Regenerative Organic Certified®

Operations Manual for Certification Bodies

Regenerative Organic Alliance

Regenerative Organic Certified® Program

The Regenerative Organic Alliance (ROA) oversees the Regenerative Organic Certified® program, including its development and implementation. The ROA is the sole owner and manager of the Regenerative Organic Certified® Framework and the associated documents, which are exclusively used for the program worldwide.

The ROA exists to promote regenerative organic farming as the highest standard for agriculture around the world. The ROA emphasizes farming practices that restore and build soil, ensure animal welfare, and end unfair conditions for farmers and farm workers. In doing so, the ROA is creating long-term solutions to some of the most significant issues of our time, including the climate crisis, factory farming, and fractured rural economies.

The Regenerative Organic Certified® program includes the Regenerative Organic Certified® Framework, Dairy Animal Criteria, Processor Criteria, and Supply Chain Guidelines. These are all considered the "standards" of the program. ROC certification is given to farms that meet the criteria, and any product or material claims must come from certified farms. Additional guidance may be added each year through supplementary documents.

The Operations Manual for Certification Bodies Version 1.1, which replaces Version 1.0, is effective as of October 01, 2025. All certification processes conducted after October 01, 2025, shall be performed using the requirements in this document. The ROC OMCB will be fully revised once every four years.

Introduction

The Operations Manual for Certification Bodies outlines the procedures and requirements that Certification Bodies (CBs) and assurance personnel must follow when providing services for the Regenerative Organic Certified® program. These rules ensure integrity, consistency, and transparency in the certification services offered for Soil Health and Land Management, Farmer and Worker Fairness, and Animal Welfare pillars. The rules apply to the bronze, silver, and gold program levels.

The Regenerative Organic Certified® program promotes and ensures integrity in claims made by companies or products. To achieve this, standards have been established to ensure that products or content claims can be verified through third-party certification. Certifying bodies evaluate organizations against the Framework, make a certification decision, and continuously monitor adherence to the ROA program. ROA evaluates and approves certification bodies in accordance with the requirements outlined in the Operations Manual.

The following documents are essential to apply these guidelines and must be used together wherever applicable. Any individual requirements mentioned in these documents refer to the version noted in this section:

- ISO/IEC 17065:2012 Conformity Assessment — Requirements for bodies certifying products, processes, and services
- ISO/IEC 19011: 2011 Guidelines for auditing management systems
- USDA NOP General Requirements for Accreditation (eCFR § 205.501)
- Regenerative Organic Certified® Framework
- Regenerative Organic Certified® Governing and Guidance Documents.

Roles and Responsibilities

The **CB Approval Committee (CBAC)** makes final decisions affecting certifying bodies. The CBAC reviews new applications and renewals and other select choices, including, but not limited to, scope, expansion or reduction, and proposed approvals, suspensions, and cancellations. The ROA Quality Assurance Team prepares recommendations for the CBAC for final approval. The CBAC is comprised of three external stakeholders and one member of the ROA leadership team.

The **Quality Assurance Team (QM)** ensures high quality in the certification process. They evaluate certifiers, offer guidance and training, approve scope extensions, and restore suspended approvals. Although qualified ROA personnel may be assigned specific duties related to these activities, the Quality Team is responsible for their proper execution.

The **Lead Evaluator (LE)** conducts approval audits under the direction of the Program Director. Evaluator responsibilities include:

1. Planning, conducting, and reporting the results of onsite and desk audits
2. Planning, conducting, and reporting the results of renewal and witness audits
3. Providing audit cost estimates based on the ROA fee schedule and any associated travel expenses

The **Internal Rules Committee (IRC)** reviews and approves Framework deviation requests and interpretation questions, program requirement interpretations, and reviewing deviations for a specific period.

The **Program Director (PD)** is responsible for the administration, researching, planning, developing, and implementing the organization's programs, including the ROC™ Framework governance, CB approval and management, and assurance services.

The **Certifying Body (CB)** is responsible for administering Regenerative Organic Certified® Framework assessments on behalf of the ROA to clients, deciding for certification, and monitoring continued compliance with all program requirements.

Acronyms used in this document

AS	Annual Surveillance
ASR	Annual Surveillance Report
BOD	Board of Directors
CB	Certifying Body
CBAC	Certifying Body Approval Committee
CS	Certification Specialist
ED	Executive Director
IRC	Internal Rules Committee
LE	Lead Evaluator
OMCB	Operations Manual for Certifying Bodies
PD	Program Director
PM	Program Manager
QM	Quality Assurance Manager
RA	Review Audit
ROA	Regenerative Organic Alliance
WA	Witness Audit

Table of Contents

Section 1 – General Requirements

To qualify for the Regenerative Organic Certified® program, a certification body (CB) must be accredited by the USDA National Organic Program and comply with the ISO/IEC 17065 standards for approvals. Even though ROA-approved certifying bodies are not mandated to possess ISO 17065 accreditation for the Regenerative Organic Certified® program, they are still obligated to follow the ISO/IEC principles while offering certification services for the program.

1.1. Certification Body Approval

STEPS to APPROVAL

Application Review and Acceptance > Document Review > Assurance Personnel Review > On-site Main Office Visit > Evaluation report > Recommendation to CBAC > Approval Decision> Contract Issuance > myROC Training

The approval process may take up to 6 months to complete

1.1.1. Application

1. The CB must fill out the Certification Body Application Form in English, which can be requested to the Quality Manager.
2. The CB must be operational in at least one country and have at least one applicant or interested client.
3. The CB must apply for the Soil Health and Land Management and the Farmer and Worker Fairness pillar. The CB can also apply for the Animal Welfare pillar, if applicable.

The ROA reviews the Certification Body Application Form to determine eligibility ***within 21 calendar days of receiving the application.*** *If approved, the ROA will send an onboarding package to the CB, which includes an Excel form for their profile, a copy of the ROA Contract Agreement, and a Statement of Service Fees with estimated costs.*

1.1.2. Document review

1. The CB must submit a completed CB Matrix form (CB Profile) along with supporting documents in English or annotated in English ROA for review within 30 calendar days after receiving approval notification of the application.
2. The CB organization must submit its proposed fee schedule to the ROA before the certifying body evaluation.
3. The CB shall demonstrate administrative capacity and ability to:
    a. manage the ROA program by a dedicated program manager;
    b. carry out certification decisions, technical reviews, and on-site audits;

c. conduct quality control of certification decisions, reviews, and on-site audits;
d. carry out risk assessments for applicants and certified operations;
e. sell certification services and market and communicate material related to the provision of the program; and
f. ensure competence and capability for all the certification activities, including selecting qualified auditors and reviewers.

***Within 30 calendar days of receiving the CB Matrix**, the ROA thoroughly reviews records and shares their findings with the CB organization. The CB Matrix outlines how the CB meets ROC program criteria and how its quality system aligns with general requirements. Annex A provides details on the records review process. Additionally, the ROA proposes a visit plan and estimated costs to the CB.*

1.1.3. Assurance Personnel Review

1. The CB provides documents of its organizational structure and personnel list involved in the program certification services.
2. Before making a final selection, the CB provides information on its assurance personnel and their qualifications to the ROA for review and approval. The ROA requires at least these minimum roles:
    - Program Manager
    - Auditor(s) for each pillar – See Annex B
    - Technical reviewer(s) for each pillar – See Annex C
3. The CB is familiar with the ROA Procedure for Review and Approval of Auditors to the program.

ROA staff will assess auditors and technical reviewers to ensure that CB assurance personnel are qualified to provide certification services under the ROA program. New auditors can be added anytime by filling out the online form at Regenorganic.org.

4. The CB has established mechanisms to provide an oversight of assurance personnel to:
    - Ensure they fulfill all the program requirements and undergo annual training and calibrations to stay compliant.
    - Stay updated with program and regulatory changes pertaining to approval, auditing, and ROC™ Framework criteria changes.
    - Understand and demonstrate competency in their assigned roles and responsibilities.
    - Manage and monitor their competence regularly.
    - Undergo regular performance evaluations through periodic reviews, witness audits, or other means of assessment.
    - Ensure that auditors apply the Framework and guidelines consistently across pillars, certification levels, and types of operations.
    - Evaluate when a technical reviewer can conduct certification reviews for assurance.
5. To ensure fairness, the auditor and technical reviewer cannot be the same person for the same client certification cycle. However, it is acceptable for the Program Manager to serve as the Technical Reviewer or auditor.

6. The technical reviewer conducts at least three annual technical reviews unless client demand prevents them from doing so.
7. Auditors carry out a minimum of three audits per year unless client demand makes this impossible.
8. If the auditors or technical reviewers no longer maintain their qualified status or are no longer employed by the CB, **the CB must inform the ROA within 15 calendar days.** The ROA will then remove their user access from myROC and Trainual.com.
9. Before conducting the onsite evaluation and becoming an approved CB, assurance personnel must complete program training assigned by the ROA.
    - CBs are given four free user accounts to access the training modules on the platform. If they require more than four accounts, CBs must pay a fee according to the Cost and Fee Structure for Certifying Bodies.

ROA provides access to various courses for CB assurance personnel via **Trainual.com**, including an overview of the Framework and equivalent standards, pillar-specific courses, auditor guidance, and supporting materials/resources. During the document review stage of the approval process, assurance personnel are added to Trainual.com.

1.1.4. Certifying Body Evaluation (initial and renewal)

1. During the evaluation, the CB must prove that it has the necessary resources and capability to conduct assessments for all levels and pillars of the Regenerative Organic Certified® program.
2. The CB is responsible and committed to:
    a. Working with the ROA to schedule the audit.
    b. Provide access to personnel, records, and facilities needed for evaluation.
    c. Assigning a knowledgeable English-speaking employee to guide and assist the ROA with obtaining and interpreting audit evidence.
    d. Developing and implementing on-time corrective action plans to address any non-conformance found during the evaluation.
3. A signed plan must be submitted to the ROA at least 10 calendar days in advance before a site visit. If it's a virtual office, the CB must provide all requested records to the ROA evaluator for remote viewing during the synchronous visit to ensure accuracy.

Please note that the ROA evaluates all office locations and sites where essential activities such as inspection handling, review, certification decision, and certificate issuance occur.

4. The CB is required to provide 5% of the certification files for each Regenerative Organic Certified® pillar based on the total number of active certificates:
    a. CBs with less than 20 active certificates must provide all certification files, as requested by the ROA, for at least one client.
    b. CBs that primarily work with group certification and have less than 20 active certificates may need to provide additional files.

c. At least one file will be selected from each pillar, including land management, social fairness, and animal welfare.
d. If no Regenerative Organic Certified® records are available, a representative sample from other programs such as USDA NOP, COR, or Fairtrade will be taken.

5. The CB, during onsite or remote audits at critical offices, will demonstrate the following in place:
   a. An effective quality management system, internal audit, and certification process.
   b. The competence of assurance personnel through documents, interviews, and training records.
   c. A system to develop, implement, and track corrective actions for any NCs found during the external or internal assessments.
   d. A system for keeping records and maintaining procedures to track and report on certified organizations, products, and sites.
   e. A system for handling suspensions, withdrawals, and cancellations for certified operations.
   f. A system to investigate and handle complaints, allegations, and misuse of labeling claims.

6. **The CB shall respond with corrective actions within 30 calendar days of receiving the final visit report.**
7. All non-conformities (NCs) must be resolved before making an approval decision.

During the approval cycle, the ROA will evaluate CB offices conducting critical certification tasks. This includes satellite and foreign locations as well as the primary office. The evaluation aims to ensure that the ROA program requirements are effectively carried out and that all conditions are met. Each relevant office will be evaluated once during the approval cycle.

1.1.5. Witness audits

1. As part of the onsite assessment and performance evaluation of CBs and auditors, the ROA conducts regularly announced or unannounced witnessed audits (WA).
1. One WA is conducted within 12 months of the CB approval and during each Renewal Application process.
2. Every two years, there must be at least one on-site witness audit. The ROA may perform additional onsite witness audits to evaluate the program performance of CBs and auditors.
   a. **Independently owned or operated CB offices must also receive witness audits** per program requirements. These are offices that directly hire or subtract auditors carrying out critical program certification activities in countries not within the CB's home country or territory.
3. The **certification body covers all costs associated with the witness audit**, including but not limited to planning, implementation, use of translators, and related travel expenses. See the CB Cost and Fee Structure Document for additional information.

1.1.7. Corrective Actions

1. At the close of each assessment, the ROA provides a report in English detailing the **findings to the CB within 21 calendar days**. The assessment report will include:
    - General audit information and observations.
    - List of personnel involved during the assessment.
    - Scope of the assessment.
    - Evidence obtained and reviewed.
    - List of NCs, if applicable.
2. After receiving the assessment report, **the Certification Body has 30 calendar days to respond in writing to the ROA.**
3. The CB response shall include a proposal and timeline for resolving NCs and submitting corrective actions.
4. During the assessment, three types of conditions are set:
    - More Information Needed (MIN),
    - Non-conformity (NC),
    - Opportunity for Improvement (OFI)
5. **The ROA has 30 calendar days to review all corrective actions** summited by the CB, require additional information, or start the final approval process with the CBAC.

