

**Regenerative Organic Certified
Operations Manual for CBs**



Regenerative Organic
Alliance

Certifying Body Requirements and Certification Procedures:

Regenerative Organic Certified™ (ROC™) Program

The *ROC Operations Manual for Certifying Bodies (OMCB)* contains three main sections - 1) *Certifying Body General Requirements* and 2) *Certification Procedures for Regenerative Organic Certified*, and 3) *Terms and Definitions*. This procedure manual replaces the *ROA CB Requirements v2* and is effective as of May 1, 2022. All audits conducted after August 1, 2022, shall be conducted using the new ROC OMCB. ROA maintains oversight of the CB certification activities for ROC.

The official name of the program is **Regenerative Organic Certified™** and should only be referenced with this exact name followed by the use of the standalone acronym **ROC™** followed by the trademark symbol. The ROC name and logo must be used in accordance with the *ROA's Labeling Guidelines & Terms of Use* located at <https://regenorganic.org/resources>.

The **Regenerative Organic Certified™ (ROC™)** “standards” collectively refer to the ROC Framework, Dairy Animal Criteria, and Processor Criteria, and Supply Chain Guidelines. ROC is a farm-level certification, and all product or material claims refer to the certification status of the farm from which the certified product and/or claimed the material was originally sourced.

The Regenerative Organic Certified™ (ROC™) program, is administered by the Regenerative Organic Alliance (ROA). The ROA is responsible for the ownership, development, and implementation of the ROC standards.

English is the official language of ROA and the *ROC Operations Manual for Certifying Bodies* is only available in English. ROA is based in the USA. An electronic copy of this manual is available at regenorganic.org/resources. This document is owned and managed by Regenerative Organic Alliance (ROA) and is to be used exclusively for the ROC program worldwide.

The ROC OMCB will undergo a revision process at least once every three years. The next revision is scheduled for 2025. You may submit feedback on the *ROC OMCB* at any time to qualityassurance@regenorganic.org. Guidance may be incorporated into supplementary documents prior to 2025. More substantive feedback or suggested changes will be collected and reviewed as part of the next revision of the document.

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 farm workers. 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.

Introduction

The *ROC Operations Manual for Certifying Bodies, v1* defines requirements for certifying bodies offering certification services to the ROC Framework (standards).

The purpose of this document is to guide an approved Certifying Body (CB) and those seeking approval to conduct certification services on behalf of the Regenerative Organic Certified™ (ROC™) program. This document also includes the procedures and requirements for becoming a ROC approved CB and the approval requirements for CB ROC assurance personnel. The procedures aim to provide a more consistent and reliable implementation of the oversight process for the following ROC pillars (scopes) for the program levels of bronze, silver, and gold:

- Soil Health and Land Management
- Farmer and Worker Fairness
- Animal Welfare

A key focus for ROA is promoting and ensuring integrity in ROC claims made on products or by a company. ROA has developed standards that ensure ROC product or content claims can be validated through third-party certification. Certifying bodies audit organizations against the ROC Framework, issue a certification decision, and continually monitor adherence to ROC. ROC certifying bodies are themselves assessed and approved by ROA against requirements detailed in these procedures.

Feedback on these procedures may be sent to the Regenerative Organic Alliance at any time by emailing qualityassurance@regenorganic.org.

The following referenced documents are indispensable for the application of this document and are encouraged to be used in conjunction wherever applicable. References to individual requirements within these documents refer to the version noted in this section.

- ISO/IEC 17065:2012 - Conformity Assessment – Requirements for bodies certifying products, processes, and services
- ISO/IEC 19011: 2011 Guidelines for auditing management systems
- USDA NOP General Requirements for Accreditation ([eCFR § 205.501](#))
- The Regenerative Organic Certified (ROC) Framework v5 (e.g., ROC Standard) and its guidance and governing documents.

Roles and Responsibilities

The ROA **CB Approval Committee (CBAC)** is responsible for making final approval decisions affecting certifying bodies. The CBAC reviews new applications and renewals as well as other select decisions, including, but not limited to scope expansion or reduction, and proposed suspensions and cancellations. The ROA Quality Assurance Manager prepares

recommendations for the CBAC for final approval. The CBAC is comprised of three stakeholders and one ROA staff member who have experience with applying organic regulations, regenerative agricultural production, organic processing practices, animal welfare, and/or evaluating audit-based certification programs.

The ROA **Quality Assurance Manager (QM)** is responsible for assessing certifiers, providing guidance, training to certifiers, approving scope extensions, and reinstating suspended approvals. The Quality Manager may assign specific tasks related to these activities to qualified ROA personnel but retains final responsibility for their proper execution.

The ROA **Lead Evaluator (LE)** conducts approval audits under the direction of the ROA QM. Evaluator responsibilities include:

1. Planning, conducting, and reporting the results of onsite audits and desk audits)
2. Planning, conducting, and reporting the results of renewal audits
3. planning, conducting, and reporting results of witness audits
4. Providing audit estimates based on ROA fee schedule and travel expenses

The ROA **Internal Rules Committee (IRC)** is responsible for reviewing and approving ROC Framework deviation requests, ROC standards/Framework interpretation questions, program rules interpretation, and approving deviations or exceptions to program policies or procedures. The committee regularly meets every other week.

The ROA **Program Director (PD)** has overall responsibility for the administration of the CB approval process and the ROC program administration.

The ROC **Certifying Body (CB)** is responsible for administering the ROC program on behalf of the ROA to clients including conducting a full review and assessing the operation to the ROC standards, making a decision for certification, and monitoring continued compliance to ROC.

Acronyms used in this document

AS	Annual Surveillance	OMCB	Operations Manual for Certifying Bodies
ASR	Annual Surveillance Report	PD	Program Director
BOD	Board of Directors	PM	Program Manager
CB	Certifying Body	QM	Quality Assurance Manager
CBAC	Certifying Body Approval Committee	RA	Review Audit
CS	Certification Specialist	ROA	Regenerative Organic Alliance
ED	Executive Director	ROC	Regenerative Organic Certified
IRC	Internal Rules Committee	WA	Witness Audit
LE	Lead Evaluator		

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Section 1 - CB General Requirements

The CB must hold USDA National Organic Program accreditation as a basis for ROC approval. A CB is not required to hold an ISO17065 accreditation for the ROC scheme, however approvals are conducted in accordance with the principles of the ISO/IEC 17065.

1.1. CB Process for ROC Approval



FIGURE 1. STEPS OF CB APPROVAL PROCEDURE

STEPS to APPROVAL: Application review > application acceptance > document review > assurance personnel review > training > on site main office visit > evaluation report > recommendation to CBAC > approval decision > contract issuance > myROC training > witness audit(s).

The approval process takes about 6 months to complete.

1.1.1. Application

The CB seeking approval must submit a completed the [Certification Body Application Form](#) in English available online at RegenOrganic.org and pays a \$350USD application fee.

1. The CB must be active in at least one country and have at least one ROC applicant or interested client.
2. The CB must apply for the *Farmer and Worker Fairness* pillar plus one or both of the following pillar scopes: 1) Soil Health and Land Management; 2) Animal Welfare.

Note: The ROA is responsible to perform an eligibility review of the application. The ROA communicates the application status within 15 calendar days of receipt. If approved, the ROA sends the CB an onboarding package with 1) CB Profile (Matrix) Excel form and 2) ROA Contract Agreement copy and 3) Statement of Service Fees and estimated costs.

1.1.2. Document review

The CB must submit a completed *CB Matrix form (CB Profile)* within 30 calendar days after application approval notification with supporting documents in English or annotated in English ROA for review.

1. The CB organization must submit its proposed fee schedule to the ROA before the onsite evaluation visit.
2. The CB shall demonstrate the:
 - a. CB has administrative management of the ROC program by a dedicated program manager
 - b. Ability to carry out certification decisions, technical reviews, and on-site audits
 - c. Ability to conduct quality control of certification decisions, reviews, and on-site audit
 - d. Ability to carry out risk assessments for ROC operations
 - e. Ability to sell ROC certification services
 - f. Ability to market and communicate material related to the provision of ROC
 - g. Ability to ensure it has the competence and capability for all the certification activities

Note: The ROA conducts the records review and communicates findings to the CB organization within 30 days of receipt of the CB Matrix. The completed CB Matrix describes how the CB meets the criteria for the ROC program and how its quality system aligns with general requirements. The records review is described in Annex A of this procedure. The ROA submits a proposed visit plan and estimated costs to the CB

1.1.3. ROC Assurance Personnel

1. The CB shall identify ROC assurance personnel and provide qualifications for each person to ROA for review and approval before final selection. See *Annex B* for ROC Auditor qualification requirements and *Annex C* for Technical Review qualification requirements. The following are the minimum roles required for ROC:
 - a. A ROC Program Manager
 - b. Technical reviewer(s) for each pillar
 - c. Auditor(s) for each pillar
2. CBs should be familiar with the *Procedure for Review and Approval of Auditors to the ROC program* available at <https://www.regenorganic.org/resources>.
3. The CB shall provide documentation of its organizational structure and personnel list involved in the ROC program certification services.

Note: *The ROA quality assurance staff will review ROC auditors and technical reviewers for approval and is responsible for qualifying ROC assurance personnel for carrying out ROC program services. New auditors can be added any time using the online form at Regenorganic.org > Get Certified.*

4. The CB shall have mechanisms in place for oversight of ROC assurance personnel to

- a. Ensure ROC assurance personnel meet and maintain the ROC CB requirements and attend ROC training at least annually
 - b. Stay up to date with program and regulatory changes that pertain to auditing and reviewing to the ROA framework and kept informed of standards changes.
 - c. Understand and demonstrate competency in their assigned roles and responsibilities for ROC.
 - d. Manage and monitor the competence of the ROC assurance personnel on a regular basis.
 - e. Undergo regular performance evaluations through periodic reviews, witness audits, or other means of evaluation.
 - f. Ensure that auditors are applying the ROC Framework and guidelines consistently across pillars, certification levels, and types of operations.
 - g. To evaluate when a technical reviewer is competent to conduct ROC certification reviews for assurance.
5. The auditor and technical reviewer cannot be the same individual for the same client certification cycle. Role and responsibilities can overlap, i.e., the Program Manager can also be a Technical Reviewer.
 6. The CB shall have a procedure regarding how they determine when
 7. The CB ROC technical reviewer should perform a minimum of three annual technical reviews unless client demand does not allow for this.
 8. Auditors should perform a minimum of three audits annually unless client demand does not allow for this.
 9. If auditors or technical reviewers do not maintain their qualified status or no longer work for the CB, the CB shall notify the ROA within 30 calendar days. ROA will remove the user access from MyROC and trainual.com

ASSURANCE PERSONNEL TRAINING REQUIREMENTS

The CB ROC assurance personnel are required to complete ROC program training before the onsite evaluation visit begins and before becoming an approved ROC CB.

All ROC assurance personnel must achieve a passing score on all assigned modules in the asynchronous Trainual.com platform to be “qualified” assurance personnel for ROC.

CBs are granted 4 free user accounts to access Trainual.com ROC training modules. Beyond the first four accounts, the CB shall pay a one-time \$50USD for each perpetual user account.

Note: The ROA provides initial and calibration training for technical reviewers and auditors. The courses are presented through the Trainual.com online platform and consist of modules for each ROC pillar (Soil Health, Animal Welfare, and Social Fairness). The ROC pillar-specific courses include an overview of the ROC criteria and equivalent standards, MyROC.org, auditor guidance, and supporting materials/resources for the respective pillar. Users will be added to Trainual.com during the document review portion of the evaluation process.

1.1.4. Onsite evaluation visit (initial and renewal)

The CB shall demonstrate at the evaluation visit that it has sufficient resources and ability to carry out assessment activities to the ROC program pillars and levels.

1. The signed visit plan must be sent to the ROA at least 10 calendar days before the site visit.
2. In the case of virtual office(s), the CB shall make all requested records available for the ROA evaluator for reliable viewing remotely during the synchronous visit.

Note: The ROA assesses a combination of office locations/sites where critical activities take place. Critical activities include inspection handling, review, certification decision, and certificate issuance.

3. The CB shall make available 5% of certification files to be reviewed by the ROA evaluator for each ROC pillar. At least one file shall be selected from each pillar applied for: land management, social fairness, and/or animal welfare. If no records for ROC are available, a representative sample will be taken from another program, i.e., USDA NOP, COR, Fairtrade.
4. The CB shall be responsible for:
 - a. Coordinating with the ROA to schedule the audit
 - b. Making necessary personnel, records, and facilities available for the ROA to conduct the audit
 - c. 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
 - d. Developing corrective action plans in response to each identified non-conformance and implementing the plan to correct them in a timely manner
5. The CB shall make available and demonstrate at each critical office (either through an on-site audit or remote audit) the following:
 - a. The quality management system, internal audit, and certification process
 - b. The competence of CB ROC assurance personnel through verification of personnel and training records
 - c. System of tracking corrective action measures regarding any NCs issued as part external or internal assessments
 - d. System of keeping records and procedures used to track and report on certified organizations, products, and sites
 - e. Handling of suspensions, withdrawals, and cancellations for certified operations
 - f. Investigation and handling of complaints and misuse of labeling claims

6. The CB shall respond with corrective actions within 30 days after receiving final visit report. All non-conformities (NCs) must be resolved before an approval decision is made.

