



Supply Chain Guidelines

Table of Contents

Supply Chain Guidelines	1
1.0 Objectives	2
2.0 Background	2
3.0 Scope	3
4.0 Applicability	3
4.1 Supply Chain Actors (SCAs).....	3
4.2 Spot-Check Audits.....	3
4.3 Exempt Organizations.....	4
5.0 License Agreement for Supply Chain Actors	4
5.1 Prerequisites for Use of the ROC Marks.....	4
6.0 Registration for Supply Chain Actors (SCAs)	4
6.1 Registration.....	4
6.2 Registration Fee.....	5
7.0 Chain of Custody Requirements	5
7.1 Separation Guidance	5
7.2 Requirements for Processors	6
7.2.3 ROC Approval of Processing Facilities	6
7.2.4 Requirements for Processing of Textiles	6
7.2.5 Requirements for Brands	7
8.0 Documentation Requirements	7
8.1 Traceability Documentation	8
8.2 Volume Reconciliation.....	8

Reference ROA Terms and Definitions document on regenorganic.org/resources.

1.0 Objectives

This document contains the chain of custody requirements for Supply Chain Actors (SCAs) that buy, sell, store, process, or transport non-exempt product intended to carry Regenerative Organic Certified™ (ROC™) claims (i.e. certified product). These requirements serve to ensure that products carrying a ROC claim are sourced from certified producers, maintain appropriate separation from non-certified products throughout the supply chain, and are produced in accordance with the Governing Documents available at RegenOrganic.org/Resources.

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

2.0 Background

The ROC program, overseen by the Regenerative Organic Alliance (ROA), aims to promote holistic agricultural practices that build upon the United States Department of Agriculture’s National Organic Program (USDA/NOP Organic) and other internationally recognized standards. The ROC program encompasses three pillars: Soil Health, Animal Welfare, and Social Fairness. In line with these pillars, the ROC program aims to:

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

ROC covers requirements for farming and ranching operations that produce food, fiber, and botanicals for both U.S. and international markets. Entities that transport, process, distribute, market, or otherwise handle ROC product must adhere to the chain of custody requirements outlined in this document and submit to ROC chain of custody audits as applicable. USDA/NOP Organic certification (or an approved international equivalent formally recognized by a trade agreements) is a prerequisite for ROC eligibility. Organizations must comply with all USDA/NOP Organic chain of custody requirements and policies.

3.0 Scope

This document covers the required practices and documentation for the harvest, storage, processing, packaging, and distribution of agricultural products intended to carry a ROC claim on- or off-product.

These requirements serve to reinforce rather than replace labeling, separation, and documentation requirements stipulated by the NOP for USDA Organic certification. All chain of custody procedures and documentation required by NOP shall be followed as the baseline for ROC.

4.0 Applicability

4.1 Supply Chain Actors (SCAs)

This document applies to organizations that process or handle Regenerative Organic Certified products between the farm and the consumer. This includes but is not limited to any stage in the supply chain where certified materials (i.e. plant or animal products) are modified, including the final stage of production.

For ROC, the first SCA occurs when legal ownership changes, or at the first qualifying post-harvest activity.

Processing may include activities such as slaughter, milling, cooking, mixing, and packaging materials into a final product. Processing may occur at a separate facility or on-farm. If the operation is both producer and processor; the ROC Operation's ROA Operation Information & Certification Contract contains a license agreement, and the operation will detail applicable processing information in their ROSP. If the Operation is processing products themselves, they must hold an organic certification for handler scope covering their facility when applicable. The operation may choose to include their handling/processing facility in ROC for Bronze or Silver levels and may need to include it for Gold level.

4.2 Spot-Check Audits

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

4.3 Exempt Organizations

NOP-exempt organizations may still be required to register or license with the ROA. The ROC requirements for exemptions align with the National Organic Program (NOP) standard (see NOP Regulations Subpart B, §205.101). Exempt organizations include:

- Retail food establishments that handle, but do not process, certified product for sale to consumers
- Retail food establishments that sell packaged, labeled product to consumers
- A processing or handling organizations that only handles ROC product that amounts to less than 70% of the finished product by weight
- An entity that does not take legal ownership of the ROC product, such as for transportation or distribution of finished goods.

5.0 License Agreement for Supply Chain Actors

Organizations, including but not limited to brand owners, brokers, and finished goods manufacturers, 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 operation who has not achieved ROC by an 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.

5.1 Prerequisites for Use of the ROC Marks

Use of the ROC marks (the Regenerative Organic Certified name and all other trademarks, certification seals, logos, or any other proprietary designations owned by the Regenerative Organic Alliance) is dependent on meeting all requirements laid out in the Governing Documents, available at RegenOrganic.org/Resources. Any Supply Chain Actor using the ROC seal, "Regenerative Organic Certified," and/or "regenerative organic [noun/verb]" must have completed a License Agreement and paid any relevant fees.

6.0 Registration for Supply Chain Actors (SCAs)

6.1 Registration

Registration with the ROA is required for all Supply Chain Actors that:

- 1) Are a major stage in the supply chain

- 2) Do not take ownership of the product(s) and
- 3) Do not market ROC products.

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. Registration ensures that the ROA has all necessary information to perform spot-check audits, verify chain of custody, and ensure traceability. Such organizations start the registration process with the ROA via the Supply Chain Actors Registration Form available at [RegenOrganic.org](https://www.RegenOrganic.org).

