

Program Manual

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The Regenerative Organic Alliance (ROA) is responsible for maintaining the ROC Program Manual and reserves the right to update this document at its sole discretion at any time. The most recent version of these requirements and other governing documents of the ROC Program are maintained at www.RegenOrganic.org/Resources. For additional questions, please contact info@regenorganic.org.

1.0 About Regenerative Organic Certified™ (ROC™)

Founded in 2017, Regenerative Organic Certified (ROC) is a holistic agriculture certification program requiring adherence to the ROC Framework (standards). The ROC Framework is overseen and maintained by the ROA Board of Directors. Certification is granted at the farm level.

ROC is an add-on to the USDA National Organic Program. To achieve ROC, an entity must first hold USDA organic certification or an international organic equivalent formally recognized by the National Organic Program (NOP). Criteria for international equivalency includes only those countries with which the USDA currently has a trade agreement. See "NOP International Equivalents" at www.RegenOrganic.org/Resources for more information.

Regenerative organic farming practices support healthy soil, animals, and people to build resilient ecosystems and communities. By using regenerative practices like conservation tillage and cover cropping, regenerative farmers increase the organic matter in soils over time to replenish the land and sequester carbon from the atmosphere. On regenerative organic farms, animals are raised and slaughtered humanely, and workers are treated fairly and ethically.

1.1 About the Regenerative Organic Alliance (ROA)

The Regenerative Organic Alliance (ROA) promotes farming practices that restore and build soil, ensure animal welfare, and end unfair conditions for farmers and farmworkers. The organization's intent is to create long-term solutions to the climate crisis, factory farming, and fractured rural economies. The ROA exists to heal a broken system, repair a damaged planet, and empower farmers and eaters to create a better future through regenerative organic farming.

The ROA serves as the *Oversight and Scheme Management Body* for the ROC program. The ROA is responsible for approving ROC Certifying Bodies and creates documentation, systems, and processes. 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 ROA board is made up of experts in farming and ranching, land management, animal welfare, and worker fairness; and oversees the development, implementation, and maintenance of the Regenerative Organic Certified™ (ROC™) program. Current board members and ROC supporters are listed on the ROC website, RegenOrganic.org.

1.2 About ROC Certifying Bodies

ROA has contractual agreements with approved Certifying Bodies. Operations seeking to gain ROC will work initially with the ROA directly for the eligibility application and then are paired with one of the contracted Certifying Bodies for the certification process of document review, on-site audit, final technical review, and certification decision. The ROA will issue the final certificate. A list of current approved Certifying Bodies is maintained on the ROC website Resources page. page.

1.3 The Structure of ROC

The ROC program encompasses three pillars: Soil Health, Animal Welfare, and Social Fairness. In line with these pillars, the ROC program aims to:

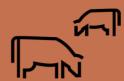
- Increase soil organic matter over time and sequester carbon below and above ground, which could be a tool to mitigate climate change
- Improve animal welfare
- Provide economic stability and fairness for farmers, ranchers, and workers.

Together, these pillars build upon and surpass the requirements of other certification programs in these areas by recognizing and promoting high-bar regenerative farming practices that support a healthy planet and a fair society.



Soil Health

- Builds soil organic matter
- Conservation tillage
- Cover crops
- Crop rotations
- No GMOs or gene editing
- No soilless systems
- No synthetic inputs
- Promotes biodiversity
- Rotational grazing



Animal Welfare

- Freedom from discomfort
- Freedom from

fear & distress

- Freedom from hunger
- Freedom from pain, injury or disease
- Freedom to express normal behavior
- Grass-fed/pasture-raised
- Limited transport
- No CAFOs





Social Fairness

- Fair payments for farmers
- Good working conditions
- Living wages
- Capacity building
- Freedom of association
- Democratic organizations
- Long term commitments
- No forced labor
- Transparency and accountability

The ROC™ program includes three levels (Bronze, Silver, and Gold) which allows participants to phase in more rigorous practices over time.



Bronze level is the minimum certification for ROC. With fewer requirements than subsequent levels, ROC Bronze is the first step to help producers phase in more regenerative organic practices over time.



Silver level certification is the core level of ROC, demonstrating adoption of key regenerative organic practices.



