

Certification Body Requirements

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1.0 Introduction

The purpose of this document is to provide guidance for Certification Bodies (CBs) that are seeking approval to conduct certification services on behalf of the Regenerative Organic Certified™ (ROC™) program, which is administered by the Regenerative Organic Alliance (ROA).

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 farmworkers. In doing so, the ROA is creating long-term solutions to some of the biggest issues of our time, including the climate crisis, factory farming, and fractured rural economies.

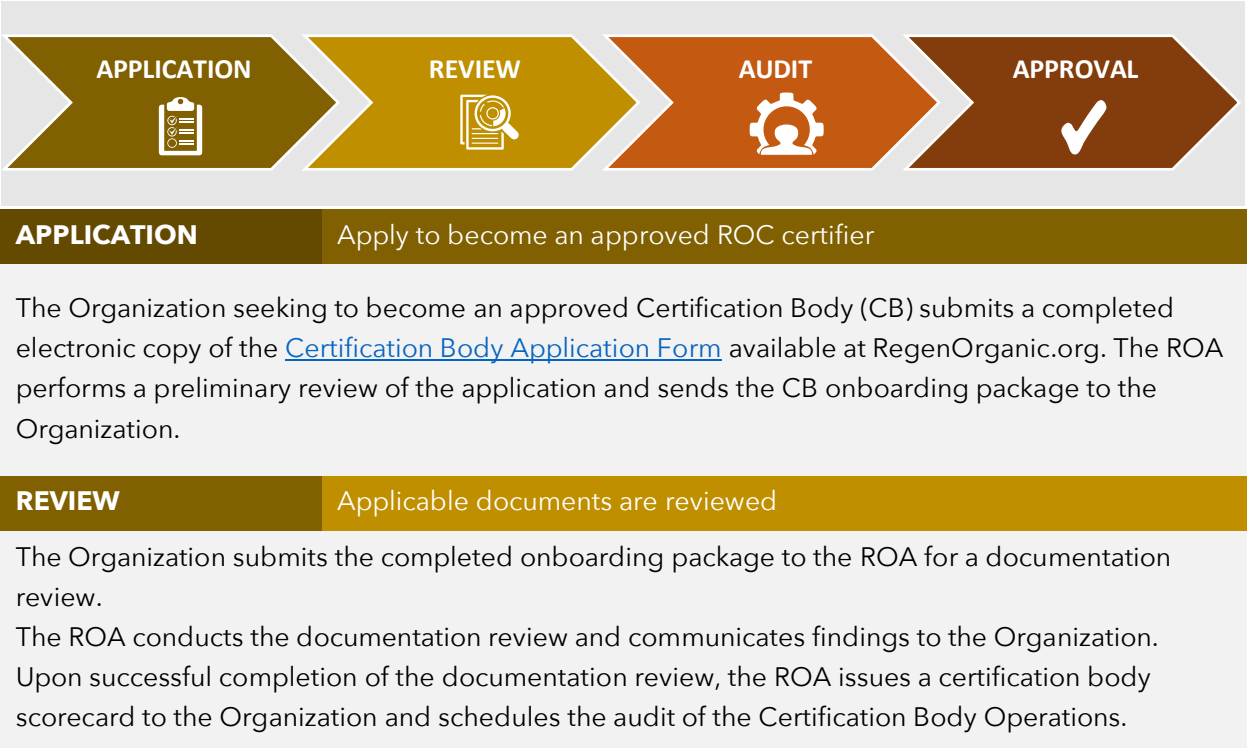
The ROA Operations Team is responsible for the development and implementation of the ROC Framework and Governing Documents.

2.0 Process Stages for Certification Body Approval

This section outlines the process stages to become an approved ROC Certification Body (CB). For additional details on timing and audit cycles, please refer to section 7.

2.1 Process Stages

Initial Approval Process:



*AUDIT	Audit is conducted
<p>The ROA conducts the audit. Due to Covid-19 travel restrictions, all audits will be conducted remotely until further notice.</p> <p>Upon successful completion of the audit, the ROA issues a final certification body scorecard. In addition, the organization signs a delivery contract with the ROA.</p>	
APPROVAL	Recommendation for Approval
<p>The ROA recommends the Organization for final approval.</p> <p>Once approval is achieved, the Organization will receive an approval letter confirming that the certification body requirements are met, the Organization has completed the certification body training (for auditors & technical reviewers) and has retained the minimum number of qualified technical personnel as defined in this document. The Organization must submit its proposed fee schedule to the ROA.</p> <p>Once approval is achieved, the Organization may offer certification services.</p>	
RENEWAL PROCESS	Continued Approval
<p>The ROA shall review the performance of all Certification Bodies per a 3-year audit cycle. The ROA has the right to conduct additional witness or performance audits at any time.</p>	

3.0 General Requirements for Certification Bodies

This section outlines the general requirements for becoming an approved ROC Certification Body. The Organization is not required to hold an ISO/IEC 17065, but it is strongly recommended. The following requirements are adapted from ISO/IEC 17065. Refer to Annex A at the end of this document for ISO/IEC 17065 equivalencies.

