

Cost & Fee Structure

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1.0 Introduction

The Regenerative Organic Alliance (ROA) has established competitively priced program fees for the Regenerative Organic Certified[™] (ROC[™]) 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 transparent fee structure. All available resources will be utilized to support farmers on the journey to regenerative organic.

This document outlines the fees and certification costs for farmers, brands, and processors. The ROA may charge additional fees for expedited services, unexpected international compliance issues, currency/exchange rate costs, or specialized shipping documents.

We want to ensure that both producers and brands are charged fairly, and that ROC remains accessible. Brands are essential in paving the path forward in this movement by committing to pay premiums and license fees and ensuring that increases in ROC product costs are not pushed back onto the farmer. Farmers should not be made to pay for the other actors in the product supply chain making ROC claims. This means that brands and finished goods manufacturers should not devalue a farm's commodity to offset their costs for ROC.

The ROC Cost & Fee Structure is subject to change and operations applying for ROC and ROC Licenses will be subject to the fees and costs associated with the published document at the time of their application.

1.1 Certification for Producers of Crops

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. For products to be sold with the ROC Gold claim, one processor in the supply chain must undergo a ROC processor audit. However, for ROC Bronze and Silver levels only the farm or ranch is required to be certified to the ROC standard.

1.2 License to Make ROC claims on Product

Organizations, including but not limited to brand owners, brokers, processors, and handlers, 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. Any company who has not achieved ROC by a ROA approved CB and intends to use the ROC marks must follow the Labeling Guidelines & Terms of Use and receive prior approval from the ROA before using any ROC marks.

1.3 Registration for Supply Chain Actors

All supply chain actors that are processing ROC product but are not making ROC claims to other companies or selling ROC product are required to register with the ROA to maintain ROC eligibility of the product. Examples of this would include toll processors, fee for service processors, or co-manufacturers who do not take legal title of the product or ingredients.

2.0 Costs for ROC Producers

A producer will incur the following fees when applying for ROC:

- One-time, non-refundable application fee
- Any associated Certifying Body (CB) fees
- Annual ROA fee
- Additional fees, if applicable

2.1 Application Fee

Applicants are responsible for a one-time, <u>non-refundable</u> fee paid directly to the ROA at the time of initial application. See the chart below. The ROA offers limited technical support to help applicants navigate the application process and on the journey to ROC.

Operation Type/Size	Application Fee
less than 5 distinct parcels*	\$350 USD

5 or more distinct parcels*, not a grower group	\$550 USD
Grower groups	\$1,000 USD

*Distinct parcels are defined as readily distinguishable from each other with no adjacent or touching borders.

2.2 CB Audit & Certification Costs

The applicant will select a ROA approved Certifying Body (CB) for the certification process. The fees assessed by the CB will be charged directly to the applicant and are in addition to the one-time application fee and annual fees assessed by the ROA. The CB fees are not regulated by the ROA.

2.3 Annual ROC Fee for Producers

First Year Fees:

The **first year ROC fee** is a flat fee based on anticipated gross revenue of ROC crops and processed products.

- Estimated annual gross revenue of ROC crops, \$0 \$300,000: \$250 Fee
- Estimated annual gross revenue of ROC crops, \$300,001 \$500,000: \$450 Fee
- Estimated annual gross revenue of ROC crops greater than \$500,000: \$750 Fee

Fee for Subsequent Years:

The fee for all subsequent years is 0.1% of the previous year's actual ROC gross revenue minus the cost to purchase raw ROC ingredients or crops. The maximum annual fee due is \$10,000.

Example:

Operation buys \$10,000 of raw ROC corn and sells it to a ROC Licensee for \$15,000. Their gross ROC revenue calculation would look like this:

\$15,000 sale value - \$10,000 cost of raw ROC corn = \$5,000 gross ROC revenue

Calculating Gross ROC Revenue for Producers with Processed Products (if applicable):

If an operation processes raw ROC crops into products, a ROC License will be issued to the operation with no additional fee. In this case the operation will calculate their gross revenue of ROC by including the following:

- 1) ROC crops sold in raw form;
- 2) ROC product value minus the cost of raw ROC crops used. These crops can be from your own operation or raw ROC crops purchased from other ROC operations.