Gold level represents the highest bar for regenerative organic production across all three ROC pillars. Those who achieve ROC Gold are pioneering, model farms.

The <u>ROC Framework</u> provides detailed and specific practices and criteria required at each level. The current ROC Framework is available on the ROC website <u>Resources</u> page.

1.4 ROC and ROA Names, Seals, and Logos

Regenerative Organic Certified seal and acronyms, aka ROC marks, must be used in accordance with the *Labeling Guidelines & Terms of Use* document, available on the ROC website <u>Resources</u> page.

Use of ROC marks must be pre-approved. ROC marks that may be used on ROC product packaging or in marketing materials include: Regenerative Organic Certified™ and ROC™. The Regenerative Organic Alliance logo and acronym ROA may not be used on products or marketing materials unless specifically approved by the ROA.

ROC product claims must follow NOP Organic labeling rules and guidelines.

2.0 Who can participate in the Regenerative Organic Certified program?

ROC is a holistic standard that applies to producers of agricultural products including, but not limited to, plant or animal products for food, textile, or personal care. Any company handling ROC products, regardless of size or geographic location, can participate in the program if they meet the eligibility requirements. Certain growing methods such as soilless practices, aquaponics/hydroponics, and container growing where crops are never integrated into a field are not eligible for ROC.

2.1 Applicability

Certification may be achieved by individual farms and ranches or by farm groups (e.g., farmer cooperatives or grower groups) for all or a portion of their operations in the U.S.A. or internationally. Certain processors or manufacturers that handle certified product are subject to chain-of-custody and audit requirements. For products to be sold with the ROC Gold claim, certain processors may also be required to achieve ROC. However, for ROC Bronze and Silver levels only the farm or ranch is required to be certified to the ROC standard.

2.1.1 Types of Operations

Certification is available for individual operations and multi-site operations. ROC covers requirements for farming and ranching operations that produce food, fiber, and other agricultural products for both U.S. and international markets.

An **individual operation** is a sole proprietorship, corporation, partnership, or similarly defined single company. A single certification may cover activities at multiple sites under the direct management of the applicant company.

A **multi-site operation** with demonstrated internal control system, i.e. cooperative or grower group, involves a centrally managed association of local growers producing similar crops using similar practices and marketing their products in common. The operation must be constituted as a legal entity in the country where they operate. A single operation may cover numerous individual member farmers. Management must establish and maintain an internal control system including access to and education regarding organic standards. Management must also annually conduct a thorough standards compliance evaluation of each member and farm.

2.1.2 Exempt Operations

The ROC Supply Chain Guidelines available on the ROC website Resources page 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. Certain processors and handlers may need to register as a supply chain actor with the ROA as described in the Supply Chain Guidelines. A link to the registration form is available on the ROC website Resources page under "Supply Chain Actors."

Exempt operation: An entity that meets the exemption criteria of the USDA NOP rules. Exempt operations still need to abide by the chain of custody requirements and the supply chain guidelines for ROC. Exempt operations include entities that do not handle the raw unpackaged organic product. They include entities that store or transport packaged bulk or finished goods, and wholesalers and retailers that sell packaged, labeled organic product.

3.0 The Certification Process

The steps to certification include:

- 1) Submit an initial application and contract at the ROA website
- 2) Submit a Regenerative Organic System Plan (ROSP) to the ROA
- 3) Get paired with a certifying body
- 4) Complete an audit to ROC Framework
- 5) Final review by the CB (certifying body)
- 6) Certificate issued by ROA

An annual audit is required to maintain ROC status.

To achieve Regenerative Organic Certified[™], operations must meet the minimum requirements for all three pillars as applicable (for example, operations that do not raise commercial livestock are not required to meet the criteria for animal welfare). Applicants can use existing certifications in soil health, animal welfare, and social fairness to help achieve ROC status at any of the ROC program levels. See "Baseline Required Certifications & Equivalency Assessment" at www.RegenOrganic.org/Resources for more information.

3.1 Consent to Electronic Submission

ROC applicants give consent to share their information electronically with the ROA and the certifying body assigned to the operation's account. Permission to share information is granted by signing and returning the *Operation Information & Certification Contract*.

