

# ROC Textile Guidelines

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# Textile Processing and Labeling

## 1.0 Introduction

These ROC Textile Guidelines provide guidance and requirements for issuing claims and on-package labeling by authorized licensees in connection with Regenerative Organic Certified™ (ROC™) products. ROC is a farm-level certification, and all product or material claims refer to the certification status of the farm in which the certified product and/or claimed material was originally sourced from. Any business making a ROC claim of any kind must either be Regenerative Organic Certified or have an approved license agreement with the Regenerative Organic Alliance (ROA). Any products or materials that use a Regenerative Organic Certified mark must be approved prior to publishing, including:

- Packaging artwork with the Regenerative Organic Certified seal;
- Packaging artwork with a Regenerative Organic Certified or regenerative organic content claim;
- Any other marketing or promotional materials that include the Regenerative Organic Certified seal.

The ROC Textile Guidelines follow a structure and framework based on the United States National Organic Program (NOP) regulated labeling requirements for organic products. This document refers to the *Title 7, Subtitle B: Regulations of the Department of Agriculture* section of the U.S. regulatory code (found [here](#) or at [ecfr.gov](#)). This document refers to *Part 205: National Organic Program of Title 7*. Any ROC claims made must not conflict with the labeling or other requirements of the NOP.

Reference ROA Terms and Definitions document on [regenorganic.org/resources](https://regenorganic.org/resources).

## 2.0 Applicability

These Guidelines apply to agricultural products and crops resulting from operations or portions of operations certified to the Regenerative Organic Certified (ROC) standard. These Guidelines shall be administered consistent with the ROC Framework, Supply Chain Guidelines, License Agreement, Program Manual, Operation Information and Certification Contract, and Cost & Fee Structure (collectively known as the “Governing Documents”) supported by the ROA Communications & Marketing Guidelines.

ROC product must also be certified USDA/NOP Organic (or an approved international equivalent formally set by a trade agreement). All USDA/NOP Organic regulations apply and

the provisions of Regenerative Organic Certified should be interpreted and applied in parallel to NOP requirements.

Product that is intended to carry ROC claims must meet all criteria for USDA/NOP Organic labeling described in *Part 205, Subpart B*. This includes restrictions on the use of synthetic substances and contents, prohibited nonorganic substances or processing aids, methods excluded by NOP, ionizing radiation, and sewage sludge in the processing or handling of certified product. Refer to the USDA/NOP Organic labeling criteria for a complete list of prohibited processing and handling practices.

ROC product includes products with one or more components, in raw or processed form, that has maintained an appropriate chain of custody throughout the supply chain. In this document, the term “certified product” refers to agricultural material from a ROC Bronze, Silver, or Gold certified operation or portion of an operation as certified by a ROA Approved Certifying Body.

### 2.1 Prerequisites for ROC Seal Use

Use of the ROC marks (the Regenerative Organic Certified name and all other trademarks, certification seals, logos, or any other proprietary designations owned by the Regenerative Organic Alliance) is dependent on meeting all requirements laid out in the Governing Documents. As the ROC Framework and Governing Documents are subject to change, use of the ROC seal is dependent on meeting all requirements in the version published at [RegenOrganic.org](https://RegenOrganic.org) at the time of production. Producers use of the ROC seal is dependent on having been awarded ROC status and having provided all details required by the ROC Supply Chain Guidelines. Producers must have a valid ROC certificate issued by the ROA in order to use the ROC seal or sell products as Regenerative Organic Certified. Any brand, entity, business, or organization responsible for making a claim by using the ROC seal, “Regenerative Organic Certified,” must have completed a License Agreement and paid any relevant fees. Any brand, entity, business, or organization handling ROC products for a ROC Operation or Licensee that does not take ownership of the product(s) and is not selling ROC products on the open market must be included in GOTS or OCS certifications or must register with the ROA.

