

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

Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, February 3, 2026 4:00 pm

Present: Kathryn Deschenes (KD), Chair; Cat McCluskey (CM) Vice Chair; Allison Johnson (AJ); Amanda Felder (AF)

Absent: None

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

Agenda

- Review January 23, 2026 notes
- eCommerce Labeling discussion doc (KD) - discuss/vote
- Consistency in Organic Seed Use discussion doc (AJ/CM) - discuss
- Additional items
- Adjourn

Discussion

- **January 23, 2026 notes** were accepted as written.
- **eCommerce Labeling discussion doc (KD).** The original discussion document was due to be discussed at the Fall 2025 meeting, and was deferred to the Spring 2026 meeting. The lead incorporated comments submitted at the Fall meeting, and the CACS will discuss and finalize the document during the Feb 10 meeting.
- **Residue testing proposal.** The lead writer will amend the document based on the conversation the CACS had on January 23. The CACS will discuss again on the February 10 call.
- **Consistency in Organic Seed Use discussion doc (AJ/CM).** The co-leads discussed how to move this project forward. Members will revisit the previous two NOSB recommendations for Strengthening Organic Seed Guidance 5029 (from 2018 and 2019) to bring the new members of the Subcommittee up to speed. At this time, the CACS intends to present a document at the Fall 2026 meeting.
- **Additional items.** None.
- **The meeting was adjourned.**

Previous CACS Notes

January 23, 2026 (Friday) - additional call. 1:30 - 2:30 ET

Residue testing (§205.670 and UREC definition) proposal (KS/ADB) - discuss

February 3, 2026

eCommerce Labeling proposal (KD) - discuss/vote

Consistency in Organic Seed Use discussion doc (AJ/CM) - discuss

February 10, 2026

eCommerce Labeling proposal (KD) - discuss/vote

Residue testing (§205.670 and UREC definition) proposal (KS/ADB) - discuss/vote

March 3, 2026

Consistency in Organic Seed Use (AJ/CM)

March 10, 2026

April 7, 2026

April 14, 2026

May 5, 2026

May 12, 2026

Work Agenda

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

Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Residue Testing for a Global Supply Chain: Regulation Review (\$205.670 and UREC definition)	KD	Proposal	Approved by Exec Cmmte/NOP 4.17.23	1.6.26 1.23.26 2.3.26 2.10.26	Spr 2026
Consistency in Organic Seed Use - Panel? - Guest speakers?	AJ/CM	Discussion Document	Approved by Exec Cmmte 6.18.23, and NOP 6.20.24	5.13.25 6.3.25 7.1.25 8.5.25 12.9.25 3.3.26	Fall 2026
eCommerce Labeling	KD/KS	Proposal	Memo sent to NOP 5.13.25	7.1.25 8.19.25 12.9.25 2.3.26 2.10.26	Spr 2026

Milestones

Spring 2026 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~Jan 24, 2026	16 -20
NOP - Draft Spring 2026 NOSB meeting tentative agenda	Feb 19, 2026	~ 10
NOSB - Spring 2026 proposals due to NOP	Feb 26, 2026	~ 9
NOP - Post proposals/Open comment period	Mar 16, 2026	7.5
Public comment closes	Apr 16, 2026	3.5
NOP - Send compiled public comments to NOSB	Apr 22, 2026	3
Public comment webinars	May 5 & 7, 2026	1
Spring 2026 NOSB meeting - Omaha, NE (TENTATIVE)	May 12 - 14, 2026	0
Final recommendations due	Jun 14, 2026	30 days post meeting

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Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Friday, January 23, 2026 1:30 pm ET

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

Absent: Cat McCluskey (CM)

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

Agenda

- Review January 6, 2026 notes
- Residue testing (§205.670 and UREC definition) draft proposal (KS/ADB) - discuss/vote
- Additional items
- Adjourn

Discussion

- **January 6, 2026 notes** were accepted as written.
- **Residue testing (§205.670 and UREC definition) draft proposal (KS/ADB).** The lead authors introduced the document and highlighted several sections that were updated since the last discussion such as cost, public access to results, unintended residual environmental contamination (UREC), and downstream notification. The comments from the last two NOSB meetings are summarized in the document. The co-leads are both rotating off the Board as of today, and the group talked about next steps for both the NOSB and the NOP. The document was transitioned to KD to lead, and the CACS will discuss minor changes before voting on the document to present at the Spring 2026 NOSB meeting.
- **Additional items.** The group bid farewell to the three outgoing members.
- **The meeting was adjourned.**

Previous CACS Notes

January 6, 2026

Residue testing (§205.670 and UREC definition) disc doc (KS/ADB) - discuss

January 13, 2026 - meeting to replace fall meeting

January 23, 2026 (Friday) - additional call. 1:30 - 2:30 ET

Residue testing (§205.670 and UREC definition) proposal (KS/ADB) - discuss

February 3, 2026

Residue testing (§205.670 and UREC definition) proposal (KS/ADB) - discuss/vote

eCommerce Labeling discussion doc (KD) - discuss/vote

Consistency in Organic Seed Use discussion doc (AJ/CM) - discuss

February 10, 2026

March 3, 2026

March 10, 2026

April 7, 2026

April 14, 2026

May 5, 2026

May 12, 2026

Work Agenda

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Residue Testing for a Global Supply Chain: Regulation Review (\$205.670 and UREC definition)	KS/ADB -> KD	Proposal	Approved by Exec Cmmte/NOP 4.17.23	1.6.26 1.23.26 2.3.26	Spr 2026
Consistency in Organic Seed Use - Panel? - Guest speakers?	AJ/CD/CM	Discussion Document	Approved by Exec Cmmte 6.18.23, and NOP 6.20.24	5.13.25 6.3.25 7.1.25 8.5.25 12.9.25 2.3.26	Spr 2026
eCommerce Labeling	KD/KS	Discussion Document	Memo sent to NOP 5.13.25	7.1.25 8.19.25 12.9.25 2.3.26	Spr 2026

