



Regenerative
Organic
Certified™

Supply Chain Guidelines

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1.0 Objectives

This document contains the chain of custody requirements for operations 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 Governing Documents available at RegenOrganic.org/Resources.

This document provides the minimum requirements for an operation to maintain an auditable management system that sufficiently documents the chain of custody of the product.

2.0 Background

The Regenerative Organic Alliance (ROA) exists to promote regenerative organic farming as the highest standard for agriculture around the world. We emphasize farming practices that restore and build soil, ensure animal welfare, and end unfair conditions for farmers and farmworkers. In doing so, we're creating long-term solutions to the climate crisis, factory farming, and fractured rural economies. We exist to heal a broken system, repair a damaged planet, and empower farmers and eaters to create a better future through better farming.

The ROC program, overseen by the ROA, aims to promote holistic agricultural practices that build upon 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 ROC program aims to:

- Increase soil organic matter over time and sequester 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.

ROC 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 product must adhere to the chain of custody requirements outlined in this document and submit to ROC chain of custody

audits as applicable. USDA/NOP Organic certification (or an approved international equivalent formally recognized by a trade agreement) is a prerequisite for ROC eligibility; as such, a participating operation must comply with all USDA/NOP Organic chain of custody requirements and policies.

3.0 Scope

The ROC Supply Chain Guidelines 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

Map of Supply Chain Actors



4.1 Non-exempt Operations

Supply Chain Guidelines apply to non-exempt operations that process or handle certified product that is not fully packaged or contained and take legal ownership of ROC product; including but not limited to 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. If the latter, the farm or ranch is both producer and processor.

4.2 Spot-check audits

Operations are subject to random ROC supply chain spot check audits as deemed necessary.

4.3 Exempt operations

Exempt operations are not required to submit to ROC chain of custody audits or register with the ROA. Should an exempt operation wish to be included in the ROC Online Directory they may choose to register with the ROA. The ROC requirements for exemptions align with the National Organic Program (NOP) standard (see NOP Regulations Subpart B, §205.101). Exempt operations 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 Registration for Supply Chain Actors (SCAs)

5.1 Registration

Non-exempt operations are those that process or handle certified product that is not fully packaged or contained and take legal ownership of ROC product. For ROC, the scope for Supply Chain Actors (SCAs) begins with the first legal change in ownership after harvest of crop.

All non-exempt operations are required to register with the ROA and complete a Social Fairness Affidavit.

Non-exempt operations that are not making a ROC claim are required to register with the ROA via the registration form (available at RegenOrganic.org/Resources).

Non-exempt operations (brand owners, producers, or finished goods manufacturers, etc. making a consumer facing ROC™ claim) who intend to make a ROC claim are

required to secure a License Agreement with the ROA to become a ROC Licensee. The License Agreement fulfills the registration requirement.

5.2 Registration Fee

Non-exempt operations are responsible for the applicable registration fee in accordance with the Cost & Fee Structure (available at RegenOrganic.org/Resources). Once the invoice is paid, your registration will be reviewed.

6.0 Chain of Custody Requirements

6.1 Separation Guidance

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 transport and storage. 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) until it reaches its final processing facility. 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.

6.1.1 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 certifying bodies.

6.2 Certification Requirements

6.2.1 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. Bronze, Silver, and Gold) should also be segregated in order to maintain claimed status. However, if ROC Gold product is mixed with ROC Bronze product, claims are only allowed at the lower certification level (i.e. ROC Bronze).

6.2.2 Certification at Processing Facilities

Processing requirements apply to 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. If the latter, then the farm or ranch is both producer and processor.

All non-exempt operations will complete a registration form or license agreement and are subject to random ROC supply chain spot check audit reviews as deemed necessary to confirm the appropriate handling and segregation of products carrying a ROC claim according to the requirements laid out in this document.

All non-exempt operations that handle or process ROC-claimed product must be USDA Organic certified or certified to an approved international equivalent (as declared by [USDA AMS](https://ams.usda.gov/services/organic-certification/international-trade) available at ams.usda.gov/services/organic-certification/international-trade). For ROC Gold level, at least one stage in the post-producer supply chain must also be certified to ROC. Processors are not required to achieve separate certification to ROC unless the brand owner is applying for ROC Gold. In such case, one selected processor will be required to undergo a ROC audit to fulfill the requirement for ROC Gold. If the processor certification level differs from that of the certified operation, any claims must defer to the lower certification level.

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

6.2.3 Certification at the Brand Level

Brand owners are not required to obtain certification. All brands (and finished goods manufacturers) are required to submit a License Agreement and Social Fairness Affidavit as described in Section 4.

For a brand to label a finished product with a Gold level ROC™ seal, at least one stage in the post-producer supply chain must also be certified to ROC. If a brand also qualifies as a non-exempt operation under Section 6.2.2, it may need to get certified as part of the processor requirement for ROC Gold.

7.0 Documentation Requirements

Non-exempt participating operations are required to maintain sufficient and appropriate documentation for demonstrating the chain of custody and traceability of ROC product from farm/ranch to the finished goods. While ROC does not specify the implementation approach, operations 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 certified operation's Organic System Plan/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:** Operations 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. Clean-out 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. Brand owners will be referred to as brands throughout this document.

Certification level: The ROC™ level to which a product is certified, i.e. Bronze, Silver, or Gold.

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.

Claimed material: The portion of a product that is intended to be used and eligible for ROC™ claims; see certified product.

Exempt operation: An operation that meets the exemption criteria of the NOP certification program and is also exempt from these ROC Supply Chain Guidelines, certification requirements, and auditing. Exempt operations include those that store, or transport only packaged, segregated raw or finished goods; and retailers that sell packaged, labeled product to consumers.

Governing Documents: The Governing Documents consist of the ROC Framework and all documents listed as Governing Documents on [RegenOrganic.org/Resources](https://www.RegenOrganic.org/Resources), such as Approved Baseline Certifications, Cost & Fee Structure, Labeling Guidelines, etc.

Handler: Any person engaged in the business of selling, processing, or packaging agricultural products except for final retailers that do not process agricultural products.

Non-exempt operation: An operation that does not meet ROC Supply Chain exemption criteria and is therefore subject to the requirements of this document. Non-exempt operations include those that process or handle certified product that is not fully packaged or contained and take legal ownership of ROC product.

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

Processing: 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. If the latter, then 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, cosmetics, or textile product. The first stage in the raw material supply chain.

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.