The ROA will share information applicable to the operation with certifying bodies and auditors as needed to support the certification process, including, without limitation, contact information, previous audit reports, traceability reports, OSP documents shared by the operator in support of ROC applications, or any other pertinent information deemed necessary.

3.1.1 MyROC

All ROC operations are provided free access to the online certification management portal called "myROC." Through myROC, operations can view their Regenerative Organic System Plan, applicable documents, communications, CB auditor scheduling, audit reports, findings, and certificates.

3.2. Initial Certification Process Flow

All applicants must complete an online, electronic ROC program application at www.RegenOrganic.org/Apply. A hard copy of the initial application can be mailed via USPS upon request. Applicants must also complete and upload an Operation Information & Certification Contract at the time of application.

Operators must read and agree to follow the ROC Framework (standards) and required practices in order to proceed with the process of application and certification.

3.2.2 Meet ROC Baseline Certification Requirements

All applicants must meet minimum qualifying criteria to be eligible for ROC:

- 1) The applicant must obtain USDA Organic certification or an approved equivalent. NOTE: Fields and livestock operations in their final year of transition to organic status may pursue ROC concurrently with USDA Organic.
- 2) The applicant must obtain a required baseline certification in Social Fairness and Animal Welfare, if applicable. Refer to the ROC website <u>Resources</u> page for a list of *Required Baseline Standards*. NOTE: Operations in the Global North are not required to obtain an additional Social Fairness certification and instead will be audited directly to the Social Fairness pillar of the ROC Framework.
- 3) Dairy operations are not required to obtain an animal welfare certification if they undergo a full ROC Animal Welfare audit.

3.2.3 Prepare for Application and Certification

Applicants should:

- 1) Obtain a copy of the ROC Framework and understand the ROC requirements
- 2) Compile records and certification documents
- 3) Plan for conducting soil sampling and testing
- 4) Review the <u>Required Baseline Certifications & Equivalency Assessment</u> to understand the additional practices needed to be eligible for ROC

3.2.4 Complete and Submit the Required Forms

Operations seeking ROC must:

- 1) Submit an *Operation Information & Certification Contract* and initial application for pre-screening using the electronic form located at RegenOrganic.org/Apply, also accessible under "Get Certified" from the ROC website homepage and
- 2) Pay a one-time application fee that covers the cost for the ROA to review application, determine eligibility, and prepare the certification documentation. After review of the pre-screening application, the ROA will send operation a customized Regenerative Organic System Plan (ROSP) based on an equivalency analysis of the applicant's operation and current certifications.
- 3) Operation returns the completed *Regenerative Organic System Plan* (ROSP) to the ROA. After receiving these documents, the ROA will
 - a. review the submission
 - b. Set up myROC portal access and enter the data into myROC online portal
 - c. resolve any requests for more information with the applicant
 - d. Assign to the Certifying Body in myROC, forward the ROSP and corresponding documentation to the Certifying Body.

3.2.5 Certifying Body Completes Document Review and Schedules On-Site Audit

Operations seeking ROC agree to:

- 1) Be contacted by the assigned CB, understand the audit process, agree to the audit schedule, and abide by the on-site audit requirements set by the CB and the ROA
- 2) Be audited to each ROC pillar applied for, which may be conducted by a single CB or in combination with another CB, or separately from other certification scopes such as the USDA NOP. The auditor will only verify the additional requirements for each ROC pillar
- 3) Be audited ideally during the time when
 - a. the product targeted for certification is in the growing season
 - b. the product is in a critical step of processing or handling; and
 - c. a sizable number of workers are available on-site for interviews.
- 4) Submit their applicable operation to

- a. an on-site audit with field inspection,
- b. document and records review, and
- c. worker interviews.
- 5) Receive feedback on the audit outcome, provide additional information as necessary, and resolve any issues necessary to meet certification requirements.

3.2.6 Certifying Body Records Audit Findings and Issues Certification Decision

Once the operation seeking ROC has completed the on-site audit, the certifying body records the outcome and makes the final certification decision.

The product certification audit findings and status to each pillar are entered and maintained in the myROC online portal. The evaluation and certification process follows the certifying body's own quality management system, policies, and procedures as approved by the ROA.

The ROA issues a certificate of conformity directly to the operator for each pillar where approval is granted.