## 3.0 Seal & Content Claim Guidelines

### 3.1 General

In order to display the ROC seal on product, the product must meet all requirements for the labeling of textiles products as organic under the NOP and in accordance with the 2011 USDA Policy Memo on Labeling of Textiles That Contain Organic Contents, addressing processing facilities. All labeling must also abide by the U.S. Federal Trade Commission’s

(FTC) [Textile and Wool Acts](#) and any other government regulations regarding the labeling of textiles that may be applicable to the locality in which the product is being produced and/or sold. In order for a ROC claim to be made, all processors/handlers in the supply chain must be certified to GOTS or the [Textile Exchange's Organic Content Standards \(OCS\)](#). The ROC claim must not conflict with NOP requirements for organic content claims for textiles. Claims must not imply or lead the consumer to believe that the finished product is certified under the NOP regulations unless it is certified in accordance with the NOP regulations.

### 3.2 Allowable Content Claims

Consumer facing content claims for textiles include, but are not limited to, hang/swing tags, claims displayed permanently on product, claims displayed on packaging and claims displayed online. Claimable textile material must be specified as Regenerative Organic Certified, and the percentage of ROC material may be listed. All claims must be made in alignment with the product's percentage of Regenerative Organic Certified content. For products sold in the US, claims must not conflict with NOP requirements for organic content claims for textiles. For products sold outside of the US, claims must not conflict with any government regulations regarding the labeling of textiles that may be applicable to the locality in which the product is being sold.

On consumer facing content claims the certification level may be listed separate from the ROC claim where use of the full ROC claim with certification level is prohibitive due to design and construction. In such cases the certification level must be represented below or next to the primary ROC claim.

#### **3.2.1 100% Regenerative Organic Certified [Specified Materials]**

Product that contains 100% ROC claimed material by weight may use the "100% Regenerative Organic Certified™ [Specified Materials]" claim and/or the applicable ROC seal. The product weight for ROC textiles is based on the weight of the textile minus the weight of uncertified trims and accessories (trim, zippers, shoe soles, etc.) The "100% Regenerative Organic Certified™ [Specified Materials]" or "100% Regenerative Organic [Specified Materials]" claim may be used as a consumer facing claim.

The finished product cannot use "Regenerative Organic Certified™" in the product name product (ex. product cannot be called "Regenerative Organic Certified Hoodie" or "Regenerative Organic Certified Slippers") \*. The certification claim must specify the certification level and textile material, i.e., "100% Regenerative Organic Certified™ Silver Cotton" or "100% Regenerative Organic Certified™ Gold Hemp." The 100% ROC claim must not conflict with NOP requirements for organic content claims for textiles.

Only products that are eligible to be labeled as organic finished products, (e.g., an organic t-shirt), and are eligible to use the USDA organic seal, or an approved international equivalent, on-product are eligible to make ROC finished product claims.

### **3.2.2 Regenerative Organic Certified [Specified Materials]**

Product that contains at least 95% ROC material by weight or volume may use the “Regenerative Organic Certified™” claim and/or the applicable ROC seal. The “Regenerative Organic Certified™” or “Regenerative Organic” claim may be used on the principal display panel, the seal used must be appropriate to the certification level of the claimed material. The certification claim must specify the certification level through seal color/text and/or written description, (i.e., “Regenerative Organic Certified™ Silver” or “Regenerative Organic Certified™ Gold.”) see Section 4.3 of this document for examples. The ROC claim must not conflict with NOP requirements for organic content claims.

The remaining non-claimed material (up to 5% of the product, by weight or volume) may be organic or nonorganic (conventional). If the product contains any combination of Bronze, Silver, and/or Gold content, any claims must defer to the lowest certification level.

### **3.2.3 Contains Regenerative Organic Certified [Specified Materials]**

Product that contains at least 50% and less than 95% ROC material by weight may use the “Contains Regenerative Organic Certified™ [Specified Materials]” claim as a consumer facing claim, which may not list more than three certified materials. The product weight for ROC textiles is based on the weight of the textile minus the weight of accessories (trim, zippers, shoe soles, etc.) The finished product cannot be represented as a “Regenerative Organic Certified™” product or state “Made with Regenerative Organic Certified™ Content.” The ROC claim must not conflict with NOP requirements for organic content claims for textiles.





