# Compliance, Accreditation & Certification Subcommittee (CACS) Notes Tuesday, December 13, 2022 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Kyla Smith (KS), Vice Chair; Jerry D'Amore (JD); Kim Huseman (KH); Allison

Johnson (AJ); Nate Powell-Palm (NPP); Mindee Jeffery - observer

**Absent:** Logan Petrey (LP); Carolyn Dimitri (CD) **Staff:** Michelle Arsenault (MA); Laura Gallagher (LG)

#### Agenda

Review December 6, 2022 notes

- Organic and Climate-Smart Agriculture Organic IS climate smart. Discuss proposal outline (NPP)
- Minimum reporting requirements. Discuss proposal outline (NPP/ADB).
- Organic and Climate-Smart Agriculture Climate induced farming risk and crop insurance (CD)
- Finalize work agenda
- Additional Items
- Adjourn

#### Discussion

December 6, 2022 were accepted with edits to the bullet about Minimum Reporting Requirements.

#### • Current agenda:

- Organic and Climate-Smart Agriculture Organic IS climate smart (NPP). The CACS will convert the discussion document to a proposal for Spring meeting.
- Minimum Reporting Requirements (NPP/ADB). NOP is working on a course for the Learning Center on this topic and the CACS asked about augmenting the work that is already underway. The NOP suggested areas in which the Subcommittee/NOSB could help, including communicating to certifiers that the modules are available, and providing feedback about best practices or additional materials that should be included in the training. The NOP also asked the CACS for ideas about priority areas. The group talked about guidance, templates, and traceback-audit aids to certifiers. The NOP noted that it's likely too late to add anything prior to the January Accredited Certifier Association training, but welcomes ideas from the NOSB for future trainings.

#### Proposed additions to work agenda

 Organic and Climate-Smart Agriculture - discussion document on climate induced farming risk and crop insurance (CD). The lead compiled background, which will be circulated to the group soon. The CACS will send the request to add this to the work agenda to the Executive Committee ahead of the December 20 call.

#### • Finalize work agenda

- There are four meetings left before the proposal deadline. The group discussed potential additions for the work agenda. The leading options are: Defining transition, Strengthening Organic Enforcement (SOE) implementation, What/Why Organic?, geo-referencing transition/organic parcels, and equivalency enforcement calibration
  - Defining transition. Transition is undefined in the Transition to Organic Partnership Program (TOPP) program. A member mentioned ideas about potential areas on which the NOSB could provide help, noting that timing is critical. The group discussed providing clarity around requirements. AJ volunteered to write a white paper to circulate to the CACS. The NOP will send examples of other work agenda requests and suggested that people look at the guidance in the PPM about what to include.
  - Strengthening Organic Enforcement (SOE) Implementation. NOP will be developing training once SOE is published, and would welcome suggestions.

 What/Why Organic? JD will develop a document and will include history and ideas about future directions. The CACS will talk more about this on the next call.

#### • Additional Items

- The group discussed potential areas/ideas where the NOSB could help the NOP such as the TOPPS program, which might be the best place to develop resources that are specific to farmers. A member asked about courses focusing on supply chain issues. Currently there isn't anything specific, but once SOE is published, the CACS could address this. Another member added a suggestion about transactions and how to provide a "mass balance".
- The meeting was adjourned

#### **Previous CACS Notes**

#### Future call schedule (1st & 2nd Tuesdays 2:00 PM ET | 11:00 AM PT, except where noted.)

December 6, 2022

Organic and Climate-Smart Agriculture (Climate/Equity) (NPP/CD)

Oversight to Deter fraud: Minimum Reporting Requirements (ADB/NPP)

December 13, 2022 January 3, 2023

Oversight to Deter fraud: Minimum Reporting Requirements (ADB/NPP)

January 10, 2023

February 7, 2023

February 14, 2023

March 7, 2023

March 14, 2023

April 4, 2023

April 11, 2023

#### **Work Agenda**

Project	Contact	Doc Type	Notes*	Scheduled, Discussed, Voted	Target meeting
Oversight improvements to deter fraud: Modernization of organic traceability - Minimum Reporting Requirements (Prop)	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	12.6.22 12.13.22 1.3.23	Spr 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - Organic IS climate smart	NPP	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22	Spr 2023

Organic and Climate-Smart Agriculture (Climate/Equity) - Climate induced farming risk and crop Insurance	CD/NPP	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22 12.13.22	Spr 2023
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal	TBD	TBD	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	TBD

Spring 2023 Milestones	Target dates (tentative)	Weeks PTM (prior to
NOP - Publish FRN, Open public comment	~Nov 10, 2022	
NOSB - Spring 2023 proposals due to NOP	Feb 14, 2023	10 weeks
New NOSB member training	TBD	
NOP - Draft Spring 2023 NOSB meeting tentative agenda	Feb 3, 2023	
NOP - Post proposals	Mar 6, 2023	7.5
Public comment closes	Apr 5, 2023	3.5
NOP - Send compiled public comments to NOSB	Apr 7, 2023	3
Public comment webinars	Apr 18 & 20, 2023	1 week
Spring 2023 NOSB meeting - Atlanta, GA	Apr 25 - 27, 2023	
Final recommendations due	May 25, 2023	

# Compliance, Accreditation & Certification Subcommittee (CACS) Notes Tuesday, December 6, 2022 4:00 pm ET

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Kyla Smith (KS); Kim

Huseman (KH), Mindee Jeffery - observer

Absent: Allison Johnson (AJ); Logan Petrey (LP); Nate Powell-Palm (NPP)

Staff: Michelle Arsenault (MA); Laura Gallagher (LG)

#### Agenda

- Review October 11, 2022 notes
- November 8, 2022
- Additional Items
- Adjourn

- October 11, 2022 were accepted as written.
- November 8, 2022 were accepted as written.
- Additional Items. The CACS discussed its work agenda and what projects will move ahead and in what
  format. The Chair described the projects they are considering, based on feedback from the Fall 2022
  NOSB meeting.
- Oversight improvements to deter fraud: Modernization of organic traceability Minimum Reporting Requirements. The CACS discussed public comments and NOSB discussion heard at the Fall meeting and will develop the previous discussion document into a proposal for the Spring 2023 meeting.
- Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal Organic and Climate-Smart Agriculture (Climate/Equity). The CACS will continue to work on this to stress that Organic IS climate smart already.
- Organic and Climate-Smart Agriculture (Climate/Equity). The CACS proposed a new topic under this
  work agenda item on climate-induced farming risk and crop insurance
- **NOSB tech support and the inspector qualifications.** The NOP will provide an update to the Subcommittee on these two human capital projects.
- Other potential topics for the work agenda
  - Clarify the definition of transition.
  - Strengthening Organic Enforcement (SOE) follow up. The CACS discussed the idea of producing focused discussion documents about implementation. A member added that certifiers will have a year to implement SOE once it's published, and it might be useful for the NOSB to prep an outline or framework on how the NOP and Certifiers can coordinate. The goal would be to have something for the Spring 2023 meeting in order to collect public feedback.
  - Why Organic? The Organic community and the NOSB discussed the idea of a marketing campaign during the last NOSB meeting, and the CACS has interest in this.
  - A member suggested a potential work agenda topic on supply chain issues and organic equivalency agreements, and would like to look at global coordination on enforcement.
  - The CACS discussed the potential of developing a proposal on geolocation of parcels. One member noted that the information is already publicly available, and it would be a matter of making it more accessible. Another member noted the existence of a similar system although some of the data is not consistent across certifiers. The CACS Chair expressed interest in coordinating across agencies.
- The meeting was adjourned

## **Previous CACS Notes**

## Future call schedule (1st & 2nd Tuesdays 2:00 PM ET | 11:00 AM PT, except where noted.)

November 8, 2022

December 6, 2022

Organic and Climate-Smart Agriculture (Climate/Equity) (NPP/CD)

Oversight to Deter fraud: Minimum Reporting Requirements (ADB/NPP)

December 13, 2022

January 3, 2023

Oversight to Deter fraud: Minimum Reporting Requirements (ADB/NPP)

January 10, 2023

February 7, 2023

February 14, 2023

March 7, 2023

March 14, 2023

April 4, 2023

April 11, 2023

## **Work Agenda**

Project	Contact	Doc Type	Notes*	Scheduled, Discussed, Voted	Target meeting
Oversight improvements to deter fraud: Modernization of organic traceability - Minimum Reporting Requirements (Prop)	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	12.6.22 1.04.23	Spr 2023
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal	TBD	TBD	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	TBD
Organic and Climate-Smart Agriculture (Climate/Equity) - Organic IS climate smart	NPP	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22	Spr 2023
Organic and Climate-Smart Agriculture (Climate/Equity) - Climate induced farming risk and crop Insurance	CD/NPP	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22	Spr 2023

Spring 2023 Milestones	Target dates (tentative)	Weeks PTM (prior
		to meeting)
NOP - Publish FRN, Open public comment	~Nov 10, 2022	
NOSB - Spring 2023 proposals due to NOP	Feb 14, 2023	10 weeks
New NOSB member training	TBD	
NOP - Draft Spring 2023 NOSB meeting tentative agenda	Feb 3, 2023	
NOP - Post proposals	Mar 6, 2023	7.5
Public comment closes	Apr 5, 2023	3.5
NOP - Send compiled public comments to NOSB	Apr 7, 2023	3
Public comment webinars	Apr 18 & 20, 2023	1 week
Spring 2023 NOSB meeting - Atlanta, GA	Apr 25 - 27, 2023	
Final recommendations due	May 25, 2023	