1.1.5. CB satellite or foreign office audit

If the certifier carries out critical certification activities for ROC at satellite or foreign offices in addition to its main office, then those applicable critical offices are assessed at least once in each approval cycle to verify that the ROC program requirements are effectively implemented, and requirements are met.

1.1.6. Witness audits of auditor

Witnessed audits (WA) of ROC CB auditors are performed by ROA lead evaluators as part of the onsite assessment for each ROC Framework pillar. One WA shall be conducted within 12 months of approval for each pillar and then every four years as part of the renewal process. One WA shall be required for all independently owned or operated offices with direct hire or subcontracted ROC auditors carrying out critical ROC activities in countries outside the home country or territory of the CB. The cost of the witness audit and related travel is paid by the CB. The *CB Cost and Fee Structure* is available at regenorganic.org.

1.1.7. Corrective Actions

Note: At the close of each audit, the ROA shall provide a report detailing the findings to the CB in English within 15 calendar days. It will include the general audit information including the location of the personnel or facility(s), the Certification Body staff that participated, and the scope of the audit, evidence obtained and reviewed, and the list of non-conformities for each requirement.

The Certification Body shall have 30 calendar days from receipt of the audit report to respond to the ROA in writing with a proposal and timeline for resolving NCs and submitting corrective actions. The four types of conditions set during an audit are: More Information Needed (MIN), Non-conformity (NC), Opportunity for Improvement (OFI), and Deferred NC (DNC).

1.1.8. CB Approval Decision

1. The CB shall demonstrate it satisfactorily meets all ROC program requirements described in this procedure manual and has resolved all NCs from the evaluation in order to be recommended to the CB Approval Committee for a decision on ROC approval.

Note: The ROA reviews the corrective actions and recommends the CB for final approval to the ROA CB Approval Committee, which meets as needed or at least every other month.

2. Once formal approval is received from the ROA, the CB organization must:
 - a. Execute a contract with ROA to offer ROC program certification services
 - b. Confirm the list of qualified staff to be added to the myROC.org (Intact) Platform
 - c. Pay all outstanding balances owed to ROA
 - d. Notify internal and external stakeholders of approval status
 - e. Formerly publish all final versions of ROC policies and procedure in draft status

Note: The ROA certification team will add CB assurance personnel for ROC to the MyROC.org platform and assist with getting users access and training on the system. See section 1.2.

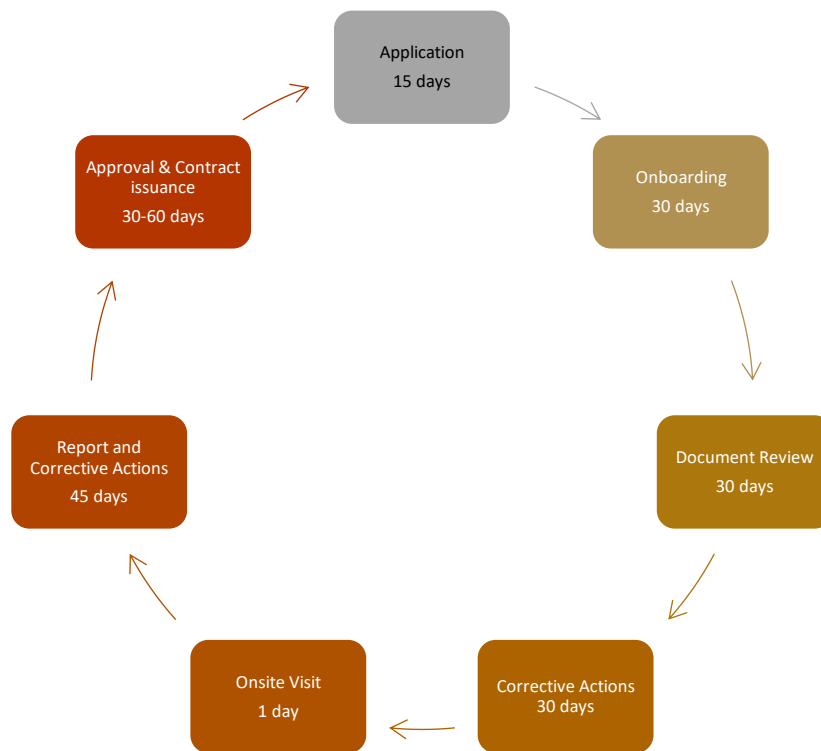


FIGURE 1. CB TIMELINE FROM APPLICATION TO CONTRACT

1.1.9. ROA Service Contract Agreement with CB

An ROA Service Contract Agreement for ROC must be executed within 30 days of approval between ROA and the CB. The CB must follow the terms of the Service Contract Agreement with ROA, which is renewed every four years.

1.2. myROC platform

The audit workorder and certification process for ROC operations must be recorded and tracked in the myROC.org electronic database platform. Qualified assurance personnel are provided user accounts and training by the ROA. CBs are expected to use the myROC platform for ROC program certification services.

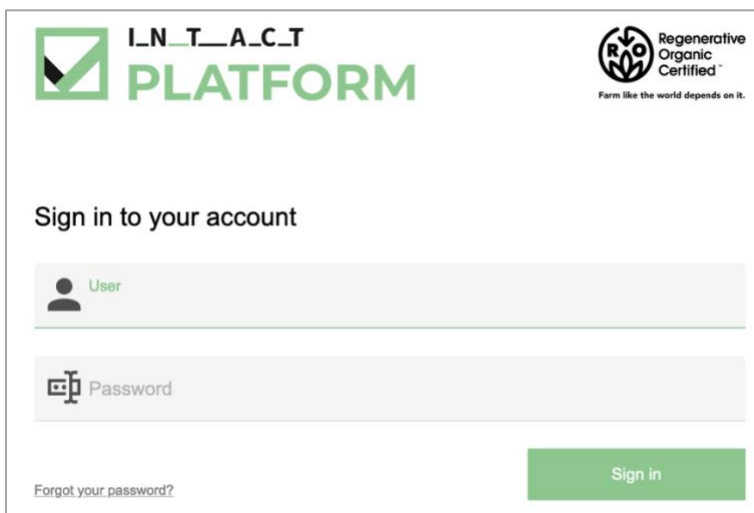


FIGURE 2. MYROC.ORG LOGIN SCREEN

1.3. CB Renewal Application for ROC

The ROA shall perform in-person audits to assess the performance of the CBs per a 4-year audit cycle in accordance with the principles of the ISO/IEC 17065. The CB will receive a notification of renewal no less than 12 months prior to the ROA contract expiration date. The renewal process follows Section A.1 described above.

Certification Bodies shall maintain and make available upon request to ROA:

1. A list of qualified auditors and their training status (i.e., trained, in-training, removal)
2. Records of qualified auditors’ approval, performance reviews, and continuing education
3. A list of witness audits or shadow audits performed with ROC auditors

Year 1	Year 2	Year 3	Year 4	Year 5
Eval/WA	ASR	ASR	ASR	Eval/WA

TABLE 1. CB EVALUATION CYCLE

The **Full Re-evaluation** occurs on a four-year cycle and shall be a virtual/remote audit of the CB’s records where the certification services are supported. On-site audits will only occur when deemed necessary. A minimum of one on-site witness audit of auditors (WA) shall also occur during the re-evaluation cycle. An annual remote desk audit based on the annual report will occur during the years there is no on-site facility or on-site witness field audit.

1.4. Appeal of ROA CB approval decision by a CB

Appeals in writing shall be submitted electronically within 30 calendar days of decision notification from ROA along with all the necessary supporting documents. Appeals are heard by the ROA Board of Directors. The decision of the ROA BoD in this regard shall be final.

Appeals should be emailed to qualityassurance@regenorganic.org.

1.5. CB Annual Surveillance Review and Reporting

The Certification Body shall participate in the ROC Annual Surveillance Review (ASR). The CB shall electronically submit an annual report of ROC activities to ROA in March of each calendar year.

1. The CB shall maintain records of all major changes that took place during the previous year and that have affected corporate structure and directors, the administrative structure, the main managers of the organization and members of the committees. The information from the CB shall include:
 - a. List of internal or external complaints related to ROC and corrective actions
 - b. Reported misuse of the ROC logo or claim, suspensions, and cancellations
 - c. List of label approvals
2. The CB shall maintain certification client data and provide it to the ROA annually by the end of March for each operator granted certification. For those elements of this information not provided via the internet, that information shall be provided annually by the CB to the ROA in Microsoft Excel format.
 - a. Legal (corporate) name of operator
 - b. Full address of the operator's head office
 - c. Type of operation indicated by pillar and level
 - d. Generic names of the products certified
 - e. For grower or smallholder groups, include the list of growers in the Internal Control System (ICS).
 - f. Soil analysis and/or soil tests for ROC certified operations if requested by ROA
3. The CB annual report shall be sent to QualityAssurance@regenorganic.org

1.6. Extension of scope

A CB shall request a scope extension to add a new pillar or country of operation. The "Scope Extension Questionnaire" fillable electronic form is available by emailing qualityassurance@regenorganic.org. Once submitted, the ROA evaluates the information and completes a risk analysis. Supporting records from the CB may be requested as part of the evaluation of the information provided. The addition of a new pillar scope or regional/foreign office may require a site evaluation.

1.7. Reduction of scope, suspension, or cancellation

This section supplements the ROA *Policy for the Suspension or Termination of a Regenerative Organic Certified™ Approved Certification Body* available upon request.

1. A Certification Body's approval may be cancelled or suspended for one or more pillars if:
 - a. the CB approval expires
 - b. the CB fails to sign the referred contract within 30 days of approval
 - c. the CB violates the terms of their contract with the ROA or their Clients
 - d. the CB does not permit an audit to be conducted by the ROA or the appointed third-party
 - e. cooperation and access to documentation, facilities, and personnel are not provided to the ROA or the appointed third-party during audits
 - f. non-conformities identified during an audit performed by the ROA, or the appointed third party, remain uncorrected beyond the time specified by the ROA for corrective action
 - g. the CB loses its accreditation(s) or approval status with another ROA baseline certification scheme
 - h. the Certification Body's local or regional office(s) are forced to close operations
 - i. other matters or circumstances arising in connection with a CB which may, in the sole opinion of the ROA, compromise the integrity or reputation of the ROC program

Note: Cancellation will result in permanent termination of the agreement between the ROA and the CB to provide ROC certification services. Suspension results in a temporary ceasing of ROC certification services activities until a condition is met for reinstatement. The ROA will provide a written report to the CB describing the grounds for suspension.

2. The CB must respond within 15 working days of a proposed suspension notification. The CB must provide a satisfactory response and corrective action(s) or a corrective action plan to prevent suspension. If corrections are accepted, the ROA shall recommend CB continuation of approval. If the CB's corrective actions are insufficient or the CB did not submit corrective actions within the time allowed, the ROA QM shall recommend to the CBAC cancellation of approval.
3. If a CB is cancelled:
 - a. The CBs shall inform all ROC certified clients immediately
 - b. The CB status shall be updated on the ROA public website at regenorganic.org
 - c. The CB shall transfer all client records, reports, and any other information to the ROA to support a timely transition to a new CB and provide uninterrupted service to the client

1.8. CB Complaints

1. The ROC CB shall inform ROA within 21 calendar days of major complaints received regarding ROC program services.
2. The CB shall follow-up ROC related complaints in a timely manner and according to own procedures.
3. 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*.
4. ROC complaints should be submitted using the online *Complaint Form* located at Regenorganic.org/resources according to the *ROC Dispute Process Policy and Procedure* found at regenorganic.org/resources.

NOTE: Regenerative Organic Certified™ (ROC™) Disputes Process policy and procedure is intended to provide any interested party an opportunity to voice their concerns about issues related to Regenerative Organic Alliance (ROA) policies, decisions, actions of participants or certifiers in the ROC program, or share any other general complaints, and to provide a transparent process for addressing potential issues.

1.9. CB Cost and Fees

The CB shall pay all fees and costs associated with ROC program assessment and approval services in a timely manner according to the ROA Cost & Fee Structure document on the Regenorganic.org/resources. The CB shall pay for services using electronic bank transfer or credit card. Questions about billing must be directed to accounting@regenorganic.org.