3.1 Certification Contract

The Certification Body shall have a legally enforceable written agreement for the provisions of certification and audit activities to its clients. The contract shall include, at a minimum:

1. A requirement for the Client to disclose any other audited programs they are involved in
2. Agreement that the Client shall, on request, supply any relevant information requested by the auditor

(Adapted from ISO/IEC 17065)

3.2 Liability and Financing

The Certification Body shall have adequate arrangements to cover the liabilities arising from its operations including, at a minimum, insurance or reserves. In addition, the Certification Body shall have financial stability and resources required for its operations. (Adapted from ISO/IEC 17065)

3.3 Non-Discriminatory Conditions

The Certification Body shall have policies and procedures that are non-discriminatory. Certification Body services shall be accessible to all applicants whose activities fall within the scope of its operations by providing access to certification applications via its website, direct contact and through public and industry trade. (Adapted from ISO/IEC 17065)

3.4 Confidentiality

The Certification Body shall have a documented procedure in place to manage information obtained during the certification process. The procedure shall require (i) that all information obtained during the certification process is considered proprietary and treated as confidential, unless the Client agrees to make the information publicly available; (ii) is handled in compliance with applicable privacy legislation; and (iii) allows the Certification Body to share with the ROA the information collected in the course of provision of certification services rendered and as required for annual reporting in section 6.8. (Adapted from ISO/IEC 17065)

3.5 Conflict of Interest Policy

The Certification Body shall have a documented conflict of interest policy that requires their employees and auditors involved in ROC certification services to sign and acknowledge having read and understood the policy, to be kept on file by the Certification Body.

3.6 Impartiality and Independence

The organization seeking to become an approved Certification Body may be categorized as a third-party assessment body in relationship to the Client, as defined in ISO/IEC 17000 International Standard: Conformity assessment - Vocabulary and general principles. (Adapted from ISO/IEC 17065)

3.7 Ethics

The Certification Body shall have a documented policy designed to guide behaviors in the areas of ethics. The policy shall include, at a minimum, a code of ethics, anti-corruption, bribery, and gifts.

4.0 Structural Requirements for Certification Bodies

4.1 Organizational Structure

The Certification Body shall provide documentation of its organizational structure, identifying duties, responsibilities and authorities for all personnel who support the certification services for ROC including:

1. A dedicated program manager

2. Performing technical desk reviews and on-site audits
3. Conducting quality control of the desk review and on-site audit
4. Selling or providing ROC certification services
5. Providing marketing or communication material related to the provision of ROC certification services

ROC program roles and responsibilities can overlap except that the technical reviewer and auditor cannot be the same individual. Persons must not review their own work. (Adapted from ISO/IEC 17065)

5.0 Resource Requirements for Certification Bodies

The Certification Body team involved in the certification and audit process for ROC must include personnel with the skills and the competency necessary to cover the objectives of the audit.

5.1 Management of Competence for Assurance Personnel Involved in the Certification Process

1. The ROA will work with the Certification Body to train assurance personnel on Standard-related subject matter. Assurance personnel include a ROC program manager, quality manager, auditor/s, and reviewer/s. The ROC training will be offered through online modules to provide flexibility across time zones and facilitate access for personnel in all regions. Auditors shall take an exam after each module and achieve a passing score of >80% to demonstrate knowledge and understanding of the ROC Framework.
2. Each Certification Body will receive four free user IDs/passwords to access the online training modules. Distinct user IDs are required for all personnel who must take exams for specific ROC pillars. User IDs provide access to the training platform and to access ROC compliance software platform.
3. Certification Bodies shall have a procedure in place to demonstrate how they determine when an auditor is competent to conduct ROC certification audits (e.g., minimum number of shadow or witness audits, supplementary training) and are responsible for ensuring the training for auditors to meet the ROC auditor requirements.
4. Certification Bodies are required to monitor assurance personnel to ensure they continue to maintain the requirements set out by the ROA. They must implement a procedure to regularly evaluate their assurance teams' performance against ROA requirements. Evaluation results must be submitted to the ROA and must include corrective improvement plans.