1.1.8. Approval Decision

1. The ROA reviews all corrective actions and recommends the CB for final approval to the ROA Certification Body Approval Committee (CBAC). **The final approval process with the CBAC occurs within 30 calendar days.**
2. To be recommended to the CBAC, the CB shall demonstrate that it satisfactorily meets all program requirements, including those in this manual, and has resolved all NCs.
3. Once the ROA issues a formal approval, the CB organization must:
    a. Execute a contract with ROA to offer program certification services
    b. Confirm the list of qualified staff to be added to the myROC.org (Intact) Platform
    c. Pay all outstanding balances owed to ROA
    d. Notify internal and external stakeholders of the approval status
    e. Formally publish all final versions of policies and procedures in draft status

The ROA will add all approved CB assurance personnel to the myROC.org platform and assist with getting users access and training on the system, see section 1.2.

1.1.9. ROA Service Contract Agreement with CB

1. A Service Contract Agreement between the ROA and the CB must be executed **within 21 calendar days of approval**. The contract outlines the terms the CB must follow while working with the ROA and is renewed every four years.

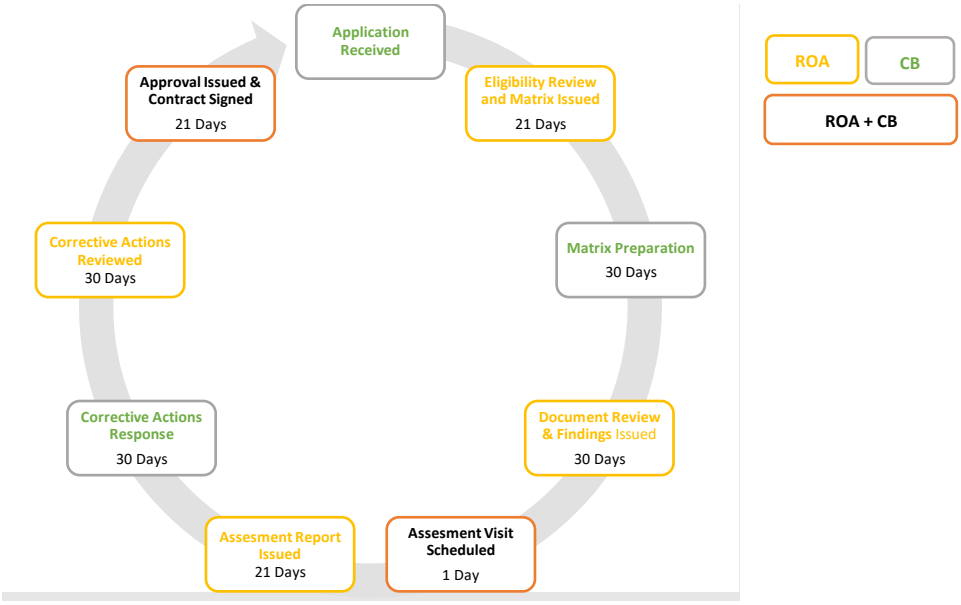


FIGURE 1. TIMELINE FROM APPLICATION TO CONTRACT

1.2. myROC platform

1. All certification service activities and data gathering begin with an audit order, which is documented and monitored using the myROC.org electronic database platform.
2. The ROA provides user accounts and training to CBs' assurance personnel, which must utilize the myROC platform for all certification service activities.

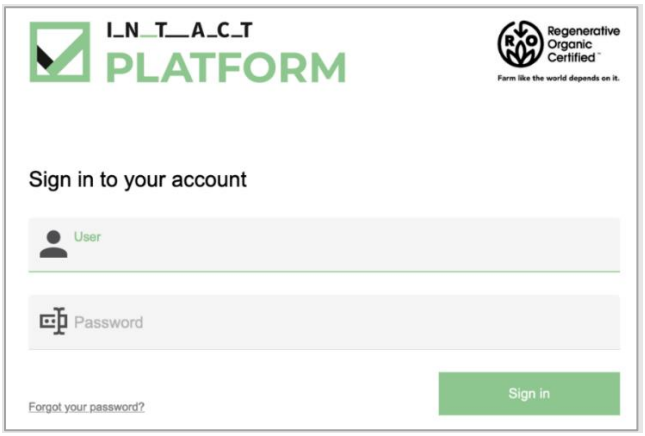


FIGURE 1. MYROC.ORG LOGIN SCREEN

3. All information CB assurance personnel provide **must be available in English**. That includes:
    a. Audit Report, Review Notification and Certification Decision
    b. Comments on checklist items
    c. Findings description
    d. Corrective action plan and corrective actions
    e. Files attached to the report. For files available only in another language, the ROA expects the CB to provide appropriate translation or explanation of its content.

1.3. Renewal Application

2. The ROA conducts audits to **evaluate the performance of CBs every four years**, based on the ISO/IEC 17065 principles.
3. CBs are notified of their renewal at least 12 months before the contract expires. To renew, CBs must follow the process outlined in Section A.1.1.
4. Certification bodies must maintain a list of qualified auditors and their training status, including records of their approval, performance reviews, and continuing education, which must be made available to the ROA upon request.
5. Certification Bodies must provide a list of witness or shadow audits performed with ROA-approved auditors, which must be made available upon request to the ROA.
6. As part of the renewal, a new CB evaluation occurs. It usually consists of a remote audit of the CB's records where certification services are provided.
7. On-site audits may occur, when necessary, with at least one on-site witness audit (WA) every two years. The ROA reserves the right to execute additional WA per program performance evaluations.
8. A remote desk audit based on the annual report may be conducted during years when no on-site facility or on-site witness field audit takes place.

Year 0	Year 1	Year 2	Year 3	Year 4
Application	ASR	ASR	ASR	Renewal
WA		WA		WA

TABLE 1. CB EVALUATION CYCLE

1.4. Appeal of approval decision

1. To appeal a decision made by ROA, the CB must **submit its appeal in writing electronically within 21 calendar days of receiving the decision notification**. CB must include all necessary supporting documents.
2. The ROA Leadership Team and the Certification Body Approval Committee address the appeals.
3. In exceptional circumstances, the Certification Body Approval Committee's decision may be reviewed by the ROA BoD, and their decision will be final.
4. All appeals are submitted to qualityassurance@regenorganic.org.
5. The ROA addresses appeals within 60 calendar days after the appellant files a complete appeal and supporting documents. Timelines to handle an appeal request vary per case and may take up to 100 calendar days.

1.5. CB Annual Surveillance Review and Reporting

1. The Annual Surveillance Review and Reporting aims to assure the adherence of the Certification Body to the program requirements and to provide feedback about the performance of each approved CB.
2. The Certification Body will participate in the Annual Surveillance Review (ASR) by presenting a report of its certification activities to ROA before the end of March each year.
    a. The CB must keep records and inform ROA of any significant changes that occurred during the previous year, which may have impacted its corporate and administrative structure, as well as the directors, managers, and committee members.
    b. The ROA will send the Annual Surveillance Report to be filled out by the CB by the end of January. The information provided by the CB covers the following:
        - List internal or external complaints about the ROA program and the corrective measures taken.
        - List of reported misuse of the Regenerative Organic Certified® logo or claim and any suspensions or cancellations.
        - List and records of instances where the ROC™ logo is used on products that are applied to final packaging at the farm or the last stage of processing on the farm for the bulk label. Any product using the ROC™ label must be consistent with the ROC crop or livestock certificate.
        - List all active auditors, reviewers, and administrative staff approved by the ROA. The assurance personnel no longer working with the CB needs to be indicated for removal.
        - List of internal training, witness audits, and performance reviews performed on the CB assurance personnel working with the program.
    c. The ROA may include additional information requests in the report according to the CB's previous performance, even if not listed above.
3. The ROA will review the Annual Surveillance Report, and a formal answer will be provided within 45 calendar days. During this period, the ROA may communicate further with the CB to clarify the information presented and make additional evaluations. Any outstanding issues detected will be communicated, and additional follow-up and corrective actions may be required.
4. The CB annual report and responses shall be sent to qualityassurance@regenorganic.org

1.6. Changes to the CB Approval Scope

1.6.1 Scope Expansion

1. A CB can request a scope expansion to add a new region, new country, or new pillar to its certification services.
2. All requests for scope expansion can be sent to qualityassurance@regenorganic.org.
3. The ROA may request additional information and documents to perform a risk analysis of the scope expansion.
4. Adding a new pillar or regional/foreign office may require a site evaluation and a witness audit to be performed by the ROA, depending on the risk analysis result.

1.6.2. Scope Reduction

1. It is possible to address identified systematic risks by considering a reduction in scope. Such a reduction might involve the removal of a country, auditor, reviewer, myROC user, or a new pillar of any CB approval.
2. The ROA will provide a written communication to the CB describing the grounds for the scope reduction, next steps, and timelines.
3. Any scope reduction results in temporarily ceasing one or more certification services or activities under the CB approval until conditions are met for reinstatement.
4. The scope reduction may be required by the CB or by the ROA.

1.7. Suspension or Cancellation of CB Approvals

The ROA may suspend or cancel the approval of a Certification Body at any time.

1.7.1 Reasons for suspension or cancellation

1. **If a Certification Body fails to comply with specific requirements,** its approval may be suspended or canceled for one or more pillars. These requirements include:
    a. Expiration of their approval.
    b. Failure to sign a contract **within 21 calendar days** of approval without presenting a valid reason.
    c. Violation of terms with the ROA or their clients.
    d. Refusal to permit an audit by the ROA or the appointed third party.
    e. Poor or lack of cooperation and access to documentation, facilities, and personnel to ROA or the appointed third-party during audits.
    f. Failure to address identified issues communicated through a non-compliance notice or correct them within a specified time frame.
    g. Lost or withdrew its accreditation or approval status with another ROA baseline certification scheme. Additional information may be requested.

h. Forced to close operations of their local or regional office(s).
i. Other circumstances that, in the sole opinion of the ROA, may compromise the integrity of the program or certification services.

1.7.2 Suspension

1. **If a suspension occurs**, the CB certification services for one or more pillars will temporarily cease until the issue is resolved:
   a. The ROA will provide a written communication to the CB describing the grounds for suspension.
   b. The **CB must respond within 15 calendar days** with a satisfactory analysis and corrective action plan to prevent cancelation.
   c. The CB might request additional time from the ROA to prepare and provide the analysis and corrective action plan. If corrective actions are sufficient, the ROA shall recommend CB continuation of approval.
   d. If the CB fails to provide sufficient response or corrective actions, or responses are not delivered within the time allowed, their approval may be canceled.

1.7.3 Cancellation

1. **Cancellation** results in permanent termination of the agreement between the ROA and the CB to provide certification services. In the event of cancellation, the ROA shall submit a letter of intent to terminate the Certification Body. The CB must:
   a. Notify all applicants and certified clients immediately.
   b. Update their status on their public website.
   c. Transfer all client certification and auditing records to the ROA.
   d. Ensure a smooth and timely transition to a new CB to provide uninterrupted service to the certified operations.

1.8. Complaints

1. If there are any complaints related to the certification services, the CB must inform the ROA within 21 calendar days.
2. The CB must handle complaints promptly using its procedures, and resolutions are communicated to the ROA.
3. The ROA reserves the right to perform or assign additional assessments if unresolved complaints exist, as per the ROA **Disputes Process.**
4. Complaints from any interested party can be submitted using the online Complaint Form located at Regenorganic.org/resources.

The Regenerative Organic Alliance has the Regenerative Organic Certified® Dispute Process to address any submitted concerns. This process allows interested parties to voice their concerns regarding the Regenerative Organic Alliance issues. Dispute procedure is available on our Resources page.

1.9. Cost and Fees

1. As a part of the ROA program, the CB is responsible for paying all fees and costs associated with program assessment and approval services in a timely manner according to the ROA Cost & Fee Structure.
2. Payments can be made through electronic bank transfer or credit card. Any questions about billing can be directed to accounting@regenorganic.org.

1.10. Communications

1. The CB must participate in all virtual meetings hosted by the ROA to stay informed about any updates, changes, or important news.
2. To ensure that assurance personnel are updated, the CB should have a procedure to communicate any relevant information from the ROA. This could include responses to program and standard interpretation requests, additional guidance on the standard, and updates to program forms.
3. If the CB would like ROA staff to attend a presentation they are hosting, they can submit a request at https://regenorganic.org/speaker-requests. The ROA encourages CBs to utilize their staff for marketing and communication presentations.
4. Any questions from assurance personnel, such as auditors or reviewers, should be directed to the ROA-approved CB Program Manager, who will forward them to the appropriate ROA email address.

Email address	Topics
Info@regenorganic.org	General questions and interested applicants
Qualityassurance@regenorganic.org	Program requirements, CB contracts, complaints, allegations, and Trainual
Certification@regenorganic.org	Applicant or certified client-related certification questions
Label@regenorganic.org	License applicants, SCA's, and label reviews
myROC@regenorganic.org	myROC database related questions
Standards@regenorganic.org	Standard interpretation and deviation inquiries

5. The CB is responsible for ensuring that the myROC platform can be updated with accurate data from certified operations, which will be publicly available through the ROA online directory generated from the myROC platform.

The Regenerative Organic Certified® operations directory link can be found here: Regenorganic.org/regenorganic-certified.

6. CB questions about the Regenerative Organic Certified® Framework or other criteria can be submitted using the CB Standard Q&A form, which can be downloaded from the ROA Google Drive folder.
7. The ROA Internal Rules Committee handles requests for deviations and clarifications on the standards criteria. If the committee cannot decide on the matter, it will be referred to the relevant subcommittee of the ROA Board of Directors.

