

ROA Integrity Program

Audit Preparation Guidance for Brands

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1. Introduction

The goal of this document is to provide Regenerative Organic Alliance (ROA) brands with guidance to assist them in preparing for their license audit. This document is non-binding and any citation issued needs to reference the ROA requirements. The Regenerative Organic Certified® Marks are trademarks owned by ROA and are used to indicate that a product is certified per ROA's guidelines. Only Regenerative Organic Certified® producers and authorized licensees may use the Regenerative Organic Certified® Marks.

For questions about licensing with the ROA, please email label@regenorganic.org.

For questions about this document, please email qualityassurance@regenorganic.org

2. Scope and Related Documents

This document applies to all brands and supply chain actors (SCA) worldwide that buy and sell Regenerative Organic Certified® products and crops and have achieved a license with the ROA. The licensing is for brands making Regenerative Organic Certified® claims, brokers selling Regenerative Organic Certified® products on the open market, finished goods manufacturers, etc.

Foreign operations are subject to the same ROA requirements as domestic U.S. operations, and products complying with the Regenerative Organic Certified® requirements and the NOP regulations or equivalency arrangements can be imported for sale into North America and Europe.

The Certification Resources page on the ROA website (<https://regenorganic.org/resources/>) provides the governing documents, forms, and worksheets you'll need. The section titled "General" applies to certified entities. Please be sure to review them carefully. Navigate to the section titled Brands for specific documents that apply to licensed brands.

3. What We Do

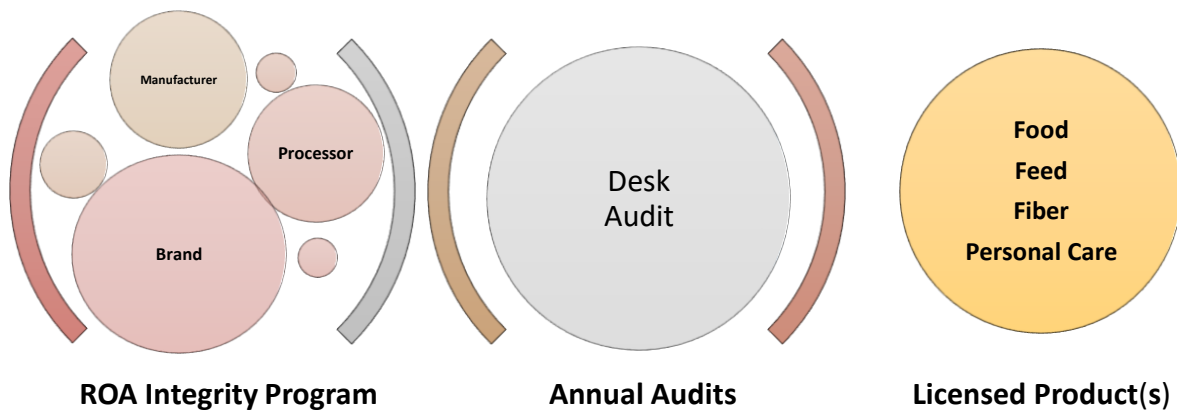
Regenerative Organic Certified® is a revolutionary certification program for food, textiles, and personal care ingredients. The Regenerative Organic Certified® label signifies that farms and products meet the highest standards in the world for soil health, animal welfare, farmworker fairness, and strong, transparent supply chains.

As a brand, buyer, and seller, of Regenerative Organic Certified® products, you will be held to the [Regenerative Organic Certified® governing documents](#), which is one of the ways we achieve our mission and deliver benefits to your company.

The Regenerative Organic Alliance integrity program for brands consists of one annual desk audit.

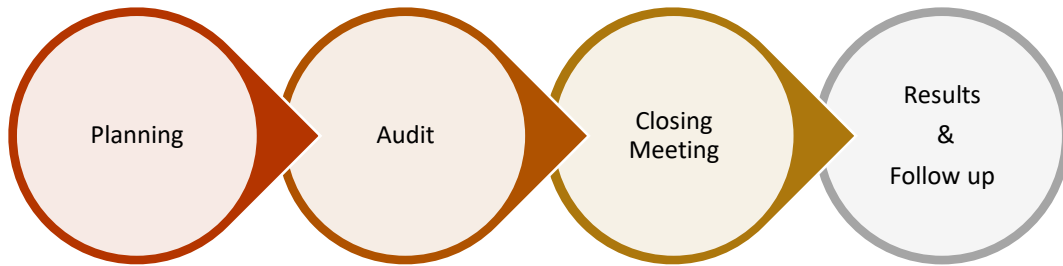
Desk Audit -The scheduled annual audit investigates Regenerative Organic Certified® logo use, administrative processes, verification of the supply chain, and risk analysis as it pertains to Regenerative Organic Certified® products. The audit is focused at 1) being able to successfully trace Regenerative Organic Certified® product through the supply chain; 2) steps taken to prevent commingling and separation from non- Regenerative Organic Certified® product; and 3) Regenerative Organic Certified® product identification through the supply chain.