5. The Certification Body shall have policies and procedures in place to manage the competence and performance of the assurance personnel involved in the certification process. At a minimum, the Certification Body shall address:

A. General Knowledge of Assurance Personnel involved in Certification Body Services:

1. ROC Framework and governing documents knowledge
2. Industry, farming, and supply chain practice knowledge
3. Local social, cultural, and legal knowledge
4. Linguistic skills appropriate for each region where services are being offered to avoid the use of translators

B. Auditor Competence:

For the complete list of auditor requirements refer to section 5.2 Auditor Requirements.

C. Assurance Personnel Competence:

1. Language proficiency to understand all documents relevant to assessing compliance
2. Ability to review documents and records and determine whether compliance is met
3. Ability to identify non-conformances in the records which may not be immediately apparent
4. Ability to analyze and cross-check all relevant sources in order to identify conflicting information and make judgements about the validity of information received in order to reach an objective conclusion
5. Ability to conduct impartial and objective evaluations of the information gathered in order to determine compliance
6. Ability to be courteous and professional when reporting instances or situations of non-compliance
7. Ability to maintain the confidentiality of proprietary information
8. Ability and commitment to reporting findings in a timely manner

D. Communication Process:

Certification Bodies shall have a process for communicating to staff all the applicable ROC guidance from the ROA, including relevant responses to interpretation requests and other relevant documents.

5.2 Auditor Requirements

1. The fundamental objective of applying these competencies and requirements is that different auditors working independently from one another should be able to reach similar

conclusions in different circumstances. Collectively, the overall competence, experience, and skill set of the assurance personnel need to be sufficient to achieve the certification objective.

2. The ROC Framework consists of three pillars: i) Soil Health ii) Animal Welfare and iii) Social Fairness. In addition, the ROC standard covers requirements for farming and ranching operations, transportation, slaughter, and certain processing facilities for food and fiber in small, medium, and large farms both domestic (USA) and international. Therefore, auditor requirements for the ROC program shall include at a minimum:

A. Character and Competency Attributes

Auditors should demonstrate:

- a) That they are non-biased
- b) That they are professional, ethical, open-minded, diplomatic, observant, adaptable, organized, collaborative, and impartial (From ISO 19011 *Guidelines for Auditing Management Systems*)
- c) Evidence of ongoing training or continuing education
- d) Proof of auditing competency (e.g., ISO auditor training, IOIA training, Professional Animal Auditor Certification Organization training, Social Auditor training, and other industry-approved, audit-related training)
- e) Agency-approved auditor training programs must be reviewed and approved by the ROA.

B. Education and Skills

General requirements for auditors (for educational qualifications please refer to pillar-specific requirements below):

- a) Language proficiency to understand all documents relevant to assessing compliance. If language proficiency does not exist, a translator shall be hired.
- b) Ability to review documents and records and determine whether compliance is met
- c) Ability to succinctly summarize observation and interview results
- d) In-depth knowledge of farming and ranching operations, transportation, slaughter, and processing in the food and fiber industry
- e) Must possess the knowledge and skills necessary to achieve the intended results of the audits they are expected to perform (From ISO 19011)
- f) Must possess generic knowledge, skills and some discipline and sector-specific knowledge and skills to conduct the audit (From ISO 19011)
- g) Ability to understand industry sector language and communicate effectively with clients

- h) Ability to keep information confidential

C. Certification Training Programs

The auditor shall have met, at minimum, one of the following auditor training program requirements recognized by the ROA:

- a) ISO/IEC 9001 (Quality Management Systems)
- b) ISO/IEC 14000 (Environmental Management)
- c) SA 8000 (Social Accountability International)
- d) SMETA (Sedex Members Ethical Trade Audit)
- e) WRAP (Worldwide Responsible Accredited Production)
- f) IRCA (International Register of Certificated Auditors)
- g) or proof of successful completion of other social auditor training per approval by ROA

D. Pillar Specific Qualification Requirements:

1. Soil Health and Land Management

- a) Education - certificate, training college or university degree in agriculture, land management, soil sciences with 3 years of related field/industry experience, or 5+ years of industry experience
- b) Required qualifications include at least 2+ years as an auditor for an accredited Certification Body for the United States Department of Agriculture's National Organic Program (or international standard recognized as equivalent by NOP)

2. Animal Welfare

- a) Education - certificate, training college or university degree in animal science, animal welfare, or related field with 3 years of related field/industry experience, or 5+ years of industry experience
- b) Preferred qualifications may include:
 - i. PAACO (Professional Animal Auditor Certification Organization) certified auditor
 - ii. Licensed Veterinarian
 - iii. Proof of successful completion of other animal welfare auditor training per approval by ROA

3. Farmer and Worker Fairness

- a) Education - certificate, training college or university degree in agriculture, social sciences, social justice or related field with 5+ years of related field/industry experience, or 5+ years of industry experience

- b) The auditor shall have met, at minimum, one of the below auditor training requirements:
- i. SA 8000 (Social Accountability International)
 - ii. SMETA (Sedex Members Ethical Trade Audit)
 - iii. WRAP (Worldwide Responsible Accredited Production)
 - iv. IRCA (International Register of Certificated Auditors)
 - v. or proof of successful completion of other social auditor training per approval by ROA

Note: Domestic auditors who have completed the ROC social training are not required to pursue formal social welfare training (i.e., SA8000) when performing audits in the Global North for small-scale farms with five or fewer permanent employees.