Once certification approval is granted, ROC marketing claims can be made in accordance with the *Labeling Guidelines & Terms of Use* document available at the ROC website Resources page.

All applicable certification and inspection fees are paid to the certifying body based on the *ROC Cost & Fee Structure*, also available on the <u>Resources</u> page.

3.3 Continuation of Certification

After the initial ROC evaluation and certification, the certified organization must re-apply yearly to maintain ROC status and pay an annual fee as set forth in the <u>Cost & Fee Schedule</u>. Operations at the Bronze and Silver levels must meet minimum milestones to maintain certification.

The certified operation must submit an annually updated ROSP to the ROA that includes:

- 1. Any changes in the operation's owners, farm/business name, principal responsible person, contact person, and contact information including address and phone number.
- 2. Any deviations, changes, modifications, or other amendments made to the certified organic status of the operations enrolled in ROC.
- 3. Any changes, additions, or deletions to the previous year's Regenerative Organic System Plan intended to be undertaken in the coming year.
- 4. An update on correction actions as the result of any nonconformities previously identified by the CB as required for continued certification.

5. Other information as deemed necessary by the CB to determine compliance with the standards.

3.3.1 Recertification and Evaluation

On-site audits are conducted annually at all levels for all pillars.

During the first certification cycle, operations must conduct soil health lab tests for all five indicators referred to in the <u>Soil Sampling Guidelines</u>. Lab soil tests must be conducted every three years following the <u>Soil Sampling Guidelines</u> and in-field tests need to be conducted annually.

3.3.2. Ongoing Milestones

For operations at the Bronze or Silver levels that wish to make public claims about their Regenerative Organic Certified status, continuous improvement milestones are required. The tiered approach to reaching higher levels enables producers to adjust and adapt their practices over time and allows for continuous improvement and meeting ongoing milestones set forth in the ROC Framework Section III. If milestones are not achieved, neither the farm nor product may carry ROC claims until the applicable milestone is met.

Organizations certified at the Gold level are not subject to additional requirements beyond the certification criteria.

3.4 Grower Groups

Grower groups, famer cooperatives, and production group collectives are eligible to apply for Regenerative Organic Certified. Cooperatives and grower groups follow the same process as an individual farming operation.

The applicant should be the responsible legal entity of the grower group and part of the same legal entity listed on the USDA NOP certification agreement. Groups are audited following the *Group Certification and Sampling Methodology* available on the ROC website Resources page.

3.5 Brands/Retailers

Brands and retailers are not required to obtain certification. However other criteria apply if the ROC claim will be applied to product packaging or marketing materials:

- 1) All brands, retailers, and finished good distributors requesting use of a ROC claim are required to submit a *License Agreement* as described in the *Supply Chain Guidelines* section 4. Both documents are available at www.RegenOrganic.org/Resources.
- 2) 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.

- 3) Brands and retailers that would like to produce and/or source ROC product are encouraged to engage with their suppliers and to contact info@regenorganic.org for additional guidance. The ROA's website at www.RegenOrganic.org provides additional information.
- 4) Brands should fully review and understand the Supply Chain Guidelines and Labeling Guidelines & Terms of Use for claiming ROC material in a product. Brands and retailers should work with both producers and processors in the supply chain to understand what changes are required for the transition to ROC. Brands that wish to publicly communicate commitment or participation in ROC should review the Communication & Marketing Guidelines. Documents are available at on ROC website Resources page.

3.6 Processors and Handlers

All organizations that handle or process ROC-claimed product must be USDA Organic certified or certified to an approved international equivalent.

The Supply Chain Guidelines contain 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). Processors and handlers are considered SCAs.

Processors and handlers 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.

For ROC Gold level, at least one stage in the post-producer supply chain must also be certified to ROC. Processors are otherwise not required to achieve separate certification to ROC. In the case of ROC Gold, 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. Additional details are found in section 8 of the <u>Supply Chain Guidelines</u>.

Exempt operations are not required to apply with the ROA and are not subject to a ROC chain of custody audit. The ROC requirements for exemptions align with the National Organic Program (NOP) standard explained further in section 5.3 of the ROC Supply Chain Guidelines.