Example 1 (100% ROC): If a winery sells \$10,000 of raw ROC grapes and takes another \$10,000 of raw ROC grapes and makes wine they sell for \$50,000, their calculation would look like this:

Raw grapes (\$10,000) + Wine (\$50,000-\$10,000= \$40,000) = \$50,000 gross ROC revenue

Example 2 (ROC and non-ROC ingredients): An operation uses all their own peanuts to grind into peanut butter. They use \$5,000 of raw ROC peanuts and mix that with \$1,000 of non-ROC peanuts to make a final product worth \$10,000. Their calculation would look like this:

Peanut butter (\$10,000) - ROC ingredients (\$5,000) = \$5,000 gross ROC revenue. Please note that only the ROC ingredient costs can be deducted.

2.4 Additional Fees

2.4.1: Eligible operations in the Global North seeking ROC Bronze and ROC Silver certification are not required to obtain an additional Social Fairness certification and instead will be audited to the Social Fairness Pillar of the ROC Framework. For these operations there is an additional annual ROA Social Fairness fee that will be assessed on a case-by-case basis depending on the complexity of the operation and an assessment of the level of risk associated with the operation. This fee will range from \$500-\$1,000 annually.

Operational complexity is based on number of locations, number of workers, employment types, and employment arrangements.

2.4.2: Dairy operations seeking ROC Bronze certification are not required to obtain an additional Animal Welfare certification. If a dairy operation is seeking Bronze and does not have a social fairness certification, they can instead be audited to the ROC Animal Welfare Dairy criteria by their ROC CB. The additional annual ROC Animal Welfare Dairy fee is assessed on a case-by-case basis depending on the complexity of the operation and costs

\$250-500 annually. Complexity for animal welfare is based on factors such as number of facilities and locations, number of animals and animal groups, and management system. Dairies seeking ROC Silver or ROC Gold certification must hold an ROA approved 3rd party animal welfare certification and will not be charged the additional ROA Animal Welfare Dairy fee.

2.5 Annual Fee Waiver

The ROA will waive the Annual ROA Fee for 501(c)3 non-profit farms who donate a significant portion (>50%) of their produce to support and feed the community. Farms that advance the return of historically marginalized farmers to the land or have established educational internship programs teaching regenerative organic practices are encouraged to inquire about fee waivers. Please inquire about your eligibility by reaching out to info@regenorganic.org.

2.6 ROC Farmer Cost-Share Program

The ROC Farmer Cost-Share Program provides financial support to farmers who have become Regenerative Organic Certified™ (ROC™). Eligible operations include any ROC certified operations who have paid ROC fees to a ROA-approved certifying body and who have a gross revenue of ROC eligible crops and products less than \$250,000.

ROA funds are limited, and applications are paid on a first-come, first-served basis. Applications received after all funds are distributed will be deferred to the following year. For more information and to apply, visit our <u>Farmer Cost Share Program</u> page.

3.0 Costs for ROC Licensees

3.1 Annual Fees for Brand Owners (EXCLUDING TEXTILES)

Any organization, including but not limited to brand owners, private label brand owners, and finished goods manufacturers selling ROC products, will pay an annual ROC licensing fee.

First Year Fee:

The first-year fee is a flat fee based on anticipated annual ROC revenue of the brand.

٠	Estimated annual ROC gross revenue of \$0 - \$500,000:	\$500 Fee
•	Estimated annual ROC gross revenue of \$500,000 - 2,000,000:	\$2,500 Fee
•	Estimated annual ROC gross revenue of \$2,000,001 - \$5,000,000:	\$7,000 Fee

- Estimated annual ROC gross revenue of \$5,000,001 \$10,00,000: \$15,000 Fee
- Estimated annual ROC gross revenue greater than \$10,000,000: \$20,000 Fee

Fee for Subsequent Years:

The fee for all subsequent years is based on the previous year's actual ROC gross revenue and the percentage of ROC ingredients in the product:

- For products with 70% or more ROC ingredients*: Fee is 0.2% of previous year's ROC sales.
- For products with less than 70% ROC ingredients*: Fee is 0.1% of previous year's ROC sales.