# Compliance, Accreditation & Certification Subcommittee (CACS) Notes Tuesday, November 8, 2022 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Kyla Smith (KS); Nate

Powell-Palm (NPP); Kim Huseman (KH), Mindee Jeffery - observer

Absent: None

Staff: Michelle Arsenault (MA); Laura Gallagher (LG)

#### Agenda

Review October 11, 2022 notes

- Meeting Debrief
- Work agenda items
- Additional Items
- Adjourn

- Acceptance of October 11, 2022 notes deferred to the next call.
- **Meeting Debrief.** Three documents at the Fall NOSB meeting passed and will be removed from the work agenda. A couple items will move from discussion documents to proposals.
- Climate change A lot of ideas were included in the climate smart agriculture discussion document.
   Useful feedback was received in public comments. The NOSB chair asked for feedback from NOSB members on next steps. Crop insurance was a top interest and the subcommittee discussed moving ahead with a discussion document.
  - Standardization of forms and better audits, better guidelines for inspectors. A subcommittee member noted that if organic is said to be climate smart, then what is holding back organic industry growth? Public comments noted crop insurance as higher risk. The subcommittee asks if crop insurance is a barrier, and if the NOSB can suggest changes to USDA programs to make crop insurance easier or less risky.
  - A subcommittee member is looking at research into how many farmers are using the various farm bill programs and what barriers exist. The subcommittee member noted that these programs are geared for conventional agriculture and were slightly changed to include organic, rather than being designed for organic. The subcommittee member suggests using the open docket to ask for feedback.
  - The subcommittee discussed how to move forward with a proposal. May include a specific request for crop insurance and why organic should be positioned, and eligible, for grants.
  - o A subcommittee member indicated that practical values should be identified for yields.
- **NOSB tech support** Public comments universally support this idea. However, specifics identified varied. Such as, who provides help, and with what.
  - The subcommittee discussed how this proposal may move forward with the NOP and if the NOSB will be informed. The NOSB will receive updates and support may be in year-to-year agreements with different USDA programs.
- Risk management project The subcommittee discussed future steps with this topic, if any. Public comments suggested work on Conflict of Interest (COI), certifier selection, certifier inconsistencies, audits. The Subcommittee discussed the collaborative work of certification agencies, the growth of the NOP, and rules in process.
- Additional Items. The NOP will send coversheets for the final recommendations to the NOSB soon.
- The meeting was adjourned

## **Previous CACS Notes**

## Future call schedule (1st & 2nd Tuesdays 2:00 PM ET | 11:00 AM PT, except where noted.)

November 8, 2022

December 6, 2022

Organic and Climate-Smart Agriculture (Climate/Equity) (NPP/CD)

Oversight to Deter fraud: Minimum Reporting Requirements (ADB/NPP)

December 13, 2022

January 3, 2023

Oversight to Deter fraud: Minimum Reporting Requirements (ADB/NPP)

January 10, 2023

February 7, 2023

February 14, 2023

March 7, 2023

March 14, 2023

April 4, 2023

April 11, 2023

## **Work Agenda**

Project	Contact	Doc Type	Notes*	Scheduled, Discussed, Voted	Target meeting
Oversight improvements to deter fraud: Modernization of organic traceability Fall 2022 - Minimum Reporting Requirements (Prop) - Grower Groups (DD)	ADB/NPP	Proposal/ Discussion document	08.10.17 NOP Memo to CACS	12.6.22 1.04.23	Spr 2023
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal	TBD	TBD	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	TBD
Organic and Climate-Smart Agriculture (Climate/Equity) -	CD/NPP	Proposal	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22	Spr 2023
Organic and Climate-Smart Agriculture (Climate/Equity) -	CD/NPP	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	11.8.22 12.6.22	Spr 2023

Spring 2023 Milestones	Target dates (tentative)	Weeks PTM	
		(prior to	
NOP - Publish FRN, Open public comment	~Nov 10, 2022		
NOSB - Spring 2023 proposals due to NOP	Feb 14, 2023	10 weeks	
New NOSB member training	TBD		
NOP - Draft Spring 2023 NOSB meeting tentative agenda	Feb 3, 2023		
NOP - Post proposals	Mar 6, 2023	7.5	
Public comment closes	Apr 5, 2023	3.5	
NOP - Send compiled public comments to NOSB	Apr 7, 2023	3	
Public comment webinars	Apr 18 & 20, 2023	1 week	
Spring 2023 NOSB meeting - Atlanta, GA	Apr 25 - 27, 2023		
Final recommendations due	May 25, 2023		

# Compliance, Accreditation & Certification Subcommittee (CACS) Notes Tuesday, October 11, 2022 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Kyla Smith (KS); Nate

Powell-Palm (NPP); Kim Huseman (KH)

**Absent:** None

Staff: Michelle Arsenault (MA); Laura Gallagher (LG)

#### Agenda

• Review September 13, 2022 notes

- Review Fall meeting logistics
- Review public comments
- Discuss additional ideas for potential work agenda topics
- Additional Items
- Adjourn

- September 13, 2022 notes were accepted as written.
- Review Fall meeting logistics.
- Review public comments. The CACS received a good number of comments on the agenda items for the fall meeting.
  - Organic and Climate-Smart Agriculture (Climate/Equity) received good feedback and anticipating robust conversation as they move to the next iteration of the document. As a community, Organics is poised to inform and educate the rest of the USDA about the fact that it is already part of the solution to climate change. Organics already has a firm footing and would like to talk about scaling up and sharing ideas. Looking for consistency in messaging to make sure that Organics has a seat at the table.
  - A subcommittee member said it would be helpful to know what the NOSB ask is, particularly if it includes a request for funding or new programs. The subcommittee anticipates that it will be able to answer this question after the fall meeting and will add it to the Spring proposal. The subcommittee plans to highlight other environmental benefits, not just carbon reduction. As well as tension between research, which is process based, and the research and data needed as system for sustainable agriculture.
  - A subcommittee member offered a view to rebalancing, suggesting that food systems currently focus on food security, not environmentalism.
  - The subcommittee would like to know how NOP will implement the recommendation for NOSB support. Public comments were for the most part supportive, and some comments mentioned specific items that the technical support person(s) would be able and should or should not do. NOP would likely write an MOU with other independent agencies to see who has the capacity to do this work. It may take some time for the NOP to find the appropriate agency and find the appropriate level of transparency. The NOSB would like to have input as the process moves forward. The process of implementing any proposal would be flexible and iterative and can be modify as needed. The subcommittee will seek intermittent updates on this project.
  - Risk mitigation the lead noted comments about risks not included on the table as they were considered out of scope.
  - Acreage Received quite a few comments with mixed support, ranging from strong to limited.
     Some comments suggested the proposal go back to the subcommittee for additional work. The subcommittee discussed the process for implementation and whether it would require

rulemaking, or guidance. The subcommittee also discussed the relationship of this proposal to the Strengthening Organic Enforcement rule that is in process.

## Discuss additional ideas for potential work agenda topics

- A subcommittee member suggested impact of climate on organic farms rather than vice versa.
   Suggested a topic of how USDA programs could be improved to help organic farmers deal with climate change.
- A subcommittee member suggested picking up "conflict of interest" as a work agenda topic, similar to the work done on the current proposal on the NOP Risk Mitigation Table. Public comments may inform this topic.
- A subcommittee member suggested discussing the difference between organic certifiers and state programs.
- Additional Items
- The meeting was adjourned

#### **Previous CACS Notes**

#### Future call schedule (2nd & 4th Tuesdays 2:00 PM ET | 11:00 AM PT, except where noted.)

October 4, 2022 - cancelled

October 11, 2022

**Review Fall comments** 

November 1, 2022 - cancelled

November 8, 2022

Organic and Climate-Smart Agriculture (Climate/Equity) (NPP/CD)

December 6, 2022

Organic and Climate-Smart Agriculture (Climate/Equity) (NPP/CD)

Oversight to Deter fraud: Minimum Reporting Requirements (ADB/NPP)

December 13, 2022

January 4, 2022

Oversight to Deter fraud: Minimum Reporting Requirements (ADB/NPP)

# **Work Agenda**

\*Highlight indicates discussion. \*Highlight indicates action needed. \*Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled, Discussed, Voted	Target meeting
Oversight improvements to deter fraud: Modernization of organic traceability Fall 2022  1. Acreage/mass balance of yields (Prop) and  2. Minimum Reporting Requirements (DD)	ADB/NPP	Proposal, Discussion Doc	08.10.17 NOP Memo to CACS	6.14.22 7.12.22 8.2.22 8.9.22 12.6.22 01.04.23	Fall 2022
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal	TBD	TBD	O7.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	TBD
Human Capital Management: NOSB technical support	JD	Proposal	07.31.20 NOP Memo to CACS	6.14.22 7.5.22 <mark>7.12.22</mark>	Fall 2022
NOP Risk Mitigation Table review	KS	Proposal	11.18.21 NOP Memo to NOSB. Assigned to CACS on 12.21.21 by Exec Cmte	6.14.22 7.5.22 7.12.22 8.9.22	Fall 2022
Organic and Climate-Smart Agriculture (Climate/Equity)	CD/NPP	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	7.5.22 7.12.22 8.2.22 8.9.22 11.8.22 12.6.22	Fall 2022