3.7 Transferring Certifying Bodies

Operations can switch certifying bodies given the following criteria:

1. All CBs must meet the <u>Certification Body Requirements</u> and be approved by the ROA.

- 2. If a ROC operation wishes to switch certifying bodies, they must notify the current CB and the ROA.
- 3. Operations must agree that CBs will exchange any relevant information with the ROA and between each body during the transfer process.
- 4. There shall be no lapse in ROC certification during the transfer of CBs.
- 5. Transfer of CB follows the written procedures and policies of the certifying body(s).

4.0 License Agreement and Registration

Any organization or brand making Regenerative Organic Certified^{$^{\text{TM}}$} (ROC^{$^{\text{TM}}$}) product claims shall register a *License Agreement* with the ROA, which is available at the ROC website Resources page.

5.0 Enforcement & Disputes

5.1 Enforcement

The integrity of the ROC program is upheld by ROC certifying bodies and their certification processes. The marketplace acceptance and success of third-party certification programs strongly depends on the consumers' confidence in the authenticity and integrity underlying certified product label claims. To this end, ROA contracted CBs implement quality certification services that ensure compliance prior to granting certification, and monitor the continued compliance of certified operations.

5.2 Disputes

The ROC *Disputes Process* is intended to provide any interested party an opportunity to voice their concerns about issues related to ROA policies, procedures, decisions, actions of participants, or certifiers. Any interested party, stakeholder, or ROC participant is eligible to submit a formal complaint or dispute through the *ROC Disputes Process* available on ROC website <u>Resources</u> page.

Complaints are handled following procedures found in the *ROC Disputes Process*. Complaints related to certification decisions, auditors, or the certifying body should follow the complaints policy set forth by the certifying body described in the *Certifying Body Requirements* section 7.6, also available on the <u>Resources</u> page.

5.2.1 Dispute Resolution (Domestic)

In the event of any dispute, controversy, or claim between ROA and a client, applicant, or certified operation relating to the ROC Governing Documents, the parties shall first seek to resolve the dispute through informal discussions. If informal discussions fail, the parties will

refer any disputes to formal arbitration and will not make public the dispute prior to the ruling.

5.2.2 Dispute Settlement (International)

For Agreements between ROA and client, applicant, or certified operation domiciled outside the United States, binding arbitration will take place in New York, New York, U.S.A, in accordance with the United Nations Commission on International Trade Law (UNCITRAL) Arbitration Rules as in effect at the time of the claim.

The appointing authority shall be the International Centre for Dispute Resolution ("ICDR"). The case shall be administered by the ICDR under its Procedures for Cases under the UNCITRAL Arbitration Rules. The language of the arbitration shall be English.

The dispute shall be resolved by three arbitrators of whom each party shall select one, with the third arbitrator to be selected by the two party-appointed arbitrators within 30 days of the appointment of the second party-appointed arbitrator. If the arbitrators selected by the parties are unable or fail to agree upon the third arbitrator, the third arbitrator shall be selected by the ICDR.

The decision of the arbitrators shall be final and binding upon the parties and their respective successors and assignees, and the parties agree that judgment upon the award rendered by the arbitrators may be entered in any court having jurisdiction thereof. Except as may be required by law, neither a party nor any arbitrator(s) may disclose the existence, content, or results of any arbitration hereunder without the prior written consent of both parties.

6.0 Policies

6.1 Governing Law

Except only to the extent expressly provided herein, this agreement shall be governed exclusively by and construed according to the laws of the State of California, without giving effect to its body of laws pertaining to conflict of laws.

6.2 Consent to Jurisdiction

The client, applicant, or certified operation hereby irrevocably consents to the jurisdiction of the courts of the State of California for all purposes in connection with any action or proceeding that arises out of or relates to ROA's ROC certification and processes including certification services provided by ROC-approved certifying bodies in relation to ROC.

6.3 Indemnification

6.3.1 Indemnification by Licensor

The Licensor (ROA) shall indemnify and hold harmless the Licensee (client) and its affiliates from and against all losses, damages, liabilities, claims, and expenses (including all legal costs such as attorneys' fees, court costs, and settlement expenses) arising out of, connected with, or resulting from any allegation that the use of the Intellectual Property by Licensee infringes upon the Intellectual Property rights of any third party.

