beck (CB)
Staff: Jessica Walden (JW), Michelle Arsenault (MA)

Work Agenda

Project	Contact	Status	Vote	Meeting
In-field, annual evaluations of inspectors update (NOP 2027) proposal	JR/SR	Approved for addition to work agenda 04 21 16	12 13 16	Spr 2017
Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production discussion doc	HB	Approved for addition to work agenda 07 15 16. Verbal update Fall 2016. DD Spr 2017	12 13 16, 01 10 17	Spr 2017
NOP operating plan suggestions	ALL		NA	NA

Agenda

- Approve December 13, 2016 notes
- Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production discussion doc - discuss and vote
- Other items

Discussion

- **The notes from** December 13 were approved with no changes.
- **Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production discussion doc (HB).** The group discussed the draft document and the changes suggested by Subcommittee members, which were incorporated. The lead noted that some countries do not allow this type of conversion, and the group can likely expect helpful comments about this during the public comment process. The group proceeded to a vote and will leave the vote open for an absent member.

Motion to accept the document on eliminating the incentive to convert native ecosystems into organic crop production.

Motion by: JR

Seconded by: HB

Additional discussion:

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

- **Other Items.** The group discussed sustainability language with regard to NOSB projects in general, and feels that the CACS could undertake this as a work agenda item. A member noted that it is especially relevant to the marine materials proposal. Another member added that the perhaps sustainability is not the correct term, as it involves social and economic aspects as well, and the NOSB only has purview over ecological issues. The USDA does have a definition of sustainability, but it seems vague.
- **Other items.** The CACS Chair informed the group about the upcoming annual certifier training, and asked for suggestions from the group about possible topics or ideas for discussion for potential work agenda items.
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future Call Schedule (2nd Tuesday 3:00 ET)

- December 13, 2016
- January 10, 2017
- February 14, 2017
- March 14, 2017
- April 11, 2017
- May 9, 2017
- June 13, 2017
- July 11, 2017
- August 8, 2017
- September 12, 2017
- October 10, 2017
- November 14, 2017
- December 12, 2017
- January 9, 2018

Spring 2017 Milestones	2017 Target date
New NOSB member orientation	Feb 8, 2017
NOP - Complete Spring 2017 NOSB meeting tentative agenda	Feb 10, 2017
NOSB - Spring 2017 proposals due to NOP	Feb 17, 2017
NOP - Post proposals, Publish FRN, Open public comment	Mar 1, 2017
Discuss work agendas on ES call	Mar 10, 2017
Public comment closes	Mar 30, 2017
NOP - Send compiled public comments to NOSB	Apr 5, 2017

Work agendas finalized on ES call (last call before fall meeting)	Apr 7, 2017
Public comment webinar	Apr 13, 2017
Spring 2017 NOSB meeting – Denver, CO	Apr 19-21, 2017 (W-F)

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 (CACS) Notes
Tuesday February 14, 2017, 3:00 pm ET**

Attending: Scott Rice (SR), Chair; Harriet Behar (HB); Emily Oakley (EO); A-dae Romero-Briones (ARB)

Absent: Tom Chapman (TC)

Staff: Jessica Walden (JW), Michelle Arsenault (MA)

Work Agenda

Project	Contact	Status	Vote	Meeting
In-field, annual evaluations of inspectors update (NOP 2027) proposal	JR/SR	Approved for addition to work agenda 04 21 16	12 13 16	Spr 2017
Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production discussion doc	HB	Approved for addition to work agenda 07 15 16. Verbal update Fall 2016. DD Spr 2017	12 13 16, 01 10 17	Spr 2017
NOP operating plan suggestions	ALL		NA	NA

Agenda

- Approve January 10, 2017 notes
- Update on In-field evaluation of inspectors
- Fracking and groundwater comments
- Other items

Discussion

- **The notes from January 10** were approved with no changes
- **Additions to agenda.** A member noted topics that were discussed in the Crops proposal on strengthening the organic seed requirements that could potentially become a work agenda item for the CACS. How to help certifiers, inspectors, and operators understand the protocol for searching for commercial availability, and the idea of continuous improvement.
- **CACS Vice Chair** - Emily Oakley will be the Vice Chair for the CACS.
- **Update on the in-field evaluation of inspectors proposal.** During the recent Accredited Certifiers Association (ACA) training the NOP provided an update about the **in-field evaluation of inspectors proposal**. The CACS Chair noted that there is wide support for audits, but not the requirement for the frequency of the audits: every inspector/every year. The NOP is open to receiving alternative plans from certifiers. The CACS will be discussing its proposal at the Spring 2017 NOSB meeting.
- **Fracking and groundwater.** Based on public comment during the last couple of NOSB meetings, it has become clear that there is concern in the organic community in various regions in the country about water use in organic. Neither the Regulations nor OFPA are very specific about water, although contamination is mentioned in a non-specific way. The CACS members have concerns, but at this time are unsure how the NOSB could address this. The CACS requested

input from the NOP on water issues, and possibly having a speaker participate on a conference call.

- **Other items** - none
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future Call Schedule (2nd Tuesday 3:00 ET)

- January 10, 2017
- February 14, 2017
- March 14, 2017
- April 11, 2017
- May 9, 2017
- June 13, 2017
- July 11, 2017
- August 8, 2017
- September 12, 2017
- October 10, 2017
- November 14, 2017
- December 12, 2017
- January 9, 2018

Spring 2017 Milestones	2017 Target date
New NOSB member orientation	Feb 8, 2017
NOP - Complete Spring 2017 NOSB meeting tentative agenda	Feb 10, 2017
NOSB - Spring 2017 proposals due to NOP	Feb 17, 2017
NOP - Post proposals, Publish FRN, Open public comment	Mar 1, 2017
Discuss work agendas on ES call	Mar 10, 2017
Public comment closes	Mar 30, 2017
NOP - Send compiled public comments to NOSB	Apr 5, 2017
Work agendas finalized on ES call (last call before fall meeting)	Apr 7, 2017
Public comment webinar	Apr 13, 2017
Spring 2017 NOSB meeting – Denver, CO	Apr 19-21, 2017 (W-F)

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 (CACs) Notes
Tuesday March 14, 2017, 3:00 pm ET**