The “Contains” claim may not list more than three materials that are fully claimable as ROC. For example, allowable claims include “Contains Regenerative Organic Certified™ cotton, hemp, and wool” or “Contains Regenerative Organic Certified™ cotton and hemp.” The textile claim may be specified as ROC Bronze, Silver, or Gold.

The remaining non-claimed material (up to 50% of the product by weight) may be organic or nonorganic (conventional). Any nonorganic material must meet the criteria of NOP standards for allowable production methods and excluded substances (e.g., non-irradiated, non-GMO, etc.). Brand, entity, business, or organization producing products that make a “Contains Regenerative Organic Certified™ [Specified Materials]” claim must submit a [Declaration of Non-ROC Content for Textiles form](#), attesting that all non-ROC contents in these products meet the NOP standards.

### **3.2.4 Specified Regenerative Organic Certified Material Content**

Product that contains less than 50% ROC material by weight or volume may not display the ROC seal anywhere on packaging or use the term “Regenerative Organic Certified™” on the consumer facing claim except for the content claim. The remaining non-claimed material (over 50% of the product by weight) may be organic or nonorganic (conventional).

### 3.3 Content Claims Summary

ROC Content	Claim	Seal	Claim Description	Requirements
100%	<b>100% Regenerative Organic Certified™</b>	 Regenerative Organic Certified™ OR  Regenerative Organic Certified™ BRONZE	<ul style="list-style-type: none"> <li>Product claim allowed on principal display panel</li> <li>ROC seal must be used with appropriate level designation</li> <li>Regenerative Organic Certified contents may be identified</li> </ul>	<ul style="list-style-type: none"> <li>Product contains 100% ROC contents (by weight or volume)</li> <li>Product is certified 100% USDA/NOP Organic (or an approved international equivalent)</li> </ul>
Greater than or equal to 95%	<b>Regenerative Organic Certified™</b>	 Regenerative Organic Certified™ OR  Regenerative Organic Certified™ BRONZE	<ul style="list-style-type: none"> <li>Product claim allowed on principal display panel</li> <li>ROC seal must be used with appropriate level designation</li> <li>Regenerative Organic Certified contents may be identified</li> </ul>	<ul style="list-style-type: none"> <li>Product contains at least 95% ROC contents (by weight or volume)</li> <li>Product is certified at least 95% USDA/NOP Organic (or an approved international equivalent)</li> <li>Remaining contents can be organic or nonorganic</li> <li>Nonorganic contents must meet the criteria of the USDA/NOP Organic standards</li> </ul>
Greater than or equal to 50%	<b>Contains Organic Certified™ [Specified Contents]</b>	No ROC seal use permitted	<ul style="list-style-type: none"> <li>“Contains” claim may not list more than three Regenerative Organic Certified contents</li> <li>Regenerative Organic Certified content may be identified on the information panel</li> </ul>	<ul style="list-style-type: none"> <li>Product contains at least 50% ROC content (by weight or volume, excluding water).</li> <li>Remaining content can be organic or nonorganic</li> <li>Nonorganic contents must meet the criteria of NOP Organic standards</li> </ul>
Less than 50%	<b>Specified Regenerative Organic Certified™ Contents</b>	No ROC seal use permitted	<ul style="list-style-type: none"> <li>No “Regenerative Organic Certified™” principal display panel claim allowed</li> <li>No “Contains Regenerative Organic Certified™ content” claim allowed</li> <li>Regenerative Organic Certified content may be identified on the content claim</li> </ul>	<ul style="list-style-type: none"> <li>Product contains less than 50 % ROC content (by weight or volume)</li> <li>Remaining content can be organic or nonorganic</li> </ul>

### 3.4 Use of ROC seal

Use of the ROC seal is restricted to textile products that are in alignment with the 2011 USDA Policy Memo on Labeling of Textiles That Contain Organic Contents. Use of the seal is restricted to textile products in the content claim category of “100% Regenerative Organic Certified™ [Specified Material],” or “Regenerative Organic Certified™ [Specified Material]”. The seal must denote the level and be used in accordance with the seal size and color requirements. The seal must be displayed on certified products or products that contain certified content and must be visible in one of the approved consumer facing content claim locations listed in Section 3.2.

