



# Supply Chain Guidelines

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## 1.0 Objectives

This document contains the chain of custody requirements for Supply Chain Actors (SCAs) 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 producers, 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](https://RegenOrganic.org/Resources).

This document provides the minimum requirements for an SCAs to maintain an auditable management system that sufficiently documents the chain of custody of the product. In this document, the term “organizations” refers to Supply Chain Actors and “operation” refers to a ROC producer.

## 2.0 Definitions

**Authorized licensee:** An authorized licensee includes, but is not limited to, any brand, broker, finished goods manufacturer, or wholesaler who is making a ROC™ claim and has a valid License Agreement with the ROA.

**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. For the purpose of this document brokers, finished goods manufacturers, or wholesalers making a ROC claim under a brand name will be referred to as brand owners. 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 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 to consumers.

**Governing Documents:** The Governing Documents consist of the ROC Framework and all documents listed as Governing Documents on RegenOrganic.org/Resources, such as Approved Baseline Certifications, Cost & Fee Structure, Labeling Guidelines & Terms of Use, 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.

**Operation:** A producer that has applied for or achieved ROC certification status and is making a ROC claim. Operations must have a valid License Agreement with the ROA. The farm or ranch that grows or raises crops, botanicals, and/or animals to be used for a food, cosmetics, or textile product. The first stage in the raw material supply chain.

**Organization:** A Supply Chain Actor that buys, sells, stores, processes, or transports product intended to carry Regenerative Organic Certified™ (ROC™) claims (i.e. certified product).

**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, botanicals, and/or animals to be used for a food, cosmetics, or textile product. The first stage in the raw material supply chain.

**ROC™ marks:** Refers to the Regenerative Organic Certified™ name and all other trademarks, certification seals, logos, or any other proprietary designations owned by the Regenerative Organic Alliance.

**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.

**Supply Chain Actor:** Any organizations that process or handle certified product that is not fully packaged or contained and/or 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, which may include the final end stage of production. For

ROC, the scope for Supply Chain Actors (SCAs) begins with the first legal change in ownership after harvest of crop.

## 3.0 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, fiber, and botanicals 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, organizations must comply with all USDA/NOP Organic chain of custody requirements and policies.

## 4.0 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.

## 5.0 Applicability

### Examples of Supply Chain Actors



### 5.1 Supply Chain Actors (SCAs)

The Supply Chain Guidelines apply to organizations that process or handle certified product that is not fully packaged or contained and/or 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, which may include the final end stage of production. 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. For ROC, the scope for SCAs begins with the first change in legal ownership or the first post-harvest movement of the certified product off of the certified farm.

### 5.2 Spot-Check Audits

Organizations are subject to random ROC supply chain spot-check audits to ensure chain of custody as deemed necessary. Organizations are responsible for any costs or fees associated with spot-check audits.

### 5.3 Exempt Organizations

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 organizations that only handles ROC product that amounts to less than 70% of the finished product by weight

- An organization 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.

## 6.0 Registration for Supply Chain Actors (SCAs)

### 6.1 Registration

All Supply Chain Actors, that represent a major stage in the supply chain, are required to register with the ROA. Registration ensures that the ROA has all necessary information to perform spot-check audits, verify chain of custody, and ensure traceability.

Organizations that are **NOT** making a ROC claim can start the registration process with the ROA via the Supply Chain Actors Registration Form available at [RegenOrganic.org/Resources](https://RegenOrganic.org/Resources).

Organizations **who intend to make a ROC claim** will register with the ROA via a License Agreement (see Section 7.0).

Registration must be updated on an annual basis on January 1st of every year.

### 6.2 Registration Fee

Registered organizations are responsible for the applicable annual registration fee in accordance with the Cost & Fee Structure (available at [RegenOrganic.org/Resources](https://RegenOrganic.org/Resources)). Once the invoice is paid, your registration will be confirmed.