Attending: Scott Rice (SR), Chair; Emily Oakley (EO); A-dae Romero-Briones (ARB); Tom Chapman (TC); Harriet Behar (HB)

Absent: none

Staff: Matt Pavone (MP), Standards Division; Michelle Arsenault (MA)

Work Agenda

Project	Contact	Status	Vote	Meeting
In-field, annual evaluations of inspectors update (NOP 2027) proposal	JR/SR	Approved for addition to work agenda 04 21 16	12 13 16	Spr 2017
Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production discussion doc	HB	Approved for addition to work agenda 07 15 16. Verbal update Fall 2016. DD Spr 2017	12 13 16, 01 10 17	Spr 2017
NOP operating plan suggestions	ALL		NA	NA

Agenda

- Approve February 14, 2017 notes
- Fracking and groundwater update (EO)
- Sustainable Harvesting of Marine Materials (EO)
- Import Certificates (HB/SR)
- Uncertified Brokers & Handlers (HB/SR)
- Brief Check in RE: [Update of NOP 2027](#)
- Other items
- Adjourn

Discussion

- **The notes from February 14** were approved with no changes.
- **Fracking and groundwater update (EO).** A member has received several communications from stakeholders concerned about fracking water used in irrigation. The group discussed various options about how the NOSB can provide input into this issue, such as perhaps putting forth a position statement. MA and JW will check with NOP leadership about the “incidental” uses of water on organic farms, which is a grey area that is not specified in the regulations. For example, irrigation water and other water issues.
- **Sustainable harvesting of marine materials (EO).** The lead summarized the history of this project including some feedback from a stakeholder regarding sustainability and inputs. The stakeholder was directed to submit comments to the open docket. A member noted that wild harvest is a larger issue and the Organic Regulations don’t include much guidance. The groups

discussed various factors associated with making recommendations about marine materials, including the authority constraints of the NOP.

- **Import Certificates (HB/SR).** The CACS Chair shared feedback from various groups regarding the changes to the NOP import certificates. Since this is such new guidance, the CACS will wait to see if there are any areas where they can provide suggestions or guidance.
- **Uncertified Brokers & Handlers (HB/SR).** The group discussed this issue also in relation to the import certificates.
- **Update of NOP 2027.** The NOP updated its instruction 2027 on March 6, which addressed some of the issues that were proposed in the CACS proposal that they are scheduled to discuss at the Spring 2017 meeting.
- **Other items.** None
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future Call Schedule (2nd Tuesday 3:00 ET)

- February 14, 2017
- March 14, 2017
- April 11, 2017
- May 9, 2017
- June 13, 2017
- July 11, 2017
- August 8, 2017
- September 12, 2017
- October 10, 2017
- November 14, 2017
- December 12, 2017
- January 9, 2018

Spring 2017 Milestones	2017 Target date
New NOSB member orientation	Feb 8, 2017
NOP - Complete Spring 2017 NOSB meeting tentative agenda	Feb 10, 2017
NOSB - Spring 2017 proposals due to NOP	Feb 17, 2017
NOP - Post proposals, Publish FRN, Open public comment	Mar 1, 2017
Discuss work agendas on ES call	Mar 10, 2017
Public comment closes	Mar 30, 2017
NOP - Send compiled public comments to NOSB	Apr 5, 2017

Work agendas finalized on ES call (last call before fall meeting)	Apr 7, 2017
Public comment webinar	Apr 13, 2017
Spring 2017 NOSB meeting – Denver, CO	Apr 19-21, 2017 (W-F)

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 (CACS) Notes
Tuesday April 11, 2017, 3:00 pm ET**

Attending: Scott Rice (SR), Chair; Emily Oakley (EO); Tom Chapman (TC); Harriet Behar (HB)

Absent: A-dae Romero-Briones (ARB)

Staff: Jessica Walden (JW); Michelle Arsenault (MA)

Work Agenda

Project	Contact	Status	Vote	Meeting
In-field, annual evaluations of inspectors update (NOP 2027) proposal	SR	Approved for addition to work agenda 04 21 16	12 13 16	Spr 2017
Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production discussion doc	HB	Approved for addition to work agenda 07 15 16. Verbal update Fall 2016. DD Spr 2017	12 13 16, 01 10 17	Spr 2017
NOP operating plan suggestions	ALL		NA	NA

Agenda

- Approve March 14, 2017 notes
- Further discussion re: water on an organic farm (irrigation, groundwater, well water, flood water)
- Review public comment
- Adjourn

Discussion

- **The notes from March 14** were approved with a small edit to the conversation regarding fracking and groundwater.
- **Water on an organic farm (irrigation, groundwater, well water, flood water).** The CACS discussed the best way to approach the evaluation of water sources, and possible paths forward. The NOP reviewed OFPA to determine if there is any guidance or language regarding contamination or irrigation water; noting the lack of specificity on this issue. The NOP also noted that in global organic standards there is an absence of regulations regarding these issues. The CACS discussed various opportunities for input into this problem. The challenge is that it must fall within the scope of the USDA's authority. The CACS members will discuss this more with stakeholders to determine if there is a section in OFPA that could be addressed.
- **Public comment.** Members discussed a public comment regarding the 5-year-long waiting time for conversion in the discussion document on conversion of native ecosystems to organic crop production. The commenter noted that OFPA says 3 years, and the discussion document

suggests a 5-year conversion. The CACS discussed whether or not they could restrict the regulations further. The NOP will review the issue, and provide feedback to the Subcommittee.