If the product contains any combination of Bronze, Silver, and/or Gold content, any claims must defer to the lowest certification level.

## 4.0 Seal & Language Use Guidance

### 4.1 Written Usage: Regenerative Organic Certified™

For all text claims, including those on the consumer-facing packaging and any other copy, the complete phrase “Regenerative Organic Certified™” must be used in the first instance and must be accompanied by the trademark indicator “™”. The abbreviation “ROC™” may be used in subsequent instances. If you plan to use the “ROC™” abbreviation, the first instance must be made with the “™” immediately following the full statement “Regenerative Organic Certified™.”

**Regenerative Organic  
Certified™**

**Regenerative Organic  
Certified™ (ROC™)**

The use of “Regenerative Organic Certified” or “ROC” are prohibited on packaging that has not been reviewed and approved by ROA or ROA Approved Certifying Body. This includes the phrase “On our way to Regenerative Organic Certified,” or “ROC pending”.

The text claim “Regenerative Organic Certified™” cannot be used as part of the legally registered product or business name. “Regenerative Organic Certified™ [textile/material]” can be listed in front of or after the product name for products that meet the content claim requirements for “100% Regenerative Organic Certified™ [Specified Material]” or “Regenerative Organic Certified™ [Specified Material].”

The certification claim may specify the certification level and textile product, i.e., “Regenerative Organic Certified™ Silver Cotton Shorts” or “Regenerative Organic Certified™

Gold Hemp Sweater.” On consumer facing content claims the certification level may be listed separate from the ROC claim where use of the full ROC claim with certification level is prohibitive due to design and construction. In such cases the certification level must be represented below or next to the primary ROC claim.

#### 4.2 Content Claims Criteria

The content claim must specify the certification level claimed (i.e., Bronze, Silver, or Gold) through the use of the Bronze, Silver, or Gold ROC seal or a text distinction (example provided below). Where applicable, textile products must have a ROC seal with the level attached in some capacity to the finished good. This may include hang tags, sewn in tags, packaging, etc. It is not sufficient to list the level online or in promotional materials only.

In the case where multiple levels of ROC products are mixed (Bronze, Silver, and/or Gold,) the content claim shall defer to the lowest certification level. For example, a product must contain 100% ROC Gold material in order to carry the “100% Regenerative Organic Certified Gold” claim. If a product contains less than 100% ROC Gold material and the remainder is made up of ROC Silver material, the “Regenerative Organic Certified Silver” or “100% Regenerative Organic Certified Silver” claim should be used.

#### 4.3 Correct Versions of the ROC Seal

The ROC seal may only be used for products that meet the “100% Regenerative Organic Certified™,” and “Regenerative Organic Certified™”. The seal must indicate the certification level (Bronze, Silver, or Gold) of the product by using either the appropriate colored seal or the black and/or white seal with text that specifies the certification level. The seal must replicate the form and design of the examples shown below, should be used on a transparent background, and must be printed legibly and conspicuously.



The below ROC seals can be used in black or white on a transparent background, otherwise, the seal may not be modified in any way. These seals must be used with additional text that specifies the certification level attained (i.e., Bronze, Silver, or Gold) as shown below.