## 7.0 License Agreement for Supply Chain Actors

Organizations, including but not limited to brand owners, producers, brokers, or finished goods manufacturers, etc. selling a certified product, who intend to make a ROC claim are required to secure a License Agreement with the ROA to become a ROC Licensee. All claims must be made in alignment with the Labeling Guidelines & Terms of Use and with prior approval from the ROA or the relevant certifying body.

### 7.1 Prerequisites for Use of the ROC™ Marks

Use of the ROC™ marks (the Regenerative Organic Certified™ name and all other trademarks, certification seals, logos, or any other proprietary designations owned by the Regenerative Organic Alliance) is dependent on meeting all requirements laid out in the Governing Documents, available at [RegenOrganic.org/Resources](https://RegenOrganic.org/Resources). As the ROC Framework and Governing Documents are subject to change, use of the ROC™ seal is dependent on meeting all requirements in the version published at [RegenOrganic.org](https://RegenOrganic.org) at the time of the

producer's audit. Producers use of the ROC™ seal is dependent on having been awarded ROC status and having provided all details required by the ROC Supply Chain Guidelines. Producers must have a valid ROC™ certificate issued by a ROC Approved Certifying Body in order to use the ROC™ seal or sell products as Regenerative Organic Certified™. Any Supply Chain Actor using the ROC™ seal, "Regenerative Organic Certified™," and/or "regenerative organic [noun/verb]" must have completed a License Agreement and paid any relevant fees.

## 8.0 Chain of Custody Requirements

### 8.1 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 producers. The mixing of different ingredients to formulate a final product is covered under the Labeling Guidelines available at [RegenOrganic.org/Resources](https://RegenOrganic.org/Resources).

### 8.2 Certification Requirements

#### 8.2.1 Certification at the Producer (Farm) Level

ROC Bronze, Silver, and Gold product is certified at the producer 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).

#### 8.2.2 Requirements for Processors

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 organizations 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 organizations 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](https://ams.usda.gov/services/organic-certification/international-trade)).

### **8.2.3 Certification of Processing Facilities**

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.

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

### **8.2.4 Requirements for Brands**

As ROC™ is a farm level certification, brand owners are not eligible for certification. All brands and finished goods manufacturers making a ROC claim are required to submit a License Agreement (see Section 7). All claims must be made in alignment with the Labeling Guidelines & Terms of Use and with prior approval from the ROA or the relevant certifying body. Brands are required to submit a Supply Chain Map and a Claimed Material & Product Formulation Worksheet for each product that carries a ROC claim and contains certified material. A sample Supply Chain Map is included as part of the Claimed Material & Product Formulation Worksheet available at [RegenOrganic.org/Resources](https://RegenOrganic.org/Resources).

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 processor under Section 8.2.2 of this document, it may need to get certified as part of the processor requirement for ROC Gold.

## **9.0 Documentation Requirements**

Operations/organizations are required to maintain sufficient and appropriate documentation for demonstrating the chain of custody and traceability of ROC product from producer to the

finished goods. While ROC does not specify the implementation approach, Operations/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 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/organizations 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.

## 9.1 Traceability Documentation

The ROA will trace product back to production, starting with outgoing documentation (sales invoice or outgoing BOL). From there, the ROA will trace ingredients back to the certified farm through purchasing/receiving documentation (purchase invoice, incoming BOL, CoA). Organizations must provide documentation adequate to demonstrate ingredients originated from a ROC source.

## 9.2 Volume Reconciliation

The ROA will look at quantities of both the ROC crop(s), ingredient(s), and/or product(s) over time. For the requested time period you must be able to supply the following information, including but not limited to the beginning inventory of ROC crop/ingredient/product, receiving quantity of ROC crop/ingredient/product (during time period), production quantity of ROC products containing this ingredient/crop (amount produced), the ending inventory of ROC crop/ingredient/product, and/or the sales quantity of ROC crop/ingredient/product.