- c) Auditor qualifications (at minimum one):
- i. 2+ years as a Fair Labor Association (FLA) IEM auditor or SCl assessment experience, or
 - ii. 2+ years textile mill and farm international assessment experience, or
 - iii. 2+ years as a social farm auditor with experience as a lead auditor, or
 - iv. 2+ years as an auditor for other Fair-Trade schemes
 - v. Or demonstrated through other ROA recognized qualifications

5.3 Training and Calibration for Assurance Personnel

ROA training is required for Certification Body personnel responsible for providing ROC certification services.

1. Initial Training: The Certification Body assurance staff are required to complete the initial ROC training before becoming an approved ROC Certification Body. The initial training shall include at a minimum:

2. ROC Training Modules: The ROA shall conduct training sessions for verification of technical reviewers and auditors. The courses will be presented through an online platform and will consist of a ROC Overview module and modules for each ROC pillar (Soil Health, Animal Welfare and Social Fairness). The ROC pillar-specific courses will include an overview of the ROC criteria and equivalent standards, auditor guidance, and supporting materials/resources for the respective pillar. Assurance personnel are required to take the ROC Overview Module training and a training for *only* the pillar(s) they intend to audit or review (i.e., each personnel is required to complete 2-4 ROC training modules). A refresher training was designed specifically for personnel who have already taken the ROC training modules for the 2019 Pilot Program.

3. ROC Course Exam: The auditor and verification technical reviewers shall complete

an exam for each ROC training module they complete (including the ROC Overview Module) and achieve a passing score of at least 80% to demonstrate knowledge and understanding of the ROC Standard and that specific module.

4. Verification Technical Reviewer Training: The Certification Body shall have a procedure in place to demonstrate how they determine when a technical reviewer is competent to conduct ROC certification technical reviews for assurance (e.g. supplementary training, verbal interview, test or examination) and are responsible for any training for technical reviewers to meet the ROC Certification Technical Reviewer Competence identified above.

5. Calibration Training: Certification Bodies shall have a documented procedure in place to calibrate Assurance personnel and auditors and ensure consistency in assessment. The calibration training shall include at a minimum:

6. Annual Calibration Session: The Certification Body shall ensure all Assurance Personnel attend annual calibration training.

7. Auditor Consistency:

- a. Minimum of three annual audits (unless Client demand does not allow for this)
- b. Attend or participate in auditor consistency sessions held by the Certification Body
- c. Obtain successful performance evaluations through periodic witness audits or other means of evaluation to retain qualified auditor status. If auditors do not maintain their qualified status, the Certification Body will notify them and the ROA.

8. Certification Verification Technical Reviewer calibration:

The Certification Body shall have a process to ensure it has the competence and capability for all the certification activities. At least one person shall be assigned to review all information and results related to the audit. The review shall be carried out by person(s) who have not been involved in the audit process.

- a. Reviewer does a minimum of three technical reviews (i.e., audit reports or annual assessments, unless Client demand does not allow for this)
- b. Attend or participate in technical reviewer consistency sessions held by the Certification Body, at least annually
- c. If the technical reviewer does not maintain their competency, the Certification Body will notify them and the ROA

9. Calibration Surveys:

- a. The ROA shall conduct, at a minimum, annual calibration surveys. Calibration surveys will be emailed to auditors and verification technical reviewers to track variances. The ROA will review results and determine if additional calibration training is needed to support consistency.

5.4 Subcontracting

The Certification Body shall take responsibility for all activities outsourced to another body and shall ensure the outsourced or contracted activities and personnel meet the ROC requirements. The Certification Body shall have a legally binding written contract with the body providing the subcontracted service. (Adapted from ISO/IEC 17065).

The office holding the ROC Certification Body approval is responsible to ensure that all ROC policies and procedures are effectively implemented at the local/regional offices. If local offices operate independently, they should apply for approval as an individual Certification Body.

Subcontracting Certification Bodies or Auditors is permitted by the ROC program. In addition to subcontractors having a legally binding contract with the approved ROC Certification Body, the subcontractor must stipulate during the certification and auditing service that they work under the approved CB's direction.

5.5 Evaluation and Monitoring

The ROA shall review the Certification Body's auditor training and monitoring system annually. The records audit shall be scheduled to provide the Certification Body with reasonable notice.