Fall 2022 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	June 23, 2022
NOP - Draft Fall 2022 NOSB meeting agenda	Aug 5, 2022
NOSB - Fall 2022 proposals due to NOP	Aug 11, 2022
NOP - Post proposals	Aug 31, 2022
Public comment closes	Sep 29, 2022
NOP - Send compiled public comments to NOSB	~Oct 3, 2022
Public comment webinars	Oct 18 & 20, 2022
Fall 2022 NOSB meeting - Sacramento, CA	Oct 25 - 27, 2022
Final recommendations due	Nov 25, 2022

# Compliance, Accreditation & Certification Subcommittee (CACS) Notes Tuesday, September 13, 2022 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Kyla Smith (KS)

Absent: Nate Powell-Palm (NPP); Kim Huseman (KH)

**Staff:** Michelle Arsenault (MA)

#### Agenda

- Review August 9, 2022 notes
- Review New Meeting Structure
- Assign dates for SC review for our two potential proposals (1. climate memo 2. oversite to deter fraud: minimal reporting requirements)
- Brainstorm Any additional topics to add to work agenda
- Comments / Discussion on Fall Meeting CACS work agenda
- Additional Items
- Adjourn

#### Discussion

- August 9, 2022 notes were accepted as written
- Review New Meeting Structure. The Chair proposed a timeline for reviewing documents to provide more time to discuss them before voting. The CACS has two potential proposals on the work agenda: Climate-Smart Ag and Oversite to deter fraud: Minimum reporting requirements, and assigned future discussion dates for them. See table below.
- Additional topics to add to work agenda. Members discussed potential topics for future work agenda
  items. The group also discussed having a broader philosophical conversation at the Fall NOSB meeting to
  discuss the past, present, and future of the NOSB.
- Additional Items. Members discussed organic certification and the potential challenges with marketing
  and add-on labels, and public perception. The CACS is interested in addressing big-picture topics and
  having full-board conversations.
- The meeting was adjourned

#### **Previous CACS Notes**

Future call schedule (2nd & 4th Tuesdays 2:00 PM ET | 11:00 AM PT, except where noted.)

September 13, 2022 October 4, 2022 October 11, 2022

**Review Fall comments** 

November 1, 2022 - cancelled November 8, 2022

Organic and Climate-Smart Agriculture (Climate/Equity) (NPP/CD)

December 6, 2022

Organic and Climate-Smart Agriculture (Climate/Equity) (NPP/CD)

Oversight to Deter fraud: Minimum Reporting Requirements (ADB/NPP)

December 13, 2022 January 4, 2022

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Oversight to Deter fraud: Minimum Reporting Requirements (ADB/NPP)

# **Work Agenda**

\*Highlight indicates discussion. \*Highlight indicates action needed. \*Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled, Discussed, Voted	Target meeting
Oversight improvements to deter fraud: Modernization of organic traceability Fall 2022  1. Acreage/mass balance of yields (Prop) and  2. Minimum Reporting Requirements (DD)	ADB/NPP	Proposal, Discussion Doc	08.10.17 NOP Memo to CACS	6.14.22 7.12.22 8.2.22 8.9.22 12.6.22 01.04.23	Fall 2022
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal	TBD	TBD	O7.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	TBD
Human Capital Management: NOSB technical support	JD	Proposal	07.31.20 NOP Memo to CACS	6.14.22 7.5.22 <mark>7.12.22</mark>	Fall 2022
NOP Risk Mitigation Table review	KS	Proposal	11.18.21 NOP Memo to NOSB. Assigned to CACS on 12.21.21 by Exec Cmte	6.14.22 7.5.22 7.12.22 8.9.22	Fall 2022
Organic and Climate-Smart Agriculture (Climate/Equity)	CD/NPP	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	7.5.22 7.12.22 8.2.22 8.9.22 11.8.22 12.6.22	Fall 2022

Fall 2022 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	June 23, 2022
NOP - Draft Fall 2022 NOSB meeting agenda	Aug 5, 2022
NOSB - Fall 2022 proposals due to NOP	Aug 11, 2022
NOP - Post proposals	Aug 31, 2022
Public comment closes	Sep 29, 2022
NOP - Send compiled public comments to NOSB	~Oct 3, 2022
Public comment webinars	Oct 18 & 20, 2022
Fall 2022 NOSB meeting - Sacramento, CA	Oct 25 - 27, 2022
Final recommendations due	Nov 25, 2022

# Compliance, Accreditation & Certification Subcommittee (CACS) Notes Tuesday, August 9, 2022 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Kyla Smith (KS); Kim

Huseman (KH); Nate Powell-Palm (NPP); Mindee Jeffery (MJ) - observer

Absent: None

Staff: Michelle Arsenault (MA); Laura Gallagher (LG)

## Agenda

- Review August 2, 2022 notes
- Oversight to Deter fraud: Acreage/mass balance of yields (ADB/NPP) discuss proposal/vote
- Oversight to Deter fraud: Minimum Reporting Requirements/bills-of-lading (ADB/NPP) discuss disc. doc/vote
- NOP Risk Mitigation Table review (KS) discuss proposal/vote
- Organic and Climate-Smart Agriculture (Climate/Equity) (CD) discuss discussion document/vote
- Additional Items
- Adjourn

#### Discussion

- August 2, 2022 notes were accepted as written, with one minor modification: The climate document will be a discussion document instead of a proposal, and the table below was updated.
- NOP Risk Mitigation Table review (KS). The lead summarized the additions/changes she made since the
  last discussion, and noted the addition of modifications regarding impartiality. The group discussed the
  proposal and voted to move it forward to the NOSB. The CACS did not receive many comments at the
  Spring meeting, but did receive a few that were specific and comprehensive.

Motion to accept the proposal on the NOP's risk mitigation table

Motion by: Kyla Smith

Seconded by: Nate Powell-Palm

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

• Oversight to deter fraud - Acreage/mass balance of yields proposal (ADB/NPP). The group discussed the proposal on acreage/mass balance of yields. The document focuses on two main aspects: how to avoid double counting acres, and small acres/parcels. The group also discussed the confidentiality and transparency of listing acreage on organic certificates, which would then be publicly available. The lead has some additional modifications to make based on feedback from members, and will add some background on taxonomy. One member felt they needed to do more research on some components of the proposal and therefore abstained from the vote.

Motion to accept the proposal on acreage/mass balance of yields

Motion by: Amy Bruch

Seconded by: Nate Powell-Palm

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

Oversight to deter fraud: Minimum reporting requirements/universal bills-of-lading (NPP). Community
feedback indicated that universality is important, and so the CACS has broadened this topic to
encompass more than just bills-of-lading. The group had a thoughtful conversation about making
reporting requirements more uniform and consistent, resulting in better outcomes for inspectors,

certifiers, and operations. If the forms that inspectors use were more similar it would eliminate inconsistencies, and also aid with better more robust trace-back and mass balance activities.

Motion to accept the discussion document on minimum reporting requirements/universals bills-of-lading

Motion by: Nate Powell-Palm Seconded by: Jerry D'Amore

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

Organic and Climate-Smart Agriculture (Climate/Equity) discussion document (NPP/CD). The NOSB
 Chair built upon the previous iteration of the document and incorporated answers to the questions
 posed in the NOP memo. The goal of the document is to illustrate the strong connection that already
 exists between organic and climate smart agricultural practices, to ensure that organic is part of the
 conversation as the USDA initiative on climate and equity progresses. The lead will finalize the
 document and recirculate to CACS members, who will vote via email. Voting will close Friday, August 12
 at 5:00 pm ET.

Motion to accept the discussion document on Organic and Climate-Smart Agriculture

Motion by: Nate Powell-Palm Seconded by: Kyla Smith

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

Additional Items. None.

The meeting was adjourned

#### **Previous CACS Notes**

## Future call schedule (2nd & 4th Tuesdays 2:00 PM ET | 11:00 AM PT, except where noted.)

August 2, 2022

Oversight to Deter fraud: Acreage/mass balance of yields (ADB/NPP) - discuss proposal/vote Oversight to Deter fraud: Minimum Reporting Requirements/bills-of-lading (ADB/NPP) - discuss disc. doc/vote

NOP Risk Mitigation Table review (KS) - discuss proposal/vote

Organic and Climate-Smart Agriculture (Climate/Equity) (CD) - discuss discussion document/vote

August 9, 2022

September 6, 2022 September 13, 2022 October 11, 2022 November 1, 2022 November 8, 2022 December 6, 2022

December 13, 2022

#### **Work Agenda**

Project	Contact	Doc Type	Notes*	Scheduled, Discussed, Voted	Target meeting
Oversight improvements to deter fraud: Modernization of organic traceability Fall 2022  1. Acreage/mass balance of yields (Prop) and  2. Minimum Reporting Requirements (DD)	ADB/NPP	Proposal, Discussion Doc	08.10.17 NOP Memo to CACS	6.14.22 7.12.22 8.2.22 8.9.22	Fall 2022
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal	TBD	TBD	O7.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	TBD
Human Capital Management: NOSB technical support	JD	Proposal	07.31.20 NOP Memo to CACS	6.14.22 7.5.22 <mark>7.12.22</mark>	Fall 2022
NOP Risk Mitigation Table review	KS	Proposal	11.18.21 NOP Memo to NOSB. Assigned to CACS on 12.21.21 by Exec Cmte	6.14.22 7.5.22 7.12.22 8.9.22	Fall 2022
Organic and Climate-Smart Agriculture (Climate/Equity)	CD/NPP	Discussion document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	7.5.22 7.12.22 8.2.22 8.9.22	Fall 2022

