

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, April 14, 2026 2:00 pm ET

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

Absent: Cat McCluskey (CM); Michelle Arsenault (MA)

Staff: Jo Mirenda (JM); Heather Kumar (HK); Jared Clark (JC)

Agenda

- Review March 10, 2026 notes
- Consistency in Organic Seed Use discussion document (AJ/CM)
- Additional items
- Adjourn

Discussion

- **March 10, 2026 notes** are approved.
- **Consistency in Organic Seed Use (AJ/CM)**
 - One of the co-leads shared a first draft of a discussion document for the Fall 2026 meeting that explores possible changes to NOP Guidance 5029 that could work towards increasing availability and use of organic seed.
 - One of the topics is about the time horizon for producers to conduct searches for organic seed, and ways that producers can plan farther ahead or take other actions that could increase likelihood of finding organic seed in the future. The members discussed challenges of enforcing such requirements and the pro/cons of the impacts on small/medium/large producers versus the benefit of moving the needle on organic seed use, and the impacts in produce versus grains sectors.
 - Another topic is about handlers that require contract producers to use a certain seed, and if the processor's OSP should address the seed commercial availability. The Subcommittee discussed challenges when the producer and handler have different certifiers, and how to close the loop through better communication between certifiers or using affidavits. The Subcommittee plans to look at past comments submitted on the question on contract production submitted at prior meetings.
 - Lastly, the Subcommittee discussed the possibilities of certifiers submitting data to NOP, although there may be challenges with data being readily accessible.
 - Next steps: The Subcommittee will continue discussion at the next Subcommittee meeting in June, and will incorporate learnings from the Seed Panel at the Spring 2026 Meeting.
- **Additional items**
 - Spring 2026 Meeting prep
 - Seed Panel - invited speakers have confirmed attendance. Subcommittee will develop questions in advance, so speakers have time to prepare.
 - Stakeholder feedback so far on the Residue Testing proposal indicates there may be concerns about the downstream notification part of the proposal. Will review comments and discuss at Spring meeting.
- **The meeting was adjourned**

Previous CACS Notes

March 10, 2026

Guest speakers - OTA Seed Task Force

Consistency in Organic Seed Use (AJ/CM)

April 14, 2026

Consistency in Organic Seed Use Discussion Document (CM/AJ). Discuss.

June 9, 2026

Consistency in Organic Seed Use (AJ/CM)

July 14, 2026

August 11, 2026

September 8, 2026

October 13, 2026

November 10, 2026

December 8, 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 at Spring 2026 - Guest speakers?	AJ/CM	Discussion Document	Approved by Exec Cmmte 6.18.23, and NOP 6.20.24	3.10.26 4.14.26 6.9.26	Fall 2026
eCommerce Labeling	KD	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

Fall 2026 Milestones	Target dates (tentative)	Weeks PTM (prior to meeting)
NOP - Publish FRN, Open public comment	~May 21, 2026	24
NOP - Draft Fall 2026 NOSB meeting agenda	Aug 11, 2026	~11
NOSB - Fall 2026 proposals due to NOP	Aug 20, 2026	~9
NOP - Post proposals/Open comment period	Aug 31, 2026	~8
Public comment closes	Oct 1, 2026	~4
NOP - Send compiled public comments to NOSB	Oct 7, 2026	~3
Public comment webinars	Oct 20 & 22, 2026	1
Fall 2026 NOSB meeting - Location TBD	TBD Oct 27 - 29, 2026	0
Final recommendations due	Nov 28, 2026	~30 days post

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Compliance, Accreditation & Certification Subcommittee (CACS) Notes

Tuesday, March 10, 2026 2:00 pm ET

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); Jared Clark (JC)

Agenda

- Review February 10, 2026 notes
- Guest speakers - OTA Seed Task Force
- Consistency in Organic Seed Use (AJ/CM)
- Additional items
- Adjourn

Discussion

- **February 10, 2026 notes** were approved as written.
- **Guest speakers - OTA Seed Task Force.** The CACS hosted several guest speakers from the Organic Trade Association (OTA) Seed Task Force: Adrienne Shelton (Enza Zaden / Vitalis Organic Seeds, Co-chair OTA seed task force), Chelsey Leczyk (Bejo Seeds, Co-chair of OTA seed task force), and Scott Rice (OTA staff and former NOSB member).