1.10. CB Communications

1. The CB should attend the monthly ROC program virtual meetings hosted by ROA on the last Thursday of each month in order to stay informed of ROA and ROC updates, changes, and latest news.
2. The CB shall have a procedure for communicating to assurance personnel all the applicable ROC guidance from the ROA, including relevant responses to interpretation requests and other relevant documents.
3. Requests for ROA staff to attend CB hosted presentations should be requested through the online form at <https://regenorganic.org/speaker-requests> . ROA strongly encourages CBs to use ROC trained staff for marketing and communication presentations, especially for new ROC CBs.
4. All questions from auditors and reviewers for ROA staff regarding ROC program services, policies, procedures, MyROC, trainual.com, ROC standards, or the certification process shall go through the CB ROC Program Manager who then forwards to the appropriate ROA department inbox as follows:

Department email address	Topics
info@regenorganic.org	General questions and interested applicants

qualityassurance@regenorganic.org	CB requirements, CB contracts, QMS, complaints, Trainual, ROC interpretation & deviation questions
certification@regenorganic.org	Any ROC client-related or certification questions
label@regenorganic.org	License agreement and label approvals for licensees
myroc@regenorganic.org	myROC database (formerly Ecert) related questions

5. ROC operations online directory is at Regenorganic.org/regenorganic-certified. The CB shall keep the myROC platform updated with the correct data of ROC certified operators so that they are accurately listed and made publicly available through the ROA online directory generated from myROC platform.
6. Requests for interpretations regarding the ROC Framework standard or other criteria shall be submitted to ROA by the CB ROC Program Manager using the [ROC CB STD Q&A form](#) (formerly known as the "Parking Lot" spreadsheet) available for download from the ROA Google Drive folder. ROC Q&A Forms are due by the 5th of the month for all non-urgent questions. Once received the ROA Internal Rules Committee (IRC) will meet to review the question.

Requests for interpretations of the standards criteria are initially processed by the ROA Internal Rules Committee that meets every other week. If the IRC is unable to reach a consensus on the question, then it is forwarded to the applicable pillar subcommittee of the ROA BoD.

1.11. Subcontracting

1. CBs should maintain a record of subcontracted services as part of the ROC program services.
2. The CB shall have a legally binding written contract with the subcontracted entity.
3. The CB shall take responsibility for all activities outsourced to another body and shall ensure that the outsourced or contracted activities and personnel meet the ROC CB requirements.
4. The CB is responsible for ensuring that all ROC policies and procedures are effectively implemented at contracted satellite or regional offices.
5. The subcontracted auditor shall stipulate during the auditing service their relationship to the CB and that they work under the approved CB's direction.

Note: An approved CB may subcontract ROC assessment activities to a third-party assessment (inspection) body in relationship to the Client, as defined in ISO/IEC 17000 International Standard: Conformity assessment - Vocabulary and general principles.

1.12. Non-Discriminatory Conditions

The Certification Body shall have policies and procedures that are non-discriminatory.

1. 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.

1.13. Confidentiality

1. The Certification Body shall have a documented procedure in place to manage information obtained during the certification process. The procedure shall require

- a. all information obtained during the certification process is considered proprietary and treated as confidential unless the Client agrees to make the information publicly available.
- b. is handled in compliance with applicable privacy laws and legislation.
- c. allows the CB to share the collected information with the ROA during provision of the certification services rendered and as required for CB annual reporting to ROA.

1.14. Conflict of Interest Policy

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

1.15. Impartiality and Independence

The CB shall have a signed agreement with subcontracted auditors to refuse any work that would create a conflict-of-interest situation with the entity that is applying for certification, either because of a family link, or because of a business relationship with the applicant during the 12 months preceding its application to the CB.

1.16. 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 that describes the CB's position on anti-corruption, anti-bribery, and accepting gifts.

1.17. 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.

1.18. Control of Documents

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

1.19. Control of Records

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

The CB shall maintain and track ROC client auditing and certification records in their existing system and enter in the minimum required information in the ROA myROC database platform required by the ROA certification team in order for ROA to issue a correct and accurate ROC certificate. Please refer to *Annex K - Data Management*

NOTE: The myROC database platform has user limitations for entering and editing information by the CB and may have less functionality than what the CB desires. Therefore, it is strongly recommended that the CB use their own system for communicating, tracking, and storing ROC program certification data and transfer the necessary ROA required information to the myROC platform.

1.20. Management Review

Management reviews should include ROC program certification services and ROC baseline certifications and be conducted to the principles outlined in ISO/IEC 17065.

1.21. Internal Audits

Internal audits should include the ROC program certification services and ROC baseline certifications and be conducted to the principles outlined in ISO/IEC 17065.

Section 2 - ROC Client Certification Requirements for CBs

This section provides guidance on the certification process including application for certification, evaluation, decision on certification and continuation of the certification under the Regenerative Organic Certified (ROC) program.

The CB shall have an effective system for auditing, certifying, and monitoring ROC operation conformance with the requirements of the ROC Framework (standards), associated guidelines, and these procedures.

Certification Bodies shall adhere to the ROC certification procedures and audit cycles as outlined in the ROC standards and guidelines, available at www.RegenOrganic.org/Resources. See also *Annex J - ICS Managed Group Certification Procedures*

2.1. Application for certification

Application Process for Operators

- ROC applicants apply online at Regenorganic.org > Get Certified > Apply for ROC. Applicants pay the application and certification fees online directly to ROA. The CB certification process is a separate fee and billed directly from the CB to the applicant.
- ROC operators must have evidence of a current baseline certification recognized by ROA. Reference: *"Required Baseline Certifications & Equivalency Assessment"*
- Operators may be certified to ROC as an individual producer or as part of a group.
- Applicants choose their preferred certifier from a list of approved CBs in the online form. The list is in alphabetical order by CB name.
- The CB ROC Program Manager will be notified through email when an applicant has been assigned to them in myROC database. The initial contact with the operator regarding CB assignment shall not exceed 10 business days from initial notification of assignment in myROC.

2.1.1. Initial Review

The CB shall have a procedure for the initial review of an operation to ROC standards. The CB shall evaluate the operator for compliance with the requirements set out in the ROC standards and guidelines and this Operations Manual. An initial review (IR) checklist will be provided by ROA and can be uploaded to myROC as a type of document, or the CB can use their own.

1. The ROC CB shall not review or approve organic operations for scope categories of apiary, insects, aquaculture, processor, handler, or trader, because ROC standards currently do not cover these types of categories. ROC pillars apply to organic scope categories equivalent to crops, livestock, and wild harvested terrestrial plants. Organic dairy operators applying for ROC do not need a baseline animal welfare certification at the bronze level. Refer to the *ROC Dairy Animal Welfare Criteria*. CBs shall audit associated processor(s) as an approved site(s) for gold level client. Processors and supply chain actors shall register with ROA directly. See the *ROC Supply Chain Guidelines* and *Processor Criteria* at <http://regenorganic.org/resources>.
2. The CB shall require that the applicant provides all the relevant documents and information deemed essential to the assessment by the CB and follow the principles of application review in ISO17065 7.3.
3. The certification body shall obtain the following information from applicants:
 4. The Regenerative Organic System Plan
 5. Current baseline certifications and expiration date or equivalent standards
 6. A copy of the most recent audit report or compliance report and ROSP if the applicant was previously audited or certified for ROC
 7. The CB shall access the ROC operator application and retrieve all supplementary information submitted through the myROC.org database platform by ROA certification staff.
8. The CB shall review the applicant information for compliance to ROC Framework and obtain the necessary information to complete the evaluation process in accordance with ROC including, but not limited to:
 - a. Application
 - b. Regenerative Organic System Plan (ROSP)
 - c. Products requested for certification
 - d. Verification of valid business license
 - e. Current baseline certification evidence for social fairness, organic, or animal welfare
 - f. Tillage action plan, crop rotation plan, and vegetative cover plan
 - g. Maps
 - h. ROC soil health lab test results & in-field soil analysis results
 - i. Record of native flora and fauna on farm
 - j. Key performance indicator tracking as required per pillar
 - k. Worker health and safety manual
 - l. Labels for ROC product(s)
 - m. List of buyers of ROC product(s)
 - n. Eligibility based on percentage of land or revenue entering ROC
 - o. Processed product formulation worksheet and supply chain flowchart
 - p. Pesticide inputs reviewed to the Xerces Society's "Toxicity of Common Organic-Approved Pesticides to Bees"
9. Certification agreement with the CB that is a legally enforceable written agreement for the provision of certification and audit activities to clients for ROC and allows the CB to share with ROA the information collected during provision of certification services rendered and covers observers from ROA. (See also ISO17065 4.1.2)

10. The scope of the certification is clarified with the applicant and any differences in understanding the standards and criteria are resolved. Language and translation needs shall be resolved.
11. The CB shall verify that the practices used in the production of ROC products comply with ROC Framework standards as applicable to the production system. The CB must maintain a procedure and documentation to support its determination about the status of compliance.
12. The CB shall verify accuracy of fields (i.e., parcels) sizes, locations, and acres for each crop product certified to ROC
13. The CB shall confirm the service(s) and site(s) assigned in the work order are correct. Corrections should be forwarded to certification@regenorganic.org for updating in myROC.

2.1.2. Onsite Audit

Visual inspections should be approached with collaboration and mutual respect towards suppliers at all levels, with a focus on education and sustainable remediation. Farm, ranch, or facility visits are preferred during the production cycle, with special attention paid to periods of increased risk to animal welfare, such as castration or other mutilations, birthing, shearing, loading, and similar. The scope of the on-site audit should include, but is not limited to, a walk-through of the facility and review of the following items:

1. Visual inspection of the treatment of the workers and animals (if applicable to the entity).
2. Visual inspection of the workers' and animals' environment (if applicable to the entity).
3. Review of product labeling practices and procedures.
4. Review of segregation and separation practices and procedures.
5. Review of traceable supply chain process implementation.
6. Worker interviews to ensure proper implementation of traceability policies, procedures, documentation, training, and animal welfare legal compliance.
7. Issues identified during the document review.
8. Complaint policies.
9. All other requirements as required by ROC.

Documentation required to demonstrate compliance must be made available for review during the audit process at all levels of the supply chain for ROC product. Additionally, auditors must be allowed to conduct private management and worker interviews in the local language at all levels of the supply chain. Auditors must assess proper implementation of traceability policies, procedures, and documentation, training, and animal welfare compliance as applicable.

The maximum period between on-site assessments should not be more than 18 months.

1. Audits shall be conducted annually for each certified operation.
2. Auditors should be familiar with the *ROA Global North Social Audit Manual* available upon request from ROA.

3. When multiple sites are included in a scope certificate, each site shall be evaluated during each audit with an exception for grower group applied sampling methodology.
4. A CB must follow their own internal policies and procedures for audit services to ROC clients, as well as adhering to the criteria stated in this section of the Operations Manual for CBs.
5. The CB shall schedule an on-site audit in a timely manner of an applicant to determine compliance with the ROC Framework standards, criteria, and guidelines, as applicable to the operation and production system. The CB shall ensure that the applicant is contacted to arrange the logistics of the on-site audit. The audit may be done on an equivalency basis based on a baseline certification.
6. The CB shall estimate the duration of on-site audit, considering the size and complexity of the production system, the production type, parcels and sizes, worker interviews, the results of the previous verification, complaints received, and risk assessment.
7. The audit team must consist of one or more of the following roles, proportionate to the CB needs and the scale of the audit:
 - a. One or more auditors approved for each pillar. If more than one auditor is part of the team, one auditor shall be designated the lead auditor and shall take overall responsibility for ensuring that the audit is complete
 - b. One or more auditors in training
 - c. A shadow auditor if the audit is part of an auditor's evaluation
 - d. One or more translators or interpreters, if needed
 - e. One or more technical experts who are not qualified auditors, if needed
8. When translators or interpreters are used in audits, the translators and interpreters shall be independent of the operation being evaluated. In all cases, the names and affiliations of translators and interpreters shall be included in audit reports.
9. When technical experts are used in audits, the technical experts shall be independent of the operation being evaluated. The names, qualifications, and affiliations of technical experts shall be included in audit reports.
10. Audit reports shall accompany the ROA audit checklist and follow a format appropriate to the type of operation inspected, and facilitate a non-discriminatory, objective, and comprehensive analysis of the respective processing system.
11. CBs shall use the appropriate ROC audit checklist provided by ROA through the myROC platform to be included with the audit report. The audit report shall cover all relevant aspects of the ROC standard and adequately validate the information provided by the applicant. It shall include:
 - a. a statement of observations of non-conformity with the certification requirements.
 - b. clear identification of any non-conformities issued, including the timeline for correction.
 - c. date and duration of the inspection, persons interviewed, fields visited.
 - d. type of documents reviewed, and soil analysis performed.

NOTE: Work orders and the affiliated checklists are filled electronically online through the myROC.org portal. Checklists can be checked out and filled out electronically using Ecert Onsite or the Ecert mobile app. Checklists are printable as

a pdf from myROC portal. An excel spreadsheet checklist can be provided upon request from ROA.