Certification Bodies shall keep at a minimum:

- 1) A list of qualified auditors and associated resume or CV, records to demonstrate auditor participation in consistency sessions and performance during witness audits. They shall regularly review audit reports for completion
- 2) A list of qualified auditors and the training status (i.e., trained, in-training, removed) of each individual. They shall keep records of qualified auditors' re-evaluations and continuing education performance.

6.0 Process Requirements for Certification Bodies

6.1 Verification Method

The Certification Body shall have documented policies and procedures that require evidence to be supplied in order to demonstrate conformance with the specified requirements of the ROC Standard. The Certification Body shall assess the integrity of the evidence provided and use their professional judgement. The auditor shall obtain audit evidence using documented audit procedures to draw reasonable conclusions on which to base the audit results. Some evidence can be verified; however, when evidence is provided internally or by suppliers and there is no standard method for verifying the integrity of the information, the Certification Body shall use their professional judgement. When assessing the integrity of evidence, the Certification Body shall, at a minimum:

- 1) Confirm the evidence supplied is appropriate and reliable to meet the requirements of the appropriate pillar (Soil Health, Animal Welfare, and/or Social Fairness).
- 2) Confirm the evidence is dated, accurate, complete, and pertinent to the entity.
- 3) Ensure that evidence supplied by other parties includes a determination or evaluation identifying the individual responsible for the decisions and their authority for making the decision.
- 4) Any personnel who perform risk-assessment procedures shall provide a satisfactory basis for the assessment of risks and resulting conclusions.

6.2 Handling of Samples

When laboratory testing is required to determine compliance to the ROC program, the Certification Body shall have documented procedures and appropriate facilities to prevent possible contamination of the samples to be sent to the lab. Evidence provided by an ISO/IEC 17025 accredited laboratory may be considered as accurate on the basis of the laboratory's accreditation.

6.3 ROC Certification Procedure and Audit Cycle for Clients

Certification Bodies shall adhere to the ROC certification procedures and audit cycles as outlined in the ROC Framework and governing documents, available at www.RegenOrganic.org/Resources.

6.4 Use and Control of Certificates

Certification Bodies shall follow the procedure for submitting their certification decisions to the ROA using the myROC compliance software.

1. The ROA shall issue the final ROC client certificate.
2. The client certificate will be maintained and available in the myROC client portal.

3. Certification Bodies are responsible for making the certification decision and determining if certificates are re-established or withdrawn. The ROA also reserves the right to withdraw certificates if the Certification Body fails to follow the procedures outlined in this document.

6.5 Conditions for Withdrawals

Certification Bodies shall have a documented procedure for managing the withdrawal of certified Clients. The conditions that may result in the withdrawal of a Client's certification include:

- a. Standard requirements or equivalent are not maintained
- b. Cooperation and access to documentation, facilities, and personnel are not provided to auditors during on-site audits
- c. Client does not permit an audit to be conducted
- d. Client uses the ROC certificate in ways that conflict with the terms and conditions of use as outlined in the Licensing Agreement (available at RegenOrganic.org/Resources)
- e. Client volunteers to withdraw or circumstance warrants temporary suspension
- f. Certificate expires
- g. Such other matters or circumstances arising which may, in the sole opinion of the ROA, in any way compromise the integrity or reputation of ROC

Should the Client fail to meet any of the above conditions, the Certification Body may withdraw the Client's certification decision for the applicable pillar(s).

6.6 Process for Withdrawals and Corrective Action

The Certification Body shall have a documented procedure to address withdrawal of Client certification and corrective action. The process followed by the Certification Body in the event a Client fails to meet any of the above conditions, is:

- 1) The Certification Body shall send written correspondence to the Client outlining results of current assessment, and if needed, requesting corrective action within 45 days* or the Client will not achieve or maintain certification.
- 2) If the Client does not respond within the timeframes noted above, the Certification Body sends a written notice stating that the Client's certificate will not be issued, or for a Client with an existing certificate, that the certificate will be withdrawn in 15 days if corrective action is not taken, unless more time is required to complete the corrective action. In such cases the Client shall request additional time from the Certification Body and obtain approval from the Certification Body prior to the 15 days.
- 3) If the Client takes no action, the Certification Body issues a written notification to inform the Client that the certificate is withdrawn.

- 4) The Certification Body removes the Client from their list of certified Clients.
- 5) If a Client wishes to recover ROC certification after having their ROC certificate withdrawn, the Client shall re-apply for certification.

**Note: The timeframes noted above and marked with asterisk (*) shall be adhered to unless the ROC Framework dictates otherwise. In certain instances, such as confirmation of a Critical Tolerance, the ROC Framework requires resolution within 30 days.*

If an appeal is in process, the withdrawal procedure may be suspended pending the outcome of the appeal. See Disputes Process available at www.RegenOrganic.org/Resources.