The ROC seal without text “Regenerative Organic Certified™” may be used for products that meet the “100% Regenerative Organic Certified™,” and “Regenerative Organic Certified™,”



criteria, only where use of the full ROC is prohibitive due to package design and construction or where a full ROC seal has already been used in a more prominent manner. The seal must replicate the form and design of the examples shown below, should be used on a transparent background, and must be printed legibly and conspicuously. These seals can be used in black or white on a transparent background, otherwise, they may not be modified in any way. The seal must be used with additional text that specifies the certification level attained (i.e., Bronze, Silver, or Gold) as shown below.



#### 4.4 Seal Size

The Regenerative Organic Certified seal must not be smaller than 0.20 in/.50 cm in height on the principal display panel. The words “Regenerative Organic Certified™” in the seal must remain legible. Should the size of the ROC seal be prohibitive due to the package design and construction, use of the alternate version of the seal without the “Regenerative Organic Certified™” text is permitted. If using the abbreviated seal without the “Regenerative Organic Certified™” text, the seal must not be smaller than 0.15 in/.38 cm in height on the principal display panel.

## 5.0 Marketing & Communication Materials

All promotional materials (digital or printed) that uses a Regenerative Organic Certified seal shall be approved by the ROA prior to use (see section 6.3 of this document.) Use of the seal must be done in alignment with the requirements around seal use and content claims laid out in sections 3 and 4 of this document.

All promotional materials (digital or printed) that make claims about “Regenerative Organic Certified™” or “regenerative organic [noun/verb]” must be done in reference to product or contents that have received certification and are in compliance with the Governing Documents. “Regenerative Organic Certification” is not an applicable term to describe certification status or the Regenerative Organic Certified standard. Use of the terms “Regenerative Organic Certified” or “ROC” in association with products or contents that are not ROC, or that have not been specifically approved by ROA, is in violation of the Guidelines. All ROC claims must be in reference to the certification status of the farm level and must not imply certification of the full supply chain.

The ROC seal and “Regenerative Organic Certified” can be used for general reference to the overall program as long as products or contents without ROC status are not misrepresented as having achieved certification. When referencing a specific certified product or content the full ROC seal must be used.

All regenerative organic claims must be displayed in accordance with the NOP organic labeling requirements.

## 6.0 Labeling Terms of Use

### 6.1 Terms of Use

The ROA exists to promote Regenerative Organic Certified as the highest standard for regenerative organic agriculture around the world. We aim to empower eaters and farmers to create a better world through regenerative organic farming. The ROC marks are trademarks owned by ROA and are used to indicate that contents in a product are sourced from a farm that is certified ROC. **Only Regenerative Organic Certified producers and authorized licensees (brands with a valid license agreement) may use the ROC marks.** Use of the ROC marks is dependent on meeting all requirements laid out in section 2.1 Prerequisites of Labeling Use, alignment with the Governing Documents, and compliance with these Guidelines. Each legal entity throughout a supply chain (brokers, brand owners, finished goods manufacturers, etc.) making a ROC claim must complete its own License Agreement in order to carry forth the ROC marks.

### 6.2 Misuse of the Seal

The ROC seal may not be used in a misleading or deceptive fashion to mischaracterize one's products. Further, the ROC seal may not be used as a primary brand indicator or indicator of source or origin for any goods, but only as a certification mark and should not appear more than half as large as the primary product branding. The ROC seal shall not be used in any manner that is likely to reduce, diminish, jeopardize, or damage the goodwill, value, or reputation associated with ROA or the ROC seal or in any manner that violates the rights of any third parties.

The ROC seal can be used in Bronze, Silver, or Gold colors (to indicate the certification level) or in Black or White on a transparent background. The Black or White seals must be used with additional text that specifies the certification level attained (i.e., Bronze, Silver, or Gold). No other color variations are allowed, and the ROC seal may not be modified in any way. Avoid placing the seal on brightly colored, patterned, or otherwise busy backgrounds.

