

Note: Subcommittee notes may include preliminary discussions regarding substances considered for addition to or removal from the National List. They do not represent official National Organic Program (NOP) policy/regulations or NOSB recommendations. Proposals must be voted on by the full Board, to become recommendations to the USDA. Please see the NOP website for official NOP policy, regulations, and status of substances used in organic production and handling.

**Compliance, Accreditation & Certification Subcommittee (CACCS) Notes**  
**Tuesday November 12, 2019, 3:00 pm ET**

**Attending:** Scott Rice (SR), Chair; Harriet Behar (HB); Ashley Swaffar (AS); Rick Greenwood (RG); Steve Ela (SE) - observer

**Absent:** Lisa de Lima (LD); A-dae Romero-Briones (ARB); Emily Oakley (EO)

**Staff:** Michelle Arsenault (MA)

**Agenda**

- Energy Infrastructure work agenda request
- Other items
- Adjourn

**Discussion**

- **Energy Infrastructure work agenda request.** NOP denied the CACS's work agenda request during the Fall NOSB meeting. The CACS noted that the NOSB heard many comments from stakeholders that this is an issue that needs to be addressed and they are seeking support from the USDA. Members will continue to discuss possible solutions in other venues, such as the Accredited Certifiers Association (ACA) and International Organic Inspectors Association (IOIA). The CACS will clarify with the NOP if it should move forward on a module for the Integrity Learning Center, which was suggested previously. Members emphasized that information and education is key for farmers and others who are effected.
- **Other items**
- **The meeting was adjourned**

[Previous CACS Notes](#)

**Future Call Schedule (2<sup>nd</sup> Tuesday 3:00 ET)**

October 8, 2019 - cancelled

November 12, 2019

December 10, 2019

January 14, 2020

February 11, 2020

March 10, 2020

April 14, 2020

May 12, 2020

June 9, 2020

July 14, 2020

August 11, 2020

September 8, 2020

October 13, 2020

November 10, 2020

December 8, 2020

## Work Agenda

Project	Contact	Status	Discussion, Vote	Meeting
Energy system infrastructure on organic farms.		CACS requested addition to work agenda 12 14 18. NOP suggested working on a module for the Integrity Learning Center.	11 12 19	TBD
Oversight improvements to deter fraud - Summary	HB/TC	On hold, pending publication of proposed rule on Strengthening organic enforcement (SOE)	TBD	TBD

\*Discussed \*Voted

Spring 2020 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	Nov 15, 2019
NOSB - Spring 2020 proposals due to NOP	Feb 20, 2020
New NOSB member training	Feb 25 - 26, 2020
NOP - Draft Spring 2020 NOSB meeting tentative agenda	Mar 2, 2020
NOP - Post proposals	Mar 5, 2020
Public comment closes	Apr 3, 2020
NOP - Send compiled public comments to NOSB	Apr 7, 2020
Public comment webinars	Apr 21 & 23, 2020
Spring 2020 NOSB meeting – Crystal City, VA	Apr 28 - May 1, 2020

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**Compliance, Accreditation & Certification Subcommittee (CACs) Notes**  
**Tuesday September 10, 2019, 3:00 pm ET**

**Attending:** Scott Rice (SR), Chair; Harriet Behar (HB); Emily Oakley (EO); Ashley Swaffar (AS)

**Absent:** Lisa de Lima (LD); A-dae Romero-Briones (ARB)

**Staff:** Michelle Arsenault (MA)

**Agenda**

- Discuss verbal update on integrity of the supply chain/oversight improvements to deter fraud at Fall 2019 NOSB meeting
- Fraud, traceability and the unique considerations of the fresh product trade.
- Energy infrastructure - status of work agenda request.
- Other items
- Adjourn

**Discussion**

- **Verbal update on Integrity of the Supply Chain/Oversight Improvements to Deter Fraud at Fall 2019 NOSB meeting.** The lead is reviewing transcripts and previous work to incorporate into the verbal update for the Fall 2019 meeting. A member mentioned that she also reviewed the transcripts and previous work and has sent that to the CACS members. The lead asked for feedback from members.
- **Fraud, traceability and the unique considerations of the fresh product trade.** The CACS will defer this project until after the Strengthening the organic enforcement rule (SOE) is published, so they can determine what previous recommendations have already been incorporated. Members also discussed potential future technologies such as block chain, and will ask the NOP for an update at the Executive call.
- **Energy infrastructure - status of work agenda request.** The CACS will request an update from the NOP about the status of this request.
- **Other items.** A member asked about having a point-of-contact at the NOP who can address certifier questions. And if having guidance from the NOSB would help with that realm.
- **The meeting was adjourned**

[Previous CACS Notes](#)

**Future Call Schedule (2<sup>nd</sup> Tuesday 3:00 ET)**

July 9, 2019 - cancelled

August 13, 2019 -cancelled

September 10, 2019

Discuss verbal update on Integrity of the supply chain/Oversight improvements to deter fraud.