1.11. Subcontracting

1. An approved CB can hire a third party for certification and assessment-related activities to a ROA client, as per ISO/IEC 17000 standards.
2. The CB records all subcontracted services as part of the ROA program services.
3. To ensure accountability, the CB must have a legally binding written with all subcontracted entities or individuals.
4. The CB ensures all outsourced or contracted activities and personnel meet the ROA program requirements.
5. The CB ensures that all policies and procedures of ROA and CB are effectively implemented at the contracted satellite or regional offices.
6. During the auditing service, the subcontracted auditor must specify their relationship with the CB and confirm that they work under the approved CB's direction.

1.12. Non-Discriminatory Conditions

1. The Certification Body must have fair policies and procedures that do not discriminate against individuals or groups.
2. The certification services offered by the CB are accessible to all operations within the program scope. The CB provides links to the ROA website to ensure easy access and offers direct contact and information through public and industry trade channels.
3. CB services related to the ROA are easily accessible through various channels, including its website, direct contact, and public and industry trade, ensuring that all eligible applicants can access the services without any difficulty

1.13. Confidentiality

1. The Certification Body must have a documented procedure and system for managing information gathered during the certification process. The system and procedure ensure that:
    a. all information gathered during the certification service is treated as confidential unless the client agrees to make it publicly available
    b. all information is handled in compliance with relevant privacy laws and legislation
    c. all collected information can be shared with the ROA as necessary for providing certification services and for CB's annual reporting

1.14. Conflict of Interest Policy

1. The Certification Body must have a written policy on conflict of interest, which should be signed and acknowledged by assurance personnel, subcontracted entities, or individuals who are part of the ROA certification services.
2. Conflict of interest includes situations when an applicant or certified client has a familial or business connection with the CB within 24 months before application or the initial interaction with the certified client.
3. Conflict of interest policy and signed documents are kept on file by the Certification Body and provided to the ROA upon request.

1.15. Impartiality and Independence

The CB shall have a signed agreement with subcontracted auditors to refuse any work that would create a conflict-of-interest situation with the entity that is applying for certification, either because of a family link, or because of a business relationship with the applicant during the 12 months preceding its application to the CB.

1.16. Ethics

The Certification Body must have a written policy that outlines ethical behaviors. This policy should include a code of ethics that expresses the CB's stance on important issues, such as anti-corruption, anti-bribery, and gift-giving.

1.17. Liability & Financing

The Certification Body must implement necessary measures to effectively manage and mitigate any potential risks arising from its operations. These measures may include securing insurance policies or allocating reserves to cover potential liabilities. Furthermore, the Certification Body must maintain financial stability and sufficient resources to ensure smooth and efficient operations.

1.18. Control of Documents & Records

There are no extra requirements beyond what is specified in ISO/IEC 17065.

1.19. Internal Audits & Management Reviews

Internal audits and management reviews should include the ROA program, certification services, and baseline certifications and be conducted under the principles of ISO/IEC 17065.

Section 2 - Certification Services Requirements

This section explains the requisite procedures for client certification and auditing. These procedures involve an application, selecting a CB, initial reviews, planning and executing audits, making certification decisions, and maintaining the certification.

General

1. The Certification Body must adhere to the ISO 17065 principles during the certification engagement service.
2. The Certification Body must adhere to the certification procedures and audit cycles outlined in the Regenerative Organic Certified® Framework and this document.
3. The CB must have an effective system for communicating, planning, auditing, reporting, and monitoring operations conformance.

2.1. Application & Certification Process

Application process, selecting a Certifying Body, and placing an audit order

The client, single or grower group operation, applies online and provides evidence of their organic and other baseline certifications.

1. The **client might select an eligible certifying body that serve in their country or region.**
2. The **ROA communicates the certifying body** that the client has selected and provides application forms and related docs via myROC.
3. **Within 10 calendar days** of receiving the ROA notification, **the CB must initiate contact with the client via email**. CB includes certification@regenorganic.org in this initial contact.
4. Eligible CB and client shall reach an initial agreement within 30 calendar **days** of the day of the initial contact. During this period:
    - CB confirm the audit engagement process with the client, including estimated timelines, audit scope, and fees.
    - The ROA might retrieve the application materials and required documents if the client has not reached an initial agreement with an eligible CB.
5. Once an initial agreement is reached, the selected CB accepts **the audit order.**
6. The selected CB will continue communicating with the client to **perform the initial review, audit planning, and schedule.**

2.1.1. Initial Review

1. The CB shall have a procedure for the initial review of an operation wishing to achieve Regenerative Organic Certified®. The process helps the CB evaluate the operation for eligibility, compliance with the Framework, guidance documents, and all program requirements:

a. The CB shall review or approve organic operations that are part of the Regenerative Organic Certified® scope. Categories currently not part of the scope are apiary, insects, aquaculture, handler, and trader.
b. The CB follows the principles of application review in ISO 17065 7.3., and ensures that the operation provides relevant, complete, accurate, and reliable information deemed essential to the program assessment.
c. The CB shall confirm that the service, sites, locations, and acres assigned in the audit order are accurate and communicate changes to the ROA when needed.

Operations must give all necessary information, including but not limited to:

- Application Form.
- Regenerative Organic System Plan (ROSP).
- Crops and Livestock requested for certification.
- Verification of valid business license.
- Active baseline certification for organic, social fairness, organic, and animal welfare.
- Most recent Regenerative Organic Certified® audit report, if applicable.
- Tillage, crop rotation, and vegetative cover plans.
- Local aerial maps of the farm or drawings. This includes land prepared for agriculture, areas where crops are grown, water sources, post-harvest, processing facilities (if applicable), storage rooms, office spaces, and other essential buildings.
- Soil health lab test results & in-field soil analysis results (as applicable per program requirements).
- Record of native flora and fauna on the farm.
- Worker health and safety manual.
- List of products using or wishing to use the Regenerative Organic Certified® name or logo.
- List of current or potential buyers of certified product(s).
- Eligibility based on a percentage of land or revenue entering the program.
- If applicable, processed product formulation worksheets.
- If applicable, supply chain and production flowcharts.
- List of all synthetic chemicals and organically approved pesticides used within the last 18 months. If pesticides are used, the CB ensures they have been reviewed for toxicity against the Xerces Society's "Toxicity of Common Organic-Approved Pesticides to Bees."

2. The CB shall retrieve, review, and upload via myROC the information submitted by the client. **See Annex K – Document Management for myROC** for expectations and requirements.
3. The CB sets a legally and enforceable written agreement to provide certification and audit services to clients. The agreement covers ROA and allows the CB to share the information collected with the ROA. See ISO 17065 4.1.2.
4. The audit and certification scope are clarified with the client. Any differences in understanding the Framework criteria are resolved. Language and translation needs are determined and resolved as well.

5. The certification body has a process in place to ensure compliance status determination and verify that practices used in the production of products comply with the Framework as applicable to the production system.
6. To ensure the certification of crop products is accurate, the CB will confirm the sizes, locations, and acres, of each parcel and crop.

2.1.2 Onsite Audit

1. CB ensures that inspections are approached with collaboration and mutual respect towards suppliers at all levels, focusing on education and sustainable remediation.
2. CB shall determine and inform the ROA whether accepting a new operation or audit order would create any threats to compliance with fundamental program requirements with the ROA governance documents or as described in this manual.
3. CB ensures that documents and records are readily available during the audit process at every point in the supply chain, production sites, offices, and checkpoints.
4. CB and client establish audit deadlines for significant tasks to ensure the smooth operation of the audit process. This should be done from the initial pre-engagement discussions through confirming audit dates and up to the report date, ensuring compliance with the ROA program requirements.
5. CB shall conduct one onsite annual audit for each certified operator (certificate holder).,**The interval between audits shall not exceed 18 months, counted from the last audit day.**

Audits can be postponed or delayed due to natural disasters, pandemics, or uncontrollable circumstances impacting the CB or the operator. The CB consistently documents the cause and informs the ROA of any postponed or delayed audit.

6. **Onsite audits of farms, ranchers, or facilities can occur at any stage of the production cycle, with specific emphasis on periods of increased risk:**

    a. To animal welfare, such as castration or other mutilations, birthing, shearing, loading, or similar.
    b. To social fairness, such as hiring process, harvesting, transportation of workers, presence of seasonal workers, housing, or similar.
    c. To soil health and land management, such as crop rotations, field preparation, cover cropping, etc.
    d. The audit period may vary each year, so the CB can assess different stages of the production process.

7. CB considers various factors to estimate the duration of an on-site audit, including production system size and complexity, parcel quantity and size, worker interviews, previous verifications, complaints, and risk assessment.
    a. **It is essential to strive for cost savings and efficient time use when conducting audits.**
    b. Audits can be bundled with other pillars and programs, but this should not negatively impact the operation by causing unreasonable delays in initial or renewal audits.

8. During the onsite audit, it is important to thoroughly examine the farms and facilities, including but not limited to a **walk-through, review of various documents, and interviews.** Critical considerations to consider as part of the audit scope are:
    a. Assessment of the working and living conditions of the farm workers, including how they are treated. This evaluation should involve a comprehensive visual inspection, interview with workers and confirming contracts and records.
    b. Assessment of the welfare of animals by visually inspecting legal compliance, living conditions, and treatment.
    c. Use of ROC™ marks, Review labeling use, farming and ranching practices, and operational procedures.
    d. Review for product segregation, including separation practices and procedures.
    e. Review of a traceable supply chain system, including procedures and records.
    f. Management and worker interviews to ensure proper implementation of policies, procedures, documentation, training, and legal compliance.
    g. Review issues identified during the initial review.
    h. Review complaint policies and records.
    i. All other requirements as established by the ROA Program

9. CB ensures that auditors are acquainted with all ROA Program Requirements and Documents:
    a. Auditors must evaluate the correct execution of various components such as systems, policies, procedures, work instructions, checklists, and training.
    b. Auditors conduct interviews with management and workers at all levels of the supply chain, using the local language.
    c. Auditors ensure the confidentiality and integrity of the audit interview source and data
    d. Auditors use confidential information solely for conducting the audit and do not disclose personal information to non-approved third personnel.
10. To decide on the sampling methodology for initial and renewal audits, the CB will refer to the **Sampling Methodology and Group Certification** document, which outlines the risk levels and requirements. **See Annex J – ICS Managed Group Certification Procedures** for additional information on grower group certification.
11. The audit team might consist of one or more of the following roles proportionate to the CB needs, the scope of the audit, and operation size:
    a. If more than one auditor is part of the team, one auditor shall be designated the lead auditor and take overall responsibility for the audit completion.
    b. One or more auditors under training, joining as observers.
    c. A shadow auditor if the audit is part of an auditor's evaluation.
    d. One or more translators or interpreters, if applicable.
    e. If applicable, one or more technical experts.
12. When translators, interpreters, or technical experts are used in audits, they shall be independent of the operation being evaluated. Names and affiliations of these individuals are included in the designated field in myROC.

Audit Protocols

13. The auditor shall conduct an **Opening Meeting** with the operator representative and all key management members to confirm the audit agenda, objectives, pillars scope, criteria, timeline, interviews, and the presence of any observers.
14. The audit shall inspect vital areas, as applicable to the operation wishing to get certified:
    a. Identify and visit land, fields, farms, ranches, and facilities, which may include visits to non-certified areas.
    b. Verify the flow of certified claimed materials and that the ROSP accurately reflects the operation structure and scope.
    c. Identify potential areas of risk to product integrity.
    d. Verify that changes to the Framework and related requirements are effectively implemented.
    e. Verify that corrective actions and plans from the last audit are thoroughly and accurately implemented, especially those closed under special circumstances (e.g., under contingencies established by the CB).
    f. Verify that any approved deviation request protocol is being followed.
    g. Interview people knowledgeable within the operation at the time of the audit.
    h. Verify that the list of parcels or fields, animals, and crops is complete and accurate.
    i. Inspect vital areas such as animal housing, grazing, harvest, storage location, worker areas, onsite processing, and packaging areas.
15. After the inspection, the auditor holds a closing meeting with the management and key members involved in the audit to discuss inspection findings and compliance issues. The auditor uses **Annex E – Closing Meeting Template** to record the meeting and summarize the information collected, the initial audit findings, and the next steps. Alternatively, CB can use its own closing meeting template, other internal system, or an integrated combination of these, ensuring that all information required is provided.

Closing Meeting information must be reported to the client during the audit and later uploaded into myROC along with the audit report created by the auditor.

16. Once finalized, the auditor submits the audit report to the CB per program requirements, see 2.1.4 Technical Review.

The CB must log in to the myROC portal to fulfill work orders and checklists. Checklists can be accessed through the Ecert onsite or mobile app. Additionally, CB can print PDF versions of the checklist directly from myROC.