- **Other items.** Members discussed the proposal on in-field, annual evaluations of inspectors (NOP 2027), since some of the issues in the proposal were addressed by the NOP in the convening months since the proposal was completed.
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future Call Schedule (2nd Tuesday 3:00 ET)

March 14, 2017

April 11, 2017

May 9, 2017

June 13, 2017

July 11, 2017

August 8, 2017

September 12, 2017

October 10, 2017

November 14, 2017

December 12, 2017

January 9, 2018

Spring 2017 Milestones	2017 Target date
New NOSB member orientation	Feb 8, 2017
NOP - Complete Spring 2017 NOSB meeting tentative agenda	Feb 10, 2017
NOSB - Spring 2017 proposals due to NOP	Feb 17, 2017
NOP - Post proposals, Publish FRN, Open public comment	Mar 1, 2017
Discuss work agendas on ES call	Mar 10, 2017
Public comment closes	Mar 30, 2017
NOP - Send compiled public comments to NOSB	Apr 5, 2017
Work agendas finalized on ES call (last call before fall meeting)	Apr 7, 2017
Public comment webinar	Apr 13, 2017
Spring 2017 NOSB meeting – Denver, CO	Apr 19-21, 2017 (W-F)

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 (CACS) Notes
Tuesday May 9, 2017, 3:00 pm ET**

Attending: Scott Rice (SR), Chair; Emily Oakley (EO); Tom Chapman (TC); Harriet Behar (HB); Dave Mortensen (DM) - observer

Absent: A-dae Romero-Briones (ARB)

Staff: Jessica Walden (JW); Michelle Arsenault (MA); Devon Pattillo (DP)

Work Agenda

Project	Contact	Status	Vote	Meeting
In-field, annual evaluations of inspectors update (NOP 2027) proposal. Inspector qualifications	SR	Approved for addition to work agenda 04 21 16. Referred back to LS at Spr 2017 meeting		Fall 2017
Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production proposal	HB	Approved for addition to work agenda 07 15 16. Verbal update Fall 2016. DD Spr 2017.		Fall 2017
NOP operating plan suggestions	ALL		NA	NA

Agenda

- Approve April 11, 2017 notes
- Denver meeting debrief
- Discussion re: proposal referred back to SC: Eliminating the Incentive to Convert Native Ecosystems/High Value Conservation Land to Organic Production
- Discussion re: Inspector Qualifications (if time allows)
- Other items
- Adjourn

Discussion

- **Personnel update.** JW will be leaving NOP at the end of May, and DP will be the technical representative on the CACS calls.
- **The notes from April 11** were approved with no changes
- **Denver meeting debrief.**
 - Members discussed comments that were received at the Denver meeting regarding exempt operations, and whether or not this is a topic they would add to the work agenda. Members were supportive of further work, and the CACS Chair will write a justification request for discussion on a future Executive call.
 - A member noted that she has had continuing conversations with stakeholders regarding fracking and the marine algae proposal. The docket for the next meeting has not yet opened, so the lead will ask that they provide any information to her directly, and then

eventually submit comments to the public docket. This topic, while important to organic agriculture, is somewhat out of the scope of the NOSB and USDA, so the Subcommittee is considering ideas on how to get involved.

- **Eliminating the Incentive to Convert Native Ecosystems/High Value Conservation Land to Organic Production.** The group discussed the various issues surrounding this very complex topic, including the regulatory authority that the USDA has, and what role the NOSB could have. The CACS Chair discussed how to scope this topic and how to move forward. HB will continue to work on the document and the group will discuss on the next call.
- **Inspector Qualifications.** The lead noted that the CACS received useful comments and feedback from the NOP at the Spring meeting in Denver on the in-field, annual evaluations of inspectors (NOP 2027) proposal. Since the NOP made changes prior to the meeting, the proposal was sent back to Subcommittee and will be re-scoped to focus on inspector qualifications. The CACS Chair noted that there has been a lot of work done in this area already, and the CACS will build upon that work.
- **Other items.** A member noted that for the next call they would like to discuss the recent news story about the certification of an organic dairy.
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future Call Schedule (2nd Tuesday 3:00 ET)

April 11, 2017

May 9, 2017

June 13, 2017

Eliminating the Incentive to Convert Native Ecosystems/High Value Conservation Land to Organic Production.

July 11, 2017

August 8, 2017

September 12, 2017

October 10, 2017

November 14, 2017

December 12, 2017

January 9, 2018

Fall 2017 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	~May 5, 2017
NOSB Request for TRs for 2020 sunset materials	July 17, 2017
NOP - Complete Fall 2017 NOSB meeting tentative agenda	Aug 11, 2017
NOSB - Fall 2017 proposals due to NOP	Aug 29, 2017
NOP - Post proposals	On or before Sep 12, 2017
Public comment closes	Oct 11, 2017
Discuss/finalize work agendas on ES call	Oct 13, 2017

NOP - Send compiled public comments to NOSB	Oct 16, 2017
Two Public comment webinars	Oct 24, and if needed 26, 2017
Fall 2017 NOSB meeting - Jacksonville, FL	Oct 31- Nov 2, 2017

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 (CACS) Notes
Tuesday June 13, 2017, 3:00 pm ET**

Attending: Scott Rice (SR), Chair; Emily Oakley (EO); Tom Chapman (TC); Harriet Behar (HB); A-dae Romero-Briones (ARB)

Absent: none

Staff: Michelle Arsenault (MA); Devon Pattillo (DP)

Work Agenda

Project	Contact	Status	Vote	Meeting
Inspector qualifications	SR	Approved for addition to work agenda 04 21 16. Referred back to CACS at Spr 2017 meeting		Fall 2017
Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production proposal	HB	Approved for addition to work agenda 07 15 16. Verbal update Fall 2016. DD Spr 2017.		Fall 2017
Exempt/uncertified handlers and brokers	SR	Discussion doc. NOP approved addition to the work agenda 05 19 17		Fall 2017
NOP operating plan suggestions	ALL		NA	NA

Agenda

- Approve May 9, 2017 notes
- Eliminating the Incentive to Convert Native Ecosystems/High Value Conservation Land to Organic Production (HB).
- Exempt Operations in the Supply Chain (SR)
- Inspector Qualifications
- Other items
- Adjourn

Discussion

- **The notes from May 9** were approved with no changes.
- **Eliminating the Incentive to Convert Native Ecosystems/High Value Conservation Land to Organic Production (HB).** The CACS members had a lengthy conversation about how to move forward with this project. Members discussed how to work within the scope of OFPA and the Organic regulations while preventing the conversion of native ecosystems for organic production. The group considered incentives, disincentives and the potential long-term implications under various options.