The first ROA audit will occur within 3-6 months following the date of issue for the ROA Licensee.



4. What to Expect

The ROA audits are a collaborative process, and we will work closely with your team to develop an understanding of the process, request materials for review, and discuss potential areas for improvement. We will require that you provide all the needed information on time. We may discuss our progress and observations with you periodically, as needed. We always maintain the confidentiality of your information following our professional standards



4.1. Planning

We will notify management of the intent to audit, coordinate scheduling, and expected timeframe for completion.

The ROA will begin planning the audit and determining the scope of the review. The ROA will provide a detailed request list of items needed for review based on the Brand Regenerative Organic System Plan (ROSP) review. We will provide you with information that outlines the audit scope, project timeline, and final deliverables.

4.2. Audit

We will perform a remote desk evaluation of your documents. The auditor will document results of the audit. As we identify areas of potential improvement, we will review them with your staff to ensure accuracy. The auditor will review the Brand ROSP to ensure it is up-to-date and accurately represents the operation's activities and the operation(s) involved with Regenerative Organic Certified® products.

4.3. Closing Meeting

After the conclusion of the audit, we will provide you with a preliminary listing of audit findings and ask that you submit action plans to remediate the identified finding. We will hold a closing meeting to review the report, implementation, and improvement plans, and discuss any final questions, if necessary.

4.4. Reporting and Follow-up

We will provide a final report for your review. Within a year of issuing the report, we will be in contact with your team to review the status of the implementation plan. Once your operation has implemented actions to remediate all findings noted from our audit, we will close out the finding.

5. How much does the audit cost?

The cost of your assessment might vary. The final cost depends on the structure of your company, supply chain actor role(s), size of your organization and number of locations,

and other important factors. Before your assessment starts, you will be contacted by the ROA team to discuss your audit fees, which must be paid before the issuance of your assessment results.

6. Audit preparation

Please make sure you are familiar with the ROA expectations. Read your ROA License Agreement, Supply Chain Guidelines, the Regenerative Organic Certified® Framework, your Brand ROSP, and any other relevant ROA Governing Documents.

7. Demonstration of Compliance

Brands, buyers, and sellers, of Regenerative Organic Certified® products, are always transparent with the Regenerative Organic Alliance and comply with local, provincial/state, and national laws for animal welfare, labor rights, and land management. In addition, USDA organic requirements (or their international equivalents) are a baseline for Regenerative Organic Certified®; therefore, you must comply with all geographically appropriate organic certification requirements, and no requirement of the Regenerative Organic Certified® program shall be read or applied in a manner that is inconsistent with NOP requirements or policies. The highest requirement, whether local law or Regenerative Organic Certified®, applies to each section of the ROA program.

Local and international trade of Regenerative Organic Certified® products is growing. The supply chain for Regenerative Organic Certified® products can be complex and often involves multiple companies, operations, and farms working across states and international borders. The ROA requires that the brand, buyer, and seller, of Regenerative Organic Certified® products, maintain an updated Brand ROSP, follow record-keeping requirements, and receive annual audits.

8. ROA Governing Documents

Brands, buyers, and sellers understand and agree to comply with the **Regenerative Organic Certified® Governing Documents** that apply to your organization's role, and that cover the various elements of working with the ROA, including registration, licensing, traceability, transparency, as well as labeling and selling or representing the product as Regenerative Organic Certified®. The complete list of Governing Documents can be found under Resources on the ROA website.

9. Record Keeping

Brands, buyers, and sellers are responsible for maintaining documents, records, and an appropriate recordkeeping system that allows for the traceability of Regenerative Organic Certified® products. Documents and records are adapted to your operation and **Your records and documents must identify products and ingredients as Regenerative Organic Certified®. Please work with your vendors to ensure that their documents also indicate their Regenerative Organic Certified® status.**

The auditor will review the effectiveness of maintained records and record-keeping systems. Existent documents and records must provide a complete audit trail from the locally sourced and imported product back to the last operation that produced, processed, or packaged the product, as well as demonstrate compliance with the Regenerative Organic Certified® Framework Section 12 - Buyer and Supply Chain requirements. The auditor might verify that the operation's records meet USDA organic regulations and additional requirements under applicable equivalency recognition agreements.