12. The timing of the on-site inspection shall take place during the growing season or active production in cases involving hired labor and seasonal workers so that worker interviews can be conducted, and soil and plant health can be observed by the auditor.
13. The audit protocol shall include the following, as applicable to the operation:
 - a. Auditing of the organization's sites, which may also include visits to non-certified areas.
 - b. Review of records and accounts to verify flow of ROC claimed materials and other similar materials and to verify that the ROSP accurately reflects the operation.
 - c. Identification of areas of risk to product integrity.
 - d. Verification that changes to the Standards and to related requirements have been effectively implemented.
 - e. Verification that corrective actions have been taken, with special focus on corrective actions for non-conformities which have been closed since the previous audit.
 - f. interview people knowledgeable within the operation at the time of the audit.
 - g. Obtains an estimate of the potential yield for ROC products for the coming year, as well as an audit of the balance in the quantities produced and sold over the previous period and including amounts still in inventory during this same period.
14. In cases involving processor(s) or supply chain actor(s) for gold level, on-site inspections shall be carried out any time during the year, preferably when ROC or organic product is being processed.
15. 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.
16. Every effort should be made for audit cost savings and consolidation of time whenever possible. Audits should be "bundled" with other pillars and programs as much as possible to conserve resources, but not to the detriment of the operation by delaying the initial or renewal audit.
17. The ROC auditor shall conduct an opening meeting with the operator or company representative to confirm the audit agenda, objectives, pillars (scope), criteria, timeline, interviews, and the presence of any observers.
18. The auditor shall ensure that all land and fields are identified in the audit including parcels not included in the scope of certification. The auditor must verify the list of parcels or fields, animals, and crops are complete and correct, and other key areas including animal housing, grazing areas, harvest areas, harvest storage locations, worker areas, onsite processing, and packaging areas.
19. The auditor shall conduct and record a closing meeting at the end of the visit to inform the operator of inspection results as well as findings made concerning the compliance with certification requirements and provide opportunity for the operator to confirm the accuracy of information collected during the inspection. CBs can optionally use *Annex E - Inspection Affirmation for ROC* form to collect and record the information and

findings from the exit meeting with the operator and report them to the CB and the ROA through myROC.

20. Audit reports should be completed and returned to the CB within 15 business days and uploaded in myROC and findings entered in myROC as soon as possible.
21. Final audit report shall be provided to the operator. If the audit checklist is not included in the audit report, it shall also be provided to the operator. When the auditor finalizes and submits the audit report in myROC, it automatically generates a PDF of the submitted report that the auditor or CB can provide directly to the client. An automatic copy of the audit report PDF will be sent to the email listed under contact information for the company entity in myROC.

2.1.3. Risk analysis

1. The auditor shall identify and inspect areas of risk at each annual audit.
2. The certification body shall conduct the risk analysis and shall inform the operation of the assigned risk designation of very low, low, or not low risk. ROA has developed a risk matrix available upon request from qualityassurance@regenorganic.org.
3. The CB shall amend and adapt its procedures to address higher risks found.
4. The CB assurance personnel should ensure the integrity of the evidence is valid, i.e., checking names and dates on records, expiration dates of certificates, signatures, and labeling claims. To be considered valid, the auditor shall confirm the following characteristics:
 - a. Confirm the audit evidence is dated, accurate, complete, and pertinent to the entity.
 - b. Ensure the audit evidence was obtained directly from the audited organization or an external source.
5. The auditor shall calculate the input/output balance and traceability exercise for one product targeted for ROC certification and for the corresponding inputs included in the products produced. The outcome shall be recorded in the audit report notes.
6. Any assurance personnel who perform risk assessment procedures shall provide a documented reason for the assessment of risks and resulting conclusions.
7. For grower group audit sampling methodology and risk assessment, the auditor must follow the document "*Group Certification and Sampling Methodology*" located at <https://regenorganic.org/resources>. Risk levels are assigned as low, medium, or high risk. See *Annex J - ICS Managed Group Certification Procedures*.

2.1.4. Technical Review

1. At least one person shall be assigned to review all information and results related to the audit. The review shall be carried out by a person(s) who have not been involved in the audit process.
2. The certification body shall assign qualified personnel to perform each evaluation task and the CB shall follow its own policies and procedures to carry out a review with its own internal staff.

3. When assessing the information, the CB shall confirm the evidence supplied is appropriate and reliable to meet the requirements of Regenerative Organic Certification or appropriate pillar (Soil Health, Animal Welfare, and/or Social Fairness).
4. The certification body shall report all evaluation findings according to their documented reporting procedures.
5. If nonconformities result, and the operator expresses interest in continuing the certification process, the CB shall provide information to the operator regarding the additional tasks needed to verify that nonconformities have been corrected.
6. The findings-review models that are identified during an audit shall be classified by the CB according to the types set by ROA and available in the myROC platform. *See Annex F - Non-conformity classification and management.*
 - a. Critical Tolerance (CT) (Classified as a serious non-compliance)
 - b. Major Non-Compliance
 - c. Minor Non-Compliance
 - d. Observation
 - e. Recommendation
 - f. Reminder
7. The CB shall send correspondence to the operator with the results of the findings and all NCs and shall require the operator to respond to NCs with corrective actions within 45 calendar days of receipt. In the case of Critical Tolerance (CT) operators shall respond within 30 calendar days. The response shall either provide evidence of completion of corrective action(s) taken to address each NC or present a plan with milestones as to how each NC will be addressed. This plan shall include a completion date not exceeding 90 working days from receipt of the NCs. The CB shall accept times greater than those stated for the closure of a NC by converting to a Minor NC with a status of follow-up needed if the corrective actions are justified and documented. Minor NCs are due before next audit.
8. The results of all evaluation activities shall be documented during the evaluation process and updated in myROC database using the appropriate task tab. Findings should be entered with all details in myROC. The CB can optionally use the *Annex F - ROC Corrective Action Tracking* form to record the status and corrective action of each finding or use the information available in myROC for tracking the status of conditions.
9. The certification body shall document measures applied to verify the effectiveness of corrective actions taken by operators to meet the requirements.

NOTE: A Client or applicant who operates under a Regenerative Organic Certified™ (ROC) organic system plan may file a **Deviation Request Application Form** from certain ROC Framework criteria and associated guidelines only if it applies to agricultural products certified to ROC or targeted for certification to ROC. The deviation will only apply to the producer who maintains a valid ROC certificate for the operation OR has received their first ROC audit. The deviation only applies to the ROC Framework criteria. An operator may submit a ROC Deviation Request Application directly to the CB after the audit. The CB shall promptly forward to qualityassurance@regenorganic.org. The Internal Rules Committee will convene and

review the request and respond to the CB within 14 days. The Deviation Request Application form is located on the [Regenorganic.org/resources](https://regenorganic.org/resources) page.

2.1.5. Label Review

1. All ROC labeling claims using the Regenerative Organic Certified™ name or logo on products applied directly by the applicant or operator at the farm level must be approved by the CB according to the *ROC Labeling Guidelines and Terms of Use* available online at regenorganic.org/resources.
2. The CB shall ensure that all certified products are labelled in accordance the *ROC Labeling Guidelines & Terms of Use* provide guidance and requirements for issuing claims and on-package labeling by certified operations and authorized licensees in connection with Regenerative Organic Certified™ (ROC™) products.
3. The CB shall upload approved labels to myROC and assign a file type of "label"
4. The CB shall have procedures to monitor the holders of certificates using the ROC mark and the ROC name to detect any improper reference to ROC or fraudulent use of the ROC name, mark, logo, and certificates.
5. The CB shall keep a list of all label approvals and shall include the name of the certified operator (certificate holder), brand name, product name, approval date, and reviewer name. This list shall be maintained and provided to ROA upon request.

2.1.6. Certification decision

1. A qualified certification decision maker shall make the certification decision and shall follow CB procedures. See *Annex C - Technical Reviewer Qualifications*.
2. Certification decisions shall be completed within 60 days of the audit.
3. If an applicant for certification has willfully made a false statement regarding its production system and operations related to the products included in the application, the CB may deny certification, without issuing a notification of noncompliance.
4. The CB shall issue a written notice of denial of certification to any applicant to whom it denies ROC. This notice shall state the reason(s) for denial and the applicant's right to:
 - a. file an appeal with the CB
 - b. reapply for certification
5. The decision to certify a product shall be taken if the CB determines that the operation complies with the ROC program requirements and that the applicant is able to operate in accordance with its plan and after the correction of all nonconformities. The certification decision is valid until the results of the next annual audit are known and a new decision is made.
6. A certification decision shall be made upon closure of the non-conformities or upon the deadline for the non-conformities, whichever comes first, and a ROC Decision Letter sent to the operator and the ROA. See *Annex D - ROC Decision Letter template*.

2.1.7. Issuance of certificate

1. The ROA shall issue the final ROC client certificate based on the information provided in myROC and the information contained in the *ROC Decision Letter* to the client.
2. The client certificate will be maintained and available in the myROC client portal.
3. The ROA shall add the operator to the online public directory.

2.2. Procedure for continuation of certification

1. ROC operators renew annually online at regenorganic.org > Get Certified > Renew ROC before the deadline of January 1st of each calendar year. If an operator fails to renew 60 days past the deadline, then the CB will issue a notice of proposed suspension. 90 days past the renewal deadline, the CB will issue a notification of suspension and inform the ROA. 120 days past the due date, the operator is cancelled, and letter of cancellation sent to the operator and the ROA.
2. The CB shall have procedures to verify annually that the ROC program requirements for certification continue to be met by the holder of the ROC certificate.
3. The CB shall conduct a document review prior to approving any change in certification scope.
4. The auditor shall conduct an on-site inspection to verify any operational changes and compliance with the applicable ROC requirements after the certified operator submits all information requested by the CB.
5. The auditor shall verify on-site that previously submitted corrective actions have been, and remain, fully implemented.
6. The CB shall ensure that the renewal certification process is completed within 12 months of last audit date. The CB shall document delays and cause. The postponed audit shall not exceed 16 months from last audit date.
7. The CB shall make its certification decision for continued certification as outlined in 2.1.6.

2.3. 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 CB and Client requiring the Client to immediately disclose any changes that would affect ROC. This may include management changes.
2. A procedure to inform the ROA of changes affecting a Client's ROC certification within 21 calendar days.
3. Information should be sent to Certification@regenorganic.org.
4. Procedure for client CB transfer for ROC according to section 2.13 below.
5. A procedure for evaluation and issuance of revised certification decision if needed.
6. The CB shall inform ROA when a ROC scope has changed.

2.4. Additional inspections

The CB shall comply with any requests from the ROA that additional inspections (spot checks) be conducted by the CB when the compliance of the operation is in doubt, as a result of a complaint, or for other valid reasons.

1. For grower groups, a minimum of 5% of total operators (at least 1) shall be subject to random and targeted unannounced inspections and soil testing each year according to *ROC Sampling Methodology and Group Certification* procedure available at regenorganic.org/resources.
2. 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.

2.5. Sampling and testing

1. The Certification Body shall have a documented procedure for handling of collected plant and soil samples at the operator's location and proper chain of custody.
2. The CB shall have arrangements with laboratory facility(s) to ensure the integrity and accuracy of the sample processing.
3. Laboratories used by the CB for sample processing should be accredited to ISO/IEC 17025, or another recognized national accreditation.
4. Lab credentials, contracts, and agreements with labs should be kept on file with the CB.

2.6. NCs, Warnings, Suspension and Cancellation

1. Certification Bodies shall have documented procedures for issuing notifications of non-compliances, warnings, suspension, and cancellation of a certified client including the following requirements:
 - a. The CB shall send written correspondence to the client outlining the results of the current assessment, and if needed, requesting corrective action within 30 calendar days for critical tolerances or within 45 calendar days for all other NCs, or the client will not achieve or maintain certification:
 - b. 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 cancelled in 15 calendar days
 - c. If corrective action is not taken and more time is required to complete the corrective action, the client shall request additional time and obtain approval from the Certification Body before the 15 calendar days.
 - d. If the client takes no action, the Certification Body issues a written notification to inform the client that the certificate is cancelled.
 - e. The Certification Body removes the Client from their list of certified clients.
2. The conditions that may result in the withdrawal of a client's certification include:
 - a. Client acts in breach of *Contract Terms and Conditions* established with ROA or the CB and systematically fails to comply with the requirements of the ROC Framework and standards

- b. Baseline standard requirements or equivalent are not maintained
 - c. Cooperation and access to documentation, facilities, and personnel are not provided to the assurance team before, during, and after desk, remote or on-site audits
 - d. Client does not permit an audit to be scheduled or conducted
 - e. Client uses the ROC certificate in ways that conflict with the terms and conditions of use as outlined in the *Licensing Agreement* (available at <http://RegenOrganic.org/Resources>)
 - f. Client voluntarily withdraws from the program
 - g. Certificate anniversary date has lapsed, and an audit extension has not been scheduled within the timelines set forth in section 2.2.6.
 - h. Client does not provide payment for certification services to ROA or the CB.
 - i. Other matters or circumstances arising which may, in the sole opinion of the ROA, in any way compromise the integrity or reputation of the ROC program.
3. Should the Client fail to meet any of the conditions of 2.6.2., the Certification Body may withdraw the Client's certification decision for the applicable pillar(s).
 4. The Certification Body shall have a documented procedure to address the cancellation of client certification and corrective action.
 5. If a Client wishes to recover ROC certification after having their ROC certificate cancelled, the Client shall re-apply for certification.
 6. If an appeal is in process, the withdrawal procedure may be suspended pending the outcome of the appeal. *Disputes Process* available at www.RegenOrganic.org/Resources.