2.1.3. Risk analysis

1. The CB and the auditor identify areas of risk before the audit and inspect them during the onsite visit.
2. The CB conducts risk assessments to identify and evaluate potential risks and updates its internal risk assessment to address any risks discovered. Risk assessments are provided to the ROA upon request.
3. The CB conducts the **Social Fairness Risk Matrix** analysis to inform the operation of the level risk assigned and appoint the auditor.
4. CB assurance personnel must verify evidence reliability by checking important details such as names, dates, signatures, and labeling. Evidence gathered must meet specific criteria or characteristics for validity:
    a. Evidence must be current, relevant, complete, sufficient, and applicable to the organization being audited.
    b. Evidence must come directly from the operation itself or a reliable third party authorized by them.
5. During an audit, the auditors evaluate the traceability of one or more products, both physical and documented, that are being considered for certification. They assess the operation traceability system, including the inputs used to create the product and the outcomes achieved. The results of this assessment are documented in the audit report notes

2.1.4. Technical Review

1. Once an audit is completed, the **audit reports must be submitted to the CB within 15 calendar days** from the last day of the audit for technical review. These reports, along with any findings, will be uploaded to myROC. See **Annex – L for guidance** on report writing.
2. The CB shall follow its policies and procedures to conduct a technical review with its internal staff.
    a. The CB assigns qualified personnel to perform each evaluation task.
    b. The technical reviewer is an individual who was not previously involved in the audit process.
    c. The technical reviewer carefully examines all evidence, data, and findings of the audit, ensuring they are relevant and reliable and meet the certification and pillar requirements.
    d. The certification body shall document measures applied to verify the effectiveness of corrective actions taken by operators to meet the requirements.
3. The CB reports all findings in accordance with their documented reporting procedures.
    a. The findings identified during an audit shall be classified by the CB according to the types set by ROA. **See Annex F – Non-conformity classification and management.**
4. The CB provides the client with information on the next certification steps, tasks, and timelines to verify that NCs have been corrected.
5. The CB sends a technical review report to the operator detailing any NCs found and request to the operator:

a. To respond within **45 calendar days**, unless it's a Critical Tolerance (CT) issue, which requires a response within **30 calendar days**
b. The response must either show evidence that **corrective action** has been implemented for each NC or provide a comprehensive **corrective action plan** addressing each NC. A corrective action plan must include relevant milestones, the people responsible, and a completion timeline within **90 calendar days** from receipt of the audit report. The CB may approve greater timelines if the corrective action plan includes long-term actions or actions that require more time to implement.
c. The CB may establish a timeline for any follow-up during the established timelines, which can be done via email and regular phone calls.

6. If the operator requires additional time to meet the designated deadlines and address an NC, they can make a written request to the CB. The CB may accept a more extended timeframe if reasonable and justified. In that case, the CB needs to include this information in myROC, by creating a finding.
    a. **Approved corrective action plans may need adjustments**. In this situation, the CB may accept written requests that are reasonable and justified.
    b. If the conditions are met and there is appropriate evidence, the CB can close an NC. If justified, the **CB might close an NC under specific contingencies**, including timelines for any necessary follow-up, which can be done via email or audit. These follow-ups may occur between annual audits or at the renewal audit.
7. The CB documents all findings and updates them in myROC using the relevant task tab. All relevant information is entered into myROC to ensure accurate records.
    a. The CB can use the corrective action template under **Annex F** to track the status and corrective action for each finding.
    b. The CB can use the information available in myROC to track the status of conditions.

Clients who have achieved certification or been audited may apply for an exception to the Regenerative Organic Certified® Framework requirement by submitting a Deviation Request Application Form to the CB. The CB reviews the application and issues a recommendation. The Deviation Request Application Form and the CB's recommendation are then sent to standards@regenorganic.org for approval. The Internal Rules Committee reviews and responds to deviation requests within 21 calendar days, approving the deviation, denying it, or requesting additional information.

2.1.5. Label Review

1. The CB monitors misuse of the Regenerative Organic Certified® name/logo on farm-level products, reports identified issues to the ROA and provide the Labeling Guidelines and Term of Use document to the clients.
2. The CB ensures all certified products are labeled according to the Labeling Guidelines & Terms of Use. The CB provides guidance and requirements to certified operations on how to issue claims and label their products in compliance with the Regenerative Organic Certified® program.
3. The CB shall upload labels to myROC and assign a file type of “label”.

2.1.6. Certification decision

1. A Decision Letter is issued once the certification decision is completed.
    a. In cases where there are no audit findings leading to non-conformities, the certification decisions are issued within 90 calendar day of the last day of the audit.
    b. In cases where there are audit findings leading to non-conformities, the certification decisions are issued within 120 calendar days of the last day of the audit.
    c. If the operator has received approval from the CB for an extended deadline to implement corrective actions, then the certification decision must be issued within 15 calendar days following that extension deadline.
2. Certification decisions are made by a qualified decision-maker who follows all applicable CB procedures. See **Annex C – Technical Reviewer Qualifications.**
3. A certification decision shall be made upon the NCs' closure or the deadline for the non-conformities, whichever comes first. The **Decision Letter** is issued to the operator and the ROA. See **Annex D – Decision Letter Template.**
4. A positive certification decision can be granted if the CB determines that the operation complies with all the program requirements. If there are any non-conformities, the CB confirms whether the operation operates according to the approved Corrective Action Plans or has corrected all the NCs.
5. The certification decision is valid until the results of the next annual audit are known, and a new decision is issued.
6. Suppose an applicant for certification has willfully made a false statement regarding its production system and operations related to the products included in the application. In that case, the CB may deny certification without issuing a notification of noncompliance to the client. CB reports the situation via myROC and via email to the ROA.
7. The CB shall issue a written notice of denial of certification to any applicant to whom it denies certification. This notice shall state the reasons for denial and the applicant's right to:
    a. file an appeal with the CB
    b. reapply for certification

2.1.7. Issuance of certificate

1. The certificate is granted to the client, and a copy is provided to the certifying body for their records.
2. The ROA issues the client certificate based on the information provided in myROC and the **Decision Letter Template issued by the CB** to the client.
3. The client certificate is maintained and available in the myROC client portal.
4. The ROA shall add the operator to the online public directory unless the client requests not to be added

2.2. Renewals

1. Operations are required to renew annually using the online form at regenorganic.org. **See Annex M – Renewal Process.**
2. The CB shall have procedures to verify annually that the program requirements continue to be met by the certificate holder.
3. During the audit renewal service, the CB verifies if any operational change or compliance with the applicable program requirements occurred after the last audit service is finalized and the operator submits all requested information.
4. During the onsite visit, the auditor shall verify if previously submitted corrective actions have been, and remain, fully implemented.
5. The CB shall make its certification decision as outlined in **2.1.6. Certification Decision**

2.3. Changes affecting certification

1. The CB conducts a document review before approving any change to the certification scope.
2. For certification changes related to new products, production units, or unit expansion, contact certification@regenorganic.org. The CB must have written policies and procedures that outline how to manage changes requested by the client. These procedures, at a minimum, cover the following areas:
    a. **Contractual agreement between the CB and client**. Clients must promptly inform the CB about any change impacting on their certification status.
        - **Changes may involve** management, organization structure, production landscape, adding or removing growers, ranchers, or sites, increasing, or decreasing labor force or changing hiring practices, certification status with other programs approved by the ROA, and other similar ones.
    b. A procedure for evaluating and issuing revised certification decisions, if needed.
3. **Communication with the ROA.** The CB informs the ROA of any change **within 21 calendar days** of the CB being informed by the client. Changes affecting client certification status or level must be reported to the ROA faster.
4. CBs can contact the ROA team to evaluate changes if needed.
5. Requests from the client and the CB decision are sent to certification@regenorganic.org.
6. Requirements for when a client wishes to change CBs can be found in this document; see section **2.11. Requirements when a client changes CBs.**
7. The CB shall inform the ROA when a certification scope has been approved and changed.

2.4. Additional inspections

1. The CB is required to respond within a reasonable time to any inspection requests from the ROA, whether scheduled or surprise visits, in cases where there are concerns about operations compliance due to complaints or other valid reasons. These inspections may include full reviews, spot checks, or other measures.

2.4.1 Unannounced Inspections

1. A minimum of 5% of unannounced audits are performed in addition to the mandatory annual audits.
    a. The 5% is calculated based on the total number of operations (certificate holders) managed by the CB in the previous year, rounded up to the whole next number with a minimum of one.
    b. The 5% shall be distributed among the countries and regions where the CB has certified operations.
2. The operation to receive a surprise audit shall be selected by the CB based on risk and consider at least:
    a. Requests received from ROA, if any.
    b. The CB's risk analysis of the operation. Considering the number of NCs identified during the last audit, implementation of corrective action plans, and other relevant justifiable reasons, the CB may have and might represent a risk of credibility to the ROA and the CB.
    c. Complaints received about the operation, if any.
    d. Operations that still need to receive an unannounced audit.
    e. CB shall not give notice of the unannounced audit to the operations of more than 24 hours.
    f. Unannounced inspections and soil testing are managed following the **Sampling Methodology and Group Certification requirements.**

The ROA has the authority to conduct additional audits at any time, especially if there are complaints or unresolved disputes.

2.5. Sampling and testing

1. The Certification Body shall have a documented procedure for handling collected plant and soil samples at the operator's location and proper chain of custody.
2. The CB shall have arrangements with laboratory facility(s) to ensure the integrity and accuracy of the sample processing.
3. Laboratories used by the CB for sample processing should be accredited to ISO/IEC 17025 or another recognized national accreditation.
4. Lab credentials, contracts, and agreements with labs should be kept on file with the CB.
5. The ROA may also request sampling and testing activities to CB as applicable. CBs are required to follow NOP §205.670 regulations.

2.6. NCs, Warnings, Suspension and Withdrawal

1. **Certification Bodies must have written procedures** for notifying applicants and certified clients regarding non-compliance, issuing warnings, and suspending or canceling their certification. The requirements for these procedures should be clearly defined.

2. **The CB and the client define the corrective action timeline for addressing any NC.** Critical tolerance findings are addressed within **30 calendar days,** while all other non-compliances must be addressed within **45 calendar days,** starting from the day after the CB sends the technical review report to the operator.

3. To address an NC, the client can **create a corrective action plan or implement a corrective action** that tackles the root cause of the finding.

4. **If the client does not address the NCs within the given timeframes**:
   a. The CB sends a written notice to the applicant indicating that a certificate will not be issued. For those with an existing certificate, the CB will cancel it within **15 calendar days.**
   b. The applicant or certified operation can request the CB for additional time to complete the corrective action or update the corrective action plan. If justified and reasonable, the CB can approve the request.
   c. If the client doesn't respond or take action after multiple attempts by the CB, they can send a written notification that states their certificate has been canceled and they have been removed from the list of certified clients.

5. **Conditions may lead to a client's certification withdrawal:**
   a. Breach of the Contract Terms and Conditions established with ROA or CB.
   b. Systematic failure to comply with Framework and program requirements.
   c. Failure to maintain baseline standard requirements or equivalent (see additional guidance below).
   d. Lack of cooperation and access to documentation, facilities, and personnel occur before, during, or after the desk, remote, or on-site audit,
   e. Failure to permit an audit to be scheduled or conducted.
   f. Using the certificate in ways that conflict with the terms and conditions of the Licensing Agreement use.
   g. Voluntary withdrawal from the program.
   h. Certificate anniversary date has lapsed, and audit extension is not scheduled within the outlined timelines.
   i. Failure to provide payment for certification services to ROA or the CB.
   j. Any other matter or circumstance that may compromise the integrity or reputation of the ROA program.

6. If the client does not meet the requirements stated in section 2.6.5., the Certification Body has the right to withdraw the certification for the relevant pillar(s).
7. The CB has a documented process for addressing certification cancellation and corrective action.
8. Clients who had their certificate canceled must reapply for certification to regain their certification status.
9. If an appeal is ongoing, the withdrawal process may be put on hold until the appeal's outcome is determined.
10. If the client fails to maintain baseline standards requirements according to the program requirements, it may be subject to sanctions by the ROA. If, at any given time, the client is subject to one or more of the following situations, the CB needs to communicate with the ROA immediately:

    a. Suspension, withdrawal, or cancellation of the certification of baseline standards for all applicable ROC pillars.
    b. Investigations, allegations, and complaints that may affect the baseline standards.
    c. Failure to renew with the baseline standards.

After receiving the communication from the CB, the ROA will evaluate the evidence and information presented and answer within **15 calendar days,** with the appropriate measures to be taken regarding the ROC certification.

2.7. Complaints and Appeals by Operations

The CB manages and resolves appeals and complaints about its certification services to ensure fairness and transparency.

1. The CB appeals and complaint procedure is publicly available.
2. The CB ensures the client is informed and understands the appeals and complaint procedure.
3. The CB has a dedicated individual, different from the ROA program manager, whom operators can contact.
4. Appeals and complaint procedure is designed to handle all requests promptly. Confirm receipt of the request within a reasonable timeframe, provide estimated timelines for resolution, ensure thorough review and investigation, and maintain the appellant or compliant informed of all results and decisions.
5. If the appellant or complainant is unsatisfied with the result, they must follow CB's appeal and complaint policy. The CB communicates the next steps to the client.
6. If the CB does not follow ROA requirements or fails to follow its own complaint or appeal process, the complainant can present their case to the ROA. CBs can direct certified operations to submit complaints directly to ROA using the online Complaint Form at https://regenorganic.org/resources. See Regenerative Organic Certified® Dispute Process.

