

National Organics Standards Board
Certification, Accreditation and Compliance Subcommittee (CACS)
Discussion Document: NOSB Technical Support Initiative
February 13, 2022

Background:

Much of the momentum for the initiative to seek technical support for the NOSB came from the Fall 2020 discussion document titled, [Human Capital Strategy for Organic Inspectors and Reviewers](#). During its Spring 2021 meeting the NOSB considered a discussion document on Human Capital Management: Supporting the Work of the NOSB. Additionally, the NOP released a Request for Applications (RFA) for human capital in Spring 2021, which included a request for industry stakeholders to bring forth ideas on ways to support the NOSB through the public private partnership. No proposals were made for that component of the RFA. Therefore, the CACS developed this discussion document seeking feedback for NOSB support specifically. The rationale for this initiative is simple. NOSB positions are not financially compensated, and many Board members have full time jobs. The time investment and workload for NOSB members can be 10-15 hours per week and this can potentially limit the number of people willing to take on board membership.

To demonstrate the scope of work, NOSB members are tasked with the following activities:

- Review petitions to add or remove materials from the National List of Approved and Prohibited Substances (National List), and complete “Sunset” reviews of materials on the National List.
- Review and develop questions for Technical Reports to inform deliberations on materials.
- Complete materials-related checklists to assess the status of materials against the OFPA criteria for inclusion on the National List; conduct supporting research to determine the context of use of materials in the organic industry.
- Attend and participate in NOSB subcommittee calls and full Board meetings to discuss agenda items and deliberate on proposals.
- Conduct other research activities to support the development of proposals and recommendations on a range of topics of interest to the organic community.
- Review and prepare summaries of public comments in advance of public meetings.
- Write proposals and recommendations that summarize petitions, the Board’s deliberations, Technical Reports, public comments, and justifications for Board positions.

Getting outside support could significantly reduce the time that Board members have to dedicate to NOSB tasks and could make tenure on the board a more attractive prospect to future members. While not all of the activities of the NOSB are amenable to support, the scope of activities and deliverables completed by the support team **could** involve:

- Conducting literature searches and research, and preparing research summaries for Board members to support their work. This may include research on the current context of material use, specific questions related to environmental or health impacts of materials, and/or research about alternative practices or materials.
- Review Technical Reports.
- Preparing summaries of public comments for Board member review.
- Drafting language for proposals and recommendations based on Board member input.

Written comments followed the Spring 2021 Board Meeting regarding the potential technical support for board members. Commenters were supportive of the idea, but not devoid of concerns. Several comments expressed the concern that the NOSB should be careful to not compromise the integrity of the process. Further concerns centered around not endangering the independent nature of the production and deliberation of the NOSB's proposals.

Summary of Recent Review by the CACS:

The CACS has had "NOSB Technical Support" as an agenda item for the past three subcommittee meetings. Two main questions have been discussed in some detail:

1. Where should the technical/advisory support come from?
2. Will the NOSB lose some of its autonomy if it receives technical support?

Source of Technical/Advisory Support

The question of where to source assistance focused on two broad categories. Technical support could come from within the government/USDA (but from outside of the NOP/AMS). Alternatively, support could come from outside organizations such as universities or nonprofits. The discussion thus far has appeared to lean towards an "inside" position but was not conclusive.

Autonomy of the NOSB

Regarding the preservation of autonomy, the subcommittee recognizes that there may be some concern, but felt confident that independence can be maintained with proper structuring of the relationship.

Questions for Further Discussion:

1. What are the advantages or disadvantages of having support come from within the government? From a nonprofit or university?
2. What NOSB tasks, if any, are critical to keep completely independent from the support team?
3. Should the support team be privy to all Subcommittee meetings and discussions?
4. What should be the scope of the NOP's relationship with the contemplated support group, i.e., should they be able to task the group directly?

Subcommittee Vote:

Motion to accept the discussion document on NOSB technical support

Motion by: Jerry D'Amore

Seconded by: Kyla Smith

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