Fall 2022 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	June 23, 2022
NOP - Draft Fall 2022 NOSB meeting agenda	Aug 5, 2022
NOSB - Fall 2022 proposals due to NOP	Aug 11, 2022
NOP - Post proposals	Aug 31, 2022
Public comment closes	Sep 29, 2022
NOP - Send compiled public comments to NOSB	~Oct 3, 2022
Public comment webinars	Oct 18 & 20, 2022
Fall 2022 NOSB meeting - Sacramento, CA	Oct 25 - 27, 2022
Final recommendations due	Nov 25, 2022

# Compliance, Accreditation & Certification Subcommittee (CACS) Notes Tuesday, August 2, 2022 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Kyla Smith (KS); Kim

Huseman (KH); Nate Powell-Palm (NPP); Mindee Jeffery (MJ) - observer

Absent: None

**Staff:** Michelle Arsenault (MA); Jennifer Tucker (JT); Laura Gallagher (LG)

## Agenda

Review July 12, 2022 notes

- Oversight to Deter fraud: Acreage/mass balance of yields (ADB/NPP) discuss proposal/vote
- Oversight to Deter fraud: Minimum Reporting Requirements/bills-of-lading (ADB/NPP) discuss disc. doc/vote
- Organic and Climate-Smart Agriculture (Climate/Equity) (CD) discuss proposal/vote
- Additional Items
- Adjourn

- July 12, 2022 notes were accepted as written
- Oversight to Deter fraud proposal (ADB/NPP). The CACS discussed the two components of this work agenda item: 1. A proposal on acreage/mass balance of yields and 2. A discussion document on minimum reporting requirements (formerly bills-of-lading).
  - Acreage/mass balance of yields (ADB). The CACS is proposing that acreage information be reported on organic certificates, which would aid in calculating approximate yields. The group discussed the taxonomy used to describe categories (livestock/crops/vegetables/fruits) and commodities and existing platforms that could be leveraged. NOP noted that the Organic Integrity Database (OID) includes a taxonomy that NOP invested significant work and resources in developing and that has been widely adopted by certifiers and data consumers. NOP noted that certifier reporting of acreage also decouples total acreage from commodity acreage. The lead will make some minor modifications to the draft document and the CACS will vote on the next call.
  - Minimum reporting requirements (formerly bills-of-lading) (NPP). The CACS briefly discussed this project, which has been rescoped to encompass more than just bills-of-lading. NPP will develop and circulate a draft later this week for discussion on the August 9 call.
- Organic and Climate-Smart Agriculture (Climate/Equity) proposal (CD). The lead sought feedback from NOSB members on a previous call and incorporated their comments into a draft document. The group had a robust conversation about the intent of the document, as emphasized in the NOP memo that tasked them with exploring "how organic can advance in tandem with climate-smart agriculture to support our planet and our farmers." Members suggested a proposal rather than a discussion document, and will include information demonstrating that organic farming is already climate-smart. A member also suggested making a connection between organic and other sectors of the food system. The audience for the proposal is the USDA and the organic community and trade. NPP will consult with the lead and will revise and recirculate the document before the next CACS call.
- Additional Items. None.
- The meeting was adjourned

#### **Previous CACS Notes**

#### Future call schedule (2nd & 4th Tuesdays 2:00 PM ET | 11:00 AM PT, except where noted.)

July 12, 2022

Oversight to Deter fraud (ADB/NPP). Discuss acreage/mass balance of yields NOSB Tech Support (JD). Discuss proposal/vote

Organic and Climate-Smart Agriculture (Climate/Equity). Discuss discussion document

## August 2, 2022

Oversight to Deter fraud: Acreage/mass balance of yields (ADB/NPP) - discuss proposal Oversight to Deter fraud: Minimum Reporting Requirements/bills-of-lading (ADB/NPP) - discuss disc. doc Organic and Climate-Smart Agriculture (Climate/Equity) (CD) - discuss proposal August 9, 2022

Oversight to Deter fraud: Acreage/mass balance of yields (ADB/NPP) - discuss proposal/vote Oversight to Deter fraud: Minimum Reporting Requirements/bills-of-lading (ADB/NPP) - discuss disc. doc/vote

NOP Risk Mitigation Table review (KS) - discuss proposal/vote

Organic and Climate-Smart Agriculture (Climate/Equity) (CD) - discuss proposal/vote

September 6, 2022

September 13, 2022

October 11, 2022

November 1, 2022

November 8, 2022

December 6, 2022

December 13, 2022

#### **Work Agenda**

Project	Contact	Doc Type	Notes*	Scheduled, Discussed, Voted	Target meeting
Oversight improvements to deter fraud: Modernization of organic traceability Fall 2022  1. Acreage/mass balance of yields (Prop) and  2. Minimum Reporting Requirements (DD)	ADB/NPP	Proposal, Discussion Doc	08.10.17 NOP Memo to CACS	6.14.22 7.12.22 8.2.22 8.9.22	Fall 2022
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Fall 2022 Milestones	Target dates (tentative)	
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Final recommendations due	Nov 25, 2022	

# Compliance, Accreditation & Certification Subcommittee (CACS) Notes Tuesday, July 12, 2022 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Kyla Smith (KS); Kim

Huseman (KH)

Absent: Nate Powell-Palm (NPP)

Staff: Michelle Arsenault (MA); Jennifer Tucker (JT); Laura Gallagher (LG)

#### Agenda

• Review July 5, 2022 notes

- NOSB Tech Support (JD). Discuss proposal/vote
- Oversight to Deter Fraud (ADB/NPP). Discuss acreage/mass balance of yields
- Risk Mitigation Table (KS). Discuss
- Organic and Climate-Smart Agriculture (Climate/Equity). Discuss discussion document
- Additional Items
- Adjourn

#### Discussion

- July 5, 2022 notes were accepted as written
- NOSB Tech Support (JD). The lead summarized the draft proposal, noting that there is overwhelming support among the community, NOSB, and NOP staff. The NOSB is putting forth suggestions for what could be completed by the technical support person/people, and will work with the NOP to refine the task list as needed. A member suggested some minor edits to the document for clarity, and the CACS moved to a vote. The proposal will be posted for public comment and will be on the agenda for the Fall 2022 NOSB meeting.

Motion to accept the proposal on NOSB technical support

Motion by: JD Seconded by: KH

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

- Oversight to Deter Fraud (ADB/NPP). The lead summarized the work to date on the acreage/mass balance of yields project. Several CACS members met with staff from the California Department of Food and Agriculture (CDFA) to talk about best practices, since CDFA already has well-established processes and guidelines. The Subcommittee discussed reporting structure and challenges with flexibility as conditions change. The CACS noted a recent press release from the Department of Justice regarding organic grain fraud, and briefly discussed this in the context of organic certificates and inspections. The lead also mentioned potential difficulties with international oversight, although the Strengthening Organic Enforcement rule (SOE) will likely help.
- **Risk Mitigation Table (KS).** The lead will draft a proposal based on feedback from NOP and CACS member and the Subcommittee will discuss it on the August 2 call.
- Organic and Climate-Smart Agriculture (Climate/Equity) (CD). The lead is working on a draft document and asked for feedback from members by July 22. NOP highlighted two resources that the CACS may find helpful as they develop the document: the <a href="memo">memo</a> that NOP sent to the CACS in February, which contains specific guidance, and the <a href="memo">USDA-wide climate change activities</a>. Members highlighted the benefits of the organic label as a multifaceted, systems-based approach, which positions it well in the climate-smart ag conversation. Such things as carbon capture, soil health, and the lack of pesticides and

chemicals, all factor into the issue. A member emphasized the importance of viewing it as a system, since it's much broader than just soil. The CACS will discuss the draft document on the August 2 call.

- Additional Items. None.
- The meeting was adjourned

#### **Previous CACS Notes**

## Future call schedule (2nd & 4th Tuesdays 2:00 PM ET | 11:00 AM PT, except where noted.)

July 12, 2022

Oversight to Deter fraud (ADB/NPP). Discuss acreage/mass balance of yields NOSB Tech Support (JD). Discuss proposal/vote

Organic and Climate-Smart Agriculture (Climate/Equity). Discuss discussion document

August 2, 2022

Oversight to Deter fraud (ADB/NPP). Discuss acreage/mass balance of yields; Bills-of-lading NOP Risk Mitigation Table review. Discuss proposal/vote

Organic and Climate-Smart Agriculture (Climate/Equity) - discuss

August 9, 2022

September 6, 2022

September 13, 2022

October 11, 2022

November 1, 2022

November 8, 2022

December 6, 2022

December 13, 2022

#### **Work Agenda**

Project	Contact	Doc Type	Notes*	Scheduled, Discussed, Voted	Target meeting
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Public comment webinars	Oct 18 & 20, 2022
Fall 2022 NOSB meeting - Sacramento, CA	Oct 25 - 27, 2022
Final recommendations due	Nov 25, 2022

# Compliance, Accreditation & Certification Subcommittee (CACS) Notes Tuesday, July 5, 2022 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Kyla Smith (KS); Nate

Powell-Palm (NPP)

Absent: Kim Huseman (KH)

Staff: Michelle Arsenault (MA); Jenny Tucker (JT); Laura Gallagher (LG)

## Agenda

- Review June 14, 2022 notes
- Risk Mitigation Table (KS) discuss in-scope/out-of-scope public comments from spring and finalize next steps
- Tech Support (JD) review draft proposal
- Climate Memo (CD) review framework
- Oversite to Deter fraud (ADB/NPP) review best practices
- Additional Items
- Adjourn