- **Exempt Operations in the Supply Chain (Exempt/uncertified handlers and brokers) (SR).** The CACS Chair noted that the topic of fraud in the supply chain (based on the recent investigation into grain imports from Turkey) has the organic community concerned and engaged. The lead noted that certified operations, and not exempt operations, have been implicated in the investigation. The CACS is considering a rule change that removes some of the exemptions, as well as guidance for organic operations regarding exemptions. SR, with assistance from TC, will develop a draft document for the group to discuss on the next CACS call.
- **Inspector Qualifications (SR).** The CACS is working on a proposal to address inspector qualifications. This project was initially part of a previous proposal on In-field, annual evaluations of inspectors (NOP 2027). To support this project work, the NOP provided the Subcommittee with a report prepared for the NOP by the International Organic Inspectors Association (IOIA) in 2011. The CACS will invite the Deputy Administrator to a future CACS call to discuss the report and provide further guidance. A member added that in addition to inspectors, reviewers are also a key component of the certification process, and should also be considered.
- **Other items. Water/Fracking (TC).** The NOSB Chair recently reviewed the original congressional conference report on OFPA and noted that a section about water was eliminated from the Senate version of the bill in conference committee. The members shared various ideas about ways in which the NOSB could address water in organic agriculture while staying within the scope of OFPA.
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future Call Schedule (2nd Tuesday 3:00 ET)

May 9, 2017

June 13, 2017

Eliminating the incentive to convert native ecosystems/high value conservation land to organic production.

July 11, 2017

Exempt operations in the supply chain (Exempt/uncertified handlers and brokers)
Eliminating the incentive to convert native ecosystems/high value conservation land to organic production
Inspector qualifications

August 8, 2017

September 12, 2017

October 10, 2017

November 14, 2017

December 12, 2017

January 9, 2018

Fall 2017 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	~ Apr 27, 2017 , May 30, 2017
NOSB Request for TRs for 2020 sunset materials	July 18, 2017
NOP - Complete Fall 2017 NOSB meeting tentative agenda	Aug 11, 2017

NOSB - Fall 2017 proposals due to NOP	Aug 29, 2017
NOP - Post proposals	On or before Sep 12, 2017
Public comment closes	Oct 11, 2017
Discuss/finalize work agendas on ES call	Oct 13, 2017
NOP - Send compiled public comments to NOSB	Oct 16, 2017
Two Public comment webinars	Oct 24, and if needed 26, 2017
Fall 2017 NOSB meeting - Jacksonville, FL	Oct 31- Nov 2, 2017

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 (CACs) Notes
Tuesday July 11, 2017, 3:00 pm ET**

Attending: Scott Rice (SR), Chair; Emily Oakley (EO); Tom Chapman (TC); Harriet Behar (HB)

Absent: A-dae Romero-Briones (ARB)

Staff: Michelle Arsenault (MA); Lisa Brines (LB); Miles McEvoy (MM)

Work Agenda

Project	Contact	Status	Vote	Meeting
Inspector qualifications proposal	SR	Approved for addition to work agenda 04 21 16. Referred back to CACS at Spr 2017 meeting		Spr 2018
Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production proposal	HB	Approved for addition to work agenda 07 15 16. Verbal update Fall 2016. DD Spr 2017.		Fall 2017
Exempt/uncertified handlers and brokers. Discussion document.	SR/TC	NOP approved addition to the work agenda 05 19 17		Fall 2017
NOP operating plan suggestions	ALL		NA	NA

Agenda

- Approve June 13, 2017 notes
- Exempt operations in the supply chain (Exempt/uncertified handlers and brokers)
- Eliminating the incentive to convert native ecosystems/high value conservation land to organic production
- Inspector qualifications
- Other items
- Adjourn

Discussion

- **The notes from June 13** were approved with no changes.
- **Exempt operations in the supply chain (Exempt/uncertified handlers and brokers) (SR).** No update or forward movement at this time. The CACS will revisit this topic on the next call.
- **Eliminating the incentive to convert native ecosystems/high value conservation land to organic production (HB).** Several members have researched other international organic standards and how this topic is addressed. The group is working on developing language to address the most critical areas, so they can get support from the community while still working within OFPA. Members discussed various details and scope of the project. HB will develop ideas for discussion on the next call.

- **Inspector qualifications (SR).** The NOP offered some additional history and perspective on the 2011 IOIA document that was provided to the CACS as they work on inspector qualifications. The NOP did not implement the 2011 guidance, and has asked that the CACS address one component of this topic: inspector qualifications. A member added that reviewers are also an important component in the process, and suggested that it be included in the review. The goal for this document would be a concise, succinct guidance document that could be used as part of a comprehensive training system. Currently IOIA, NOP and individual certifiers all do separate training. The NOP noted that the IOIA contains useful elements, such as the auditor qualifications and auditor-in-training documents, which also align with ISO requirements. The group discussed next steps and based on today's conversation, may address this project at the Spring 2018 meeting.
- **Other Items.** The CACS added an additional call on August 22.
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future Call Schedule (2nd Tuesday 3:00 ET)

June 13, 2017

Eliminating the incentive to convert native ecosystems/high value conservation land to organic production.

July 11, 2017

Exempt operations in the supply chain (Exempt/uncertified handlers and brokers)
 Eliminating the incentive to convert native ecosystems/high value conservation land to organic production
 Inspector qualifications

August 8, 2017

Exempt operations in the supply chain (Exempt/uncertified handlers and brokers) (SR).
 Eliminating the incentive to convert native ecosystems/high value conservation land to organic production

August 22, 2017 additional call.

September 12, 2017

October 10, 2017

November 14, 2017

December 12, 2017

January 9, 2018

Fall 2017 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	~ Apr 27, 2017 , May 30, 2017
NOSB Request for TRs for 2020 sunset materials	July 19, 2017
NOSB public teleconference	Aug 14, 2017
NOP - Draft Fall 2017 NOSB meeting tentative agenda	Aug 11, 2017
NOSB - Fall 2017 proposals due to NOP	Aug 29, 2017
NOP - Post proposals	On or before Sep 12, 2017

Public comment closes	Oct 11, 2017
Discuss/finalize work agendas on ES call	Oct 13, 2017
NOP - Send compiled public comments to NOSB	Oct 16, 2017
Two Public comment webinars	Oct 24, and if needed 26, 2017
Fall 2017 NOSB meeting - Jacksonville, FL	Oct 31- Nov 2, 2017

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 (CACS) Notes
Tuesday August 8, 2017, 3:00 pm ET**