Organizations who intend to make a ROC marketing claim see Section 5.0 above.

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

6.2 Registration Fee

Registered organizations are responsible for the applicable annual registration fee in accordance with the Cost & Fee Structure (available at [RegenOrganic.org/Resources](https://www.RegenOrganic.org/Resources)).

7.0 Chain of Custody Requirements

7.1 Separation Guidance

ROC products must maintain appropriate separation from non-ROC product throughout the supply chain and must comply with USDA/NOP Organic chain of custody requirements and policies.

ROC Bronze, Silver, and Gold product is certified at the producer level according to the ROC Framework requirements. Certified product should be clearly identifiable, labeled with the appropriate claim (i.e. ROC Bronze, Silver, or Gold), and segregated from non-certified product throughout the lifecycle, harvest, storage, and transport of the product.

ROC products from a single origin must be maintained separate from other product throughout transport and storage for identity preservation until it reaches its processing destination.

ROC product must not be physically mixed with non-ROC product or with certified product from another source (i.e. organic coconut oil must be separated from ROC coconut oil) until it reaches its final processing facility. This ensures that product carrying a ROC claim is sourced from ROC certified producers. The mixing of different ingredients to formulate a final product is covered under the Labeling Guidelines & Terms of Use available at

RegenOrganic.org/Resources.

Products of different certification levels (i.e. Bronze, Silver, and Gold) should also be segregated in order to maintain claimed status. If ROC products of differing levels are mixed, claims are only allowed at the lowest certification level present in the mix (i.e. If Silver and Bronze are mixed, the product can only carry ROC Bronze).

7.2 Requirements for Processors

Processing requirements apply to any stage in the supply chain where ROC materials (i.e. plant or animal products) from the producer are modified. Processing may include activities such as slaughter, milling, cooking, or mixing and packaging raw materials into a final product. Processing may occur at a separate facility or on-farm. If the latter, then the farm or ranch is both producer and processor.

All organizations that handle or process ROC claimed product must be USDA Organic certified or certified to an approved international equivalent (as declared by USDA AMS available at ams.usda.gov/services/organic-certification/international-trade).

7.2.3 ROC Approval of Processing Facilities for Gold Level Claims

For ROC Gold claims to be approved for finished goods, at least one major stage in the processing supply chain must undergo a ROC audit. For Bronze and Silver claims, processors are not required to achieve separate certification to ROC. Any raw commodity with Gold level status can carry forth the claim if no processing is required. Any raw commodity that undergoes processing must undergo a ROC audit on one major stage of processing.

ROC producers who process their crops into finished goods and seek to maintain Gold level will include their processing facility in their ROC audit.

7.2.4 Requirements for Processing of Textiles

Textile manufacturing will follow ROA policy as set forth in the document ROC Textile Guidelines-Processing, Labeling, and Costs (available on regenorganic.org/resources).

7.2.5 Requirements for Brands

ROC is a farm level certification; brand owners are not eligible for certification. If the brand owner is also a processor undergoing a ROC audit, see 7.2.3 above. All brands and finished goods manufacturers making a ROC claim are required to submit a License Agreement (see Section 7). All claims must be made in alignment with the Labeling Guidelines & Terms of Use and with prior approval from the ROA. Brands are required to submit a Supply Chain Map along with either a Claimed Material & Product Formulation Worksheet, or other equivalent documentation, for each product that carries a ROC claim and contains certified material. A sample Supply Chain Map is included as part of the Claimed Material & Product Formulation Worksheet available at RegenOrganic.org/Resources.

For a Brand that has sourced ROC Gold ingredients and intends to carry forth a Gold level claim on a finished product, at least one stage in the post-producer supply chain must have a ROC audit.

8.0 Documentation Requirements

Operations/organizations are required to maintain sufficient and appropriate documentation for demonstrating the chain of custody and traceability of ROC product from producer to the finished goods. While ROC does not specify the implementation approach, operations/organizations are encouraged to follow NOP guidelines for documentation and management procedures. Samples of this documentation should be provided to the ROA in the licensing and registration process where applicable.

Management systems for demonstrating sufficient traceability and chain of custody must include, but are not limited to, the following components:

- 1) **Management Systems:** Document policies, roles and responsibilities, procedures, training, communication, monitoring, and continuous improvement for tracking ROC product and maintaining appropriate chain of custody practices.
- 2) **Input Storage Segregation:** Claimed material must be kept separate during storage and transport, and not mixed or blended with non-ROC material until the final stage of production.
- 3) **Inventory Management:** Operations/organizations must keep records of the quantities of claimed raw material and finished goods, subject to reconciliation.
- 4) **Separation:** All products shall be clearly identified while they are in production. When ROC and conventional materials are processed in the same locations or machinery, there should be a clean-out procedure between batches. Clean-out is not required between ROC and certified organic products.

- 5) **Traceability Documentation:** Commercial and shipping documents must be available throughout the supply chain that attest to the origin of the claimed material.
- 6) **Volume Reconciliation:** Accurate data on the ratios of raw materials to finished goods must be available for review, including the average amount of loss to be expected during production processes.

8.1 Traceability Documentation

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

8.2 Volume Reconciliation

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