



# Chain of Custody Guidelines

## Table of Contents

1.0 Objectives	2
2.0 Background	2
3.0 Scope	2
4.0 Applicability	3
5.0 Chain of Custody Requirements	3
5.1 Allowable Model	3
5.2 Certification Requirements	4
6.0 Documentation Requirements	5
7.0 Definitions	5

## 1.0 Objectives

This document contains the chain of custody requirements for organizations that buy, sell, store, process, or transport product intended to carry Regenerative Organic Certified™ (ROC™) claims (i.e. certified product). These requirements serve to ensure that product carrying a ROC claim is sourced from certified farms, maintains appropriate separation from non-certified product throughout the supply chain, and is produced in accordance with the [ROC Framework](#) and [Labeling Guidelines](#).

Additionally, this document provides the minimum requirements for an organization to maintain an auditable management system that sufficiently documents the chain of custody of the product.

## 2.0 Background

The ROC program, overseen by the Regenerative Organic Alliance (ROA), aims to promote holistic agricultural practices that build on the United States Department of Agriculture's National Organic Program (USDA/NOP Organic) and other internationally recognized standards. The ROC program encompasses three pillars: Soil Health, Animal Welfare, and Social Fairness. In line with these pillars, the goals of ROC include:

- Increase soil organic matter over time and sequesters carbon below and above ground, which could be a tool to mitigate climate change;
- Improve animal welfare; and
- Provide economic stability and fairness for farmers, ranchers, and workers.

Regenerative Organic Certified covers requirements for farming and ranching operations that produce food and fiber for both U.S. and international markets. Entities that transport, process, distribute, market, or otherwise handle ROC certified product must adhere to the chain of custody requirements of the ROC program and submit to verification audits as applicable. USDA/NOP Organic certification (or an approved international equivalent) is a prerequisite for ROC eligibility; as such, a participating organization must comply with USDA/NOP Organic chain of custody requirements and policies.

## 3.0 Scope

The ROC Chain of Custody requirements cover the required practices and documentation for the harvest, storage, processing, packaging and distribution of agricultural product intended to carry a ROC claim on or off-product.

These requirements serve to reinforce rather than replace labeling, separation, and documentation requirements stipulated by the NOP for USDA Organic certification. All chain of custody procedures and documentation required by NOP shall be followed as the baseline for ROC.

## 4.0 Applicability

Chain of Custody requirements apply to non-exempt participating organizations that buy, sell, transport, process, store, or otherwise handle ROC certified product. Non-exempt organizations include, but are not limited to facilities that:

- Prepare, mix, or package raw material (primary processors);
- Further process or package certified goods; and
- Store or transport certified product that is not enclosed or pre-packaged for the entire duration of ownership.

Exempt organizations are not required to submit to ROC chain of custody audits. The ROC requirements for exemptions align with the National Organic Program (NOP) standard (see NOP Regulations Subpart B, §205.101). Exempt organizations include:

- Retail food establishments that handle, but do not process, certified product for sale to consumers;
- Retail food establishments that sell packaged, labeled product to consumers;
- A processing or handling operation that only handles ROC product that amounts to less than 70% of the finished product by weight;
- An operation that handles only packaged or enclosed ROC product that remains in the same package or container for the entire duration of ownership;
- An entity that does not take legal ownership of the ROC product, such as for transportation or distribution of finished goods.

## 5.0 Chain of Custody Requirements

### 5.1 Allowable Model

ROC certified products must maintain appropriate separation from non-certified product throughout the supply chain and must comply with USDA/NOP Organic chain of custody requirements and policies.

Certified products from a single origin must be maintained separate from other product throughout the supply chain. Certified product must not be physically mixed with non-certified product or with certified product from another source (i.e. organic coconut oil must be separated from ROC coconut oil). This ensures that product carrying a ROC claim is sourced from ROC certified farms. The mixing of different ingredients to formulate a final product is covered under the Labeling Guidelines available at [RegenOrganic.org/Resources](https://www.RegenOrganic.org/Resources).

### **5.1.1 Exemptions to Physical Separation**

Exemptions may be allowed for unique circumstances but must comply with USDA/NOP organic regulations. Exemptions are granted by approved ROC certification bodies.