2.7. Complaints and appeals by operations

1. Appeals and complaints shall be submitted and handled by the CB.
2. The Certification Body is responsible for managing and resolving appeals and complaints associated with their certification services.
3. The CB shall have a dedicated individual for operators 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.
4. The CB shall follow-up on ROC related complaints and appeals received from certified operators in a timely manner and according to its own procedures including:
 - a. The CB 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.
 - b. In the case of unsatisfactory result and request for further appeal, the appellant or complainant must follow the procedures according to the appeal and complaint policy of the CB.
 - c. The CB shall communicate the next steps to the client in case the operator is not satisfied with the CB certification process.

5. If the CB does not follow ROA CB requirements or fails to follow their own complaint or appeal process, the complainant may present their case to the ROA. The case shall be presented to the ROA. CBs can direct certified operations to submit complaints directly to ROA using the online *Complaint Form* located at <https://regenorganic.org/resources> according to the *ROC Dispute Process Policy and Procedure*.

2.8. Exceptions and Deviations to Requirements

1. The CB shall collect all Deviation Requests to the ROC standards from certified operators or ROC applicants and send to ROA for review. Operators shall not submit deviation requests to the ROA directly.
2. The CB shall only receive, and forward *Deviation Requests* related to clients in an active certification cycle or process with the CB.
3. Deviation requests shall be submitted using the online *Deviation Request form* in fillable PDF format downloadable at <http://regenorganic.org/resources>. The CB shall send completed form with supporting evidence to qualityassurance@regenorganic.org.
4. Deviation requests should include as much supporting evidence as possible, e.g., photos, field maps, field plan, soil test results, crop consultant advice, etc.
5. It is strongly encouraged that peer-reviewed research articles and literature supporting and justifying the exemption are provided with the submitted form.
6. Deviation requests shall follow the *Deviation Request Procedure* and reviewed by the ROA Internal Rules Committee according to the *Standards and Criteria Interpretation Procedure*.

2.9. Use of licenses, claims, and marks of conformity

1. The CB shall ensure that all certified products are labelled in accordance with the *ROC Labeling Guidelines & Terms of Use* and *ROC Framework*.
2. The CB shall have procedures to monitor the holders of ROC certificates using the ROC certification mark or claim and the ROC name in marketing to detect any improper reference.
3. The CB shall have procedures ensuring that the holders of ROC certificates do not allow the ROC mark to be used in any way likely to lead to confusion among consumers, i.e., using the phrase "Regenerative Organic Certification" instead of "Regenerative Organic Certified™."

2.10. Records control by the CB and client

The CB shall ensure that the operator maintains records and relevant supporting documents concerning the production of products that are or are intended to be sold, labelled, or otherwise represented as ROC. Records should be kept for 5 years.

2.11. Requirements when a client changes a CB

1. The client decides to change their current ROC CB (sending) to a new CB (receiving), they shall submit a ROC application for certification as a new applicant to the ROA, pay the initial application fee, and complete any application process described by the new CB (receiving), and follow the application requirements.
2. The client shall notify their current CB of their intent to change ROC CB. The client shall request a "letter of current status" to be sent to the new ROC CB (receiving), confirming that all nonconformities (NCs) and any contract conditions (for example, outstanding fees) have been addressed. The current client CB shall send this letter to the new ROC CB program manager for ROC and upload to myROC.
3. The client shall maintain their current certification with the sending CB until the new certification process is complete with the new CB and a decision confirming the certification of the operator's Land and product(s) is issued.

2.11.1. Requirements on the sending (current) CB

1. The sending CB shall continue to monitor the client's compliance with ROC requirements and shall ensure that the client resolves any outstanding NCs before the new decision is issued by the new (receiving) CB.
2. The sending CB shall notify the client with a "termination letter" stating that the certification agreement with the client has ended and will no longer monitor the compliance of the client once the new CB confirms that a new decision has been issued to the operator.
3. Upon receiving confirmation from the new CB that a new decision has been issued to the client, the sending CB shall require the operator to immediately stop the use of advertising which identify the sending CB on the operator's products or marketing materials.
4. The sending shall report the cancellation in the annual report to the ROA as a "cancellation due to a CB change".

2.11.2. Requirements on the receiving (new) CB

1. The receiving ROC CB shall require the operator to apply for certification as a new applicant, complete an application form prescribed by the new CB (receiving) and follow the application requirements.
2. The receiving ROC CB shall request information from the applicant's current (sending) CB including a copy of the latest audit report or audit findings and corrective actions. The receiving CB shall review the "current status" information provided by the sending CB.
3. The receiving ROC CB shall schedule and conduct an on-site audit of the client's operation.
4. The receiving ROC CB shall issue a new decision only after the certification process is complete and the applicant has been determined to follow all the ROC requirements.
5. The date on the new ROC certificate shall be the date on which the receiving CB issued the certification decision.

6. The receiving CB shall inform the sending CB within 10 working days that the receiving CB has issued a new certification decision to the operator.

Section 3 - Glossary of Terms

1. **Agreement:** The ROC licensing agreement between the ROA and the Organization
2. **Approval:** ROA CBAC decision that a certification body is competent to carry out ROC certification activities. Achieving approval status gives a certification body the authority to grant certification to ROC.
3. **Assurance personnel:** The Certification Body personnel approved for conducting any activities related to ROC audits and personnel performing technical reviews and on-site audits.
4. **Authorized licensee:** Includes, but is not limited to, any brand, broker, finished goods manufacturer, or wholesaler who is making a ROC claim and has a valid License Agreement with the ROA.
5. **Brand:** A name, term, design, symbol, or any other distinctive feature that identifies a product as distinct from other products.
6. **Brand Owner:** a person or company who sells a commodity or product under a registered brand label. Brand owners will be referred to as “brands” throughout this document.
7. **Auditor:** A certification body representative who conducts audits.
8. **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.
9. **Certification level:** The ROC™ level to which a product is certified, i.e., Bronze, Silver, or Gold.
10. **Certified producer:** A farm or ranch that has applied for or achieved ROC certification status and is making a ROC claim. A Certified Producer must have a valid License Agreement with the ROA. A producer grows or raises a commodity to be used for a food, feed, cosmetics, or textile product. The first stage in the raw material supply chain. Certified producers are also referred to as “operator”.
11. **Certified operation:** See certified producer.
12. **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 for a final consumer product to carry ROC™ claims.
13. **Claimed material:** The portion of a product that is intended to be used and eligible for ROC claims; see certified product.
14. **Client:** A ROC certified operator or applicant.
15. **Consumer facing content claims for textiles:** These include but are not limited to hang/swing tags, claims displayed permanently on product, and alternative packaging.
16. **Critical activities:** file review, auditing, decision making, or issuance of certificate.
17. **Critical tolerance (CT):** a type of finding that is a major non-compliance with resolution due within 30 days.
18. **Desk audit:** off-site records assessment conducted by the ROA to assess conformance to the ROC Certification Body Requirements document or approved equivalent.

19. **Evaluation:** Process undertaken by ROA to assess the quality and competence of a certification body based on a defined scope of approval.
20. **Exempt organization:** An organization that meets the exemption criteria of the NOP Organic certification program and is also exempt from certification requirements and auditing. Exempt organizations include those that store, or transport only packaged, segregated raw or finished goods; and retailers that sell packaged, labeled product(s) to consumers.
21. **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.
22. **Governing documents:** any document stating ROC program requirements. The Governing Documents consist of: License Agreement, the ROC Framework, the Program Manual, the Operation Information & Certification Contract, the Supply Chain Guidelines, the Cost & Fee Structure, and the Labeling Guidelines & Terms of Use. The Governing Documents are subject to change. Governing Documents will be available at RegenOrganic.org/Resources.
23. **Grower group:**
24. **Handler:** Any person engaged in the business of selling, processing, or packaging agricultural products except for final retailers that do not process agricultural products.
25. **Information panel:** The labeled panel immediately to the right of the principal display panel, as displayed to the consumer. If the panel is not usable, due to package design and construction, then the information panel is the next label panel immediately to the right.
26. **Internal control system (ICS):**
27. **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.
28. **Licenser:** ROA is the licensed owner of the Regenerative Organic Certified name and all other trademarks, certification seals, logos, and standards.
29. **Low Risk Social Fairness Audit:** A low-risk farmer and worker fairness audit is defined as an audit of a family owned and operated farm or ranch located in the global north with less than 5 direct hire employees in a calendar year with no third-party contract laborers; no H2A workers; and no hired adolescent labor under age 16.
30. **Medium-scale farm:** 6-25 permanent workers and no more than 100 total workers on-site at the management unit at any time.
31. **Medium-scale farm organization:** More than 2/3 of member farms meet the criteria for medium-scale
32. **Non-compliance (NC):** type of finding issued to an operator found not in compliance with the ROC standards due for resolution within 45 calendar days.
33. **On-site Audit:** synchronous evaluation visit of conformance to the ROC Certification Body Requirements either in person or virtually.
34. **Operation:** A legal entity which is certified to or in the process of becoming certified to ROC. The farm or ranch that grows or raises crops, botanicals, and/or animals to be used for a food, cosmetics, or textile product. Typically, the first stage in the raw material supply chain.
35. **Operator:** the owner or responsible person of the applicant or certified operation.

36. **Opportunity for Improvement (OFI):** a type of finding set on the CB related to program improvement during the evaluation visit that has no due date but suggested for resolution before the next full evaluation.
37. **Organization:** the Farm, Producer, Operation, Brand, Finished Goods Manufacturer, Supply Chain Actor, or other entity that executed a License Agreement.
38. **Parcel:** readily distinguishable pieces of land from each other with no adjacent or touching borders.
39. **Principal display panel:** The portion of a product packaging or label that is most likely to be displayed, presented, shown, or examined under customary conditions of display for sale.
40. **Processing:** Any stage in the supply chain where ROC materials (i.e., plant or animal products) are modified. Processing may include activities such as slaughter, milling, cooking, mixing, and packaging 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.
41. **Producer:** The farm or ranch that grows or raises crops and/or animals to be used for a food or textile product. The first stage in the raw material supply chain.
42. **Recommendation:** a type of finding that has no due date, and suggested to be resolved before the next audit cycle.
43. **Reevaluation:** A complete audit of the CB quality system and certification operational activities that occurs every four years. It is a process undertaken by ROA to assess the quality and competence of a certification body based on a defined scope of approval.
44. **Remote audit:** A site audit that is conducted via a remote web conferencing method or other audio/video means.
45. **ROC mark(s):** Refers to the Regenerative Organic Certified seal and name and all other trademarks, certification seals, logos, or any other proprietary designations owned by the Regenerative Organic Alliance.
46. **ROC Pillars:** Soil Health, Animal Welfare, and Social Fairness.
47. **ROSP -** Regenerative Organic System Plan completed by the Client
48. **Surveillance Audit (ASR):** Annual audit of the Certifying Body as a condition of approval.
49. **Site:** Any geographically distinct unit within a certification pillar scope. Locations which are geographically distinct or have different civic addresses are separate sites (see exception for *farms*). *Subcontractors* are not considered to be sites. Includes: farms, *facilities*, offices.
50. **Smallholder:** Small farming operations where land and labor productivity are comparatively low due to limited resources. Smallholder farmers often rely on farming as a primary means of livelihood and are at greater risk of vulnerability in the supply chain. Smallholders rely primarily on family labor for farm operations. Smallholder size may vary by farm type and commodity; however, some certifications set thresholds so confirm with your certification program, if applicable. Most smallholders are organized by Internal Control System (ICS) for certification purposes. Contact the ROA for additional guidance on determining if your operation is considered a smallholder under the ROC.
51. **Small-scale farm:** ≤5 permanent workers and no more than 25 total workers on-site at the management unit at any time (FT-USA, FFL).
52. **Small-scale farm organization:** More than 2/3 of member farms meet the criteria for small-scale. A maximum of 1/3 of member farms may have up to 2 times the parameters defined.

53. **Spot audit** - A type of short notice onsite or synchronous virtual visit to an ROA-approved Certifying Body or certified operator usually as the result of a complaint or major non-conformity to the ROC program.
54. **Standards:** ROC Framework, Dairy Animal Welfare Criteria, Processor Criteria, and Supply Chain Guidelines.
55. **Subcontractor:** A legal entity hired by an operation to perform services (e.g., storage, processing). Subcontractors take physical possession, but not legal ownership of certified product and are independent of the organization which outsources the material; OR an independent legal entity hired by a certification body to provide services related to certification activities.
56. **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.
57. **Supply Chain Actor:** Any organizations that process or handle certified product that are 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 ROC materials (i.e., plant or animal products) from the producer are modified, which may include the final stage of production. For ROC, the scope for Supply Chain Actors (SCAs) begins with the first legal change in ownership after harvest of crop.
58. **Suspension:** The limitation of a *scope certificate* or *accreditation* due to a specific *non-conformity* or issue. A suspension may be lifted when the non-conformity or issue is resolved, and the scope certificate or accreditation becomes active again immediately.
59. **Withdrawal:** The revocation of a *scope certificate* or *accreditation* due to a specific non-conformity or issue, or at the request of the *accredited/certified* party. Following a withdrawal of accreditation/certification, a new *assessment/audit* is required for accreditation/certification to return to active status.
60. **Witness Audit of Auditor(s) (WA):** on-site audit during which a qualified auditor is observed by the ROA to confirm 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.