2.8. Deviations to Requirements

1. The CB shall collect all Deviation Requests to the Regenerative Organic Certified® Framework from operations that have received an audit. Operators shall not submit deviation requests to the ROA directly.
2. The CB shall only receive, review and forward Deviation Requests related to clients in an active certification cycle or process with the CB.
3. Deviation requests are submitted to standards@regenorganic.org using the online Deviation Request form.
4. Deviation requests must include supporting evidence and be comprehensive. This can include but is not limited to the following: photos, field maps, field plans, soil test results, crop consultant advice, specific documents and records, description of system or procedures, and more.
5. To support and justify deviations, it is highly recommended to include peer-reviewed research articles and literature along with the submitted form.
6. The CB shall communicate Deviation Decisions to clients and upload all supporting documents to myROC.org

2.9. Use of Licenses, Claims, and Marks of Conformity

1. The CB shall ensure that all certified products are labeled in accordance with the Labeling Guidelines & Terms of Use and Regenerative Organic Certified® Framework.
2. To ensure proper use of the Regenerative Organic Certified® mark and name in marketing, the CB must have monitoring procedures and systems for certified operations.
3. Additionally, certificate holders must not use the phrase "Regenerative Organic Certification" instead of "Regenerative Organic Certified®" to avoid consumer confusion.

2.10. Records Control by the CB and Client

1. The CB maintains certification and auditing of related documents and records.
2. The CB ensures that the certified operation maintains records and supporting documents concerning the harvest, production, and sales of crops, including the certification status.
3. The CB ensures that the certified operation maintains records of purchases, sales, labels, or otherwise representations as a certified crop or product.
4. Records of the quantity of the raw materials received, used for processing, and processed final product are maintained from the last 3 years.
5. Unless indicated differently in this document, all documents and records are kept for at least five years.
6. All documents and records are made available for ROA upon request.

2.11. Requirements When a Client Changes a CB

1. If clients wish to switch from their current CB (sending) to a new CB (receiving), they must notify their current CB and the ROA in writing about their intention to make the change.
2. The client must request a "**letter of current certification and auditing status**" to the current CB confirming that all non-compliance and contract conditions have been addressed. This letter should be sent to the new CB program manager and uploaded to myROC.
3. The client shall maintain their current certification status with the sending CB until the new certification process is complete and the new CB issues a certification decision for their land and products.

2.11.1. Requirements on the sending (current) CB

1. When requested, the sending CB must provide all certification and auditing information and records to the client and receiving CB.
2. The sending CB is responsible for notifying the client of the termination of the certification agreement through a **"termination letter"** stating that the certification agreement has ended and will no longer monitor the client's compliance once the new CB confirms that a new decision has been issued to the operator.
3. After confirmation from the new CB that a certification decision has been issued, the sending CB has the right to require the operator to immediately stop using the sending CB's identity on their products or marketing materials.
4. The sending CB must report any terminations due to a change in CB in the annual report to the ROA as a **“termination due to a CB change.”**

2.11.2. Requirements on the receiving (new) CB

1. The receiving CB shall request information from the current (sending) CB and the client, including a copy of the latest audit report, audit findings, and corrective actions. The receiving CB shall review the **"letter of current certification and auditing status"** the sending CB provides.
2. The receiving CB shall schedule an on-site audit in coordination with the client.
3. The receiving CB shall issue a new decision only after the certification service is completed and it is determined that the client follows all program requirements.
4. The Issue Date on the new certificate shall be when the receiving CB takes the certification decision. The since date (first audit date) will remain the same.
5. Within **10 calendar days**, the receiving CB must notify the sending CB that the operator has been issued a new certification decision

Section 3 – Glossary of Terms

1. **Agreement**: The licensing agreement between the ROA and the Organization.
2. **Approval**: CBAC decision that a certification body is competent to carry out certification activities. Achieving approval status gives a certification body the authority to grant certification.
3. **Assurance personnel**: The Certification Body personnel approved for conducting any activities related to the audit service, including personnel performing technical reviews and on-site audits.
4. **Authorized licensee**: Includes, but is not limited to, any brand, broker, finished goods manufacturer, or wholesaler who is making a Regenerative Organic Certified® claim and has a valid License Agreement with the ROA.
5. **Brand**: A name, term, design, symbol, or any other distinctive feature that identifies a product as distinct from other products.
6. **Brand Owner**: a person or company who sells a commodity or product under a registered brand label. Brand owners will be referred to as "brands" throughout this document.
7. **Auditor**: A certification body representative who conducts audits.
8. **Calibration**: A targeted review or training of any assurance personnel to ensure performance metrics and program goals are consistently applied. Any findings in the individual's performance or training should appropriately address any deficiencies or knowledge gaps observed.
9. **Certification level**: The Regenerative Organic Certified® level to which a product is certified, i.e., Bronze, Silver, or Gold.
10. **Certified producer**: A farm or ranch that has applied for or achieved Regenerative Organic Certified® status and is making a claim. A certified producer must have a valid License Agreement with the ROA. A producer grows or raises a commodity to be used for food, feed, cosmetics, or textile products. The first stage is the raw material supply chain. Certified producers are also referred to as "operators."
11. **Certified operation**: See certified producer.
12. **Chain of custody**: The set of practices and documentation required to ensure that certified products (i.e., plant or animal products) are segregated, identifiable, and traceable throughout the supply chain. Post-farm processors and handlers must maintain the proper chain of custody standards for a final consumer product to carry Regenerative Organic Certified® claims.
13. **Claimed material:** The portion of a product that is intended to be used and eligible for Regenerative Organic Certified® claims.
14. **Client:** A certified operator or applicant.
15. **Consumer-facing content claims for textiles: These include but are not limited to hang/swing tags, claims displayed permanently on the** product, and alternative packaging.
16. **Critical activities**: file review, auditing, decision-making, or issuance of certificates.
17. **Critical tolerance** (CT): a type of finding with resolution due within 30 days.
18. **Desk audit**: off-site records assessment conducted by the ROA to assess conformance to the Operation Manual for Certifying Bodies requirements or approved equivalent.
19. **Evaluation**: The Process undertaken by ROA to assess the quality and competence of a certification body based on a defined scope of approval.
20. **Exempt organization**: An organization that meets the exemption criteria of the NOP Organic certification program and is also exempt from certification requirements and auditing. Exempt

organizations include those that store or transport only packaged, segregated raw or finished goods and retailers that sell packaged, labeled product(s) to consumers.

21. **Framework**: Standards for the Regenerative Organic Certified®. Consists of three pillars: Soil Health and Land Management, Animal Welfare, and Farmer & Worker Fairness. Regenerative Organic Certified® has three levels: Bronze, Silver, and Gold. Each requires a different number and scope of regenerative organic practices used.
22. **Governing documents**: any document stating program requirements. The Governing Documents consist of the License Agreement, the Framework, the Program Manual, the Operation Information & Certification Contract, the Supply Chain Guidelines, the Cost & Fee Structure, and the Labeling Guidelines & Terms of Use. The Governing Documents are subject to change. Governing Documents will be available at RegenOrganic.org/Resources.
23. **Grower group:** group of sites that wish to achieve certification and are represented by a group leader and by group members. Group Certification Requirements can be found under the Group Certification and Sampling Methodology document.
24. **Handler**: Any person engaged in selling, processing, or packaging agricultural products except for final retailers that do not process agricultural products.
25. **Information panel:** The labeled panel immediately to the right of the principal display panel, as displayed to the consumer. If the panel is not usable due to package design and construction, then the information panel is the next label panel immediately to the right.
26. **Initial Agreement:** An initial agreement is a verbal or written contract between the CB and the operation that sets the terms and conditions of a new relationship between them. The contract states, at minimum, who the contract parties are, what obligations they each agree to take on when the audit might occur, and what the audit fees might be.
27. **Internal control system** (ICS): The Grower Group follows procedures, activities, and steps led by the operation's management and assigned personnel. These measures are designed to ensure compliance with the applicable Regenerative Organic Certified® Framework and other program regulations, contracts, policies, and procedures across the Grower Group.
28. **Licensee:** Legally authorized representative of an organization that has signed the ROA License Agreement and has agreed to be bound by the terms of the Regenerative Organic Certified® program.
29. **Licensor:** ROA is the licensed owner of the Regenerative Organic Certified® name and all other trademarks, certification seals, logos, and standards.
30. **Low-Risk Social Fairness Audit**: A low-risk farmer and worker fairness audit is defined as an audit of a farm or ranch in the Global North that complies with the Risk Matrix for Social Audits in the Global North. *See Annex N*.
31. **Medium-scale farm**: 6-25 permanent workers and no more than 100 total workers on-site at the management unit at any time.
32. **Medium-scale farm organization**: More than 2/3 of member farms meet the criteria for medium-scale
33. **Non-compliance (NC):** a type of finding issued to an operator that is not in compliance with the Regenerative Organic Certified® Framework.
34. **On-site Audit**: synchronous evaluation visit of conformance to the Operations Manual for Certifying Bodies either in person or virtually.

35. **Operation**: A legal entity which is certified to or in the process of becoming certified. The farm or ranch that grows or raises crops, botanicals, and/or animals to be used for food, cosmetics, or textile products. Typically, the first stage in the raw material supply chain.
36. **Operator**: the owner or responsible person for the applicant or certified operation.
37. **Organization**: The Farm, Producer, Operation, Brand, Finished Goods Manufacturer, Supply Chain Actor, or other entity that executed a License Agreement.
38. **Parcel**: readily distinguishable pieces of land from each other with no adjacent or touching borders.
39. **Principal display panel**: The portion of a product packaging or label that is most likely to be displayed, presented, shown, or examined under customary conditions of display for sale.
40. **Processing**: Any stage in the supply chain where certified materials (i.e., plant or animal products) are modified. Processing may include activities such as slaughter, milling, cooking, mixing, and packaging a final product. Processing may occur at a separate facility or on-farm. If the latter, then the farm or ranch is both a producer and processor.
41. **Producer**: The farm or ranch that grows or raises crops and/or animals to be used for a food or textile product. The first stage in the raw material supply chain.
42. **Reevaluation**: A complete assessment of the CB quality system and certification operational activities that occurs every four years. It is a process undertaken by ROA to assess the quality and competence of a certification body based on a defined scope of approval.
43. **Remote audit**: A site audit that is conducted via a remote web conferencing method or other audio/video means.
44. **Regenerative Organic Certified® mark:** Refers to the Regenerative Organic Certified® seal and name and all other trademarks, certification seals, logos, or any other proprietary designations owned by the Regenerative Organic Alliance.
45. **Pillars**: Soil Health, Animal Welfare, and Social Fairness.
46. **ROSP –** Regenerative Organic System Plan completed by the Client
47. **Surveillance Audit (ASR)**: Annual audit of the Certifying Body as a condition of approval.
48. **Site**: Any geographically distinct unit within a certification pillar scope. Locations which are geographically distinct or have different civic addresses are separate sites (see “Parcel” for land). Subcontractors are not considered to be sites. Includes: farms, facilities, offices.
49. **Smallholder:** Small farming operations where land and labor productivity are comparatively low due to limited resources. Smallholder farmers often rely on farming as a primary means of livelihood and are at greater risk of vulnerability in the supply chain. Smallholders rely primarily on family labor for farm operations. Smallholder size may vary by farm type and commodity; however, some certifications set thresholds so confirm with your certification program, if applicable. Most smallholders are organized by Internal Control System (ICS) for certification purposes. Contact the ROA for additional guidance on determining if your operation is considered a smallholder.
50. **Small-scale farm:** ≤5 permanent workers and no more than 25 total workers on-site at the management unit at any time (FT-USA, FFL).
51. **Small-scale farm organization**: More than 2/3 of member farms meet the criteria for small-scale. A maximum of 1/3 of member farms may have up to 2 times the parameters defined.
52. **Spot audit** - A type of short notice onsite or synchronous virtual visit to an ROA-approved Certifying Body or certified operator, usually as the result of a complaint or major non-conformity to the ROA program.
53. **Standards**: Regenerative Organic Certified® Framework, Dairy Animal Welfare Criteria, Processor Criteria, and Supply Chain Guidelines.

54. **Subcontractor**: A legal entity hired by an operation to perform services (e.g., storage, processing). Subcontractors take physical possession, but not legal ownership, of certified products and are independent of the organization that outsources the material or an independent legal entity hired by a certification body to provide services related to certification activities.
55. **Supply Chain**: Any steps taken to deliver food, fiber, or botanical products from the farm to the end consumer. Raw agricultural materials are transformed into saleable goods by processing, packaging, transporting, storing, or distributing to final sales outlets.
56. **Supply Chain Actor**: Any organization that processes or handles certified product that are not fully packaged or contained and/or take legal ownership of certified products, including but not limited to any stage in the supply chain where certified materials (i.e., plant or animal products) from the producer are modified, which may include the final stage of production. For certification purposes, the scope for Supply Chain Actors (SCAs) begins with the first legal change in ownership after the crop harvest.
57. **Suspension**: The limitation of a scope certificate or accreditation due to a specific non-conformity or issue. A suspension may be lifted when the non-conformity or issue is resolved, and the scope certificate or accreditation becomes active again immediately.
58. **Technical Review Report**: The report that is issued after the technical review, to operators, by the Certification Body (CB) that summarize the audit findings and non-conformities identified during the audit process.
59. **Withdrawal or Cancellation**: Refers to the revocation of a scope certificate or accreditation due to a specific non-conformity or issue or by the request of the certification body or the certified operation. When approval or certification is withdrawn, a new assessment or audit must reinstate accreditation or certification to active status.
60. **Witness Audit of Auditor(s) (WA):** on-site audit during which the ROA observes a qualified auditor to confirm competence. The Certification Body, ROA, and auditor will schedule the witness audit at an agreed-upon time. A mock audit is acceptable if the Certification Body has no active clients.