Fraud, traceability, and the unique considerations of the fresh product trade.

Energy infrastructure - status of work agenda request.

October 8, 2019

November 12, 2019

December 10, 2019

**Work Agenda**

Project	Contact	Status	Discussion, Vote	Meeting
Energy system infrastructure on organic farms.		CACS requested addition to work agenda 12 14 18.		TBD
Oversight improvements to deter fraud - Summary	HB/TC	Verbal update Fall 2019		Fall 2019

\*Discussed \*Voted

Fall 2019 Milestones	Target dates (tentative)
New NOSB member training	TBD Feb/Mar 2020
NOP - Publish FRN, Open public comment	May 3, 2019
NOSB Request for TRs for 2022 sunset materials	Jun 12, 2019
NOP - Draft Fall 2019 NOSB meeting tentative agenda	Aug 5, 2018
NOSB - Fall 2019 proposals due to NOP	Aug 15, 2018
NOP - Post proposals	On or before Sep 4, 2018
Public comment closes	Oct 3, 2019
NOP - Send compiled public comments to NOSB	Oct 7, 2019
Discuss/finalize work agendas on ES call	Oct 14, 2019
Public comment webinars	Oct 15 & 17, 2019
Fall 2019 NOSB meeting - Pittsburgh, PA	Oct 23-25, 2019

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### **Compliance, Accreditation & Certification Subcommittee (CACS) Notes Monday June 17, 2019, 3:00 pm ET**

**Attending:** Scott Rice (SR), Chair; Harriet Behar (HB); Emily Oakley (EO); Lisa de Lima (LD);

**Absent:** Sue Baird (SB); A-dae Romero-Briones (ARB); Ashley Swaffar (AS)

**Staff:** Michelle Arsenault (MA)

#### **Agenda**

- Notes from May 14, 2019
- NOP Memo to Certifiers re: Container Production
- Fraud, Traceability and the unique considerations of the fresh product trade
- Other items
- Adjourn

#### **Discussion**

- **Notes from May 14, 2019** were accepted as is.
- **NOP memo to certifiers re: container production.** The group discussed the [NOP memo regarding certification of container growing systems](#). Subcommittee members noted the memo raised a lot of questions and uncertainty in the certifier community. In addition to feedback from the NOSB during the last Executive call, a member noted that the NOP has also heard from several other stakeholder groups, such as certifiers, and the International Organic Inspectors Association (IOIA).
- The group discussed the need for definitive and quick answers from the NOP to resolve certifier questions and discrepancies. Members shared their perspectives that it can be problematic to certifiers and the operations to not have a quick and decisive answer, and it ultimately stifles the growth of the organic industry. A member added that the absence of an answer often results in conflict and division in the community. There is great interest in continuous improvement and accountability, and the CACS would like to explore how to get involved. The CACS discussed several ways to engage and is considering a request for a work agenda item. SR will develop a draft request.
- **Fraud, Traceability and the unique considerations of the fresh product trade.** Deferred to next call due to lack of time.
- **Other items.**
  - Energy infrastructure. The CACS is seeking feedback from NOP about the status of its work agenda request of December 2018. MA will check with NOP leadership to see if there is additional information needed. Members added that there is currently inconsistent implementation, and the community is anxious to have the NOSB work on it.
- **The meeting was adjourned**

#### **[Previous CACS Notes](#)**

#### **Future Call Schedule (2<sup>nd</sup> Tuesday 3:00 ET)**

May 14, 2019

June 17, 2019

July 9, 2019

Fraud, traceability and the unique considerations of the fresh product trade.

Energy infrastructure – status of work agenda request.