Attending: Scott Rice (SR), Chair; Emily Oakley (EO); Tom Chapman (TC); Harriet Behar (HB); A-dae Romero-Briones (ARB)

Absent: none

Staff: Michelle Arsenault (MA); Devon Pattillo (DP)

Work Agenda

Project	Contact	Status	Vote	Meeting
Inspector qualifications proposal	SR	Approved for addition to work agenda 04 21 16. Referred back to CACS at Spr 2017 meeting	Jul 11	Spr 2018
Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production. Proposal	HB	Approved for addition to work agenda 07 15 16. Verbal update Fall 2016. DD Spr 2017.	Aug 8, Aug 22	Fall 2017
Exempt/uncertified handlers and brokers. Discussion document.	SR/TC	NOP approved addition to the work agenda 05 19 17	Aug 8, Aug 22	Fall 2017
NOP operating plan suggestions	ALL		NA	NA

Agenda

- Approve July 11, 2017 notes
- Exempt operations in the supply chain (Exempt/uncertified handlers and brokers) (SR).
- Eliminating the incentive to convert native ecosystems/high value conservation land to organic production
- Adjourn

Discussion

- **The notes from July 11** were approved with no changes.
- **Exempt operations in the supply chain (Exempt/uncertified handlers and brokers) (SR).** The group discussed the draft document on exempt operations. With regard to the subject of fraudulent imports, the NOP and the community are addressing this issue, and the Board is considering ways in which it can address it as well. The current focus for the CACS is a document with a more limited scope - excluded operations. The group discussed the questions that they would like to ask of the public and discussed the various types of excluded operations such as brokers and transit operations. A member offered to forward an opinion piece she wrote on this topic. The CACS will discuss and vote on the document on the next call.
- **Eliminating the incentive to convert native ecosystems/high value conservation land to organic production (HB).** The lead summarized the draft document, and the group suggested some edits and additions. Members discussed various aspects such as definitions of high value, time restrictions, land requirements, and wild crops. The CACS will continue to discuss it on the next call, before bringing it to a vote.

- **The meeting was adjourned**

[Previous CACS Notes](#)

Future Call Schedule (2nd Tuesday 3:00 ET)

July 11, 2017

Exempt operations in the supply chain (Exempt/uncertified handlers and brokers)
 Eliminating the incentive to convert native ecosystems/high value conservation land to organic production
 Inspector qualifications

August 8, 2017

Exempt operations in the supply chain (Exempt/uncertified handlers and brokers) (SR).
 Eliminating the incentive to convert native ecosystems/high value conservation land to organic production

August 22, 2017 additional call

Exempt operations in the supply chain (Exempt/uncertified handlers and brokers) (SR). Discuss and vote
 Eliminating the incentive to convert native ecosystems/high value conservation land to organic production, Discuss and vote.

September 12, 2017

October 10, 2017

November 14, 2017

December 12, 2017

January 9, 2018

Fall 2017 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	May 30, 2017
NOSB Request for TRs for 2020 sunset materials	July 19, 2017
NOSB public teleconference	Aug 14, 2017
NOP - Draft Fall 2017 NOSB meeting tentative agenda	Aug 11, 2017
NOSB - Fall 2017 proposals due to NOP	Aug 29, 2017
NOP - Post proposals	On or before Sep 12, 2017
Public comment closes	Oct 11, 2017
Discuss/finalize work agendas on ES call	Oct 13, 2017
NOP - Send compiled public comments to NOSB	Oct 16, 2017
Two Public comment webinars	Oct 24, and if needed 26, 2017
Fall 2017 NOSB meeting - Jacksonville, FL	Oct 31- Nov 2, 2017

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 (CACS) Notes
Tuesday August 22, 2017, 3:00 pm ET**

Attending: Scott Rice (SR), Chair; Emily Oakley (EO); Tom Chapman (TC); Harriet Behar (HB); A-dae Romero-Briones (ARB)

Absent: none

Staff: Michelle Arsenault (MA); Devon Pattillo (DP)

Work Agenda

Project	Contact	Status	Vote	Meeting
Inspector qualifications proposal	SR	Approved for addition to work agenda 04 21 16. Referred back to CACS at Spr 2017 meeting	Jul 11	Spr 2018
Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production. Proposal	HB	Approved for addition to work agenda 07 15 16. Verbal update Fall 2016. DD Spr 2017.	Aug 8, Aug 22, Aug 29	Fall 2017
Excluded/uncertified handlers. Discussion document	SR/TC	NOP approved addition to the work agenda 05 19 17	Aug 8, Aug 22, Aug 29	Fall 2017
Imports		Memo sent to NOSB 08 10 17	TBD	TBD
NOP operating plan suggestions	ALL		NA	NA

Agenda

- Approve August 8, 2017 notes
- Excluded operations in the supply chain (uncertified handlers) (SR).
- Eliminating the incentive to convert native ecosystems/high value conservation land to organic production
- Marine Materials for Handling - move this discussion to HS notes.
- Adjourn

Discussion

- **The notes from August 8** were approved with no changes.
- **Excluded operations in the supply chain (uncertified handlers) (SR).** The CACS discussed the memo from the NOP requesting that the NOSB add a work agenda item regarding imports. The document on excluded operations overlaps with imports but does not address imports specifically. The CACS discussed ways in which it could address this topic, perhaps without recommending a rule change. The CACS will continue the discussion and vote on the discussion document on exempt operations on the August 29 call.

- **Eliminating the incentive to convert native ecosystems/high value conservation land to organic production (HB).** Members provided feedback and edits to the draft document. The group discussed the addition of language about economic impacts. Members asserted that converting land that has already been in agricultural production, as opposed to clearing native ecosystems for agricultural production, would be much less economically impactful. The NOP must consider economic impacts when conducting rulemaking. The CACS will continue the discussion and vote on the August 29 call.
- **Other items:** The CACS will add another call on August 29.
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future Call Schedule (2nd Tuesday 3:00 ET)

August 8, 2017

Exempt operations in the supply chain (Exempt/uncertified handlers and brokers) (SR).
Eliminating the incentive to convert native ecosystems/high value conservation land to organic production

August 22, 2017 additional call

Exempt operations in the supply chain (Exempt/uncertified handlers and brokers) (SR). Discuss and vote
Eliminating the incentive to convert native ecosystems/high value conservation land to organic production, Discuss and vote.