Annex A - CB Document Review

This section describes the types of information that the applicant CB should submit for the document review or have available to the ROA as part of the onsite evaluation.

1. Documents pertaining to the CB

1. The corporate structure showing internal and external relations of control by shareholders, companies, or other groups for the organization
2. If incorporated, the general by laws
3. A list of directors, comprising: 1) members of the board of directors (including specific function, duration of mandate, and affiliation); 2) board members of a sponsoring organization (if applicable)
4. The addresses of all locations where the organization does business and summary of activities from each location
5. A copy of the USDA NOP accreditation certificate for the CB
6. Prepared financials or evidence of financial stability and adequate resources

2. Description of decision-making structures

1. A description of ROC technical reviewers or internal bodies making decisions covering ROC product certification
2. A description of the appeal process used for ROC
3. A description of sharing of responsibilities between head office and subcontractors
4. An internal organization chart related to the general administration of the ROC program including names of persons occupying managerial positions in both Head Office and subcontracted offices or regional offices carrying out ROC activities

3. Information on programs

1. List of current accreditations and baseline certification programs for ROC with scopes categories shown. Example: USDA NOP (crops, livestock, handling).
2. List of countries, provinces, or states in which the CB is carrying out certification activities for USDA NOP and potentially ROC
3. Copy of organization's latest annual report
4. List of subcontracted auditors and laboratories

4. Policies and technical procedures

1. The quality manual related to the ROC program
2. Code of Ethics or Ethics Policy
3. Standard operating policies and procedures used in the ROC program
4. ROC Fee schedule
5. Document management

6. Certification management system

5. CB human resources management

1. A complete list of ROC assurance personnel resumes with status and positions held
2. Person(s) in charge of reviewing ROC labels for compliance
3. Person(s) in charge of reviewing inputs for ROC
4. Person in charge of quality control for ROC
5. Signed confidentiality and conflict of interest forms for ROC assurance personnel
6. Standard contract used with all ROC subcontractors (if applicable)

7. Certified operator documents

List of documents included in the file for each operator certified to ROC at a minimum:

- a) Exit interview form
- b) Non-compliance and corrective action measures
- c) ROC decision letter to client
- d) Copy of ROC certificate
- e) Label review and approval
- f) ROSP
- g) Risk assessment
- h) Parcel Maps
- i) Product formulation and supply chain flowchart
- j) Current and complete Approved Farmers List for grower groups

Annex B - Auditor Requirements

Auditors for ROC must demonstrate the necessary skills, experience, and competency for auditing to the pillar(s) in which they are assigned. The three pillars in which an auditor can be approved to are 1) soil health and land management, 2) animal welfare, and/or 3) social fairness. Auditors can qualify for any one pillar or a combination thereof.

The process for ROC approval is as follows: CB submits Approved Auditor Application > ROA reviews request and supporting documents > ROA notifies CB of decision. If approved, ROA adds auditor to Trainual.com to complete asynchronous ROC training. Once auditor passes the ROC training modules, they are considered "qualified" and added to myROC database platform. The ROA does not approve auditors not affiliated with a ROC approved CB.

1. New auditors for the ROC program must undergo an initial qualification review by the CB, which includes evaluating education, training, and experience credentials. Only qualified auditors can audit for the ROC program.
2. New auditor requests shall be submitted by the CB to the ROA using the "Approved Auditor" online application form located at regenorganic.org > Get Certified. Once received, the ROA will process the request and send an approval or denial decision for each pillar scope to the CB within 14 calendar days.
3. All auditors shall complete and pass the ROC program training before being "qualified" to audit for the ROC program.
4. The CB ROC Program Manager is responsible for ensuring the ongoing training for auditors for ROC and verify auditors are staying informed of ROC standards updates and regulatory changes that pertain to ROC pillars.
5. Auditors shall pass the required asynchronous ROC training modules for each assigned pillar using the Trainual.com online training platform and complete myROC training.
6. The CB shall only assign auditors to scopes, sites, and risk levels in which they are competent, i.e., inexperienced auditors should not be assigned to carry out large, complex, or high-risk audits on their own. Audit Teams can be used for large scopes.

Auditor Expectations for ROC

Auditor remuneration is not incentive based, nor based on the outcome of inspections. All approved auditors must receive initial training as well as continuous education and periodic evaluation.

Supporting Resources

ISO 19011: Guidelines for auditing management systems Section 7.2 "Determining auditor competence to fulfill the needs of the audit program" [ISO19011 v1 EN](#)

GSCP (Global Social Compliance Program - Table A - Core auditor competence and prerequisite reference requirements (for social and environmental compliance assessment), pg. 13. [GSCP Auditing Competence reference tool in pdf format](#)

APSCA (Association of Professional Social Compliance Auditors) [Competency Framework for Social Compliance Auditors](#)

1. Auditor General Knowledge

Auditors for all ROC pillars shall have knowledge of:

1. ROC Framework and ROA governing documents
2. Industry, farming, processing, and supply chain practices
3. National and local legislation and rules, as well as their correct interpretation and application during an audit
4. Local social and cultural practices
5. Linguistic skills appropriate for the region or a translator is available

2. Auditor General Skills

Auditors shall have general skills of how to conduct a professional, efficient, accurate, and meaningful audit applying general principles of good audit practices to applicable operations and management systems. Auditors shall have:

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 to identify conflicting information and make judgments about the validity of the information received
5. Ability to identify risks and apply a risk analysis
6. Ability to conduct impartial and objective evaluations of the information gathered to determine compliance
7. Ability to be courteous and professional when reporting instances or situations of non-compliance
8. Ability to succinctly summarize observations and interview results
9. Ability to maintain the confidentiality of proprietary information
10. Ability and commitment to reporting findings on time
11. Working knowledge of sector-specific terminology and practices
12. Characteristics of being professional, ethical, open-minded, diplomatic, observant, adaptable, organized, collaborative, and impartial.

3. Auditor General Training Qualifications

1. A variance to any criteria in sections B.3, B.4, or B.5 can be requested for consideration on a case-by-case basis from the ROA Quality Assurance team. The ROA does not imply nor is obligated to approve a variance to the “high-bar” expectations of auditors and reviewers for ROC and will review and consider requests within 2 weeks of submission. All requests for a variance must be submitted to qualityassurance@regenorganic.org for review. Include at a minimum the following information with your request:
 1. Name of requestor
 2. Country(s) of operation affected by request
 3. Name of auditor or reviewer and title
 4. Current CV or resume of auditor or reviewer
 5. Reason for variance, supporting evidence, and risk analysis to audit integrity
 6. Name of operation(s) affected by the variance request
 7. A plan to come into compliance with criteria if applicable

2. The auditor should have completed at least one of the following **lead auditor training** courses recognized by the ROA:
 1. ISO/IEC 9001 - Quality Management Systems Lead Auditor Course
 2. ISO/IEC 14000 - Environmental Management Lead Auditor Course
 3. ISO/IEC 19011:2018 - Guidelines for auditing management systems
 4. ANSI/AAMI/ISO 13485: 2016/(R)2019
 5. Bureau Veritas Auditor Training Course
 6. SQF Internal Auditor Training
 7. GroupGAP Plus Auditor Training plus USDA Fundamentals of Auditing course
 8. Other lead auditor training recognized by the ROA

4. Pillar Specific Qualifications

4.1. Soil Health and Land Management

This section describes the minimum auditor qualifications for auditing to the soil health and land management pillar of the ROC Framework (standards).

4.1.1. EDUCATION

Auditors should have formal education in a related field, e.g., agriculture, agronomy, horticulture, land management, environment, or soil sciences, evidenced by the following

1. a conferred degree, diploma, or certificate granted from an accredited college, university, or educational institution, or equivalent number of completed courses in a related field of study.

4.1.2. TRAINING

Auditors should have formal training in auditing to organic program standards, i.e., International Organic Inspectors Association (IOIA) training course or other internal or external auditor training recognized by the ROA.

4.1.3. EXPERIENCE

Auditors must have documented work experience in auditing to organic farming operations for crops. At a minimum, one of the following must be met:

1. At least 8 completed organic crop program audits within the past 18 months as a lead auditor for small to medium sized grower operations with a high-performance rating by the CB.
2. At least 6 completed organic program audits within the past 18 months as a lead auditor for medium to large grower operations with a high-performance evaluation rating from the CB.
3. At least 4 completed organic program audits to large grower groups managed by an internal control system (ICS) within the past 18 months with a high-performance evaluation rating from the CB.
4. More than 5 years of related work experience in land management, crop management, agronomic consulting, crop production, training, natural resources, conservation, forestry, or environment.

4.2. Animal Welfare

This section describes the minimum auditor qualifications for auditing to the animal welfare pillar of the ROC Framework (standards).

4.2.1. EDUCATION AND TRAINING

Auditors should have formal education in a related field, e.g., animal science, meat science, veterinary science, agriculture, or animal welfare, evidenced by:

1. conferred degree, diploma, or certificate granted from an accredited college, university, or educational institution, or equivalent years of completed courses in a related field of study.
2. and at least one formal training course, certificate, or license from the following:
 - a. PAACO (Professional Animal Auditor Certification Organization)
 - b. FSNS C&A Auditor (Food Safety Net Services Certification and Audit)
 - c. NAMI (North American Meat Institute)
 - d. ISO / TS 34700 (animal welfare principles in livestock production supply chain)
 - e. VERITAS Animal Welfare course
 - f. FACTA (Farm Animal Care Training and Auditing)
 - g. Veterinarian
 - h. Other formal animal welfare training recognized by the ROA

4.2.2. EXPERIENCE

1. Auditors must have experience as an auditor to animal welfare standards or other significantly related work experience. At a minimum, one of the following must be met:
 - a. At least 5 completed animal welfare audits as lead auditor in the past 18 months to livestock operations with a high-performance rating by the CB.

- b. At least 3 completed animal welfare program audits as a lead auditor in the past 12 months for dairy operations if auditing to the ROC Dairy standards.
- c. At least 5 years of related work experience in herd or flock management or handling, i.e., veterinarian, ranch manager, dairy manager, herd manager, dairy supervisor, trainer, abattoir supervisor, or flock manager.

4.3 Farmer and Worker Fairness

This section describes the minimum auditor qualifications for auditing to the farmer and worker fairness pillar of the ROC Framework (standards).

1. ROC social fairness auditors should be familiar with the *ROA Global North Social Audit Manual*.
2. There are two levels that ROC auditors can be approved for: a) low risk operations in “Global North” designated countries, or b) medium-high risk operations in all other countries worldwide. Auditors in the Global North must qualify at a minimum for low-risk level for social fairness.

4.3.1. Low-risk auditor qualifications

Low Risk Social Fairness Audit is a low-risk farmer and worker fairness audit of a family owned and operated farm or ranch located in the global north with less than 5 direct hire employees in a calendar year with no third-party contract laborers; no H2A workers; and no hired adolescent labor under age 16.

1. EDUCATION AND EXPERIENCE

Auditors for low-risk social fairness audits should have 1) evidence of formal education, e.g., college or university degree or diploma in social sciences, social justice, or a related field of study; or 2) an equivalent number of formal courses by an educational institution, and 3) experience as a lead auditor.

2. TRAINING

The low-risk operation auditor shall have had at least one in-person shadow audit or mock audit interview with feedback and at least one of the following trainings:

- a. SOCIAL AUDITS - Regulatory framework and methods online course by Ecocert Academy
- b. ROA/Equitable Food Initiative (EFI) Training for ROC social auditors
- c. SA 8000 Introduction and Basic Auditor Training by SAI
- d. Ecocert Social Auditing Techniques for Fair for Life course
- e. Other social auditor training recognized by the ROA, e.g., IFOAM COROS criteria 10.

4.3.2. Medium to high-risk audit qualifications

1. EDUCATION

Auditors for high-risk operations for social fairness should have evidence of formal education by meeting one of the following:

- a. Certificate, diploma, college or university degree in social sciences, anthropology, social justice, sustainability, education, psychology, or counseling or related educational field
- b. Equivalent number of formal courses by an accredited educational institution

4. TRAINING AND CERTIFICATION CREDENTIALS

The high-risk operation social fairness auditor shall have met, at minimum, one of the following:

- a. SA 8000 training course by SAI (Social Accountability International)
- b. SMETA (SEDEX Members Ethical Trade Audit)
- c. WRAP (Worldwide Responsible Accredited Production)
- d. IRCA (International Register of Certificated Auditors)
- e. Ecocert Social Auditing Techniques for Fair for Life course
- f. Social Responsibility Auditor (ISO 26000)
- g. APSCA membership in Good Standing
- h. Certified Social Compliance Auditor (CSCA), plus signed APSCA's Code of Professional Conduct.
- i. Registered Auditor (RA), plus signed APSCA's Code of Professional Conduct

5. EXPERIENCE

The auditor shall have at minimum, experience in auditing social standards, at least 10 relevant audits, or 30 relevant working days as a social fairness standards auditor or trainee within the past 2 years.