August 13, 2019

September 10, 2019

October 8, 2019

November 12, 2019

December 10, 2019

### Work Agenda

Project	Contact	Status	Discussion, Vote	Meeting
Energy system infrastructure on organic farms.		CACS requested addition to work agenda 12 14 18.		TBD
Oversight improvements to deter fraud - Summary	HB/TC			TBD

\*Discussed \*Voted

Fall 2019 Milestones	Target dates (tentative)
New NOSB member training	TBD Feb/Mar 2020
NOP - Publish FRN, Open public comment	May 3, 2019
NOSB Request for TRs for 2022 sunset materials	Jun 12, 2019
NOP - Draft Fall 2019 NOSB meeting tentative agenda	Aug 5, 2018
NOSB - Fall 2019 proposals due to NOP	Aug 15, 2018
NOP - Post proposals	On or before Sep 4, 2018
Public comment closes	Oct 3, 2019
NOP - Send compiled public comments to NOSB	Oct 7, 2019
Discuss/finalize work agendas on ES call	Oct 14, 2019
Public comment webinars	Oct 15 & 17, 2019
Fall 2019 NOSB meeting - Pittsburgh, PA	Oct 23-25, 2019

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**Compliance, Accreditation & Certification Subcommittee (CACCS) Notes**  
**Tuesday May 14, 2019, 3:00 pm ET**

**Attending:** Sue Baird (SB), Chair; Scott Rice (SR), Vice Chair; Harriet Behar (HB); Emily Oakley (EO); Ashley Swaffar (AS)

**Absent:** Lisa de Lima (LD); A-dae Romero-Briones (ARB)

**Staff:** Michelle Arsenault (MA)

**Agenda**

- Debrief from Seattle meeting
- Energy system infrastructure on organic farms.
- Other items
- Adjourn

**Discussion**

- **Debrief from Seattle meeting.**
  - The CACS Chair summarized the top three topics from public comments: Stop-sale, for which the NOP doesn't have authority; uncertified handlers, because there is no traceability; and acreage reporting. A member asked about areas where the NOSB could provide input while waiting for requests from the NOP.
  - A member noted there are a couple of minor areas with regard to certification that could be useful. For example, tightening up certification systems which helps the accreditation aspect. A member noted that there is a gap - not in the system but in the implementation, adding that audits and accreditation oversight often involve checking boxes as apposed to assessing whether or not an operation made a good decision.
  - A member indicated the NOP is working on a project regarding fraud that they will ask the CACS to work on. MA will follow up with the Deputy Administrator and the Director/or Assistant director of AIA to see if they can provide additional information. The Subcommittee also discussed checklist-based oversight (as opposed to process-based decisions), which doesn't offer much helpful feedback or oversight about decision making. The CACS Vice-Chair suggested they review the comments and use those to inform their work going forward.
  - Other potential work agenda items could include excluded operations and accreditation.
- **Energy system infrastructure on organic farms.** Waiting on approval from NOP about this work agenda request.
- **Other items.** None
- **The meeting was adjourned**

[Previous CACS Notes](#)

**Future Call Schedule (2<sup>nd</sup> Tuesday 3:00 ET)**

May 14, 2019

June 17, 2019, rescheduled from June 11

July 9, 2019

August 13, 2019  
 September 10, 2019  
 October 8, 2019  
 November 12, 2019  
 December 10, 2019

**Work Agenda**

Project	Contact	Status	Discussion, Vote	Meeting
Energy system infrastructure on organic farms.		CACS requested addition to work agenda 12 14 19.		TBD
Oversight improvements to deter fraud - Summary	HB/TC			TBD

\*Discussed \*Voted

Fall 2019 Milestones	Target dates (tentative)
New NOSB member training	TBD Feb/Mar 2020
NOP - Publish FRN, Open public comment	May 3, 2019
NOSB Request for TRs for 2022 sunset materials	Jun 12, 2019
NOP - Draft Fall 2019 NOSB meeting tentative agenda	Aug 5, 2018
NOSB - Fall 2019 proposals due to NOP	Aug 15, 2018
NOP - Post proposals	On or before Sep 4, 2018
Public comment closes	Oct 3, 2019
NOP - Send compiled public comments to NOSB	Oct 7, 2019
Discuss/finalize work agendas on ES call	Oct 14, 2019
Public comment webinars	Oct 15 & 17, 2019
Fall 2019 NOSB meeting - Pittsburgh, PA	Oct 23-25, 2019



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**Compliance, Accreditation & Certification Subcommittee (CACs) Notes**  
**Tuesday February 12, 2019, 3:00 pm ET**