6.7 Changes Affecting Certification

The Certification Body shall have documented policies and procedures in place addressing how to handle changes that are initiated by the Client. At a minimum the procedures shall include:

- 1) A contractual obligation between the Certification Body and Client requiring the Client to immediately disclose any changes that would affect certification. This may include location, process or management changes.
- 2) If a Client is transferring from one Certification Body to another, the new Certification Body shall require Clients to disclose previous enrollment with another Certification Body and provide a copy of the latest audit report or audit findings and corrective actions.
- 3) The Certification Body shall have a procedure in place to review, evaluate, and issue revised certification documentation as needed.

6.8 Control of Documents

There are no requirements additional to those set forth in ISO/IEC 17065.

6.9 Control of Records

There are no requirements additional to those set forth in ISO/IEC 17065.

6.10 Management Review

There are no requirements additional to those set forth in ISO/IEC 17065.

6.11 Internal Audits

There are no requirements additional to those set forth in ISO/IEC 17065.

6.12 Annual Reporting to the ROA

The Certification Body shall have a procedure in place to electronically submit the annual report information to the ROA on an annual basis.

The certification information will be made publicly available via myROC compliance database. All other information will be used in aggregate reporting only, to maintain confidentiality of Client information.

The annual reports shall be submitted in Excel format to QualityAssurance@regenorganic.org

The reports shall include:

1. **Database Certification Information:** This information will be made publicly available via myROC.
 - a. Certified entities
 - Name of entity
 - Location(s) (e.g., state/province, country)
 - ROC certification level achieved (e.g., Bronze, Silver, Gold)
 - Framework pillars (e.g., Soil Health, Animal Welfare and/or Social Fairness)
 - National Organic Program (NOP) compliance status
 - Equivalency social or animal welfare certification/compliance status if applicable
 - ROC certification expiration date
 - Certified raw materials (plant and/or animal products)
 - Certified processed products
 - Soil test results
2. **General Certification Information:** This information will be used in aggregate reporting only, to maintain confidentiality of Client information.
 - Number of operations with failed audits
 - Number of trigger audits
 - Number of non-conformances identified by module
 - Number of complaints or appeals regarding certification decisions for ROC
3. **Certification Information by Pillar:** This information will be used in aggregate reporting only, to maintain confidentiality of Client information.
 - a. Soil Health
 - by level (e.g., Bronze, Silver, Gold)
 - by location (e.g., state/province and country)
 - by sector
 - b. Animal Welfare
 - by level (e.g., Bronze, Silver, Gold)
 - by location (e.g., state/province and country)
 - by sector

- c. Social Fairness
 - by level (e.g., Bronze, Silver, Gold)
 - by location (e.g., state/province and country)
 - by sector

6.13 Scheduling of Audits

The certification body shall have a procedure in place for timely initial contact and audit scheduling of operations.

The initial contact with operator regarding Certification Body assignment shall not exceed 10 business days from initial notification of assignment in myROC.

Audit scheduling of operations shall not be delayed, except in cases of a natural disaster, pandemic, or similar circumstance out of the control of the Certification Body or the Client. The reason must be justified and recorded.

Every effort should be made to ensure inspector cost savings whenever possible, but not to the detriment of the operation by delaying the initial or renewal audit.

7.0 Approval and Review of Certification Bodies

ROA carries out processes and activities designed to oversee and support the integrity and credibility of its assurance model. These activities are conducted throughout the year with annual oversight review. These include maintaining public information on certification status via myROC; reviewing auditing related documents; implementing procedures for approving Certification Bodies and assurance personnel; and providing training and support. Desk and/or on-site audits of Certification Bodies, witness audits, and issuing the resultant oversight report are part of ROA's review process.

7.1 ROA Procedure for Review and Approval of Certification Body

A. Audit Types

- 1) **Full Approval Review (FR):** the full approval review occurs on a three-year cycle and consists of:
 - a) **Desk Audit:** off-site records assessment conducted by the ROA to assess conformance to the ROC Certification Body Requirements document or approved equivalent
 - b) **On-site Audit:** on-site audit conducted by the ROA may be necessary to assess conformance to the ROC Certification Body Requirements document or approved equivalent based on findings from the desk audit. An on-site audit can also be triggered by changes in management or ownership.