6. SKILLS

- a. Knowledge of International Labor Organization (ILO) Conventions Labor Standards terms and definitions
- b. Knowledge of local labor laws
- c. Knowledge of local wage information and calculating living wage

Annex C - Technical Reviewer Requirements

1. The three pillars in which a technical reviewer can be approved are 1) soil health and land management, 2) animal welfare, and/or 3) social fairness.
2. New reviewers for the ROC program must undergo qualifications review by the CB, which includes evaluating education, training, and experience. Only qualified technical reviewers make decisions.
3. Technical Reviewer requests for adding in MyROC shall be sent to the qualityassurance@regenorganic.org.

1. Technical Reviewer General Qualifications

1. Technical Reviewers must demonstrate the necessary training, experience, and competency for reviewing and making certification decisions to the ROC pillar(s) in which they are assigned.
2. All technical reviewers shall complete and pass the ROC program training from ROA.
3. Technical Reviewers shall pass the required asynchronous ROC training modules for each assigned pillar using the Trainual.com online training platform and myROC training.

2. Technical Reviewer General Knowledge

1. Knowledge of ROC Framework and ROA governing documents knowledge
2. Knowledge of industry, farming, processing, handling, and supply chain practice knowledge
3. ROC label review procedures
4. Input reviews, i.e., pesticides and herbicides are reviewed to toxicity to bees and pollinators.

3. Technical Reviewer Skills

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 to identify conflicting information and make judgments about the validity of the information received
5. Ability to conduct impartial and objective evaluations of the information gathered to determine compliance
6. Ability to maintain the confidentiality of proprietary information
7. Ability and commitment to reporting findings in a timely manner

Annex D - ROC Decision Letter Template

CBs are encouraged to use the *ROC Decision Letter* template but not required. However, the information in items 1- 6 below must be included in the letter sent to the operator and ROA.

Date:

Contact Name

Operation Name

Address

Email address

ROC™ Certification Decision

Dear Contact Name,

We have completed the audit process and issued a certification decision dated XX/XX/XX for the Regenerative Organic Certified™ (ROC™) Program. Congratulations on achieving ROC. You are being recommended for certification to the Regenerative Organic Alliance (ROA) for the following:

- 1. ROC™ Pillars:**
- 2. Level:**
- 3. Location(s):**
- 4. Crop(s):**
- 5. Acreage:**
- 6. Product(s):**

ROA will issue your ROC certificate to you electronically.

We appreciate your dedication to Regenerative Organic Certified™ agriculture!

Sincerely,

Annex E - Closing Meeting Template

CBs can optionally use the *Inspection Affirmation for ROC* to record information and findings at the onsite exit meeting with the operator. Provide a copy to the operator and the ROA.

INSPECTION AFFIRMATION FOR REGENERATIVE ORGANIC CERTIFIED™							
Operator Name:			Phone or email:			Date:	
						Audit Year:	
Address or Location:						Country:	
Baseline certifications for ROC:							
# Direct hire permanent workers annually:			# Direct hire seasonal workers annually:			# Contract laborers annually:	
Name of Grower Group ICS (if applicable):						# Group members:	
Name(s) processors and/or buyer(s):						Location(s):	
Type of crop / livestock	Level	# Acres/ head	# Field parcels	# Soil tests	# Soil health analysis	Projected yield	Estimated Gross sales revenue \$ USD
Exit Interview summary:							
Summary of findings:							
Date of first sale:		Timing needs for decision:				ROC logo use: YES or NO	
Signature of authorized person(s):						Date:	
Name and Signature of organic inspector:						Date:	

Annex F - Non-conformity classification and management

Findings that are identified during an audit shall be classified according to the levels set by ROA and entered in the myROC platform by the CB denoted as “findings”.

The findings-review models that are identified during an audit shall be classified by the CB according to the types set by ROA and available in the myROC platform:

- a. Critical Tolerance (CT) (Classified as a serious non-compliance)
- b. Major Non-Compliance
- c. Minor Non-Compliance
- d. Observation
- e. Recommendation
- f. Reminder

The available settings for the status of findings are available in myROC.

The CB shall issue non-conformities for the specified requirement to the indicated pillar and certification level (bronze, silver, or gold). For all other requirements, the certification body shall assign a type to each finding based on the requirements below.

1. The certification body shall apply the specified timeline for each finding type based on its certification level. Shorter timelines may be given when the certification body believes they are justified.
2. Evaluation of non-conformities shall be conducted on-site when this is needed for credible evaluation of the non-conformity. The use of alternative synchronous technologies (e.g., remote video conferencing) should be considered prior to requiring an additional site visit.
3. In all cases, the ROC decision should be issued within 65 days of an initial audit.

1. Critical Tolerance (CT) Guidelines

Critical Tolerances shall be issued in the following circumstances:

1. For requirements which are indicated as a major non-compliance with the requirements in the ROC standards or does not meet a specific pillar requirement.
2. The CT results in or may result in a fundamental or systematic failure to meet the objectives of the Standard. This may be indicated by findings which:
 - a. continue over a long period of time
 - b. are repeated or systematic and cover two or more pillar scopes
 - c. affect a wide area
 - d. affect the integrity of the product or the ROC standard, or
 - e. are not corrected or adequately addressed once they are identified

3. When a ROC certificate includes a large number of sites (including grower groups) and a site receives a critical tolerance, the site may be suspended from the certificate to avoid suspension of the entire group ICS.
4. If a CT occurs prior to certification the certification decision shall not be issued if not resolved and closed.
5. If a CT happens during the renewal audit, the operator has 30 days from the exit meeting to resolve before the suspension process is enacted.
6. Certificate decision shall not be renewed with outstanding critical tolerance(s).
7. All CTs must be reported to ROA immediately at certification@regenorganic.org.
8. ROC certification decisions shall be suspended if there are five or more open critical tolerances

2. Non-compliance (NC) Guidelines

Non-conformities shall be issued in the following circumstances:

1. For requirements which are indicated as a non-compliance with the requirements in the ROC standards, or
2. An NC is a moderate non-compliance finding this is a non-systematic failure to meet the objectives of the ROC standards. This may be indicated by non-conformities which:
 - f. affects a small area or small number of animals
 - g. affects a single certification level (bronze, silver, or gold)
 - h. a single event or practice or incident
 - i. may affect the integrity of a ROC claimed product or material if left uncorrected
 - j. includes a small number of group sites within an ICS managed grower group
 - k. occur when a single observed lapse has been identified in a procedure required as part of the client's management system or the non-conformity is a temporary lapse, non-systemic, limited in scale, or does not represent a fundamental failure to achieve the objectives of the ROC standards.
3. Closure is due 60 days from audit closing meeting
4. If no corrective action is received by the due date, the non-conformity is upgraded to become a critical tolerance with a timeline 30 days from the original deadline, or if it is specific to a certification level, the operation will be downgraded to a lower level in which it does meet the ROC standards.

3. Recommendation (R)

1. Recommendations are criteria that have been included as examples of best practice. They may indicate future expectations and flag what may be coming in a future version of the ROC standards.
2. There is no consequence if not closed. There is no timeline for closure.
3. Recommendations shall be issued for any criteria which are not met, and which are identified as recommendations.
4. Recommendations shall be issued using 'should' language.
5. The certification body is not required to follow up on recommendations.

6. The certification body shall ensure that recommendations do not represent consultancy (see ISO17065 3.2).


4. Sample corrective action tracking record for use by reviewers

1. General Information about the client and the ROC audit					
Operator Name:			Audit Date:		
Name of Grower Group ICS (if applicable):			Audit year:		
Operation Locations(s) (municipality/state/country):					
# Direct hire permanent workers annually:		# Direct hire seasonal workers annually:		Contacted Labor: YES or NO	
Baseline certifications for ROC:					
Type of crop / livestock	Certification Level	Pillar	Finding Type	Field or Group ID	Notified ROA
2. Table of Findings and Corrective Actions from ROC Audit and Reviews					
Due Date	NC # or CT #	Framework Criteria	NC Evaluation comments		
3. Corrective Action Plan					
NC #	Detailed Plan	Supporting docs provided	Deviation Request	Implement Date	Responsible Person

NC #	Detailed Plan	Supporting docs provided	Deviation Request	Implement Date	Responsible Person
NC #	Detailed Plan	Supporting docs provided	Deviation Request	Implement Date	Responsible Person
4. CB Reviewer Decision					
CB response to client		Status of NC	Date	If not closed, state reason	

Annex G - Sample ROC Certificate and Profile

Certificates and Profile are generated by ROA from the information in MyROC.org database platform. Examples are shown below of the certificate and client profile.



**Regenerative
Organic
Certified™**

CERTIFICATION ACKNOWLEDGMENT

This is to certify that

ROC Test Farm
16 Conscious Way
Asheville, North Carolina 28806 UNITED STATES

has been inspected and assessed under the ROC Framework for
REGENERATIVE ORGANIC CERTIFIED™:

ROC SILVER LEVEL

for the following pillars:

- ✓ Soil Health and Land Management
- ✓ Animal Welfare
- ✓ Farmer and Worker Fairness

CERTIFIED ROC CROPS AND LOCATIONS: See Client Profile

CERTIFIED BY: TESTCAB

SINCE: 29 Sep 2021

CERTIFICATION ISSUE DATE: 24 May 2022

ANNIVERSARY DATE: Certified operations are required to submit annual updates to ROA by January 1 of each year.

CERTIFICATION NUMBER: ROC0221-0099

AUTHORIZED BY:

Elizabeth Whitlow

Elizabeth Whitlow, Executive Director

Once certified an operation's ROC™ certification continues in effect until surrendered, suspended, or revoked.

Regenerative Organic Alliance • P.O. Box 622 Graton, CA 95444 • regenorganic.org



PUBLIC CLIENT PROFILE

This client profile must be accompanied by the ROC certificate to be valid and does not alone constitute a certificate.

ROC Test Farm

16 Conscious Way
Asheville, North Carolina 28806 UNITED STATES

ROC Level	SILVER
ROC ID	66
Locations	Cloverdale Fields, Corner Farm, Home Farm, Jone's Farm, Morningside
Total ROC Acres	726.00
Crops	Abaca, Acai Berries, Anise, Bananas, Blueberries, Hay, Hemp, Huckleberries, Kernza, Mangos, Pasture, Vetch
Facilities	ROC Test Farm Creamery
Livestock	Bison, Broilers, Horses, Milking Goats
Products	Goat Cheese

AUTHORIZED BY:

Elizabeth Whitlow

Elizabeth Whitlow, Executive Director

Regenerative Organic Alliance • P.O. Box 622 Graton, CA 95444 • regenorganic.org

Addendum to certification number: ROC0221-0099

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Annex H - List of ROA Documents

ROA documents are publicly available at <https://regenorganic.org/resources/>

1. Regenerative Organic Framework (standards)
2. Dairy Animal Welfare Criteria
3. Processor Criteria
4. Steps to Certification
5. Application form operators
6. Renewal Application form for operators
7. Operator Information and Contract
8. Cost and Fee Structure for operators and supply chain actors
9. ROC Program Manual
10. Disputes Process
11. Complaint Form
12. Supply Chain Actor registration form
13. Supply Chain Actor license application form
14. Supply Chain Guidelines
15. Supply Chain Claimed Materials Worksheet
16. Labeling Guidelines & Terms of Use
17. License Agreement for brands
18. Communications and Marketing Guidelines for operators and supply chain actors
19. Group Certification & Sampling Methodology
20. Regenerative Organic System Plan (ROSP)
21. Soil Health In-Field Testing Worksheet
22. Soil Sampling Guidelines
23. Soil Testing Field Guide
24. Auditor Application form
25. Certifying Body Application
26. Cost and Fee Structure for Certifying Bodies
27. Deviation Request Form
28. Framework Criteria Interpretation Request Procedure
29. Procedure for Review & Approval of Auditors
30. Remote Auditor Policy
31. Required Baseline Certifications & Equivalency Assessment
32. ROA Policy for Accepting Corporate Funds
33. ROC Approved Certifying Bodies list
34. ROA Terms and Definitions
35. ROC Operations Manual for CBs

Annex I - Standards Criteria Interpretation Request Form and ROA Responses

CBs should follow the *Framework Criteria Interpretation Request Procedure* available at [Regenorganic.org/Resources](https://regenorganic.org/Resources) when completing this form. It is also [available in Excel format](#) for download online. Completed form should be submitted by the 5th of the month to qualityassurance@regenorganic.org. CBs should allow up to 30 days for a response. If a request is urgent, please indicate “urgent” in the subject line of the email. Responses will be returned to the CB via email.