August 29, 2017 - Additional call

Excluded operations in the supply chain (uncertified handlers) disc doc (SR) - Discuss and vote
Eliminating the incentive to convert native ecosystems/high value conservation land to organic production - Discuss and vote.

September 12, 2017

October 10, 2017

November 14, 2017

December 12, 2017

January 9, 2018

Fall 2017 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	May 30, 2017
NOSB Request for TRs for 2020 sunset materials	July 19, 2017
NOSB public teleconference	Aug 14, 2017
NOP - Draft Fall 2017 NOSB meeting tentative agenda	Aug 11, 2017
NOSB - Fall 2017 proposals due to NOP	Aug 29, 2017
NOP - Post proposals	On or before Sep 12, 2017

Public comment closes	Oct 11, 2017
Discuss/finalize work agendas on ES call	Oct 13, 2017
NOP - Send compiled public comments to NOSB	Oct 16, 2017
Two Public comment webinars	Oct 24, and if needed 26, 2017
Fall 2017 NOSB meeting - Jacksonville, FL	Oct 31- Nov 2, 2017

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 (CACs) Notes
Tuesday August 29, 2017, 3:00 pm ET**

Attending: Scott Rice (SR), Chair; Emily Oakley (EO); Tom Chapman (TC); Harriet Behar (HB); Sue Baird (SB) - observer

Absent: A-dae Romero-Briones (ARB)

Staff: Michelle Arsenault (MA); Devon Pattillo (DP); Paul Lewis (PL)

Work Agenda

Project	Contact	Status	Vote	Meeting
Inspector qualifications proposal	SR	Approved for addition to work agenda 04 21 16. Referred back to CACS at Spr 2017 meeting	Jul 11	Spr 2018
Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production. Proposal	HB	Approved for addition to work agenda 07 15 16. Verbal update Fall 2016. DD Spr 2017.	Aug 8, Aug 22, Aug 29	Fall 2017
Excluded/uncertified handlers. Proposal	SR/TC	NOP approved addition to the work agenda 05 19 17	Aug 8, Aug 22, Aug 29	Fall 2017
Imports		Memo sent to NOSB 08 10 17	TBD	TBD
NOP operating plan suggestions	ALL		NA	NA

Agenda

- Approve August 22, 2017 notes
- Excluded operations in the supply chain (uncertified handlers) disc doc (SR) - Discuss and vote Eliminating the incentive to convert native ecosystems/high value conservation land to organic production - Discuss and vote.
- Adjourn

Discussion

- **The notes from August 22** were approved with no changes.
- **Eliminating the incentive to convert native ecosystems to organic production.** The lead summarized the changes that were made since the last discussion and the members discussed the current iteration of the document. The group made some modifications to the language and proceeded to a vote. The NOP asked about the choice of a 10-year wait period and also asked whether the Subcommittee had considered a recommendation for guidance (vs. rulemaking).

The group noted that they considered addressing this issue via guidance but did not see a path forward.

Motion to accept the proposal on eliminating the incentive to convert native ecosystems to organic production.

Motion by: HB

Seconded by: TC

Additional discussion: none

Yes: 4 No: 0 Abstain: 0 Absent: 1 Recuse: 0

- **Excluded operations in the supply chain (uncertified handlers) (SR).** The group discussed the draft document and made minor edits to the language. Members chose to put this forth as a proposal rather than a discussion document.
Motion to accept the proposal on excluded operations in the supply chain (uncertified handlers)
Motion by: TC
Seconded by: HB
Additional discussion: none
Yes: 4 No: 0 Abstain: 0 Absent: 1 Recuse: 0
- **Other items.** The CACS cancelled the September 12 call.
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future Call Schedule (2nd Tuesday 3:00 ET)

August 22, 2017 additional call

Exempt operations in the supply chain (Exempt/uncertified handlers and brokers) (SR). Discuss and vote

Eliminating the incentive to convert native ecosystems/high value conservation land to organic production, Discuss and vote.

August 29, 2017 - Additional call

Excluded operations in the supply chain (uncertified handlers) disc doc (SR) - Discuss and vote

Eliminating the incentive to convert native ecosystems/high value conservation land to organic production - Discuss and vote.

September 12, 2017 - cancelled

October 10, 2017

November 14, 2017

December 12, 2017

January 9, 2018

Fall 2017 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	May 30, 2017
NOSB Request for TRs for 2020 sunset materials	July 19, 2017
NOSB public teleconference	Aug 14, 2017
NOP - Draft Fall 2017 NOSB meeting tentative agenda	Aug 11, 2017
NOSB - Fall 2017 proposals due to NOP	Aug 29, 2017
NOP - Post proposals	On or before Sep 12, 2017
Public comment closes	Oct 11, 2017
Discuss/finalize work agendas on ES call	Oct 13, 2017
NOP - Send compiled public comments to NOSB	Oct 16, 2017
Two Public comment webinars	Oct 24, and if needed 26, 2017
Fall 2017 NOSB meeting - Jacksonville, FL	Oct 31- Nov 2, 2017

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 (CACs) Notes
Tuesday October 10, 2017, 3:00 pm ET**

Attending: Scott Rice (SR), Chair; Emily Oakley (EO), Vice Chair; Tom Chapman (TC); Harriet Behar (HB); A-dae Romero-Briones (ARB)

Absent: none

Staff: Michelle Arsenault (MA); Devon Pattillo (DP)

Work Agenda

Project	Contact	Status	Vote	Meeting
Inspector qualifications proposal	SR	Approved for addition to work agenda 04 21 16. Referred back to CACS at Spr 2017 meeting	Jul 11	Spr 2018
Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production. Proposal	HB	Approved for addition to work agenda 07 15 16. Verbal update Fall 2016. DD Spr 2017.	Aug 8, Aug 22, Aug 29	Fall 2017
Excluded/uncertified handlers. Proposal	SR/TC	NOP approved addition to the work agenda 05 19 17	Aug 8, Aug 22, Aug 29	Fall 2017
Imports		Memo sent to NOSB 08 10 17	TBD	TBD
NOP operating plan suggestions	ALL		NA	NA

Agenda

- The notes from August 29 were approved via email after the call
- Public comments.
- Excluded/uncertified handlers.
- Inspector Qualifications (SR)
- Fracking (EO, ABR)
- Imports (8/10/17 NOP memo)
- Other items
- Adjourn

Discussion

- **The notes from August 29** were approved via email after the call
- **Public comments.** The group discussed the comments briefly, specifically for the proposal on eliminating the incentive to convert native ecosystems into organic crop production.