6.3.2 Indemnification by Licensee

The Licensee (ROA) shall defend, indemnify, and hold harmless the Licensor (client) and its affiliates from and against all losses, damages, liabilities, claims, and expenses (including all legal costs such as attorneys' fees, court costs and settlement expenses) arising out of Licensee's client's use, marketing, or implementation of the ROA Intellectual Property.

6.4 Limit of Liability

The ROA maintains insurance to cover errors and omissions.

The ROA Board of Directors evaluates risk arising from ROC activities.

The Licensor agrees to indemnify and hold harmless the Licensee (ROA) against all losses, damages, liabilities, claims and expenses (including all legal costs) arising from any disputes or claims between the Licensor and the certifying body.

6.5 Use of Contractors

The certification process is contracted with approved certifying bodies. By applying for ROC^T, applicants consent to the use of contractors and subcontractors during the certification process.

6.6 Personnel Involved in the ROC Program

- 1) The ROA operates with competent personnel to support its certification scheme.
- 2) The ROA has a sufficient number of personnel to carry out its duties.
- 3) The ROA staff are committed to following ROA policies and procedures. All staff commit to confidentiality and declarations of conflict of interest are signed annually.
- 4) Personnel records are maintained for each ROA staff member involved in the certification process and confidentiality is maintained.
- 5) The ROA has established policies and procedures for initial training and ongoing evaluation of all personnel in the ROC program.

6.7 Records Control

The ROC quality management system includes document control, records control, and a system for identifying non-conformities and resulting corrective actions. ROC maintains a policy for document control which describes the record control system. The policy applies to both internal and external documents.

6.8 Management System

This Program Manual and all its related documents are maintained on a secure storage location and accessible to all ROC personnel to ensure effective implementation of the quality management system. ROC continuously reviews and improves the effectiveness of the quality management system.

7.0 Confidentiality Information

- 1) All records and files are maintained and stored electronically.
- 2) All records managed and maintained by ROA are maintained securely and according to a records control procedure.
- 3) ROC maintains a fully traceable record-keeping system with backup and retrieval to protect against data loss.
- 4) All records are managed according to the *Document Retention Policy* for the Regenerative Organic Alliance to enhance compliance with the Sarbanes-Oxley Act and to promote the proper treatment of corporate records of the Organization.
- 5) File access is based on applicable permissions so that only authorized certification and administrative staff gain access to confidential information.
- 6) The ROA requires that personnel who have access to confidential information sign a "Confidentiality/Non-disclosure Agreement" which prohibits them from releasing confidential information (except as described below). This applies to all certification and administrative staff as well as any other ROA program personnel, contracted certifying bodies and their contracted auditors.
 - a) Confidential information includes but is not limited to discoveries, ideas, designs, drawings, specifications, techniques, models, data, documentation of programs, processes, know-how, customer lists, marketing plans, and financial and technical information.
- 7) Conflict of interest is reviewed annually for all personnel.
- 8) The ROC confidentiality policy applies to all personnel, committees, and contracted assessors who shall keep confidential all information obtained during the certification process, except as required by law.
- The ROA makes public on its website at <u>www.RegenOrganic.org</u> information about its organization, governing documents, CB responsibilities, standards, and certification process.

7.1 ROC Public Directory

Public information on the ROC directory about certified operations is made available on the ROA online directory released by the ROA. The ROA routinely makes available to the public the following information about certified operations:

- 1. Business name
- 2. Contact information, including phone number, main contact's email, and website
- 3. Effective date of certification
- 4. Names of products grown or processed that are enrolled in the ROC program
- 5. Details about products enrolled in the ROC program including, but not limited to, acreage, status, and other details contained in the Client Profile
- 6. Parcel and/or facility identification
- 7. Status of certification

7.2 Research Data

The ROA may provide researchers with anonymous raw soil data and KPIs as well as summaries of internal analyses based on ROC soil sampling results and ROSPs. The ROA will never release personal or confidential information about an operation without explicit permission from the certified operation.