- c) **Witness Audit of Auditor(s) (WAA):** on-site audit during which a qualified auditor is observed by the ROA for the purpose of confirming competence. The witness audit will be scheduled at an agreed upon time by the Certification Body, ROA, and auditor. In the event the Certification Body has no active ROC applicants, a mock audit is acceptable. ROA may give provisional approval for the first year in the absence of a full witness audit provided the CB demonstrates that it meets the auditor qualifications of section 5.2. New CBs must have at least one applicant within the first calendar year of approval.
- d) **Trigger audits:** an audit that is triggered by alert of a high-risk situation, flagged by a complaint, or changes that would affect a Certification Body’s existing ROC Certification Body approval. Trigger audits do not reset the audit cycle timing.
- e) **Surveillance Review (SR):** The Certification Body shall complete a “surveillance assessment” form and submit it electronically or by mail by the date specified by the ROA.

B. Audit Schedule for Certification Body Approval

The **Full Approval Review (FR)** occurs on a three-year cycle and shall be a virtual/remote audit of the primary facility(s) records where the certification services are supported. On-site audits will only occur when deemed necessary. The audit shall occur within 12 months of the Certification Body’s first client. A minimum of one on-site witness audit of auditors (WAA) shall also occur during the Full Approval Review (FR) once the Certification Body obtains their first client. An annual remote desk audit will occur during the years there is no on-site facility or on-site witness field audit. The ROA obtains the right to conduct additional audits at any time if circumstances arise, such as complaints or unresolved disputes according to the Disputes Process.

Year 1*	Year 2*	Year 3*	Year 4*
FR/WAA	SR	SR	FR/WAA

Full Approval Review (FR), Surveillance Review (SR), Witness Audit of Auditors (WAA)

7.2 Role of Certification Bodies in Supporting the ROA Approval Audits

In order to maintain ROC approval as a Certification Body, the Certification Body shall support the ROA approval audits and at a minimum are responsible for:

- 1) Coordinating with the ROA to schedule the audit
- 2) Making necessary personnel, records, and facilities available for the ROA to conduct the audit

- 3) Providing a knowledgeable employee, who is fluent in English, to guide the audit and to act as a liaison to assist the ROA with obtaining and interpreting the necessary audit evidence
- 4) Developing corrective action plans in response to each identified non-conformance and implementing the plan to correct them in a timely manner

7.3 Certification Bodies Approval and Corrective Actions

At the close of each approval audit, the ROA shall provide a draft audit report to the Certification Body in English within 30 days of completing each audit. The audit report shall identify:

- 1) General audit information including the location of the personnel or facility(s), the Certification Body staff that participated, and the scope of the audit
- 2) Evidence obtained and reviewed
- 3) Decision of conformance or non-conformance for each requirement

The Certification Body shall have 30 days from receipt of the audit report to respond to the ROA in writing with a proposal for corrective action and a timeline for completing the plan for each identified non-conformance. The ROA will have 15 days from receipt of the Certification Body's corrective action plan to communicate to the Certification Body the acceptability of the proposed action and the method and timeframe for follow up. To officially resolve the non-conformance, the Certification Body shall provide evidence of correction via email to the ROA for review and final approval. In some circumstances, the ROA may decide to evaluate it at the next scheduled audit.

7.4 ROA Evaluation of Certification Body Performance

The ROA shall review the following Certification Body performance items in addition to the required items identified in this document:

- 1) Number of Clients and certificates issued
- 2) Complaints or appeals regarding Certification Decisions for ROC
- 3) Other items that may be developed by ROA

7.5 Termination or Suspension of Certification Body Approval

The ROA may suspend or terminate the approval of a Certification Body at any time. Termination will result in cancellation of the agreement between the ROA and the Certification Body and bars the Certification Body from providing ROC certification services.

1. A Certification Body's approval may be terminated or suspended if:

- a) A Certification Body violates the terms of their contract with the ROA or their Clients
- b) Non-conformances identified during an audit performed by the ROA remain uncorrected beyond the time specified by the ROA for corrective action
- c) Cooperation and access to documentation, facilities and personnel are not provided to the ROA during audits
- d) The Certification Body does not permit an audit to be conducted
- e) The approval expires
- f) Other matters or circumstances arising in connection with a Certification Body which may, in the sole opinion of the ROA, in any way compromise the integrity or reputation of the ROC program
- g) If the Certification Body loses its accreditation(s) or approval status for any reason with another ROA recognized Certification Scheme
- h) If the Certification Body's local or regional offices are forced to close operations or its Standards are withdrawn or cancelled

2. In the event a Certification Body's approval shall be terminated or suspended, a meeting between the ROA and the Certification Body may occur to discuss the reason for termination or suspension.

3. If a Certification Body's approval shall be suspended, the Certification Body shall present the ROA with a plan and timeline describing how they will correct the issue that resulted in suspension.