- **Excluded/uncertified handlers.** The group discussed comments received to date on the proposal. Some stakeholders have provided feedback that the CACS's recommendations should be broader than the changes proposal in the document for the Fall 2017 meeting. Members acknowledged that further work will be needed and acknowledged that the direction of future work may be influenced by changes under the Farm Bill and interest in imports.
- **Inspector Qualifications (SR).** Members discussed how to proceed with their proposal on inspector qualifications from the Spring 2017 meeting. Members discussed how inspector qualifications relate to the size and complexity of the organic operations they inspect. The CACS will continue work on this topic after the Fall meeting.
- **Imports (8/10/17 NOP memo).** The NOP is holding a panel at the Fall NOSB meeting and there will be four government panelists: one each from NOP, APHIS, Specialty Crops, and Customs and Border Protection. The NOSB Chair asked that folks prepare possible questions for the panelists if they have any, and send those to him by Friday, October 13.
- **Fracking and Water Issues (EO, ABR).** This issue was initially raised by the organic community, and the NOSB agrees that it is important to address. At the Denver meeting the CACS had asked the community to provide input about where within the regulation the CACS could address this issue. Members noted that several organizations are working on comments to the NOSB on this topic. The group discussed how best to move forward and will continue to discuss this issue before submitting a request to add it to the work agenda.
- **Other items.** None
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future Call Schedule (2nd Tuesday 3:00 ET)

August 29, 2017 - Additional call

Excluded operations in the supply chain (uncertified handlers) disc doc (SR) - Discuss and vote
Eliminating the incentive to convert native ecosystems/high value conservation land to organic production - Discuss and vote.

September 12, 2017 - cancelled

October 10, 2017

November 14, 2017

Imports - discussion (TC on travel)

December 12, 2017

Imports

Inspector qualifications

January 9, 2018

February 13, 2018

Fall 2017 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	May 30, 2017
NOSB Request for TRs for 2020 sunset materials	July 19, 2017

NOSB public teleconference	Aug 14, 2017
NOP - Draft Fall 2017 NOSB meeting tentative agenda	Aug 11, 2017
NOSB - Fall 2017 proposals due to NOP	Aug 29, 2017
NOP - Post proposals	On or before Sep 12, 2017
Public comment closes	Oct 11, 2017
Discuss/finalize work agendas on ES call	Oct 13, 2017
NOP - Send compiled public comments to NOSB	Oct 16, 2017
Two Public comment webinars	Oct 24, and if needed 26, 2017
Fall 2017 NOSB meeting - Jacksonville, FL	Oct 31- Nov 2, 2017

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 (CACS) Notes
Tuesday November 28, 2017, 3:00 pm ET**

Attending: Emily Oakley (EO), vice chair; Tom Chapman (TC)

Absent: Harriet Behar (HB); Scott Rice (SR), Chair; A-dae Romero-Briones (ARB)

Staff: Michelle Arsenault (MA); Devon Pattillo (DP); Jenny Tucker (JT); Betsy Rakola (BR)

Work Agenda

Project	Contact	Status	Vote	Meeting
Inspector qualifications proposal	SR	Approved for addition to work agenda 04 21 16. Referred back to CACS at Spr 2017 meeting	Jul 11	Spr 2018
Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production. Proposal	HB	Approved for addition to work agenda 07 15 16. Verbal update Fall 2016. DD Spr 2017. Proposal Fall 2017. Referred back to CACS at Fall 2017 meeting		Spr 2018
Imports		Memo sent to NOSB 08 10 17	TBD	Spr 2018

Agenda

- Approve notes from October 10
- Ecosystem/Inspector Qualifications next steps
- Imports next steps:
 - Co-packer/Industry panel
 - 4 Options from NOP as presented at the NOSB meeting
 - Program feedback on supply chain integrity issues (JT, BR)
- Other items
- Adjourn

Discussion

- **Approval of the notes from October 10** was deferred to the next call.
- **Inspector Qualifications next steps.** Deferred to next call.
- **Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production.** The CACS is evaluating public comments and considering next steps for the proposal that was referred back to CACS at the fall meeting. The NOP noted that if the CACS wants to propose

rulemaking the justification needs to be robust and the benefits need to outweigh costs and/or address a market failure.

- **Imports.** The group discussed next steps with regard to imports, which is of great interest to the NOP and USDA.
 - **Co-packer/Industry panel.** The NOSB Chair noted the need for more dialogue with public, industry, and certifiers. The CACS would like to assemble a panel of industry and certifier representatives, and the NOP noted that the Spring 2018 meeting would be the best time to convene the panel. This will allow time for selection of panelists and for the Board to develop appropriate questions for the panel. Members discussed that it will likely be easier to tackle this broad topic by developing several smaller proposals to address specific problems.
 - **Project topics, as presented by NOP at the NOSB meeting; Program feedback on supply chain integrity issues (JT, BR).** The group discussed the best path forward, beginning with determining a scope for the projects. A primary issue is the complexity of the supply chains. Some specific challenges include the paper trail and documentation of organic status as product is bought and sold by multiple entities (sometimes uncertified brokers/traders) and as it passes through international borders. The NOSB is interested in finding resources about documentation required for imports, which is a complex problem in and of itself. As part of its review, the NOP is looking at document trails, including phytosanitary certificates, bills of lading, invoices, etc. Also of interest is what tools the industry is currently using. The NOP noted that part of the complexity lies in the distinction between product-level certification vs. process-based certification. The CACS would like to post questions to the open docket, and discussed how best to communicate the request for feedback on specific topics from stakeholders. The NOP will explore the options to coincide with the opening of the next meeting docket. JT will work with BR to refine the four suggested items, and possibly other ideas, and send them to the CACS. The NOSB Chair asked that the NOP provide the names of experts who can provide additional information to the CACS regarding the various potential topic areas. JT will develop a project plan and timeline for panel invitations.
- **Other items.** None
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future Call Schedule (2nd Tuesday 3:00 ET)