Annex A – CB Document Review

This section describes the types of information that the applicant CB should submit for the document review or have available to the ROA as part of the onsite evaluation.

1. Documents pertaining to the CB

1. The corporate structure showing internal and external relations of control by shareholders, companies, or other groups for the organization.
2. If incorporated, the general by-laws.
3. A list of directors comprising: 1) members of the board of directors (including specific function, duration of mandate, and affiliation); 2) board members of a sponsoring organization (if applicable).
4. The addresses of all locations where the organization does business and a summary of activities from each location.
5. A copy of the USDA NOP accreditation certificate for the CB.
6. Prepared financials or evidence of financial stability and adequate resources.

2. Description of decision-making structures

1. A description of the technical reviewers or internal bodies making product certification decisions.
2. A description of the appeal process.
3. A description of sharing responsibilities between head office and subcontractors.
4. An internal organization chart related to the general administration of the ROA program, including names of persons occupying managerial positions at the head, subcontracted, and regional offices carrying out certification activities.

3. Information on programs

1. List of current accreditations and baseline certification programs for ROA with scope categories shown. Example: USDA NOP (crops, livestock, handling).
2. List of countries, provinces, or states where the CB is carrying out certification activities for USDA NOP and potentially ROA.
3. A copy of the organization's latest annual report.
4. List of subcontracted auditors and laboratories.

4. Policies and technical procedures

1. The quality manual related to the ROA program.
2. Code of Ethics Policy.
3. Standard operating policies and procedures used in the ROA program
4. Regenerative Organic Certified® Fee schedule.

5. Document management system.
6. Certification management system.

5. CB human resources management

1. A complete list of CB assurance personnel resumes with status and positions held.
2. Person(s) reviewing certification labels for compliance.
3. Person(s) reviewing inputs for Regenerative Organic Certified®.
4. Person in charge of quality control for ROA and Regenerative Organic Certified®.
5. Signed confidentiality and conflict of interest forms for CB assurance personnel.
6. Standard contract used with all subcontractors (if applicable).

6. Certified operator documents

List of documents included in the file for each Regenerative Organic Certified® operator at a minimum:

a) Exit interview form (aka closing meeting).
b) Non-compliance and corrective action measures and plans.
c) Decision letter to the client.
d) Copy of Regenerative Organic Certified® certificate.
e) Label review and approval.
f) Regenerative Organic System Plan form.
g) Risk assessment.
h) Parcel Maps.
i) Product formulation and supply chain flowchart.
j) Current and complete Approved Farmers List for grower groups.

Annex B – Auditor Requirements

Auditors must demonstrate the necessary skills, experience, and competency for auditing the pillar(s) to which they are assigned. The three pillars in which an auditor can be approved are 1) soil health and land management, 2) animal welfare, and 3) social fairness. Auditors can qualify for any one pillar or a combination thereof.

The process for approval is as follows: CB submits Approved Auditor Application > ROA reviews the request and supporting documents > ROA notifies CB of the decision. If approved, ROA adds the auditor to Trainual.com to complete asynchronous training. Once the auditor passes the training modules, they are considered "qualified" and added to the myROC database platform.

1. New auditors must undergo an initial qualification review by the CB, which includes evaluating education, training, and experience credentials.
2. New auditor requests shall be submitted by the CB to the ROA using the "Approved Auditor" online application form. Once received, the ROA processes the request and sends the CB an approval or denial decision for each pillar scope within **15 calendar days.**
3. All auditors shall complete and pass the program training before being "qualified" to audit.
4. The CB Program Manager ensures auditors receive ongoing training and stay updated on Framework updates, ROA program, and regulatory changes.
5. Auditors must pass asynchronous ROA training modules for each assigned pillar using the Trainual.com online training platform and finish myROC training.
6. The CB should assign auditors only to scopes, sites, and risk levels in which they are competent. Inexperienced auditors should not conduct large, complex, or high-risk audits independently. Audit Teams can be utilized for large scopes

A variance to requirements under sections B.3, B.4, or B.5 may be requested for consideration on a case-by-case basis to the ROA; however, it is not obliged to approve any changes that fall below the high standards set by auditors and reviewers.

Once submitted to qualityassurance@regenorganic.or, all requests will be reviewed within **15 calendar days**. Any request for a variance, at a minimum, includes the following information: name of requestor, countries of operation affected by the request, name of auditor or reviewer and title, current CV or resume of auditor or reviewer, reason for variance, supporting evidence, and risk analysis to audit integrity. And, if applicable, a plan to comply with the criteria and the name of the operation(s) affected by the variance request.

1. Expectations

Auditor remuneration is not incentive-based nor based on the outcome of inspections. All approved auditors must receive initial training, continuous education, and periodic evaluation.

Supporting Resources

1. ISO 19011: Guidelines for auditing management systems Section 7.2 “Determining auditor competence to fulfill the needs of the audit program” ISO19011
2. GSCP - Global Social Compliance Program - Table A - Core auditor competence and prerequisite reference requirements (for social and environmental compliance assessment), pg. 13. GSCP Auditing Competence reference tool in pdf format
3. APSCA - Association of Professional Social Compliance Auditors, Competency Framework for Social Compliance Auditors

2. Knowledge

Auditors responsible for all pillars must have knowledge of the following:

1. The Regenerative Organic Certified® Framework and the governing documents of the Regenerative Organic Alliance (ROA)
2. Practices related to industry, farming, processing, and supply chain
3. National and local regulations, their accurate interpretation, and how to apply them during an audit
4. Local social and cultural practices
5. Adequate linguistic skills for the region or access to a translator.

3. Skills

To conduct a thorough and effective audit, auditors must possess various general skills and apply principles of good audit practices to relevant operations and management systems. These skills include:

1. Strong language proficiency in comprehending all relevant documents.
2. Ability to review records and documents and determine if compliance is met, even when non-conformities are not immediately apparent.
3. Skilled in cross-checking all relevant sources to identify conflicting information and make informed judgments about the validity of the information received.
4. Adept at identifying risks and applying risk analysis.
5. Able to conduct impartial and objective evaluations of the information gathered to determine compliance.
6. Courteous and professional when reporting instances or situations of non-compliance
7. Able to succinctly summarize observations and interview results.
8. Able to maintain the confidentiality of proprietary information

9. Committed to issuing audit reports and findings on time.
10. Working knowledge of sector-specific terminology and practices.
11. Possess professional, ethical, open-minded, diplomatic, observant, adaptable, organized, collaborative, and impartial characteristics.

4. Qualifications

1. Complete at least one of the following **lead auditor training** courses recognized by the ROA:
    a. ISO/IEC 9001 - Quality Management Systems Lead Auditor Course
    b. ISO/IEC 14000 - Environmental Management Lead Auditor Course
    c. ISO/IEC 19011:2018 - Guidelines for auditing management systems
    d. ANSI/AAMI/ISO 13485: 2016/(R)2019
    e. Bureau Veritas Auditor Training Course
    f. SQF Internal Auditor Training
    g. Group GAP Plus Auditor Training plus USDA Fundamentals of Auditing course
    h. Other lead auditor training recognized by the ROA

5. Qualifications per Pillar

5.1. Soil Health and Land Management

5.1.1. Education

Education may be substituted for experience. A 4-year course of study leading to a bachelor's degree in agriculture-related fields, e.g., agronomy, horticulture, land management, environment, soil sciences, sciences, statistics, business, or an equivalent number of completed courses in a related field of study will meet the experience requirement.

5.1.2. Specific Program Training – Auditor-in-Training

Training in auditing to organic program standards, i.e., International Organic Inspectors Association (IOIA) training course or other training recognized by the ROA.

5.1.3. Work Experience

At a minimum, one of the following must be met:

1. Participated in 8 organic crop program audits (5 assisting with the audit and 3 leading the audit) for small to medium-sized scale operations within the past 18 months. Earning at least two acceptable evaluations within one year.
2. Completed five organic program audits within the past 18 months as a lead auditor for medium- to large-scale operations and earned at least three acceptable evaluations within one year.
3. Completed four organic program audits for large-scale grower group operations within the past 18 months. Earning acceptable evaluations within one year.

4. Four or more years of work experience in land management, crop management, agronomic consulting, crop production, training, natural resources, conservation, forestry, or environment.

5.2. Animal Welfare

5.2.1. Education and Training

Education may be substituted for experience. A 4-year course of study leading to a bachelor's degree in a related field, e.g., animal science, meat science, veterinary science, agriculture, animal welfare, or an equivalent year of completed courses in a related field will meet the experience requirement. **And at least one formal training course, certificate, or license from the following:**

1. PAACO (Professional Animal Auditor Certification Organization)
2. FSNS C&A Auditor (Food Safety Net Services Certification and Audit)
3. NAMI (North American Meat Institute)
4. ISO / TS 34700 (animal welfare principles in livestock production supply chain)
5. VERITAS Animal Welfare course
6. FACTA (Farm Animal Care Training and Auditing)
7. Veterinarian
8. Other formal animal welfare training recognized by the ROA

5.2.2. Experience

At a minimum, one of the following must be met:

1. A minimum of five animal welfare audits have been conducted at livestock operations in the past 18 months. Three of these were assisted audits, and two were led by the auditor. Earned at least one high-performance rating by the CB.
2. Completed three animal welfare program audits as a lead auditor for dairy operations in the past 12 months if auditing to the Regenerative Organic Certified® Dairy standards.
3. Five or more years of related work experience in herd or flock management or handling, i.e., veterinarian, ranch manager, dairy manager, herd manager, dairy supervisor, trainer, abattoir supervisor, or flock manager.

5.3. Farmer and Worker Fairness

Use the **Risk Matrix for Social Audits in the Global North** to determine the audit risk level associated with any Global North operation.

5.3.1. Low-risk auditor qualifications

1. Education and experience

Auditors for low-risk social fairness audits must have either:

a. A college or university degree or diploma in social sciences, social justice, or a related field, along with experience as a lead auditor or

b. An equivalent number of formal courses from an educational institution, also with experience as a lead auditor.

2. Training

Auditors for low-risk social fairness audits must have participated in an in-person shadow or mock audit interview with feedback. Additionally, they must have completed at least one of the following trainings:

a. Regulatory Framework and Methods online course for social audits by Ecocert Academy
b. ROA and Equitable Food Initiative (EFI) Training for Social Auditors
c. SA 8000 Introduction and Basic Auditor Training by SAI
d. Ecocert Social Auditing Techniques for Fair for Life course
e. Other social auditor training recognized by the ROA, such as IFOAM COROS criteria 10.

5.3.2. HIGH-RISK AUDIT QUALIFICATIONS

1. Education

Auditors have evidence of formal education by meeting one of the following:

a. Certificate, diploma, college or university degree in social sciences, anthropology, social justice, sustainability, education, psychology, or counseling or related educational field
b. Equivalent number of formal courses by an accredited educational institution

2. Training and Certification Credentials

Auditors have completed at least one of the following:

a. SA 8000 training course by SAI (Social Accountability International)
b. SMETA (SEDEX Members Ethical Trade Audit)
c. WRAP (Worldwide Responsible Accredited Production)
d. IRCA (International Register of Certificated Auditors)
e. Ecocert Social Auditing Techniques for Fair for Life course
f. Social Responsibility Auditor (ISO 26000)
g. APSCA membership in Good Standing
h. Certified Social Compliance Auditor (CSCA), plus signed APSCA's Code of Professional Conduct.
i. Registered Auditor (RA), plus signed APSCA's Code of Professional Conduct
j. Other equivalent training and certification that shall be applied to the ROA for evaluation

3. Experience

Social audit experience is crucial.

a. Auditors must have at least ten relevant audits or 30 relevant working days as a social fairness standards auditor or trainee in the past two years.
b. After completing ten low-risk audits or 30 audit days, the CB can request authorization from ROA to perform high-risk audits under the Regenerative Organic Certified® program.

4. Combination Education & Work Experience

It is required for social fairness to possess knowledge of International Labor Organization (ILO) Conventions, Labor Standards, terms and definitions, local labor laws, local wage information, and how to calculate a living wage.

Global North Social Audit - Social fairness auditors must familiarize themselves with the **Social Fairness Audit Global North Manual.**

Annex C – Technical Reviewer Requirements

The three pillars in which a technical reviewer can be approved are 1) soil health and land management, 2) animal welfare, and 3) social fairness. The CB must conduct a qualification review process, including assessing their education, training, and experience. Only qualified technical reviewers make decisions. To be added as a Technical Reviewer in myROC, the CB submits a request to qualityassurance@regenorganic.org.

1. General

1. To review and make certification decisions on Regenerative Organic Certified® pillars, Technical Reviewers must have the relevant training, experience, and competency.
2. All technical reviewers must complete and pass the Regenerative Organic Certified® program training provided by the ROA.
3. Technical reviewers must pass the asynchronous training modules for each assigned pillar on the Trainual.com online training platform and myROC training.

2. Knowledge

1. Understand the Regenerative Organic Certified Framework and ROA governing documents.
2. Familiarity with industry, farming, processing, handling, and supply chain practices.
3. Knowledge of Regenerative Organic Certified® label review procedures.
4. Conducting input reviews, such as pesticides and herbicides, to assess their toxicity to bees and pollinators.