7.2.1 Open-Source Soil Health Database

The ROA may develop an open-source database to promote research and public awareness about the effects of regenerative organic practices on soil health. The information on soil health shared on the database will not include business names or contact information. The data may include:

- KPI results from your ROSP
- Soil lab testing results
- In-field test results
- GPS coordinates of soil sampling locations
- Crop type/ground cover at soil sampling locations
- Other associated soil test metadata

7.3 Equality

The ROA offers certification without discrimination and encourages operations that fall within the scope of its certification program to apply. The ROA does not discriminate against any person because of race, color, national origin, gender, religion, age, disability, political beliefs, sexual orientation, or marital or family status.

The ROA does not create undue financial hardship or other conditions that discriminate, impede, or inhibit applicants based on their size or type of operation.

8.0 Program Fees

The Regenerative Organic Alliance (ROA) has established competitively priced program fees for the Regenerative Organic Certified^{TM} (ROC $^{\mathsf{TM}}$) program in a manner that is accessible to farms of all size and scope. The ROA values our global community of regenerative organic producers and aims to establish a financially accessible, transparent fee structure.

Costs will vary depending on the size and scope of the operation, geographic location, projected production value, and product claims. The *Cost and Fee Structure* available on the ROC website Resources page outlines the estimated certification costs for farmers, processors, brands, and supply chain actors. The *CB Cost and Fee Structure* (mailed upon application acknowledgment and also available upon request; please contact qualityassurance@regenorganic.org) outlines estimated certification costs for approved certifying bodies.

In general, there are fees that apply to all certified operations: the ROA one-time application fee, the flat-rate annual fee, and the CB administrative certification and audit costs. Participants will be responsible to pay the application fee directly to the ROA, and the annual fee and other certification costs to the Certifying Body.

9.0 Certifying Body Approval

ROA has a process for approving certifying bodies before certification activities are undertaken to the ROC program:

- 1) All certifying bodies wishing to carry out evaluation and certification activities to ROC must be pre-approved by the ROA. A list of approved CBs is on the ROC website <u>Resources</u> page.
- 2) The electronic application to become an approved CB is located on the ROC website under the "Get Certified" tab. The process for approval can take anywhere from two to six months or longer.
- 3) Certifying bodies must pay the applicable fees for application, review, and continued evaluation by ROA. The ROA *CB Cost and Fee Schedule* is available upon request from qualityassurance@regenorganic.org.
- 4) Certifying bodies are approved according to the *ROA CB Approval Procedure* available upon request from <u>qualityassurance@regenorganic.org</u>.

10.0 Acronyms

CB Certifying body

ROA Regenerative Organic Alliance

ROC™ Regenerative Organic Certified™ ROSP Regenerative Organic System Plan

KPI Key Performance Indicator

SCA Supply Chain Actor

USDA NOP United States Department of Agriculture National Organic Program

11.0 Glossary of terms

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 producer: 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. Certified producers will be referred to as "producers" and/or "operations" throughout this document.

Certified product: Raw material and/or packaged or processed goods that are certified under the Regenerative Organic Certified[™] (ROC[™]) standard 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^{TM} 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.

Framework for ROC: Standards for Regenerative Organic Certified™ (ROC™). ROC consists of three pillars: Soil Health and Land Management, Animal Welfare, and Farmer & Worker Fairness. ROC has three levels: Bronze, Silver, and Gold. Each requires a different number and scope of regenerative organic practices used.

Governing Documents: The Governing Documents consist of the ROC Framework and the following documents listed on www.RegenOrganic.org/Resources.

- Approved Certification Bodies
- Certifying Body Requirements
- Cost and Fee Structure
- Disputes Process
- Group Certification & Sampling Methodology
- Labeling Guidelines & Terms of Use
- License Agreement
- Program Manual
- Required Baseline Certifications & Equivalency Assessment
- Sample Regenerative Organic System Plan
- Soil Sampling Guidelines
- Supply Chain Guidelines

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

Licensor: ROA is the licensed owner of the Regenerative Organic Certified name and all other trademarks, certification seals, logos, and standards.

Licensee: Legally authorized representative of an organization that has signed the ROA License Agreement and has agreed to be bound to the terms of the ROC program

Producer: See "certified producer"

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.

Regenerative organic: The term used to represent a set of holistic agricultural practices that support the health of soil, animals, and workers. Regenerative farming aims to not only sustain but regenerate and rebuild soil health over time.

ROC™ mark: 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.