October 10, 2017

November 14, 2017 - cancelled

November 28, 2017 - additional call

December 12, 2017

Imports

Inspector qualifications

December 26, 2017- additional call

January 9, 2018

January 23, 2018 - additional call

January 30, 2018 - additional call

February 13, 2018

February 27, 2018 - additional call
 March 13, 2018
 April 10, 2018
 May 8, 2018
 June 12, 2018
 July 10, 2018
 August 14, 2018
 September 11, 2018
 October 9, 2018
 November 13, 2018
 December 11, 2018

Spring 2018 Milestones	Target dates (tentative)
New NOSB member orientation	TBD
NOSB - Spring 2018 proposals due to NOP	Feb 21, 2018
NOP - Complete Spring 2018 NOSB meeting tentative agenda	Mar 6, 2018
NOP - Post proposals, "Open" public comment	Mar 6, 2018
Discuss work agendas on ES call	Mar 9, 2018
Public comment closes	Apr 4, 2018
NOP - Send compiled public comments to NOSB	Apr 9, 2018
Work agendas finalized on ES call (last call before fall meeting)	Apr 13, 2018
Public comment webinar(s)	Apr 17 & 19, 2018
Spring 2018 NOSB meeting – Tucson, AZ	Apr 25-27, 2018

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 (CACs) Notes
Tuesday December 12, 2017, 3:00 pm ET**

Attending: Scott Rice (SR), Chair; Emily Oakley (EO), vice chair; A-dae Romero-Briones (ARB); Tom Chapman (TC); Harriet Behar (HB)

Absent: Jenny Tucker (JT)

Staff: Michelle Arsenault (MA); Devon Pattillo (DP)

Work Agenda

Project	Contact	Status	Discussion, Vote	Meeting
Inspector qualifications proposal	SR	Approved for addition to work agenda 04 21 16. Referred back to CACS at Spr 2017 meeting	Dec 12	Spr 2018
Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production. Proposal	HB	Approved for addition to work agenda 07 15 16. Verbal update Fall 2016. DD Spr 2017. Proposal Fall 2017. Referred back to CACS at Fall 2017 meeting	Nov 28	Spr 2018
Imports	ALL	Memo sent to NOSB 08 10 17	Nov 28	Spr 2018

*Discussed *Voted

Agenda

- Approve notes from October 10
- Approve notes from November 28
- Inspector Qualifications next steps
- Imports
- Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production
- Other items
- Adjourn

Discussion

- **Notes from October 10** were approved with no changes.
- **Notes from November 28 notes** were approved with a date correction under the imports topic.
- **Inspector qualifications next steps (SR).** The group discussed some ideas for the next iteration of the proposal on inspector qualifications. Members suggested such things as guidance and best practices for inspectors about scale of operations. A member stressed the importance of such training, which can build stronger and more confident relationships between operations and inspectors. Another member mentioned several other standards, such as Global G.A.P.,

suggesting that it would be helpful to know how other certification schemes address inspector training and qualifications. The lead will develop an outline or draft for the next call.

- **Imports.** The group discussed the next steps with regard to imports. The NOP refined the four broader topics that were proposed at the Fall 2017 meeting to help focus in on areas where the CACS could develop a recommendation(s). Several questions came up during the conversation as the group tried to identify how to best address this broad topic. A member questioned how the EU verified organic certification for goods exported from countries that have been implicated in fraudulent behavior. Another member asked if there could be useful information from the recent meeting in Odessa, Ukraine, and HB agreed to reach out to participants of that meeting.

As the discussion continued, there was some uncertainty as to how the NOSB could best provide feedback given the size and complexity of the topic. A member felt that the very idea that the USDA/NOSB is attempting to close the gaps could act as a deterrent to fraud. Another member discussed the implicit level of trust that exists within the organic community and suggested that perhaps verification needs to be enhanced, which would also provide a deterrent. The NOSB Chair is reaching out to industry representatives who have experience in international trade in an effort to gather more information. The CACS would also like to invite experts to the Subcommittee calls to provide additional insight. There was a request that the program prioritize the bulleted list of possible topics, and provide additional input about other activities at the USDA regarding imports.

- **Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB).** The lead discussed the feedback that the CACS received at the Fall 2017 NOSB meeting, and indicated she was developing ideas for the next iteration of the proposal to include some of these suggestions. The lead invited feedback about the path forward. The group discussed the inclusion of a definition of native ecosystem. The NOSB Chair suggested looking at how this issue may be affecting domestic farmers economically as compared to international farmers (given that most destruction of native ecosystems is international). A member urged the group to write the proposal they want to see go forth, with the acknowledgement that it likely won't go forward as rulemaking in the near future.
- **Other items.** None
- **The meeting was adjourned**

[Previous CACS Notes](#)

Future Call Schedule (2nd Tuesday 3:00 ET)

November 28, 2017 - additional call

December 12, 2017

Imports

Inspector qualifications

December 26, 2017- additional call

Imports discussion (ALL)

Inspector qualifications (SR)

Eliminating the Incentive to Convert Native Ecosystems into Organic Crop Production (HB)

January 9, 2018

January 23, 2018 - additional call

January 30, 2018 - additional call

February 13, 2018
 February 27, 2018 - additional call
 March 13, 2018
 April 10, 2018
 May 8, 2018
 June 12, 2018
 July 10, 2018
 August 14, 2018
 September 11, 2018
 October 9, 2018
 November 13, 2018
 December 11, 2018

Spring 2018 Milestones	Target dates (tentative)
New NOSB member orientation	TBD
NOSB - Spring 2018 proposals due to NOP	Feb 21, 2018
NOP - Complete Spring 2018 NOSB meeting tentative agenda	Mar 6, 2018
NOP - Post proposals, "Open" public comment	Mar 6, 2018
Discuss work agendas on ES call	Mar 9, 2018
Public comment closes	Apr 4, 2018
NOP - Send compiled public comments to NOSB	Apr 9, 2018
Work agendas finalized on ES call (last call before fall meeting)	Apr 13, 2018
Public comment webinar(s)	Apr 17 & 19, 2018
Spring 2018 NOSB meeting – Tucson, AZ	Apr 25-27, 2018