CB Standards Criteria Interpretation Request Form				
Date:				
CB Name:				
Name of submitter:				
	Priority processing (High, Low)	Pillar	Criteria number	Question (please provide supporting details)
1				
2				
3				
4				
5				

Annex J - ICS managed group certification procedures

1. Requirements for Internal Control System

1. The grower group shall be established formally, based on written agreements with its members. It shall have a central management, established decision procedures and be a legal entity.
2. The grower group shall have in place an effective and documented internal control system.
3. The grower group may be organized by itself, that is, as a co-operative, or as a structured group of producers affiliated with a processor or brand.
4. The audit of the ICS shall include an evaluation of the ability of the ICS to manage the group members.
5. The practices of the grower group operation shall be uniform and reflect a consistent process or methodology, using the same inputs and processes.
6. Participation in the grower group shall be limited to those members who market their ROC products only through the grower group, unless the member is individually certified

2. ICS certification

1. The CB shall approve the certification of new sites upon request from the ICS, provided that the ICS provides documentation to demonstrate that the site is in conformity with the requirements of the Standard, including a report of an inspection by the ICS
2. ROC audits of group certifications shall consist of:
 - a. an audit of the internal control system (ICS) for the group
 - b. an audit of a sample of group members
 - c. an audit of each site included in the scope certificate, which is not part of the group, or does not meet the criteria to be a group member.
3. The certification body shall conduct a risk assessment on the group to determine the sampling rate to be used, based on the risk criteria and sampling rates in the *ROC Group Certification & Sampling Methodology*.
4. Non-conformities may be issued to the ICS or to one or more sites. If the same non-conformity is identified at several sites, it shall be a systemic issue within the group and shall be issued to the ICS.
5. The internal control system shall have a procedure to remove noncompliant group members from the list. The CB should be notified when a (noncompliant) member is suspended or when a member voluntarily withdraws.
6. The internal control system shall record all nonconformities related to ROC. The ICS shall require from the operator to respond to any NCs related to ROC issued by the ICS within 30 working days of its receipt. The response shall either provide evidence of completion of corrective action taken to address each NC or present a plan with

milestones as to how each NC will be addressed. This plan shall include a completion date not exceeding 90 working days from receipt of the NCs. The ICS shall accept times greater than those stated for the closure of a NC as long as they are justified and documented.

3. Maintenance of ICS certification

The CB shall ensure that the grower group maintains an updated list of all members and informs the CB in a timely manner anytime there are changes to the status of the members and changes to the group as a whole.

The **ROC Approved Farmers List** must be maintained and include ROC farmer names, locations, parcel ID, crops, hectares, or acres, social fairness certification status, organic status. Farmers in transition for the baseline certification are not eligible and should not be listed on the ROC Approved Farmers List.

4. ICS Records

The CB shall ensure that the ICS managed grower group has adequate record-keeping for the individual production units, sites, or facilities within a grower group.

5. ICS Certification documents

The CB shall provide certification decision documents to the ICS as a whole. Members within a grower group cannot possess individual certificates unless that member has obtained its own ROC certification independent from the ICS.

6. ICS Suspension and cancellation

1. The CB shall hold the ICS as a whole responsible for compliance of all members.
2. The CB shall suspend or cancel the certification granted to the grower group as a whole in cases where the grower group's internal control system fails to act on outstanding non-compliances.

Annex K - Document Management for myROC

Certifying bodies are required to use the myROC.org Intact (Ecert) database platform for input, tracking, and accessing critical data for each ROC client certification process. The CB shall document the certification process sufficiently to allow the auditing and tracking procedures from application review to certification decision. Document management for ROC will likely include a hybrid approach of using both the CB's internal data management procedures and the ROA myROC platform procedures. This annex describes the basic expectations and requirements for data management for ROC that has been created by the Certification Team at the ROA.

Document management is performed continuously throughout the contracted ROC service with a Client, including Application Review (AR), Initial Review (IR), Final Technical Review (FR), and during the certification cycle including renewal.

Specific Work Instructions on how to perform these tasks in myROC can be found on in the **Trainual.com** portal.

2. File management in myROC

Electronic files in myROC must be maintained to show the correct file type and status. Inactive file status will be periodically hidden in order to reduce clutter by the ROA staff.

The **myROC Work Instruction for file management** is linked in Trainual.com

1.1. List of File types and their purpose

- General
- Application Advancement to CB
- Label
- Letter
- Map
- Organic Baseline Certificate
- Social Fairness Baseline Certificate
- Animal Welfare Baseline Certificate
- Additional Certificate
- Regenerative Organic System Plan (ROSP)
- ROA Contract
- ROC Contract
- Soil Test Results
- ROSP addendums/Supporting Documents
- CB Decision Letter
- Organic System Plan
- Approved Farmers List
- Grower Group ICS Manual
- Retired Document
- Archived ROSP

1.2. File Management Best Practices

1. Files that are entered in myROC through a **"Finding"** cannot have their file type changed. They will remain for *"evidence of implementation"*. If you need to change a file type such as a Revised Map, ROSP, or Approved Farmers List, follow the steps below.

- a. Any files that should have a different file type must be uploaded in the **Files** tab and the appropriate file type applied.
- b. The file name details should be identified in the appropriate comment area of the *Finding*. For example, the wording "See file 'ROSP updated 05112022'" should be placed as an "*evidence of implementation*" comment.
2. Correspondence should be identified appropriately in myROC by File Type.
 - a. For example, the CB Certification Decision, will be file type "*CB certification decision*" and not as "*letter*".
 - b. Other correspondence that does not have a specified "*File Type*" should use "*letter*" file type.

1.3. ROSP maintenance

ROSP revisions must be incorporated into the ROSP file during Final Review (FR) and the full ROSP uploaded to myROC. Do not upload sections of the ROSP as separate ROSP files.

1. The ROSP will be uploaded with the **File Status** "*Active*" and **File Type** "*Regenerative Organic System Plan*".
2. If revisions need to be made to the ROSP, the individual sections that were changed and uploaded by the CB should be incorporated into the original ROSP file.
 - a. The new revised ROSP document should be uploaded to myROC with the correct file status and file type.
 - b. The outdated ROSP document should be changed to show **File Status** "*inactive*" and **File Type** "*Archive ROSP*".
 - c. Obsolete documents should be assigned **File Type** "*retired document*" and File Status "*Inactive*."

If there is additional information obtained in the audit and recorded in the audit report that the CB believes should also be updated in the ROSP, the reviewer can make the update referencing the audit report. The reviewer should initial and date the change to the ROSP. ROC Clients should always be notified about their revised ROSP and sent an updated copy for their records.

3. Additional documents referenced in the ROSP such as supply chain maps, workflows, charts, recipes, ingredient sheets, SOPs, or SSOPs, should have **File Type** "*ROSP addendums*."

1.4. Listing Crops

Listing ROC approved crops in myROC portal must follow the ROA guidelines in this section.

Note: Crop acreage should be included for each crop entered in myROC.

1.4.1. CROP ELIGIBILITY

1. Crops must be listed on the baseline organic certificate used for ROC eligibility.

2. Crops must be included on the social fairness 3rd party certificate if applicable.
3. Crops targeted for ROC must have been audited and are from ROC approved fields.

1.4.2. SPECIAL CROP VARIETIES AND NAMES

There are dozens of crop variety names which may not yet be added to the myROC database. When a specialty crop variety name is listed on the organic baseline certificate and not yet added myROC, contact the ROA at myroc@regenorganic.org to inquire about getting the variety added to the master list of crop varieties.

1.5. Listing Products

Processed products made with ROC ingredients can be listed on ROC certificates. Product review information and supporting documentation must be entered in myROC based on the guidelines in this section below.

1.5.1. PRODUCT ELIGIBILITY FOR THE CERTIFICATE

To be eligible for certification:

1. The product name must be on the baseline organic certificate used for ROC eligibility.
2. The product must be included on the social fairness 3rd party certificate, if applicable.
3. The product must be produced in a facility included in the ROC audit.

If 1.5.1.c is not met, the processor or brand owner will need to include the product under a License Agreement with the ROA.

1.5.2. SUPPORTING DOCUMENTATION FOR PRODUCTS

The ROC technical review and audit must include an evaluation and product verification of the following:

1. *The Product Formulation Worksheet*
2. *Supply Chain Map*, i.e., workflow of chain of custody steps
3. Approved ROC Label(s)
 - a. Current approved labels must be clearly indicated with approval date and reviewer initials and uploaded with **File Type** of "Label" and applicable **File Status** as "Active". Labels should be uploaded in the Labels section of the Product Entry in myROC.
 - b. Labels no longer in use should have a File Status of "Inactive."

1.6. Listing Livestock

Listing ROC approved livestock in myROC portal must follow the ROA guidelines in this section.

1. Livestock must be listed on the baseline organic certificate used for ROC eligibility.
2. Livestock eligible for ROC must be included on the animal welfare baseline certification.

3. Livestock targeted for ROC must have been audited and included in the audit report.

Note: The number of each livestock should be included in myROC for each livestock type entered in myROC.

1.7. Listing Fields and Parcels

1. Eligible Locations are also termed “*Fields*” and listed in my ROC and must include these guidelines:

- a. Fields must be certified organic and included in the baseline certification.
 - b. Fields must be included in the social fairness 3rd party certification, if applicable
3. A parcel is defined as a distinct piece of land with no adjacent or touching borders to other parcels. A parcel can be divided up into one or more fields. The following guidelines should be applied when entering fields and parcels in myROC.
- a. Listing “*Fields*” and/or “*Parcels*” in myROC for a Single Producer operation should reflect all the production land-base to be ROC certified. “*Fields*” and “*Parcels*” entered in myROC are listed as “*Locations*” on the ROC certificate.
4. Entering “*Fields*” for Grower Group operations in myROC
- a. Enter one field for per ICS managed grower group(s).
 - b. The name can be “grower group”.
 - c. The field’s total acreage will be the summation of all the acres for the group(s).
 - d. The comment for the field must include: 1) the total number of groups, 2) the total number of farmers, and 3) refer to the Approved Farmers List.

1.7.3. GUIDELINES FOR IDENTIFYING PARCELS AND FIELDS

1. ROA identifies distinct parcels and any individual “*fields*” in myROC. Each field entered into myROC would be distinct parcels of land, with no adjacent or touching borders, that an auditor would need to visit. If the farmer has multiple contiguous fields, that is one parcel.
 - a. Fields that are separated by municipality maintained roadways would be classified as a separate parcel in myROC. A field or farm access road would not require a separate parcel designation in myROC.
 - b. Natural features of the land may not indicate a separate parcel in myROC. The CB should evaluate the seasonal nature of grass waterways versus a permanent irrigation ditch or stream.

NOTE: ROA recognizes that adjacent fields may be considered differently to some organic certifier’s due to organic status eligibility dates. The purpose of the field data in myROC is not to track organic eligibility, but to track ROC eligibility, therefore ROA parcel data may differ from the baseline certification data. If new fields are eligible for ROC, they will be entered into myROC with the applicable ROC status date and a new Field/Parcel should be created.

2. The parcels in myROC will be numbered and must include a “name”. The number is required, but not listed on the certificate. The name is important because it is listed on the client profile page with the issued certificate.

a. The name for each parcel should be the identifiable name or number the farmer uses. There must be a name entered for each parcel in myROC.

NOTE: If the farmer does not have a name for the parcel, but instead refers to it as numbered fields, i.e., Fields 1-10 are, or Blocks 4a and 4b, then the name of the parcel can be “Fields 1-10” or “Blocks 4a and 4b.”

b. The acreage for each parcel must be the correct total acres for that individual parcel.

- The ROC certificate includes the sum of each parcels acres.
- The individual crop acreages within the parcels/fields will be listed in myROC.

c. Since distinct parcels listed on the OSP may contain one or more contiguous or adjacent fields, the field numbers or names must be included in the comment field of the “Field” in myROC. For example, “Greenfield parcel contains fields 1- 3”

Below is a screenshot from myROC of the Field Form for data entry and the field data that should be entered.

The screenshot shows a web-based form for entering field information. The breadcrumb trail at the top reads 'Audit orders > Field information (66 - ROC Test Farm) > Field 1 Home Farm'. On the left, a sidebar menu contains 'Details', 'Crops', 'History of crops', 'Lots', 'GEO code', and 'Service'. The main form area contains the following fields:

- Field no.:** 1
- Name:** Home Farm
- Country:** UNITED STATES
- Town:** Nashville
- acres:** 100.00
- State:** Tennessee
- ha:** 40.47
- District:** 123 Main st
- ft²:** 4,356,000
- Start of use:** 5/12/2020
- End of use:** (empty)
- Last application of prohibited products:** (empty)
- Date first certification:** (empty)
- Applied product:** (empty)
- Ownership:** --
- Status field:** --
- Type of use:** --
- Comment:** Includes fields 1-23.
- Text field 1:** (empty)