Certified producers and authorized licensees agree to use the ROC name and seal(s) only in accordance with ROC standards and ceasing all use of ROC's name and seal upon notice by the ROA. Any use of ROC's names or marks, without the expressed consent of the ROA, is strictly prohibited and constitutes an infringement of the ROA's rights. The ROA shall be entitled to its reasonable attorney's fees and costs incurred in bringing any civil action, arbitration, or mediation to enforce its rights to its names or marks.

### 6.3 Review of Seal Use

All use of the ROC marks by authorized licensees, such as brokers, brands, or finished goods manufacturers, are required to undergo review and approval prior to printing packaging or selling product as "Regenerative Organic Certified." Authorized licensees will submit labels

directly to the ROA for review and approval. These labels should be submitted to [label@regenorganic.org](mailto:label@regenorganic.org). Review of labels prior to printing will save your organization considerable expense and avoid issues arising with non-compliances. Review and approval time will depend on the workload of the ROA staff. Contact and work closely with the ROA staff to coordinate timelines for label development purposes. Authorized licensees should plan for a minimum of four weeks for the review and approval of any packaging making a ROC claim. Questions about product labeling can be submitted to [label@regenorganic.org](mailto:label@regenorganic.org). Any marketing and/or communications use of the ROC seal must be explicitly approved by the ROA and the ROC seal graphic files must be directly obtained from the ROA.

Authorized licensees should take into consideration that the certification level of the certified producer they are sourcing from may change from year to year and packaging should be ordered and printed with this in mind. Brands may under-represent the ROC level of their products (calling Gold or Silver products Bronze) if they wish but must not over-represent the ROC level.

#### **6.4 ROC Seal Distribution**

Authorized licensees must request the ROC seal files from the ROA. Use of the Regenerative Organic Certified seal must follow the requirements set forth in the Guidelines and the Governing Documents. Any entity not Regenerative Organic Certified making marketing and/or communications use of the ROC seal must be explicitly approved by the ROA. These ROC seal graphic files must be directly obtained from the ROA.

#### **6.5 Basic ROC Labeling Requirements**

Any party seeking to make claims on packaging must be authorized licensees and submit labels to the ROA for review and approval. Labels should be submitted to [label@regenorganic.org](mailto:label@regenorganic.org).

The ROC seal may not be used on products from acreage/animals/facilities in "Certification Pending" status.

#### **6.6 Traceability Requirements for ROC Product Claims**

Regenerative Organic Certified product intended for processing must maintain and demonstrate current certification to USDA National Organic Program (NOP) or an approved international equivalent and further, must appear as a unique and distinct product on a current NOP organic certificate. ROC product includes both single-ingredient and multi-ingredient products, in raw or processed forms, that have maintained an appropriate chain of custody throughout the supply chain subject to inspection/verification. ROC product includes products with one or more components, in raw or processed form, that has maintained an appropriate chain of custody throughout the supply chain.

In order for a ROC claim to be made on textiles, all processors/handlers in the supply chain must be certified to GOTS or the [Textile Exchange's Organic Content Standards \(OCS\)](#).

Certified product must maintain appropriate separation from non-certified product throughout the supply chain until they are mixed by the spinner or other processor and must comply with USDA/NOP organic chain of custody requirements and policies.

Certified product from a single origin must be maintained separate from other product throughout transport and storage. Certified product must not be physically mixed with non-certified product or with certified product from another source (i.e., organic cotton must be separated from ROC cotton) until it reaches its final processing facility. This ensures that product carrying a ROC claim is sourced from ROC certified farms. Exemptions may be allowed for unique circumstances but must comply with USDA/NOP organic regulations.

## Textile Supply Chain Guidelines

### 7.0 Objectives

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

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

### 8.0 Scope

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

Any authorized licensees selling finished textile products making a ROC claim must provide evidence of GOTS and/or OCS certification as part of their Licensing agreement with the

ROA. These requirements serve to reinforce rather than replace labeling, separation, and documentation requirements outlined by these certifications.