4. If a Certification Body is terminated:

- a) The ROA shall submit a letter of intent to terminate the Certification Body.
- b) If a resolution to the termination is not found, the ROA shall ensure that the Certification Body's Clients are informed of the pending termination.
- c) If a Certification Body is terminated, the Certification Body shall transfer all Client records, reports, and any other information to the ROA to support a timely transition to a new Certification Body and provide uninterrupted service to the Client

7.6 Complaints and Appeals with Respect to the Certification Body

The Certification Body is responsible for managing and resolving appeals and complaints associated with their certification services. Certification Bodies shall report all appeals and complaints to the ROA. If the Certification Body is unable to resolve appeals and complaints after following the below procedures, the case shall be presented to the ROA as defined below.

A. Procedure

The Certification Body shall have a documented procedure for receiving and resolving appeals and complaints from Clients, auditors, and any other stakeholders related to the ROC certification services they provide. They shall have a dedicated individual that is publicly identified (e.g., on the organization's website) for stakeholders to contact. The appeals and complaint procedure shall also be publicly available and include a reasonable time for confirming receipt of the complaint and an estimated resolution date.

Appeals and complaints shall be submitted and handled as outlined in the steps below:

1. Person or organization appealing or complaining contacts the Certification Body and presents their case
2. Certification Body confirms receipt within a reasonable timeframe; provides the appellant or complainant an estimated timeline for resolution; conducts a full review and investigation; and subsequently notifies the appellant or complainant of the resolution. In the case of unsatisfactory result and request for further appeal, the appellant or complainant must follow the procedures according to the Complaint policy of the Certification Body.
3. If the Certification Body does not meet the timelines and requirements outlined above, the complainant may present the complaint to the ROA. The ROA Operations Team will review the actions of the Certification Body.

8.0 Definitions

Assurance personnel: The Certification Body personnel approved for conducting any activities related to ROC audits and approval including a dedicated program manager; personnel performing technical desk reviews and on-site audits; personnel conducting quality control of the desk review and on-site audit; selling or providing ROC certification services; providing marketing or communication material related to the provision of ROC certification services.

Calibration: A targeted review or training of a technical reviewer or auditor to ensure performance metrics and ROC program goals are consistently applied. Any findings in the individual's performance or training should appropriately address any deficiencies or knowledge gaps that are observed.

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

Desk audit: An audit of a Certifying Body that does not involve a physical site visit or remote site audit

Governing documents: The governing documents consist of the ROC Framework and other documents (such as Required Baseline Certifications, Cost & Fee Structure, Labeling Guidelines, etc.) listed at RegenOrganic.org.

Remote audit: A site audit that is conducted via a remote web conferencing method or other audio/video means.

Surveillance review audit (SRR): Annual audit of the Certifying Body as a condition of approval

Trigger audit: A spot audit of an ROA-approved Certifying Body or certified operator usually as the result of a complaint or major non-compliance to the ROC program.

Witness audit of auditor (WAA): An on-site inspection of a ROC operator observed by the ROA

Annex A

Table of requirements and ISO/IEC 17065 equivalency

Criterion & Section	ISO/IEC 17065 Equivalency (FE = Full Equivalency PE = Partial Equivalency)
3 General Requirements	
3.1 Certification Contract	PE
3.2 Liability and Financing	PE
3.3 Non-discriminatory Conditions	PE
3.4 Confidentiality	PE
3.5 Conflict of Interest Policy	PE
3.6 Impartiality and Independence	PE
3.7 Ethics	-
4 Structural Requirements	
4.1 Organizational Structure	PE

5 Resource Requirements

5.1	Management of Competence for Assurance Personnel and Auditors Involved in the Certification Process	-
5.2	Auditor Requirements	-
5.3	Training and Calibration for Assurance Personnel	-
5.4	Evaluation and Monitoring	-
5.5	Subcontracting	PE

6 Process Requirements for Certification Bodies

6.1	Verification Method	-
6.2	Handling of Samples	-
6.3	ROC Certification Procedure Audit Cycle for Clients	-
6.4	Use and Control of Certificates	-
6.5	Conditions for Withdrawals	-
6.6	Process for Withdrawals and Corrective Action	-
6.7	Changes Affecting Certification	-
6.8	Control of Documents and Records	FE
6.9	Control of Records	FE
6.10	Management Review	FE
6.11	Internal Audits	FE
6.12	Annual Reporting to the ROA	-

7 Appeals and Complaints

7.6	Complaints and Appeals with Respect to the Certification Body	-
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References

ISO/IEC 17000:2004 - Conformity assessment – Vocabulary and general principles

ISO/IEC 17020: 2012 - General criteria for the operation of various types of bodies performing inspection

ISO/IEC 17065:2012 (EN) - Conformity assessment – Requirements for bodies certifying products, processes, and services

ISO/IEC 19011:2018 - Guidelines for Auditing Management Systems

ISO 26000:2010 - Social Responsibility Guidelines