3. Skills

Some skills required for assessing compliance include:

1. Proficiency in language to understand all relevant documents. Capability to review documents and records and decide if compliance is met.
2. Aptitude to identify non-conforming records that may take time to be noticeable.
3. Ability to analyze and cross-check all relevant sources to identify conflicting information and make informed judgments.
4. Capability to impartially and objectively evaluate gathered information to determine compliance.
5. Dedication to maintaining the confidentiality of proprietary information.
6. Commitment to reporting findings on time.

Annex D – Decision Letter Template

The letter addressed to the operator and the ROA communicating the certification decision must contain all the information outlined in items 1 – 6. The use of the **Decision Letter Template** is encouraged.

Date:

Contact Name

Operation Name

Address

Email address

Regenerative Organic Certified®

Certification Decision

Dear Contact Name,

We have completed the audit process and issued a certification decision dated XX/XX/XX for the Regenerative Organic Certified® Program.

Congratulations! on achieving Regenerative Organic Certified®. You are being recommended for certification by the Regenerative Organic Alliance for the following:

1. **Pillars:**
2. **Level:**
3. **Location(s):**
4. **Crop(s):**
5. **Acreage:**
6. **Product(s):**

ROA will issue your ROC certificate to you electronically.

We appreciate your dedication to Regenerative Organic Certified® agriculture!

Sincerely,

Annex E – Closing Meeting Template

During the audit exit meeting, CBs must provide the initial observation and findings to the operator, enabling clients to start developing CAs or CAPs. CBs should use this template, or an equivalent document, to summarize observations and conclusions and submit a copy to the ROA via myROC.

INSPECTION AFFIRMATION FOR REGENERATIVE ORGANIC CERTIFIED®		
Operator Name:	Phone or email:	Date: Audit Year:
Address or Location:		Country:
Baseline certifications for Regenerative Organic Certified®:		
# Direct hire permanent workers annually:	# Direct hire seasonal workers annually:	# Contract laborers annually:
Name of Grower Group ICS (if applicable):		# Group members:
Name(s) processors and/or buyer(s):		Location(s):

Type of crop/livestock	Level	# Acres/ head	# Field parcels	# Soil tests	# Soil health analysis	Projected yield	Estimated Gross sales revenue $ USD

Exit Interview Summary:	
Summary of findings:	

Date of first sale:	**Timing needs for decision:**	**Logo use: YES or NO**
Signature of authorized person(s):		Date:
Name and Signature of organic inspector:		Date:

Annex F – Non-conformity classification and management

Any discoveries made during an audit must be categorized according to the ROA's designated levels below and recorded on the myROC platform by the CB under the label "findings."

a. Critical Tolerance (CT)
b. Non-Compliance (NC)

1. The certification body is required to comply with the timelines outlined in this document for each finding. However, they may give shorter timelines if they believe it is warranted.
2. In some instances, non-compliances may require a brief follow-up audit that will be charged at standard fee rates. If this happens, the CB may schedule another audit to check if the corrective actions for the identified non-compliances have been implemented. Before requesting a follow-up audit, it's essential to consider alternative synchronous technologies, such as remote video conferencing.

1. Critical Tolerance (CT) Guidelines

General

1. If a Regenerative Organic Certified® certificate covers multiple farmers, ranchers, or sites (including grower groups), and one of the sites receives a critical tolerance finding, the operation can remove the site from the certificate to avoid suspension of the entire certificate. A timeline to bring the site back into compliance is defined between the operation and the CB.
2. If a CT is identified any time before certification, the certification decision will only be issued once the CT is resolved and closed.
3. CTs identified during a renewal audit must be responded to within **30 calendar days** (or sooner if the CB decides) from the day after the operator receives the technical review report from the CB to avoid suspending the certificate.
4. The certificate decision cannot be renewed if critical tolerances remain open.
5. It is important to promptly report all CTs to the ROA by emailing certification@regenorganic.org.

Critical Tolerances will be issued under the following circumstances:

1. For requirements indicated as a Critical Tolerance or CT in the Regenerative Organic Certified® Framework.
2. For non-conformities that result in or may result in a fundamental or systematic failure to maintain compliance as a whole and the objectives of the standard. This may be indicated by findings which:
    a. continue over a long period (e.g., two consecutive onsite annual audits)
    b. are systematic and might cover two or more pillar scopes (e.g., document and record management)

c. impact a wide area of the audit scope
d. affect or might affect the integrity of the certified product
e. affect or might affect the reputation of the Regenerative Organic Alliance Program
f. are not corrected or adequately addressed once the corrective action plan is identified and implemented

2. Non-conformities (NC) Guidelines

Non-conformities shall be issued in the following circumstances:

1. An NC is a moderate non-compliance. This means that the Framework objectives are not being met in a non-systematic manner. This can be indicated by non-conformities that:
    a. Affect a small number of animals or areas.
    b. Affect only one certification level (bronze, silver, or gold).
    c. Affect a single event, practice, or incident.
    d. May impact the integrity of a certified product or material if not corrected.
    e. Affect a small number of sites within the certificate.
    f. Occur when a single lapse is observed in a procedure required for the client's management system or if it is a temporary lapse, non-systemic, limited in scale, or does not represent a fundamental failure to achieve the Framework objectives.
2. If no corrective action is taken within the timelines specified in this document, the CB may raise the NC to critical tolerance (CT) and provide the operator with a 30-calendar-day deadline to address it. If the NC is specific to a certification level, the CB will change the operator's status to the level where the Framework's requirements are met.

3. Sample corrective action tracking record for use by reviewers

1. General Information about the client and the Regenerative Organic Certified® audit		
Operator Name:		Audit Date:
Name of Grower Group ICS (if applicable):		Audit year:
Operation Locations(s) (municipality/state/country):		
# Direct hire permanent workers annually:	# Direct hire seasonal workers annually:	Contacted Labor: YES or NO
Baseline certifications:		

Type of crop/livestock	Certification Level	Pillar	Finding Type	Field or Group ID	Notified ROA

2. Table of Findings and Corrective Actions from Audit and Reviews			
Due Date	NC # or CT #	Framework Criteria	NC Evaluation comments

3. Corrective Action Plan					
NC #	Detailed Plan	Supporting docs provided	Deviation Request	Implement Date	Responsible Person
NC #	Detailed Plan	Supporting docs provided	Deviation Request	Implement Date	Responsible Person
NC #	Detailed Plan	Supporting docs provided	Deviation Request	Implement Date	Responsible Person

4. CB Reviewer Decision			
CB response to the client	**Status of NC**	**Date**	**If not closed, state the reason**

Annex G – Sample Certificate and Profile

Below are samples of the certificate and the client profile generated by the ROA using the myROC database platform.

ROC Test Farm
16 Conscious Way
Asheville, North Carolina 28806 United States

The above named operation has been audited and assessed under the **Regenerative Organic Certified®** Framework and has achieved:

SILVER LEVEL

for the following pillars:

- ✓ Soil Health and Land Management
- ✓ Animal Welfare
- ✓ Farmer and Worker Fairness

CERTIFIED CROPS AND LOCATIONS: See Client Profile
CERTIFYING BODY: TESTCAB
CERTIFIED SINCE: 22 Sep 2021
CERTIFICATE ISSUE DATE: 05 Oct 2023
ANNIVERSARY DATE: Operations must submit annual updates according to program rules.
CERTIFICATE NUMBER: ROC0221-0227

Once certified an operation's certification continues in effect until surrendered, suspended, or revoked, provided that the above-mentioned client continues meeting the conditions as laid down in the client contract with ROA and Certifying Body.

AUTHORIZED BY:

Elizabeth Whitlow

Elizabeth Whitlow, Executive Director

Regenerative Organic Alliance • 2809 Spring Creek Drive, Santa Rosa, CA 95405 • regenorganic.org

Regenerative Organic Certified®

PUBLIC CLIENT PROFILE

This client profile must be accompanied by the Regenerative Organic Certified® certificate to be valid and does not alone constitute a certificate.

ROC Test Farm
16 Conscious Way
Asheville, North Carolina 28806 United States

Level	SILVER
ID	66
Locations	Cloverdale Fields & &, Corner Farm, Home Farm & Test, Jone's Farm, Morningside
Total Acres	746.00
Crops	Abaca, Acai Berries, Anise, Bananas, Blueberries, Hay, Hemp, Huckleberries, Kernza, Mangos, Pasture, Vetch
Facilities	ROC Test Farm Creamery
Livestock	Bison, Broilers, Horses, Milking Goats

AUTHORIZED BY:

Elizabeth Whitlow

Elizabeth Whitlow, Executive Director

Annex I – Standards Criteria Interpretation Request Form and ROA Responses

When completing this form, CBs should follow the Framework Criteria Interpretation Request Procedure available at Regenorganic.org/Resources. It is also available in Excel format for download online. The completed form to standards@regenorganic.org. CBs should allow up to 30 days for a response. If a request is urgent, please indicate "urgent" in the email's subject line. Answers will be returned to the CB via email.

CB Standards Criteria Interpretation Request Form				
Date: **CB Name:** **Name** of submitter:				
	Priority processing (High, Low)	**Pillar**	**Criteria number**	**Question (please provide supporting details)**
1				
2				
3				
4				
5				

Annex J – ICS Managed Group Certification Procedures

Grower groups wishing to achieve certification may apply under different structures, such as a small producer association, a coop, or as a group of growers or ranchers of different sizes affiliated with another entity (e.g., a processor, a brand, a farm, or a ranch). The organization or operation applying for certification is identified as the Regenerative Organic Certified Certificate Holder for the grower group.

1. Internal Control System

For a grower group certification to be successful, it is essential to have a well-documented internal control system in place.

1. A centralized management system and established decision-making procedure are created and implemented.
2. A written agreement must be established with all current and future members.
3. The grower group should follow uniform practices and consistent processes or methodologies using the same inputs and procedures.
4. Members market their certified products through the grower group certificate holder only to participate in the grower group certification. Members who wish to sell crops or products to other ROC certificate holders or ROA licensees may be required to be individually certified.
5. The CB ensures that the grower group managed by the ICS maintains effective **record-keeping** for each production unit, site, or facility within the group.

2. Certification

1. The CB must audit the internal control system to ensure the group can effectively manage its members.
2. The ICS manager can request the CB to certify new sites between annual audits by submitting documentation that proves compliance with the Framework's requirements, including an internal inspection report.
3. Audits for group certification involve (a) reviewing the ICS for the group, (b) a sample of group members, and (c) each site included in the certificate's scope that is not a group member or doesn't meet the criteria.
4. The CB must conduct a risk assessment and determine the appropriate sampling rate based on the criteria of Group Certification & Sampling Methodology.
5. Non-compliances are issued to the grower group or one or more sites. If NCs are identified at multiple locations, it will be considered a systemic issue within the group.
6. The grower group should have a process to remove non-compliant group members from the list and notify the CB of suspended or voluntarily withdrawn members.
7. The grower group is responsible for keeping a record of all reported NCs and must address them in accordance with the requirements outlined in this document.

3. Maintenance of ICS certification

1. The CB is responsible for ensuring that the grower group keeps an updated record of all members and promptly notifies the ROA of any changes to the members' status or the group as a whole.
2. The Regenerative Organic Certified® Approved Farmers List needs to be regularly updated and should contain the names of certified farmers, their locations, parcel ID, crops, hectares or acres, social fairness certification status, and organic status.

4. ICS Certification documents

1. The CB shall provide certification decision documents to the ICS management. Members within a grower group can possess individual certificates if they have independently applied for and achieved Regenerative Organic Certified®.

5. ICS Suspension and cancellation

1. The CB shall hold the grower group certificate holder responsible for the compliance of all members.
2. The CB shall suspend or cancel the certification granted to the grower group as a whole in cases where the grower group's internal control system fails to act on outstanding non-compliances.

Annex K – Document Management for myROC

This annex outlines the minimum standards and requirements for document and data management under Regenerative Organic Certified®. Document and data management is an ongoing process that takes place throughout the auditing service provided to the client, including Application Review (AR), Initial Review (IR), Final Technical Review (FR), and during the renewal of certification.

To keep clients informed and support their certification process, CB must use the myROC.org database platform for data input, tracking, and access. The CBs must thoroughly document the certification process from application review to certification decision, ensuring all auditing and tracking procedures are followed and recorded.

For specific instructions on how to perform these tasks using myROC, please refer to the Trainual.com portal.

1. File management in myROC

Electronic files in myROC must be maintained to show the correct file type and status. The ROA staff will periodically hide inactive files to reduce clutter.

1.1. List of File types (most common)

- General
- Application Advancement to CB
- Label
- Letter
- Map
- Organic Baseline Certificate
- Social Fairness Baseline Certificate
- Animal Welfare Baseline Certificate
- Additional Certificate
- Regenerative Organic System Plan (ROSP)
- Regenerative Organic Certified® Contract
- Soil Test Results
- ROSP addendums/Supporting Documents
- CB Decision Letter
- Organic System Plan
- Approved Farmers List
- Grower Group ICS Manual
- Retired Document
- Archived ROSP

1.2. File Management Best Practices

1. Files entered in myROC through a "Finding" cannot change their file type. They will remain for "*evidence of implementation*." If you need to change a file type such as a Revised Map, ROSP, or Approved Farmers List, follow the steps below.
    a. Any files with a different file type must be uploaded in the **Files** tab, and the appropriate file type applied.
    b. The file name details should be identified in the appropriate comment area of the *Finding*. For example, the wording "See file 'ROSP updated 05112022'" should be placed as an "*evidence of implementation*" comment.
2. Correspondence should be identified appropriately in myROC by File Type.
    a. For example, the CB Certification Decision will be file type "*CB certification decision*" and not as "*letter*."
    b. Other correspondence that does not have a specified "*File Type*" should use a "*letter*" file type.