## 9.0 Applicability

### 9.1 Supply Chain Actors (SCAs)

This section applies to any business that processes or handles Regenerative Organic Certified textile products and any company that is selling ROC products on the open market. If the ROC Operation is processing ROC products themselves, they must hold an organic certification for the handler scope covering their facility when applicable. The Operation may choose to include their handling/processing facility in ROC for Bronze or Silver levels and may need to include it for Gold level.

### 9.2 Spot-Check Audits

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

## 10.0 License Agreement for Supply Chain Actors

### 10.1 General

Anyone seeking to make a ROC claim on the open market (wholesale, retail, etc.) is required to secure a License Agreement with the ROA.

### 10.2 Cotton Gins

For cotton, the gin that receives the cotton from ROC Operations and the authorized licensees making the final claim are both required to secure a License Agreement with the ROA to become a ROC Licensee. The Licensee fees are waived for the gin unless they are selling on the open market. All other actors between the gin and Brand are reviewed under GOTS and/or OCS certifications and are not generally required to license or register with the ROA. The exception to this is when any supply chain actor wishes to sell ROC products on the open market. Anyone seeking to make a ROC claim on the open market (wholesale, retail, etc.) is required to secure a License Agreement with the ROA.

For supply chains where the gin is not able to sufficiently verify the ROC products are handled in accordance with this document, or where the gin is shared (co-owned, rented, etc.) between multiple individuals or businesses, the ICS manager or Brand may submit a

request to the ROA to assume the responsibility for this stage of production. In this case, the ICS manager or Brand must provide a verifiable system for ensuring that the raw ROC cotton entering the gin and the cleaned cotton lint leaving the gin are segregated from all other non-ROC production.

## 11.0 Documentation Requirements

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

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

- 1) **Raw Product Handling:** All raw ROC products being transported between ROC producers and gin (or other processors,) must be labeled in a way that is visually distinguishable from any other products (organic or non-organic.) This may include lot numbers, colored packaging, packing slips, or other easily identifiable markings.
- 2) **Management Systems:** Document policies, roles and responsibilities, procedures, training, communication, monitoring, and continuous improvement for tracking ROC product and maintaining appropriate chain of custody practices.
- 3) **Input Storage Segregation:** Claimed material must be kept separate during storage and transport, and not mixed or blended with non-ROC material until the final stage of production.
- 4) **Inventory Management:** Operations/organizations must keep records of the quantities of claimed raw material and finished goods, subject to reconciliation.
- 5) **Separation:** All products shall be clearly identified while they are in production. When ROC and conventional materials are processed in the same locations or machinery, there should be a clean-out procedure between batches. Clean-out is not required between ROC and certified organic products.
- 6) **Traceability Documentation:** Commercial and shipping documents must be available throughout the supply chain that attest to the origin of the claimed material.
- 7) **Volume Reconciliation:** Accurate data on the ratios of raw materials to finished goods must be available for review, including the average amount of loss to be expected during production processes.

### **11.1 Traceability Documentation**

Complete documentation is required to be able to trace a product back from finished good to the farm, starting with outgoing documentation (purchase invoice, incoming BOL, Certificate of Analysis). From there, documentation must provide traceability of the contents back to the certified farm through purchasing/receiving documentation (purchase invoice, incoming BOL, Certificate of Analysis). Organizations must provide adequate documentation to demonstrate contents originated from a ROC source, such as transaction certificates provided by organic certifiers, invoices, and ROC certificates, etc. The ROA and ROA CBs reserve the right to verify this documentation at any time upon request.

### **11.2 Volume Reconciliation**

The ROA or an ROA approved Certifying Body may look at quantities of the ROC crop(s), content(s), and/or product(s) over time. For a requested time period, Supply Chain Actors must be able to supply the following information, including but not limited to: the beginning inventory of ROC crop/content/product, receiving quantity of ROC crop/content/product (during time period), production quantity of ROC products containing this content/crop (amount produced, conversion/loss ratio, etc.), the ending inventory of ROC crop/content/product, and/or the sales quantity of ROC crop/content/product.