## **5.2 Certification Requirements**

### **5.2.1 Certification at the Farm Level**

ROC Bronze, Silver, and Gold product is certified at the farm level according to the ROC framework requirements. Certified product should be clearly identifiable, labeled with the appropriate claim (i.e. ROC Bronze, Silver or Gold) and segregated from non-certified product throughout the lifecycle, harvest, storage, and transport of the product. Product of different certification levels (i.e. Gold and Silver) should also be segregated in order to maintain claimed status. However, if ROC Gold product is mixed with ROC Silver product, claims are allowed at the lower certification level (i.e. ROC Silver).

### **5.2.2 Certification at Processing Facilities**

All non-exempt operations that handle ROC claimed product must be USDA Organic certified, or certified to an approved international equivalent (see [Approved Baseline Standards](#)). Processing facilities are not required to achieve separate certification to ROC\*, however non-exempt operations will be subject to a Supply Chain & Brand Licensee review to confirm the appropriate handling and segregation of products carrying a ROC claim, according to the requirements laid out in this document.

Operations required to achieve a separate certification to ROC are those that fulfill all of the following criteria:

1. Take legal ownership of ROC certified product
2. Physically handle ROC certified product
3. Make product claims about ROC

Operations with annual sales below \$10,000 may be exempt from certification.

*\* For ROC Gold level, at least one stage in the post-producer supply chain must also be certified to ROC.*

### **5.2.3 Registration for Processing Facilities**

Operations (processors/handlers/brand owners, etc.) that do not meet all three of the criteria in 5.2.2 are not required to achieve a separate certification to ROC, however, are required to undergo a separate registration to secure the Licensing Agreement with the ROA.

## 6.0 Documentation Requirements

Non-exempt participating organizations are required to maintain sufficient and appropriate documentation for demonstrating the chain of custody and traceability of ROC certified product from farm/ranch to the finished goods. While ROC does not specify the implementation approach, organizations are encouraged to follow NOP guidelines for documentation and management procedures. Where applicable, documented procedures and records related to chain of custody practices should be included in the Regenerative Organic System Plan. Management systems for demonstrating sufficient traceability and chain of custody must include, but are not limited to, the following components:

- 1) **Management Systems:** Document policies, roles and responsibilities, procedures, training, communication, monitoring, and continuous improvement for tracking ROC product and maintaining appropriate chain of custody practices.
- 2) **Input Storage Segregation:** Claimed material must be kept separate during storage and transport, and not mixed or blended with non-ROC material.
- 3) **Inventory Management:** Entities must keep records of the quantities of claimed raw material and finished goods, subject to reconciliation.
- 4) **Separation:** All products shall be clearly identified while they are in production. When ROC and conventional materials are processed in the same locations or machinery, there should be a clean out procedure between batches. Cleanout is not required between ROC and certified Organic product.
- 5) **Traceability Documentation:** Commercial and shipping documents must be available throughout the supply chain that attest to the origin of the claimed material.
- 6) **Volume Reconciliation:** Accurate data on the ratios of raw materials to finished goods must be available for review, including the average amount of loss to be expected during production processes.

## 7.0 Definitions

**Brand owner:** A brand is a name, term, design, symbol or any other distinctive feature that identifies a product as distinct from other products. The brand owner is a person or company who sells any commodity under a registered brand label.

**Certified product:** Raw material and/or packaged or processed goods that are certified under the Regenerative Organic Certified (ROC) program that is eligible for and intended to carry labeling claims.

**Chain of custody:** The set of practices and documentation required to ensure that certified product (i.e. ROC plant or animal products) is segregated, identifiable, and traceable

throughout the supply chain. Post-farm processors and handlers must maintain the proper chain of custody standards in order for a final consumer product to carry ROC claims.

**Exempt organization:** An entity that meets the exemption criteria of the NOP certification program and is also exempt from these ROC Chain of Custody certification requirements and auditing. Exempt organizations include entities that store or transport only packaged, segregated raw or finished goods and retailers that sell packaged, labeled product to consumers.

**Non-exempt organization:** An entity that does not meet ROC Chain of Custody exemption criteria and is therefore subject to the requirements of this document. Non-exempt organizations include entities that process or handle certified product that is not fully packaged or contained.

**Participating organization:** Any entity or facility that processes, handles, stores, or transports ROC product or is otherwise involved in the product supply chain.

**Processor:** Any stage in the supply chain where raw materials (i.e. plant or animal products) from the producer are modified. Processing may include activities such as slaughter, milling, cooking, or mixing and packaging raw materials into a final product. Processing may occur at a separate facility or on-farm, in which case the farm or ranch is both producer and processor.

**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.