1.3. ROSP MAINTENANCE

1. ROSP revisions must be incorporated into the ROSP file during Final Review (FR), and the complete ROSP must be uploaded to myROC. Do not upload sections of the ROSP as separate ROSP files.
2. The ROSP will be uploaded with the **File Status** "Active" and **File Type** "Regenerative Organic System Plan".
3. If revisions need to be made to the ROSP, the individual sections changed and uploaded by the CB should be incorporated into the original ROSP file.
    a. The revised ROSP document should be uploaded to myROC with the correct file status and type.
    b. The outdated ROSP document should be changed to show the **File Status** "inactive" and **File Type** "Archive ROSP."
4. Obsolete documents should be assigned **File Type** "retired document" and File Status "Inactive."
5. Additional documents referenced in the ROSP, such as supply chain maps, workflows, charts, recipes, ingredient sheets, SOPs, or SSOPs, should have **File Type** "ROSP addendums."

If the audit report reveals important information for the ROSP, the reviewer updates it and references it in the report. Any changes must be initialed and dated. CB must inform the client of the revised ROSP and provide a copy of their records.

1.4. LISTING CROPS

Listing Regenerative Organic Certified® crops in the myROC portal must follow the ROA guidelines in this section.

Note: Crop acreage should be included for each crop entered in myROC.

1.4.1. Crop eligibility

2. Crops must be listed on the baseline organic certificate used for Regenerative Organic Certified® eligibility.
3. Crops must be included on the social fairness 3rd party certificate if applicable.

4. Crops targeted for certification must have undergone an audit and come from approved fields.

1.4.2. Special crop varieties and names

1. To add a crop or variety name to the master list of crop varieties on myROC, contact the ROA at myroc@regenorganic.org if it is listed on the organic baseline certificate but not yet included.

1.5. Listing Livestock

To list livestock on the myROC portal, it is necessary to adhere to the ROA guidelines outlined in this section:

1. Livestock must be listed on the baseline organic certificate used for ROC eligibility.
2. Livestock eligible for certification must be included on the animal welfare baseline.
3. Livestock targeted for certification must have been audited and included in the audit report.

Note: The number of each livestock should be included in myROC for each livestock type entered in myROC.

1.6. Listing Fields and Parcels

The purpose of the field data in myROC is to track Regenerative Organic Certified® eligibility. Therefore, ROA parcel data may differ from the organic baseline certification data. If new fields are eligible for Regenerative Organic Certified®, they are entered into myROC with the applicable ROC™ status date, and a new Field/Parcel is created. Eligible locations are referred to as "Fields" and are listed in myROC. These fields must meet the following criteria:

1. They must be certified organic and included in the baseline certification.
2. They must be included in the social fairness 3rd-party certification if applicable.

A "parcel" is defined as a distinct piece of land with no adjacent or touching borders to other parcels. A parcel can be divided into one or more fields. The following guidelines should be followed when entering fields and parcels in myROC:

1. For a Single Producer operation, listing "Fields" and "Parcels" in myROC should reflect all the production land-base that needs to be ROC certified. "Fields" and "Parcels" entered in myROC are listed as "Locations" on the ROC certificate.
2. For Grower Group operations, one field should be entered per ICS managed grower group(s). The name can be "grower group". The field's total acreage will be the summation of all the acres for the group(s). The comments for the field must include a) the total number of groups, b) the total number of farmers, and c) refer to the Approved Farmers List.

ROA identifies distinct parcels and individual "fields" in myROC. Each field entered in myROC would be a distinct parcel of land, with no adjacent or touching borders, that an auditor would need to visit. If the farmer has multiple contiguous fields, that is one parcel.

1. Fields separated by municipality-maintained roadways would be classified as separate parcels in myROC. A field or farm access road would not require a different parcel designation in myROC.

2. Natural features of the land may not indicate a separate parcel in myROC. The CB should evaluate the seasonal nature of grass waterways versus a permanent irrigation ditch or stream.

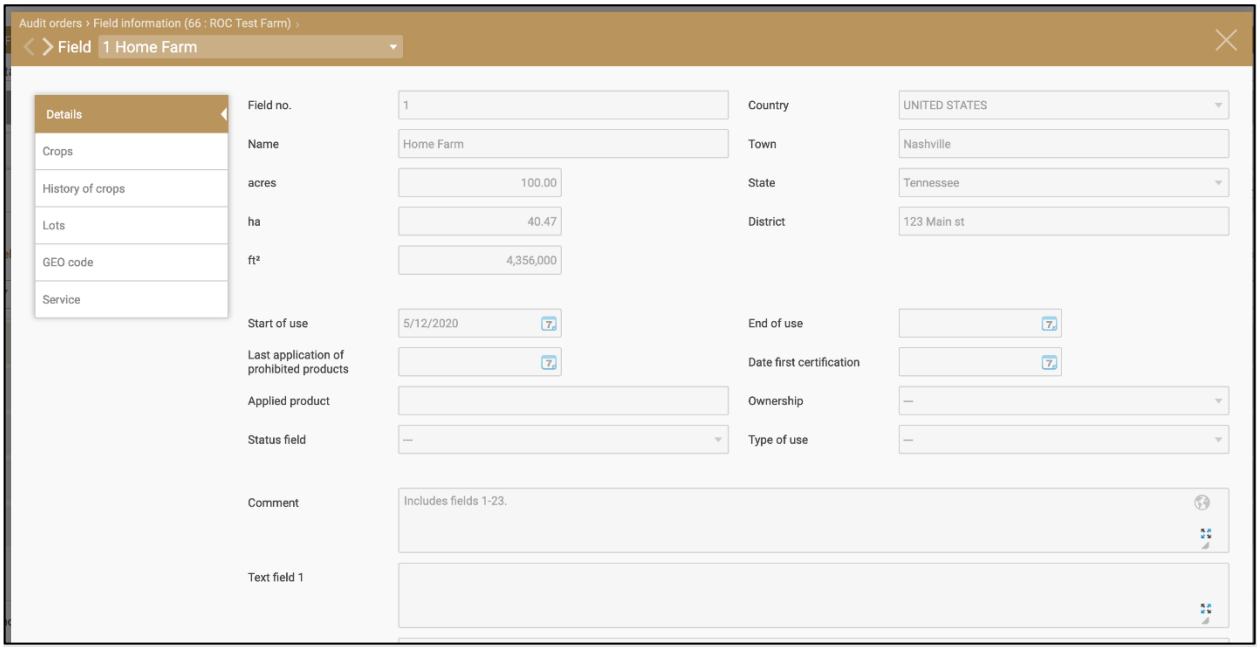
The parcels in myROC will be numbered and must include a "name". The number is required but not listed on the certificate. The name is important because it is listed on the client profile page with the issued certificate.

1. The name for each parcel should be the identifiable name or number the farmer uses. A name must be entered for each parcel in myROC.
2. If the farmer does not have a name for the parcel but instead refers to it as numbered fields, i.e., Fields 1-10 are, or Blocks 4a and 4b, then the name of the parcel can be "Fields 1-10" or "Blocks 4a and 4b."

The acreage for each parcel must be the correct total acres for that individual parcel. The ROC certificate includes the sum of each parcel's acres. The individual crop acreages within the parcels/fields will be listed in myROC.

Since distinct parcels listed on the OSP may contain one or more contiguous or adjacent fields, the field numbers or names must be included in the comment field of the "Field" in myROC. For example, "Greenfield parcel contains fields 1-3."

Please find a screenshot from myROC of the Field Form for data entry and the field data that should be entered.



Annex L – Writing the Report

The audit report content may vary depending on the scope, the expectations set during the opening meeting, and the findings. If an audit presents more findings and complexity than anticipated, the auditor might need to include more details in the report. The content of the report, per each Regenerative Organic Certified® Criteria (Base Requirement and Practice Description), shall consist of the following:

1. **Background or Overview of the Audit Area Reviewed:** offices, fields, parcels, and facilities visited.
2. **Scope Approach** (what we looked at). Farm agriculture and operational activities, type of relevant documents reviewed, soil analysis performed, and interviewed individuals involved.
3. **Audit Period**. Date and duration of the inspection.
4. **Findings Summary** (positive findings, issues, or problems). Statement of non-compliance observations and their connection to program criteria and requirements.
5. **Observations**. Clear identification of findings, including the timeline for corrections.

The content of the report shall use the following practices:

1. **Reference Everything.** Avoid unverifiable claims and bridge any information gaps by referencing the criteria and where you obtained vital facts and figures.
2. **Include a Reference Section.** In addition to Best Practice references, use indices, appendices, and tables in this section.
3. **Use Figures, Visuals, and Text Stylization.** Put a number behind a fact or use a percentage to describe it. Depending on the criteria, use pictures, tables, or graphs to summarize and draw attention to critical trends or essential data wherever possible.
4. **Make a "Findings Sandwich."** Layer a positive finding, followed by an issue, followed by a positive, and so on. Try to end the Findings Summary on a positive note.
5. **Ensure Every Issue Includes the 3 Cs of Observations.** Criteria (Practice Description), Condition, and Consequence.
6. **Avoid Blame – State the Facts.** Be objective, and state issues and actions.
7. **Be as Direct as Possible.** Avoid soft statements when making observations of findings (such as "management might be…") and opt for solid statements and references to the certification requirements.

Annex M – Renewal Process

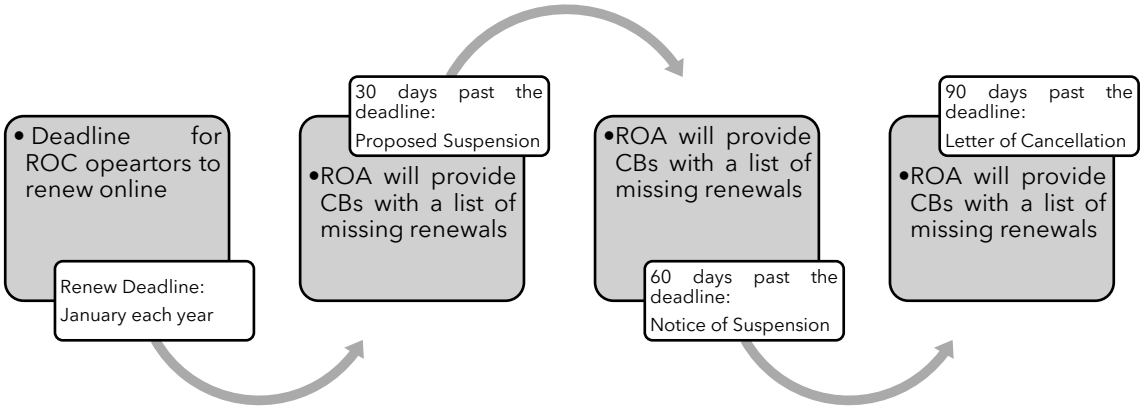
The purpose of this annex is to offer a process for communicating and defining roles between the Regenerative Organic Alliance (ROA) and Certification Body (CB) when renewing certification, as outlined in item 2.2 of the "Regenerative Organic Certified Operations Manual for CBs."

Roles and Responsibilities during the Renewal Process:

Every year, ROA will inform the CBs and certified operations about the renewal process for certification continuation, including operations name, deadlines, communication channels, and other relevant details.

a. **Not meeting the established deadline:** Early each year, ROA shares with the CB the list of their operators who still need to renew their certification.
b. **30 days past the deadline:**
    a. ROA issues a notice of proposed suspension within **10 calendar days** after the deadline is passed, copying the CB in the communication to the operator.
c. **60 days past the deadline:**
    a. ROA issues a notification of suspension within **10 calendar days** after the deadline is passed, copying the CB in the communication to the operator.
d. **90 days past the deadline:**
    a. ROA shares with CB the list of remaining operations that failed to renew within **90 calendar days** after the annual deadline.
    b. CB issues a cancellation letter to all remaining operations mentioned in the ROA list.
e. CB keeps the ROA informed by including certification@regenorganic.org in all relevant communications to the operator.

ROA will assist CBs with any concerns or obstacles during this renewal process and communicate with the operator to help resolve any issues.



Annex N - Risk Matrix for Operations in the Global North

Purpose: The Social Fairness Risk Matrix is a tool certifying bodies use to evaluate the risk level for operations in the Global North based on the ROC Farmer and Worker Fairness Pillar.

Instructions: If none of the answers to the questions below is "Yes," then the operation assessment is considered low risk. However, if any of the questions have a “Yes” response, the client cannot be classified as a low-risk operation.

1) Does the operation hire workers using more than two hiring approaches?

For example, direct hire, contract labor, labor recruiter, seasonal agriculture worker programs, etc.

☐ Yes ☐ No

2) Are there hired young workers under the age of 18 years (including migrant workers and those residing on the farm)?

☐ Yes ☐ No

3) Are there more than ten workers on-site for more than a total of ten consecutive or not days within a calendar year?

☐ Yes ☐ No