#### **Discussion**

- June 14, 2022 notes were accepted as written.
- **Risk Mitigation Table (KS).** The lead summarized the discussion from the last CACS call, and the group reviewed the current list of items under consideration for the next iteration of the proposal. The CACS would like to invite Rebecca Claypool of NOP to the next CACS call as they finalize the list. The CACS will include items that it is not sure about, and let the NOP determine if they are appropriate and in-scope.
- NOSB Tech Support Proposal (JD). The lead circulated a draft document, which includes public comment the NOSB received on the Spring 2022 discussion document. The group discussed outstanding questions, including the potential source of technical support and Board autonomy. Members discussed the independence of using another department within USDA versus an outside entity. Although it seems counterintuitive, if NOP contracts with an outside entity, then it (NOP) would oversee the contract, scope of work, and deliverables.
- Organic and Climate-Smart Agriculture (Climate/Equity) (CD). The lead has had discussions with
  stakeholders and is reviewing literature, and will work on a draft document to bring to a future call. She
  views this project as iterative and incremental. The NOSB Chair added that the <u>initial memo from NOP</u>
  contained a lot of information, and it may be helpful to revisit it as they move forward. The CACS is
  aiming for a document that frames the issue to seek public comment and to facilitate conversations.
- Oversite to Deter fraud (ADB/NPP). Deferred to next call due to lack of time.
- Additional Items. The NOSB Vice chair has engaged in conversations with CDFA to discuss the current best practices on acreage reporting.
- The meeting was adjourned

#### **Previous CACS Notes**

Future call schedule (2nd & 4th Tuesdays 2:00 PM ET | 11:00 AM PT, except where noted.)

July 5, 2022

July 12, 2022

Oversight to Deter fraud (ADB/NPP). Discuss acreage/mass balance of yields NOSB Tech Support (JD). Discuss proposal/vote

Organic and Climate-Smart Agriculture (Climate/Equity). Discuss discussion document

August 2, 2022

NOP Risk Mitigation Table review. Discuss proposal/vote

August 9, 2022

September 6, 2022

September 13, 2022

October 11, 2022

November 1, 2022

November 8, 2022

December 6, 2022

December 13, 2022

# **Work Agenda**

\*Highlight indicates discussion. \*Highlight indicates action needed. \*Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled, Discussed, Voted	Target meeting
Oversight improvements to deter fraud: Modernization of organic traceability Fall 2022  1. Acreage/mass balance of yields and  2. Bills-of-lading	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	6.14.22 7.12.22	Fall 2022
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Organic and Climate-Smart Agriculture (Climate/Equity)	CD	Discussion Document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	7.5.22 7.12.22	Fall 2022

Fall 2022 Milestones	Target dates (tentative)		
NOP - Publish FRN, Open public comment	~May 20, 2022		
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NOSB - Fall 2022 proposals due to NOP	Aug 11, 2022		
NOP - Post proposals	Aug 31, 2022		
Public comment closes	Sep 29, 2022		

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Public comment webinars	Oct 18 & 20, 2022
Fall 2022 NOSB meeting - Sacramento, CA	Oct 25 - 27, 2022
Final recommendations due	Nov 25, 2022

# Compliance, Accreditation & Certification Subcommittee (CACS) Notes Tuesday, June 14, 2022 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Mindee Jeffery (MJ); Kim

Huseman (KH); Kyla Smith (KS); Nate Powell-Palm (NPP)

Absent: None

Staff: Michelle Arsenault (MA); Rebecca Claypool (RC); David Glasgow (DG)

#### Agenda

Review May 10, 2022 notes

- NOP Risk Mitigation Table review (KS)
- NOSB tech support proposal (JD)
- Climate Memo framework discussion
- Acres on Certificates Define boundaries of confidential business information
- Additional Items
- Adjourn

- May 10, 2022 notes were accepted as written.
- NOP Risk Mitigation Table review (KS). Rebecca Claypool and David Glasgow joined the call to discuss the NOP Risk Mitigation Table proposal. The NOP asked the NOSB to review the table because there was an update to the ISO standards, which changed how accreditation bodies manage risk for impartiality. The CACS presented a document to the full NOSB at the Spring 2022 meeting, which was sent back to the Subcommittee for additional work. The document is intended for accreditation bodies, and some of the comments the NOSB received were outside of scope. The CACS is going to work on a document for the Fall meeting and will acknowledge concerns they heard from commenters. The NOP added that this is a living document and can be updated as needed.
- NOSB tech support proposal (JD). The NOP and organic stakeholders are supportive of this work agenda
  item. The lead will have a draft document ready for the next call. Outstanding questions for discussion
  include the following:
  - Where should support come from? Internal or external?
  - Would NOSB lose autonomy seeking outside help?
  - What are the costs involved and are ? Is this an issue? DG provided some feedback about possible issues.
- Climate Memo framework discussion (CD). The CACS will work on this project during the next meeting. The group discussed the idea of inviting guests to future calls. A member offered to share a link to a hearing occurring tomorrow in which the OFRF is participating.
- Acres on Certificates Define boundaries of confidential business information (CBI) (ADB). The CACS discussed CBI and how organic could be more transparent. Members discussed data collection, which some agencies do, and the need for data collection for the purposes of enforcement and identifying risk. NOP noted that it doesn't collect acreage data unless it's for enforcement activities. NOP also highlighted the risk management aspect, and reminded the group that organic is an opt-in standard. Members also discussed how this could impact different sectors of the organic community, and how it would apply to international equivalency agreements. The NOSB Vice Chair shared a link to a document from the California Department of Food and Ag (CDFA) as a reminder that CA has already done a lot of work on this realm.

**Additional Items.** The CACS added an extra call each month, and discussed moving it from the 4th Tuesday to a different week and day. NOP will search for a couple of options and let the group know.

## The meeting was adjourned

## **Previous CACS Notes**

## Future call schedule (2nd & 4th Tuesdays 2:00 PM ET | 11:00 AM PT, except where noted.)

June 14, 2022

NOSB tech support proposal

June 28, 2022

July 12, 2022

July 26, 2022

August 9, 2022

August 23, 2022

September 13, 2022

September 27, 2022

October 11, 2022

November 8, 2022

November 22, 2022

December 13, 2022

December 27, 2022

#### **Work Agenda**

Project	Contact	Doc Type	Notes*	Scheduled, Discussed, Voted	Target meeting
Oversight improvements to deter fraud: Modernization of organic traceability Fall 2022  1. Acreage/mass balance of yields and  2. Bills-of-lading	ADB/NPP	Proposal	08.10.17 NOP Memo to CACS	6.14.22 6.28.22	Fall 2022
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NOP Risk Mitigation Table review	KS	Proposal	11.18.21 NOP Memo to NOSB. Assigned to CACS on 12.21.21 by Exec Cmte	6.14.22 6.28.22	Fall 2022
Organic and Climate-Smart Agriculture (Climate/Equity)	CD	Discussion Document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.28.22	Fall 2022

Fall 2022 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	~May 20, 2022
NOP - Draft Fall 2022 NOSB meeting agenda	Aug 5, 2022
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Public comment webinars	Oct 18 & 20, 2022
Fall 2022 NOSB meeting - Sacramento, CA	Oct 25 - 27, 2022
Final recommendations due	Nov 25, 2022

# Compliance, Accreditation & Certification Subcommittee (CACS) Notes Tuesday, May 10, 2022 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Nate Powell-Palm (NPP);

Mindee Jeffery (MJ); Kim Huseman (KH)

Absent: Kyla Smith (KS)

**Staff:** Jennifer Tucker (JT); Laura Gallagher (LG); Michelle Arsenault (MA)

#### Agenda

Review April 12, 2022 notes

- Debrief from Spring 2022 NOSB meeting.
- Discuss ideas for the framework for the climate work agenda item
- Brainstorm additional topics for work agenda for the upcoming semester
- Finalize CACS meeting schedule
- Additional Items. June 14 or May 10 talk through RMT.
- Adjourn

- April 12, 2022 notes were accepted as written.
- Debrief from Spring 2022 NOSB meeting.
  - The Chair thanked the group for their flexibility at the meeting to continue the discussion of the Modernization of organic traceability later in the meeting.
  - Oversight improvements to deter fraud: Modernization of organic traceability Fall 2022: The CACS discussed decoupling two topics within this project: Acreage and universal bills-of-lading. The intent is to aggregate acreage information into the organic certificate, and with regard to the bills-of-lading piece, the intent is to improve usability and standardization. The lead will look more closely at the confidential business information (CBI) component, and NOP will seek feedback from within the USDA from personnel who can speak to CBI, such as technology and privacy officers. The group also discussed the idea of a universal Organic System Plan (OSP), which has mixed certifier support, crop insurance, and the cost share program. The NOSB Chair asked about inviting Natural Resources Conservation Service(NRCS) or Farm Service Agency (FSA) to a future call to discuss.
  - NOSB tech support (JD). The lead summarized the feedback from the Spring meeting, and laid out the possible paths forward. The two main questions/concerns are how to fund NOSB tech support, and how to protect the Board's autonomy. The organic community was supportive of the project.
  - Risk Mitigation Table. NOP is reviewing the public comments to determine if the scope of the Risk Mitigation Table needs to be revised or updated. If so, the NOP may ask the CACS to continue work on this.
- Climate work agenda item (CD). The CACS would like to reach out to the community seeking ideas for what this project could and should look like. Given that climate change is a broad topic, the group will put some boundaries on it. The lead will sketch out some directions and present that to the CACS on a future call.
- Additional topics for work agenda. The CACS has a full schedule and will not add any new topics at this
  time.
- **Finalize CACS meeting schedule.** The CACS would like to add meeting time each month and discussed adding 30 minutes to the current call, which also requires swapping the CACS call with the Materials Subcommittee call. The NOP will work with the CACS to find a solution.