The guest speakers presented information about the OTA Seed Task Force composition and activities. The task force is made up of 15 members, and includes certifiers, seed growers, seed breeders, crop producers, and advocates of US organic production. It has been meeting monthly since Summer 2024 to provide comments in response to NOSB's current work agenda item to support organic seed usage. The speakers presented information about the current challenges with the organic seed regulations and provided updates on the task force's activities over the past year. The task force has studied and collected data for about a year, and presented 4 case studies about seed use, which they included in their Fall 2025 public comments to the NOSB: <https://www.regulations.gov/comment/AMS-NOP-25-0034-0083>.

The speakers described the challenges of accessing data on the usage of conventional seed in organic systems, by acreage, crop type, and variety. They also presented data from a survey they conducted with the Accredited Certifiers Association, assessing the data certifiers collect from their certified operations regarding conventional seed use exemption requests.

With regard to the 2018 & 2019 NOSB recommendations, they noted that the recommendations didn't quite get to a solution, so perhaps it will require more regulatory language. For example, there needs to be clarity on how to measure "full compliance," as stated in the 2018 NOSB recommendation, given that 100% organic seed usage is not realistic.

Lastly, the task force members offered suggestions as to what the next NOSB seed proposal could look like, including additional regulatory language to complement the 2018 recommendation; data collection; approaching seed usage requirements based on specific crops, regions, and operation types; investigating the development of a seed availability resource through a public-private partnership, using risk-based seed use requirements for handlers, and the development of crop expert groups to determine feasibility of organic seed usage. Following the presentation, CACS members asked various questions of the speakers about the role of handlers, how to increase availability, how to

address demand from farmers and consumers, and whether the Strengthening Organic Enforcement (SOE) rule could help provide visibility on seed usage and supply chains.

- **Consistency in Organic Seed Use (AJ/CM).** The CACS will likely produce a discussion document for the Fall 2026 meeting. The lead intends on having a rough draft for the April 2026 CACS call.
- **Additional items.** None.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

February 10, 2026

eCommerce Labeling proposal (KD) - discuss/vote

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

March 10, 2026

Guest speakers - OTA Seed Task Force

Consistency in Organic Seed Use (AJ/CM)

April 14, 2026

Consistency in Organic Seed Use Discussion Document (CM/AJ). Discuss.

May 12, 2026

June 9, 2026

July 14, 2026

August 11, 2026

September 8, 2026

October 13, 2026

November 10, 2026

December 8, 2026

Work Agenda

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

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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
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Milestones

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Final recommendations due	Jun 14, 2026	30 days post meeting

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Compliance, Accreditation & Certification Subcommittee (CACs) Notes

Tuesday, February 10, 2026 2:00 pm ET

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 February 3, 2026 notes
- Residue testing (§205.670 and UREC definition) proposal (KS/ADB) - discuss/vote
- eCommerce Labeling proposal (KD) - discuss/vote
- Additional items
- Adjourn

Discussion

- **February 3, 2026 notes** were accepted as written.
- **Residue testing (§205.670 and UREC definition) proposal (KS/ADB).** The CACS reviewed and edited the draft document in real time, and voted to move it to the full Board for the Spring NOSB meeting. The lead will finalize the proposal and submit it to the NOP.

Motion to accept the proposal on residue testing

Motion by: KD

Seconded by: AF

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

- **eCommerce Labeling proposal (KD).** The group discussed the draft document and suggested minor edits. The proposal is written as a response to the [NOP memo](#), based on the petition sent to the NOP.

Motion to accept the proposal on eCommerce Labeling

Motion by: KD

Seconded by: CM

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

- **Additional items.** The CACS will meet once a month instead of twice, on the second Tuesday, given its smaller work agenda. The NOP will send updated calendar invitations.
- **The meeting was adjourned.**

[Previous CACS Notes](#)

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 (KD) - discuss/vote

March 10, 2026

Guest speaker - OTA Seed Task Force

Consistency in Organic Seed Use (AJ/CM)

April 14, 2026
 May 12, 2026
 June 9, 2026
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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

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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

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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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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 -> 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

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Final recommendations due	Jun 14, 2026	30 days post meeting

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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

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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)
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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