**Attending:** Sue Baird (SB); Harriet Behar (HB); Emily Oakley (EO); Lisa de Lima (LD); A-dae Romero-Briones (ARB)

**Absent:** Ashley Swaffar (AS); Eric Schwartz, CACS Chair; Scott Rice (SR), Vice Chair

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

**Agenda**

- Summary of import panel
- Other items
- Adjourn

**Discussion**

- **Summary of import panel.** The NOSB Chair intends on writing a discussion document with a summary of the import panels and any work to date on imports. The CACS will post a discussion document for the Spring NOSB meeting. Since the CACS does not have another call before the proposal deadline, the lead will send it to the members via email by the end of the week for review.
- **Other items.**
  - **Grower groups.** The members briefly discussed grower groups. NOP noted that grower groups are addressed in the Strengthening Organic Enforcement rulemaking, based on previous NOSB recommendations. NOP is in ex parte communication while rulemaking is underway,
  - Eric Schwartz resigned his position on the NOSB as he took a new position with a company that does not support organic. Sue Baird is now Chair of the CACS beginning with the March 12 call.
- **The meeting was adjourned**

[Previous CACS Notes](#)

**Future Call Schedule (2<sup>nd</sup> Tuesday 3:00 ET)**

January 29, 2019

February 12, 2019

March 12, 2019

April 9, 2019

May 14, 2019

June 11, 2019

July 9, 2019

August 13, 2019

September 10, 2019

October 8, 2019

November 12, 2019

December 10, 2019

## Work Agenda

Project	Contact	Status	Discussion, Vote	Meeting
Integrity of the supply chain	SR, HB, TC	NOP Memo, requesting the CACS add a work agenda item on Import Integrity, sent to NOSB 08 10 17.	01 29 19	Proposal Spr 2019
Energy system infrastructure on organic farms.		CACS requested addition to work agenda 12 14 19	01 29 19	TBD
Summary of import panel	TC		01 29 19 02 12 19	TBD

\*Discussed \*Voted

Spring 2019 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	Nov 26, 2018
NOSB – Spring 2019 proposals due to NOP	Feb 21, 2019
NOP - Draft Spring 2019 NOSB meeting tentative agenda	Mar 4, 2019
NOP - Post proposals	Mar 6, 2019
Public comment closes	Apr 4, 2019
Discuss/finalize work agendas on ES call	Apr 13, 2019
NOP - Send compiled public comments to NOSB	Apr 8, 2019
Public comment webinars	Apr 16 & 18, 2019
Spring 2019 NOSB meeting - Seattle, WA	Apr 24 - 26, 2019

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**Compliance, Accreditation & Certification Subcommittee (CACS) Notes**  
**Tuesday January 29, 2019, 3:00 pm ET**

**Attending:** Eric Schwartz, CACS Chair; Sue Baird (SB); Harriet Behar (HB); Emily Oakley (EO); Ashley Swaffar (AS); Lisa de Lima (LD)  
**Absent:** Scott Rice (SR), Vice Chair; A-dae Romero-Briones (ARB)  
**Staff:** Michelle Arsenault (MA); Devon Pattillo (DP)

**Agenda**

- Energy system infrastructure on organic farms.
- Integrity in the supply chain - further work
- Other items
- Adjourn

**Discussion**

- **Energy system infrastructure on organic farms.** The goal of this project is to develop guidance for certifiers and would address energy infrastructure, such as pipelines, fracking, utilities, etc., to protect integrity of organic land. The CACS is waiting for feedback from NOP approving the work agenda request, and about how best to move forward.
- **Integrity in the supply chain.** The Subcommittee discussed various components of the project on integrity in the supply chain, including the development of a summary of the two import panels that addressed the NOSB, and domestic fraud. The CACS Chair will check with the lead author of the summary to determine if they will bring something forward to the Spring 2019 NOSB meeting. The CACS is seeking advice from the NOP about what topics are priorities.
- **Other items.**
  - **Origin of Livestock.** NOP received considerable public comment in support of this rule and will determine how to move forward in the coming weeks. The NOSB expressed their support at the Fall 2018 meeting in the form of a resolution.
  - **Guidance about goats.** A member mentioned working on better, more species-specific guidance for goats.
  - **Pasture rule.** The CACS would like information from NOP about how it is moving forward with better oversight of implementation of the pasture regulations
- **The meeting was adjourned**

[Previous CACS Notes](#)

**Future Call Schedule (2<sup>nd</sup> Tuesday 3:00 ET)**

December 11, 2018

January 8, 2019 - cancelled due to shutdown

January 29, 2019

February 12, 2019

March 12, 2019

April 9, 2019

May 14, 2019  
 June 11, 2019  
 July 9, 2019  
 August 13, 2019  
 September 10, 2019  
 October 8, 2019  
 November 12, 2019  
 December 10, 2019

**Work Agenda**

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Energy system infrastructure on organic farms.		CACS requested addition to work agenda 12 14 19	01 29 19	TBD
Summary of import panel	TC		01 29 19	TBD

\*Discussed \*Voted

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NOP - Publish FRN, Open public comment	Nov 26, 2018
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