- Additional Items. The CACS is interested in inviting guest speakers to the calls to provide feedback on the climate change discussion. A member reminded the group of an upcoming organic farming research day at USDA, being held in Beltsville, MD and virtually, and noted that Michel Cavigelli, a soil scientist with ARS, who is leading the field day, would be a valuable speaker.
- The meeting was adjourned

## **Previous CACS Notes**

#### Future call schedule (2nd & 4th Tuesdays 2:00 PM ET | 11:00 AM PT, except where noted.)

April 12, 2022

May 10, 2022

June 14, 2022

NOSB tech support proposal

June 28, 2022

July 12, 2022

July 26, 2022

August 9, 2022

August 23, 2022

September 13, 2022

September 27, 2022

October 11, 2022

November 8, 2022

November 22, 2022

December 13, 2022

December 27, 2022

#### **Work Agenda**

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	Organic and Climate-Smart Agriculture (Climate/Equity)	CD	Discussion Document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	6.14.22	Fall 2022
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Fall 2022 NOSB meeting - Sacramento, CA	Oct 25 - 27, 2022
Final recommendations due	Nov 25, 2022

# Compliance, Accreditation & Certification Subcommittee (CACS) Notes Tuesday, April 12, 2022 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Nate Powell-Palm (NPP);

Kyla Smith (KS); Mindee Jeffery (MJ)

**Absent:** None

**Staff:** Jennifer Tucker (JT); Laura Gallagher (LG); Michelle Arsenault (MA)

#### Agenda

Review March 8, 2022 14, 2022 notes

- Review upcoming oral comments and board meeting agenda
- Discuss ideas for the framework for the climate work agenda item
- Brainstorm additional topics for work agenda for the upcoming semester
- Finalize updated CACS meeting schedule
- Additional Items
- Adjourn

- March 8, 2022 notes were accepted as written.
- Review written comments and board meeting agenda.
  - NOSB technical support: The CACS received a number of comments on the NOSB technical support document. Commenters addressed the topics thoughtfully, and the CACS is looking forward to further discussion at the NOSB meeting. The group discussed how other USDA agencies would factor into the decision if the Board were to choose to seek technical support from within the USDA. Members also discussed benefits and challenges of chooses external versus internal assistance.
  - Risk management table: The CACS received detailed comments and looks forward to discussing this more at the NOSB meeting. The CACS will summarize the comments and forward those along with the recommendation to NOP after the meeting.
  - Modernization of organic traceability: The lead posed questions to the group regarding the document and feedback from the community regarding acreage reporting, non-compliances, information sharing, etc.
- Framework for the climate work agenda item. The CACS received comments despite the fact that there is no document yet. The NOP sent a memo to the CACS in February asking them to work on a climate change project, and the CACS will discuss the topic on a future call. Members are supportive of making sure organic is at the forefront of the conversation. The group also discussed the possibility of holding an expert panel at a future NOSB meeting. NOP supports this idea. A member cautioned the group about gaps in research, and about difficulties when comparing the US to the EU. After the Spring meeting, the CACS will discuss the scope the project.
- A member shared a link to an upcoming organic farming research event being held in Maryland (and virtually) by a soil scientist at the USDA Agricultural Research Service (ARS), which will include discussions on future organic research topics.
- Additional topics for work agenda for the upcoming semester. Deferred to later call.
- **Finalize CACS meeting schedule.** The CACS would like to either add an additional call each month or add 30 minutes to its existing call. In order to add 30 extra minutes, it would require swapping the call time with the Materials Subcommittee and starting a half-hour earlier. Another option would be to hold an additional meeting on a different day of the week. NOP will check with the MS Chair and members.
- Additional Items. None.
- The meeting was adjourned

# **Previous CACS Notes**

# Future call schedule (2<sup>nd</sup> Tuesday 2:00 PM ET | 11:00 AM PT, except where noted.)

March 8, 2022

April 12, 2022

May 10, 2022

June 14, 2022

July 12, 2022

August 9, 2022

September 13, 2022

October 11, 2022

November 8, 2022

December 13, 2022

# **Work Agenda**

\*Highlight indicates discussion. \*Highlight indicates action needed. \*Highlight indicates review completion and/or vote.

Project	Contact	<b>Doc Type</b>	Notes*	Scheduled, Discussed, Voted	Target meeting
Oversight improvements to deter fraud: Modernization of organic traceability Spring 2022	ADB/NPP	Discussion Document	08.10.17 NOP Memo to CACS	11.9.21 12.14.21 1.11.22 1.25.22 2.14.22	Spr 2022
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal	TBD	TBD	07.31.20 NOP Memo to CACS.  Proposal passed at April 2021  NOSB meeting. Will remain an active agenda item for future work	TBD	TBD
Human Capital Management: NOSB technical support	JD	Discussion Document	07.31.20 NOP Memo to CACS	11.9.21 12.14.21 1.11.22 1.25.22 2.14.22	Spr 2022
NOP Risk Mitigation Table review	KS	Proposal	11.18.21 NOP Memo to NOSB. Assigned to CACS on 12.21.21 by EC	1.25.22 2.8.22	Spr 2022
Organic and Climate-Smart Agriculture (Climate/Equity)	CD	Discussion Document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS 02.23.22	1.11.22 1.25.22	Fall 2022

Spring 2022 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	Mar 3, 2022
NOSB - Spring 2022 proposals due to NOP	Feb 16, 2022

New NOSB member training	Mar 16 - 18, 2022
NOP - Draft Spring 2022 NOSB meeting tentative agenda	Feb 2, 2022
NOP - Post proposals	Mar 3, 2022
Public comment closes	Apr 1, 2022
NOP - Send compiled public comments to NOSB	Apr 4, 2022
Public comment webinars	Apr 19 & 21, 2022
Spring 2022 NOSB meeting - Crystal City, VA	Apr 26 - 28, 2022
Final recommendations due	May 27, 2022

# Compliance, Accreditation & Certification Subcommittee (CACS) Notes Tuesday, March 8, 2022 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Nate Powell-Palm (NPP)

**Absent:** Kyla Smith (KS)

**Staff:** Jennifer Tucker (JT); Laura Gallagher (LG); Michelle Arsenault (MA)

#### Agenda

- Review February 14, 2022 notes
- · Review spring meeting agenda
- Review climate letter confirm that CACS committee will work on this
- Additional Items
- Adjourn

#### Discussion

- **February 14, 2022 notes** were accepted as written.
- **Review spring meeting agenda.** The CACS discussed the three agenda items for the Spring meeting. They have one hour for two discussion documents and one proposal
- Review climate letter (CD). The NOSB Chair confirmed that the CACS committee will work on this topic
  for the upcoming semester. The lead has some upcoming meetings and will be discussing both climate
  change and equity and will bring that info back to the CACS. NOP added that the memo was based on a
  framework from the previous CACS work, similar to the import oversight and human capital projects,
  which are longer-term "umbrella" work agenda items.
- Additional Items.
  - NOSB Current and Past, was a topic that a CACS member proposed, but for now they will table
     it. The CACS may talk more about it when they meet in person, rather than virtually.
  - A member mentioned that crop insurance is an issue that needs to be addressed, even though it is not under the purview of NOSB or NOP, it is important to discuss its relationship to organic, and potential barriers. The member added that it could be a good fit with the climate-smart-ag initiative. Another member added that crop insurance is very complicated and important, and proposed a crop insurance panel or NOP-hosted educational webinars.
  - The CACS discussed a possible research priority on crop insurance to assess what is currently out there, what gaps exist, and what the barriers are. This may be a great question to ask NIFA at the spring NOSB meeting. Perhaps the Risk Management Agency (RMA) could guest speak on a future CACS call. The NOSB Chair will formulate question(s) for NIFA, and will also try to tie risk management into climate change and crop Insurance.
  - The CACS will discuss swapping call times with the PDS, in order to give the CACS more time to meet. If that does not work, they may add a second call each month.
- The meeting was adjourned

#### **Previous CACS Notes**

Future call schedule (2<sup>nd</sup> Tuesday 2:00 PM ET | 11:00 AM PT, except where noted.)