The maximum fee due is \$100,000.

All licensees are required to submit a <u>ROC License Fee Worksheet</u> annually.

* As measured by weight or volume excluding water or salt.

3.2 Annual Fees for Brand Owners - TEXTILES ONLY

Any organization, including but not limited to brand owners, private label brand owners, and finished goods manufacturers selling ROC **textile** products, will pay an annual ROC licensing fee. See ROC Textile Guidelines for requirements.

First Year Fee:

The first-year fee is a flat fee based on anticipated annual ROC revenue (FOB) of the brand:

•	Estimated ROC gross revenue of \$0 - \$2,000,000:	\$1,500 Fee
•	Estimated ROC gross revenue of \$2,000,001 - \$5,000,000:	\$5,250 Fee
٠	Estimated ROC gross revenue of \$5,000,001 - \$10,000,000:	\$11,250 Fee
٠	Estimated ROC gross revenue greater than \$10,000,000:	\$15,000 Fee

Fee for Subsequent Years:

The fee for all subsequent years is based on the previous year's FOB and the percentage of ROC contents in the product:

• For products with 50% or more ROC contents*: Fee is 1.5% of previous year's ROC FOB.

• For products with less than 50% ROC contents*: Fee is 1.0% of previous year's ROC FOB.

The maximum fee due is \$100,000. All licensees are required to submit a <u>ROC License Fee</u> <u>Worksheet for Textiles</u> annually.

* As measured by weight or volume excluding water or salt.

3.3 Annual Membership Fee:

Brands, private label brand owners, and finished goods manufacturers with \$2 million or more in gross annual sales (ROC and non-ROC sales combined) will pay a \$1,000 annual membership fee.

3.4 Annual Fee for Handlers/Processors/Brokers/Textile Manufacturers

The ROA requires any supply chain actor who comes into **ownership of ROC product and sells products as ROC** to sign a license agreement and pay an annual license fee.

The first year ROC fee is a flat fee based on anticipated gross revenue of the operation minus the cost to purchase raw ROC ingredients or crops.

•	Estimated annual ROC gross revenue of \$0 - \$500,000:	\$250 Fee
٠	Estimated annual ROC gross revenue of \$500,001 - \$2,000,000:	\$1,250 Fee
٠	Estimated annual ROC gross revenue of \$2,000,001 - \$5,000,000:	\$3,500 Fee
٠	Estimated annual ROC gross revenue of \$5,000,001 - \$10,000,000:	\$7,500 Fee
•	Estimated annual ROC gross revenue greater than \$10,000,000:	\$10,000 Fee

The fee for all subsequent years is 0.1% of the previous year's actual sales. The maximum fee due is \$20,000. All licensees are required to submit a <u>ROC License Fee Worksheet</u> or <u>ROC License Fee Worksheet for Textiles</u> annually.

4.0 ROA Label Review Fee

Labels carrying any ROC claim must be reviewed and approved by the ROA prior to use. This includes retail and non-retail (wholesale) labels. There is no charge for the first 5 labels reviewed annually per Licensee. If more than 5 labels are submitted in one calendar year, there is a \$50 fee per additional label.

5.0 Cost for ROA Registrants

Supply chain actors that are processing ROC product but are not taking ownership of or selling ROC products are required to register with the ROA to maintain ROC eligibility of the products. The ROA requires an annual registration fee of \$100 USD for all ROC commodity processors in the supply chain between the producer and the finished goods manufacturer unless they otherwise need to License with the ROA. Registration is intended for handlers that do not own or sell products as ROC and are not excluded from organic certification requirements. This fee covers the ROA's time to cross check and confirm the supply chain actor's role in a ROC supply chain. All supply chain actors should review the <u>Supply Chain</u> <u>Guidelines</u> for full details.

NOTE: Textile supply chain actors that are processing ROC product but are not taking ownership of or selling ROC textile products are NOT required to register with the ROA but must be GOTS or OCS certified. See <u>ROC Textile Guidelines</u> for requirements.