Milestones

Spring 2026 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
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NOP - Draft Spring 2026 NOSB meeting tentative agenda	Feb 19, 2026	~ 10
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NOP - Send compiled public comments to NOSB	Apr 22, 2026	3
Public comment webinars	May 5 & 7, 2026	1
Spring 2026 NOSB meeting - Omaha, NE (TENTATIVE)	May 12 - 14, 2026	0
Final recommendations due	Jun 14, 2026	30 days post meeting

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

Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, January 6, 2026 2:00 pm ET

Present: Kyla Smith (KS), Chair; Amy Bruch (ADB); Allison Johnson (AJ); Kathryn Deschenes (KD); Cat McCluskey (CM)

Absent: Heather Kumar (HK); Carolyn Dimitri (CD), Vice Chair

Staff: Michelle Arsenault (MA); Jo Mirenda (JM)

Agenda

- Review December 9, 2025 notes
- Residue testing (§205.670 and UREC definition) draft proposal - discuss
- Consistency in Organic Seed Use discussion doc (AJ/CD/CM) - discuss
- Additional items
- Adjourn

Discussion

- **December 9, 2025 notes** were approved as written.
- **Residue testing (§205.670 and UREC definition) draft proposal (KS/ADB).** The leads provided background information about the project, and noted that the co-leads will present the discussion document at the January 2026 NOSB meeting, and have also developed a draft proposal for the Spring meeting, which they will discuss at the full Board meeting. The proposal was modified to include public comments collected in the Fall, prior to the meeting being rescheduled. Given that the co-leads are both completing their NOSB tenure shortly after the meeting, they wanted to move this forward before leaving. The group reviewed the text of the proposal and made suggestions for minor modifications.
- **Consistency in Organic Seed Use discussion doc (AJ/CD/CM).** Deferred to future call.
- **Additional items.** The CACS added a call on January 23 to finalize the residue testing proposal.
- **The meeting was adjourned.**

Previous CACS Notes

December 9, 2025

Residue Testing: Regulation Review (§205.670 and UREC definition) proposal (KS/ADB) - discuss
Consistency in Organic Seed Use discussion doc (AJ/CD/CM) - discuss
eCommerce Labeling discussion doc (KD/KS) - discuss

January 6, 2026

Residue testing (§205.670 and UREC definition) disc doc (KS/ADB) - discuss
Consistency in Organic Seed Use discussion doc (AJ/CD/CM) - discuss

January 13, 2026 - meeting to replace fall meeting

January 23, 2026 (Friday) - additional call. 1:30 - 2:30 ET

Residue testing (§205.670 and UREC definition) proposal (KS/ADB) – discuss/vote

February 3, 2026

eCommerce Labeling discussion doc (KD) - discuss/vote
Consistency in Organic Seed Use discussion doc (AJ/CM) - discuss

February 10, 2026

March 3, 2026

March 10, 2026

April 7, 2026

April 14, 2026

May 5, 2026

May 12, 2026

Work Agenda

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Project	Contact	Doc Type	Notes*	Scheduled/ status	Target meeting
Residue Testing for a Global Supply Chain: Regulation Review (§205.670 and UREC definition)	KS/ADB	Discussion Document/ Proposal	Approved by Exec Cmmte/NOP 4.17.23	6.10.25 7.1.25 7.8.25 8.19.25 12.9.25 1.6.26 1.23.26	Fall 2025
Residue Testing for a Global Supply Chain: § 205.671 (certifier testing)	KS/ADB	Proposal	Split out from the Residue Testing for a Global Supply Chain: Regulation Review	6.10.25 7.1.25 7.8.25 8.12.25	Fall 2025
Risk-Based Certification	KS	Proposal	Approved by Exec Cmmte 6.18.23, and NOP 6.20.24	6.10.25 7.1.25 8.12.25	Fall 2025
Consistency in Organic Seed Use - Panel? - Guest speakers?	AJ/CD/CM	Discussion Document	Approved by Exec Cmmte 6.18.23, and NOP 6.20.24	5.13.25 6.3.25 7.1.25 8.5.25 12.9.25 2.3.26	Spr 2026
eCommerce Labeling	KD/KS	Discussion Document	Memo sent to NOP 5.13.25	7.1.25 8.19.25 12.9.25 2.3.26	Spr 2026

Milestones

Fall 2025 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~May 15, 2025	24
NOP - Draft Fall 2025 NOSB meeting agenda	Aug 8, 2025	~11
NOSB - Fall 2025 proposals due to NOP	Aug 20, 2025	~9
NOP - Post proposals	Sept 9, 2025	~8
Public comment closes	Oct 8, 2025	~4
NOP - Send compiled public comments to NOSB	Oct 14, 2025	~3
Public comment webinars	Cancelled	1
Rescheduled public comment closes	Dec 30, 2025	2
Rescheduled Fall 2025 NOSB meeting - Virtual	Jan 13 & 14, 2026	0

Final recommendations due	Feb 13, 2026	~30 days post
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