February 14, 2022 (Monday - Additional call)

NOSB tech-support discussion doc (JD) - discuss/vote

Oversight improvements to deter fraud: Modernization of Supply Chain Traceability discussion doc (ADB/NP) - discuss/vote

NOSB Current and Past (CD) - discuss

March 8, 2022

April 12, 2022

May 10, 2022

June 14, 2022

July 12, 2022

August 9, 2022

September 13, 2022

October 11, 2022

November 8, 2022

December 13, 2022

# **Work Agenda**

\*Highlight indicates discussion. \*Highlight indicates action needed. \*Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled, Discussed, Voted	Target meeting
Oversight improvements to deter fraud: Modernization of organic traceability Spring 2022	ADB/NPP	Discussion Document	08.10.17 NOP Memo to CACS	11.9.21 12.14.21 1.11.22 1.25.22 2.14.22	Spr 2022
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal	TBD	TBD	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	TBD
Human Capital Management: NOSB technical support	JD	Discussion Document	07.31.20 NOP Memo to CACS	11.9.21 12.14.21 1.11.22 1.25.22 2.14.22	Spr 2022
NOP Risk Mitigation Table review	KS	Proposal	11.18.21 NOP Memo to NOSB. Assigned to CACS on 12.21.21 by EC	1.25.22 2.8.22	Spr 2022
Climate/Equity	CD	Discussion Document	Approved by Exec Cmmte/NOP 1.18.22. Memo sent to CACS XX.XX.XX	1.11.22 1.25.22	Fall 2022

Spring 2022 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	Mar 3, 2022
NOSB - Spring 2022 proposals due to NOP	Feb 16, 2022
New NOSB member training	Mar 16-18, 2022

NOP - Draft Spring 2022 NOSB meeting tentative agenda	Feb 2, 2022
NOP - Post proposals	Mar 3, 2022
Public comment closes	Apr 1, 2022
NOP - Send compiled public comments to NOSB	Apr 4, 2022
Public comment webinars	Apr 19 & 21, 2022
Spring 2022 NOSB meeting - Crystal City, VA	Apr 26 - 28, 2022
Final recommendations due	May 27, 2022

# Compliance, Accreditation & Certification Subcommittee (CACS) Notes Monday, February 14, 2022 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Nate Powell-Palm (NPP);

Kyla Smith (KS) **Absent:** None

Staff: Michelle Arsenault (MA)

### Agenda

- Review February 8, 2022 notes
- NOSB tech-support discussion doc (JD) discuss/vote
- Oversight improvements to deter fraud: Modernization of Supply Chain Traceability Spring 2022 discussion doc (ADB/NP) discuss/vote
- NOSB Current and Past (CD) discuss
- Adjourn

#### Discussion

- **February 8, 2022 notes** were accepted as written.
- NOSB tech-support discussion document (JD). The lead summarized the document, noting the
  modifications made based on feedback since the last call. The CACS moved to a vote on the document
  and will forward it to the NOP for posting at the Spring meeting.

Motion to accept the discussion document on NOSB technical support

Motion by: JD Seconded by: KS

Additional Discussion: None

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

Oversight improvements to deter fraud: Modernization of Supply Chain Traceability Spring 2022
discussion document (ADB/NP). The group discussed the draft document, made some minor edits, and
moved to a vote. The CACS will post this document for the Spring meeting.

Motion to accept the discussion document on Oversight Improvements to Deter Fraud: Modernization of Supply Chain Traceability Spring 2022

Motion by: ADB Seconded by: NPP

Additional Discussion: None

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

- NOSB Current and Past (CD). The lead explained the impetus behind the idea for this document, which
  is two-fold: to inform new members and remind other members about the broader NOSB mandate; and
  to seek historical information about the sunset process and what the resolution was after the lawsuit
  and court ruling. The lead also noted the value in having the conversation as a full Board. The group
  discussed how to move forward, if at all, and will discuss this on the next call.
- Additional Items. None.
- The meeting was adjourned

### **Previous CACS Notes**

# Future call schedule (2<sup>nd</sup> Tuesday 2:00 PM ET | 11:00 AM PT, except where noted.)

February 8, 2022

Review January 11, 2022 notes

Review January 25, 2022 notes

NOSB tech-support doc (JD) - discuss/vote

Risk Management Table (KS) - discuss/vote

Oversight improvements to deter fraud: Modernization of Supply Chain Traceability (ADB/NP) - discuss/vote

Climate Change/Equity Update (CD) - discuss/vote

# February 14, 2022 (Monday - Additional call)

NOSB tech-support discussion doc (JD) - discuss/vote

Oversight improvements to deter fraud: Modernization of Supply Chain Traceability discussion doc (ADB/NP) - discuss/vote

NOSB Current and Past (CD) - discuss

March 8, 2022

April 12, 2022

May 10, 2022

June 14, 2022

July 12, 2022

August 9, 2022

September 13, 2022

October 11, 2022

November 8, 2022

December 13, 2022

### **Work Agenda**

\*Highlight indicates discussion. \*Highlight indicates action needed. \*Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled, Discussed, Voted	Target meeting
Oversight improvements to deter fraud: Modernization of organic traceability infrastructure Spring 2022	ADB/NPP	Discussion Document	08.10.17 NOP Memo to CACS	11.9.21 12.14.21 1.11.22 1.25.22 2.14.22	Spr 2022
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal	TBD	TBD	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	TBD
Human Capital Management: NOSB technical support	JD	Discussion Document	07.31.20 NOP Memo to CACS	11.9.21 12.14.21 1.11.22 1.25.22 2.14.22	Spr 2022

NOP Risk Mitigation Table review	KS	Proposal	11.18.21 NOP Memo to NOSB. Assigned to CACS on 12.21.21 by EC	1.25.22 2.8.22	Spr 2022
Climate/Equity	CD	Discussion Document	Approved by Exec Cmmte/NOP 1.18.22	1.11.22 1.25.22	Fall 2022

Spring 2022 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	~Nov 12, 2021
NOSB - Spring 2022 proposals due to NOP	Feb 16, 2022
New NOSB member training	TBD
NOP - Draft Spring 2022 NOSB meeting tentative agenda	Feb 2, 2022
NOP - Post proposals	Mar 3, 2022
Public comment closes	Apr 1, 2022
NOP - Send compiled public comments to NOSB	Apr 4, 2022
Public comment webinars	Apr 19 & 21, 2022
Spring 2022 NOSB meeting - Crystal City, VA	Apr 26 - 28, 2022
Final recommendations due	May 27, 2022

# Compliance, Accreditation & Certification Subcommittee (CACS) Notes Tuesday, February 8, 2022 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Nate Powell-Palm (NPP);

Kyla Smith (KS); Mindee Jeffery (MJ) - observer

Absent: None

Staff: Jenny Tucker (JT); Michelle Arsenault (MA); Laura Gallagher (LG)

### Agenda

- Review January 11, 2022 notes
- Review January 25, 2022 notes
- NOSB tech-support discussion document (JD) discuss/vote
- Risk Management Table (KS) discuss/vote
- Oversight improvements to deter fraud: Modernization of Supply Chain Traceability (ADB/NP) discuss/vote
- NOSB (CD) discuss/vote
- Adjourn

#### Discussion

- January 11, 2022 notes were accepted as written.
- January 25, 2022 notes were accepted as written.
- NOSB tech-support discussion document (JD). The lead summarized the draft document noting the two
  tasks in front of the CACS and NOSB. First, to confirm that the NOSB does want technical assistance and
  whether that assistance should come from the USDA or from the non-profit/university community. The
  CACS will submit a discussion document for the Spring 2022 meeting. The lead will circulate a revised
  draft for vote on February 14.
- Risk Mitigation Table Review (KS). The lead thanked the members for feedback and the CACS moved to a vote on the proposal.

Motion to accept the proposal on NOP's Risk Mitigation Table

Motion by: KS Seconded by: NPP

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

- Oversight improvements to deter fraud: Modernization of Supply Chain Traceability Discussion
   Document (ADB/NP). The leads circulated a draft discussion document and the CACS discussed it. The
   CACS added an additional call on February 14 to complete the vote.
- NOSB Current and Past (CD). A member proposed a topic for conversation regarding the role of the NOSB, based on the initial intent of OFPA. The CACS discussed the idea and what the goal of this would be. A member noted that if the goal is to suggest changes to OFPA, that would require negotiations within the framework of the Farm Bill and Congress. The CACS will talk more about this on the February 14 call.
- Additional Items. The CACS added a call on February 14 to complete two votes.
- The meeting was adjourned

### **Previous CACS Notes**

# Future call schedule (2<sup>nd</sup> Tuesday 2:00 PM ET | 11:00 AM PT, except where noted.)

January 25, 2022

NOP Risk Mitigation Table - Assign lead/Discuss

February 08, 2022

Review January 11, 2022 notes

Review January 25, 2022 notes

NOSB tech-support doc (JD) - discuss/vote

Risk Management Table (KS) - discuss/vote

Oversight improvements to deter fraud: Modernization of Supply Chain Traceability (ADB/NP) -

discuss/vote

Climate Change/Equity Update (CD) - discuss/vote

February 14, 2022 (Monday - Additional call)

NOSB tech-support discussion doc (JD) - discuss/vote

Oversight improvements to deter fraud: Modernization of Supply Chain Traceability discussion doc (ADB/NP) - discuss/vote

March 08, 2022

April 12, 2022

May 10, 2022

June 14, 2022

July 12, 2022

August 09, 2022

September 13, 2022

October 11, 2022

November 08, 2022

December 13, 2022

## **Work Agenda**

\*Highlight indicates discussion. \*Highlight indicates action needed. \*Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled, Discussed, Voted	Target meeting
Oversight improvements to deter fraud: Modernization of organic traceability infrastructure/Supply Chain Verification	ADB/NPP	Discussion Document	08.10.17 NOP Memo to CACS	11.9.21 12.14.21 1.11.22 1.25.22 2.14.22	Spr 2022
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal	TBD	TBD	07.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	TBD
Human Capital Management: NOSB support	JD	Discussion Document	07.31.20 NOP Memo to CACS	11.9.21 12.14.21 1.11.22 1.25.22 2.14.22	Spr 2022

NOP Risk Mitigation Table review	KS	Proposal	11.18.21 NOP Memo to NOSB. Assigned to CACS on 12.21.21 by EC	1.25.22 <mark>2.8.22</mark>	Spr 2022
Climate/Equity	CD	Discussion Document	Approved by Exec Cmmte/NOP 1.18.22	1.11.22 1.25.22	Fall 2022