See Annex A for examples of documents and records that might help you prepare for your audit.

10. Transparency and Traceability

Brands, buyers, and sellers of Regenerative Organic Certified® products must ensure transparency and traceability of certified products and claims. Your Regenerative Organic Certified® product, single- or multi-ingredient product, in the raw or processed form must maintain an appropriate chain of custody throughout the supply chain and is maintained separated from the non-certified product.

The auditor might verify that your operation and/or supply chain maintain and demonstrate current certification to USDA/NOP (or approved international equivalent) and have a **system and documented procedures** to ensure the traceability of all transactions and volumes of Regenerative Organic Certified® products.

The auditor, based on your supply chain role, will verify that the Regenerative Organic Certified® product from a single origin has been maintained separated from other products throughout transport and storage and that the certified product has not been physically mixed with the non-certified product or with the certified product from another source until it reached its final processing facility.

Importers and Operations. If you are the first business in the chain to purchase or receive imported Regenerative Organic Certified® products or ingredients, you will be required to have additional documentation showing that imported Regenerative Organic Certified® products have not been mixed with non-Regenerative Organic Certified® products.

Shipments from EU, UK, Japan, Korea, Taiwan, India, and Switzerland - NOP import certificates issued by an organic certification agency might be reviewed for each shipment.

Shipments from India - NOP import certificate issued by a USDA-accredited organic certification agency might be reviewed for each shipment. We reserve the right to review the TraceNet system and check transactions at random.

Selling directly to consumers. If you are a brand that sells products using your own stores, online platforms, or through other retailers, you will need to provide records to help identify the total count of items labeled, packaged, sold, and distributed via intended channels for final consumers.

11. Basic Labeling Requirements

Your operation must have clear and distinct labeling, including a system in place that helps you differentiate between products that are: Regenerative Organic Certified® and non-Regenerative Organic Certified®. Make sure to read the information needed to comply with the requirements for labeling and the minimum percentage of Regenerative Organic Certified® content in finished products as outlined in the ROA Labeling Guidelines and Terms of Use.

Before your audit, you might be required to submit all related Regenerative Organic Certified® labels currently used by your brand and operation(s), including private labels if used for other brands.

Annex A

Below please see examples of documents and records that might be required for your desk or onsite audit. The exact document or record required depends on the structure of your company, your supply chain actor role(s), the size of your organization, and the number of locations involved. The current version of these documents can be found at <https://regenorganic.org/resources/>.

- Signed ROA License Agreement listing all authorized contacts
- Most recent organic certificates for each Regenerative Organic Certified® product, crop, or ingredient received
- Signed contracts or agreements with each organization (e.g., grower, processor, manufacturer, handler, or other supply chain actor) involved in the Regenerative Organic Certified® product(s) supply chain.
- Completed Product Claimed Material Worksheet or equivalent documentation providing a supply chain map and individual product formulations
- Brand License Fee Worksheet or Textile Brand License Fee Worksheet
- Currently approved and/or drafts of all labels making a Regenerative Organic Certified® claim
- Final invoices and purchase orders with information identifying the specific Regenerative Organic Certified® product(s), such as lot numbers, amounts, and supply chain entities.
- Shipping documents, such as booking sheets or bills of lading (if imported), with information such as lot numbers, product volume, handling instructions, and the name of the last certified organic operation in the Regenerative Organic Certified® chain of custody.

Importers and Operations. Additional documentation for each shipment may be required, including import permits, transaction certificates, NOP Import certificates, commercial invoices, export packing lists, Certificate of Origin, Bill of Lading, Waybills/Air Waybills, AMS Inspection Certificate, Charter Party, Marine Surveyor report (for bulk vessel shipments) and other documents.

- Weigh tickets, receipts, and tags
- Records showing Regenerative Organic Certified® status, the quantity of Regenerative Organic Certified® product received, and the source of the product.
- Regenerative Organic Certified® product inventory and storage records per location (if more than one and if applicable)
- NOP Import Certificates
- TraceNet certificates - applicable to products certified in India to the USDA organic standards
- Attestation statements (Applies to products certified to the Canadian organic standards)
- [Declaration of Non-Certified Content for Textiles](#)