Spring 2022 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	~Nov 12, 2021
NOSB - Spring 2022 proposals due to NOP	Feb 16, 2022
New NOSB member training	TBD
NOP - Draft Spring 2022 NOSB meeting tentative agenda	Feb 2, 2022
NOP - Post proposals	Mar 3, 2022
Public comment closes	Apr 1, 2022
NOP - Send compiled public comments to NOSB	Apr 4, 2022
Public comment webinars	Apr 19 & 21, 2022
Spring 2022 NOSB meeting - Crystal City, VA	Apr 26 - 28, 2022
Final recommendations due	May 27, 2022

# Compliance, Accreditation & Certification Subcommittee (CACS) Notes Tuesday, January 25, 2022 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Nate Powell-Palm (NPP);

Kyla Smith (KS) **Absent:** None

Staff: Jenny Tucker (JT); Michelle Arsenault (MA); Laura Gallagher (LG)

### Agenda

- NOSB tech-support doc review update (JD)
- Climate Change/Equity Update (CD)
- Risk Management Table (KS) NOP Memo to NOSB Risk Mitigation Table (usda.gov)
- Supply Chain Verification Update (ADB/NP)
- Additional Items
- Adjourn

#### Discussion

- NOSB tech-support doc review update (JD). The lead expressed support for this work given the
  workload of the NOSB. Members discussed several facets of the project including barriers to finding the
  appropriate expertise, and the perception that the NOSB does not have autonomy from the NOP. The
  CACS is considering the pros and cons of seeking support from non-profits/universities, versus a
  department within the USDA, but outside of NOP. The discussion document will include an excerpt from
  the NOPs statement of work and the CACS will seek feedback from the organic stakeholders at the
  Spring 2022 NOSB Meeting.
- NOP Risk Mitigation Table. KS will lead this project and is seeking feedback from the other Subcommittee members. The CACS intends on presenting a discussion document at the Spring 2022 NOSB meeting to gather feedback from stakeholders before sending its response to the NOP.
- Climate Change/Equity Update (CD). The lead indicated that this project is vast, and she is still working
  on scoping, but may produce a brief discussion document for the Spring NOSB meeting to introduce the
  topic and start a discussion. The NOP will be sending the CACS a work agenda item on this topic, which
  may initiate a document for the Fall 2022 meeting.
- Supply Chain Verification Update (ADB/NPP). The leads indicated that this is a work in progress and the group had a robust conversation about best practices and next steps for aspects such as tech support for the community and how enhanced data collection could possibly assist in identifying fraud. Members discussed the use of the Organic Integrity Database to input data, and the benefits and challenges associated with that. A member noted that the Strengthening Organic Enforcement (SOE) rule does have data requirements that may address this need, and it might be better to wait until it is published before they move forward.
- Additional Items. None
- The meeting was adjourned

### **Previous CACS Notes**

Future call schedule (2<sup>nd</sup> Tuesday 2:00 PM ET | 11:00 AM PT, except where noted.)

January 11, 2022

January 25, 2022

NOP Risk Mitigation Table - Assign lead/Discuss

### February 08, 2022

Review January 11, 2022 notes

Review January 25, 2022 notes

NOSB tech-support doc (JD) - discuss/vote

Risk Management Table (KS) - discuss/vote

Oversight improvements to deter fraud: Supply Chain Verification Update (ADB/NP) - discuss/vote Climate Change/Equity Update (CD) - discuss/vote

March 08, 2022

April 12, 2022

May 10, 2022

June 14, 2022

July 12, 2022

August 09, 2022

September 13, 2022

October 11, 2022

November 08, 2022

December 13, 2022

## **Work Agenda**

\*Highlight indicates discussion. \*Highlight indicates action needed. \*Highlight indicates review completion and/or vote.

Project	Contact	<b>Doc Type</b>	Notes*	Scheduled, Discussed, Voted	Target meeting
Oversight improvements to deter fraud: Modernization of organic traceability infrastructure/Supply Chain Verification	ADB/NPP	Discussion Document	08.10.17 NOP Memo to CACS	11.9.21 12.14.21 1.11.22 1.25.22 2.8.22	Spr 2022
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal	TBD	TBD	O7.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	TBD
Human Capital Management: NOSB support	JD	Discussion Document	07.31.20 NOP Memo to CACS	11.9.21 12.14.21 1.11.22 1.25.22 2.8.22	Spr 2022
NOP Risk Mitigation Table review	KS	Discussion Document	11.18.21 NOP Memo to NOSB. Assigned to CACS on 12.21.21 by EC	1.25.22 2.8.22	Spr 2022
Climate/Equity	CD	Discussion Document	Approved by Exec Cmmte/NOP 1.18.22	1.11.22 1.25.22 2.8.22	Spr 2022

Spring 2022 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	~Nov 12, 2021
NOSB - Spring 2022 proposals due to NOP	Feb 16, 2022
New NOSB member training	TBD
NOP - Draft Spring 2022 NOSB meeting tentative agenda	Feb 2, 2022
NOP - Post proposals	Mar 3, 2022
Public comment closes	Apr 1, 2022
NOP - Send compiled public comments to NOSB	Apr 4, 2022
Public comment webinars	Apr 19 & 21, 2022
Spring 2022 NOSB meeting - Crystal City, VA	Apr 26 - 28, 2022
Final recommendations due	May 27, 2022

# Compliance, Accreditation & Certification Subcommittee (CACS) Notes Tuesday, January 11, 2022 2:00 pm ET

Present: Amy Bruch (ADB), Chair; Jerry D'Amore (JD), Vice Chair; Carolyn Dimitri (CD); Steve Ela (SE); Nate

Powell-Palm (NPP); Kyla Smith (KS); Mindee Jeffery (MJ) - observer.

Absent: None

Staff: Michelle Arsenault (MA); Laura Gallagher (LG)

### Agenda

- Review December 14, 2021 notes
- Tech-Support for NOSB RFA (CD/NPP)
- Climate/Equity (CD)
- Oversight Improvements to deter fraud (ADB/NPP)
- NOP Risk Mitigation Table (Assigned to CACS 12.21.21) Assign lead/Discuss
- Additional Items
- Adjourn

#### Discussion

- December 14, 2021 notes were accepted with a minor correction.
- Tech-Support for NOSB RFA (CD/NPP). The NOP drafted a proposal seeking assistance for the NOSB
  members, and the CACS will review the draft and provide feedback. The group discussed whether to
  seek assistance from non-profits and outside organizations, or to solicit help from within the
  government/USDA, but outside of NOP/AMS.
- Climate/Equity (CD). The lead introduced the issues that the Board proposes to address with this project and will write a request to add this to the CACS work agenda. The Chair will forward the request to the Executive team for discussion on the January 18 call. Members discussed possible topics and content for consideration.
- Oversight Improvements to deter fraud (ADB/NPP). The lead summarized feedback from the community from the Fall meeting regarding goals, outstanding questions, and the focus going forward. The CACS discussed whether to produce a document for the Spring meeting or to wait until other external pieces move ahead, specifically the final rule for Strengthening Organic Enforcement (SOE).
- NOP Risk Mitigation Table (Assigned to CACS 12.21.21). Deferred to January 25 call.
- Additional Items. None.
- The meeting was adjourned

### **Previous CACS Notes**

### Future call schedule (2<sup>nd</sup> Tuesday 2:00 PM ET | 11:00 AM PT, except where noted.)

December 14, 2021

Oversight improvements to deter fraud: Modernization of organic traceability infrastructure (ADB/NPP) Finalize Potential Work Agenda Topics (AB)

January 11, 2022 January 25, 2022

NOP Risk Mitigation Table - Discuss

February 08, 2022

March 08, 2022

April 12, 2022

May 10, 2022 June 14, 2022 July 12, 2022 August 09, 2022 September 13, 2022 October 11, 2022 November 08, 2022 December 13, 2022

# **Work Agenda**

\*Highlight indicates discussion. \*Highlight indicates action needed. \*Highlight indicates review completion and/or vote.

Project	Contact	Doc Type	Notes*	Scheduled, Discussed, Voted	Target meeting
Oversight improvements to deter fraud: Modernization of organic traceability infrastructure	ADB/NPP	Discussion Document	08.10.17 NOP Memo to CACS	11.9.21 12.14.21 1.11.22 2.8.22	Spr 2022
Human Capital Management: Inspector mentorship/ apprenticeship/consistency proposal	TBD	TBD	O7.31.20 NOP Memo to CACS. Proposal passed at April 2021 NOSB meeting. Will remain an active agenda item for future work	TBD	TBD
Human Capital Management: NOSB support	CD/NPP	DD/Proposal?	07.31.20 NOP Memo to CACS	11.9.21 12.14.21 1.11.22 2.8.22	Spr 2022
NOP Risk Mitigation Table review	TBD	TBD	11.18.21 NOP Memo to NOSB. Assigned to CACS on 12.21.21 by EC	1.25.22	Spr 2022
Climate/Equity	CD	TBD	Pending approval by Exec Cmmte/NOP.	1.11.22 2.8.22	TBD

Spring 2022 Milestones	Target dates (tentative)
NOP - Publish FRN, Open public comment	~Nov 12, 2021
NOSB - Spring 2022 proposals due to NOP	Feb 16, 2022
New NOSB member training	TBD
NOP - Draft Spring 2022 NOSB meeting tentative agenda	Feb 2, 2022
NOP - Post proposals	Mar 3, 2022
Public comment closes	Apr 1, 2022

NOP - Send compiled public comments to NOSB	Apr 4, 2022
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Spring 2022 NOSB meeting - Crystal City, VA	Apr 26 - 28, 2022
Final recommendations due	May 27, 2022