

Labeling Guidelines & Terms of Use

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1.0 Introduction

These Labeling Guidelines & Terms of Use ("Guidelines") provide guidance and requirements for issuing claims and on-package labeling for Regenerative Organic Certified® products. Regenerative Organic Certified® 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. A farm or operation that has been issued a Regenerative Organic Certified® certificate by the Regenerative Organic Alliance ("ROA") is hereinafter referred to as a "Certified Producer." Any business making a Regenerative Organic Certified® claim of any kind must be a Certified Producer, have authorization to sell a Certified Product (as defined below) to make content claims, and/or have an approved license agreement with the ROA.

These Guidelines govern the use of the Regenerative Organic Certified® name, certification marks, seals, logos and/or any other proprietary designations owned by ROA (collectively, the "Regenerative Organic Certified® Marks").

These Guidelines follow a structure and framework based on the United States Department of Agriculture (USDA) National Organic Program ("NOP") regulating labeling requirements for organic products. This document refers to *Part 205: National Organic Program* of *Title 7* (found here or at ecfr.gov). Any Regenerative Organic Certified® claims made must not conflict with the labeling or other requirements of the NOP.

Reference ROA Terms and Definitions document at Regenorganic.org/resources.

2.0 Applicability

The Guidelines apply to agricultural products and crops resulting from operations or portions of operations certified to the Regenerative Organic Certified standards. The Guidelines shall be administered consistent with the applicable Regenerative Organic Certified Governing Documents including the Program Manual, the Supply Chain Guidelines, the Brand or Producer License Agreement, and the Cost & Fee Structure, which are available at https://regenorganic.org/resources.

Regenerative Organic Certified® 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 Regenerative Organic Certified® claims must meet all criteria for USDA/NOP Organic described in *Part 205, Subpart B*. This includes restrictions on the use of synthetic substances and ingredients, 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.

Regenerative Organic Certified® product includes both single-ingredient and multi-ingredient products that have maintained an appropriate chain of custody throughout the supply chain. In this document,

the term "Certified Product" refers to agricultural material that complies with these Guidelines from a Regenerative Organic Certified® Bronze, Silver, or Gold certified operation or portion of an operation as certified by an approved ROA Certifying Body.

2.1 Prerequisites for Regenerative Organic Certified® Marks Use

To use any of the Regenerative Organic Certified® Marks, all the following requirements must be satisfied:

- i. Products must be certified USDA/NOP Organic (or an approved international equivalent formally set by a trade agreement);
- ii. All requirements in the applicable ROA Governing Documents, including the Supply Chain Guidelines, must be satisfied. As the Governing Documents are subject to change, all requirements in the version published at RegenOrganic.org at the time of audit must be satisfied;
- iii. Producers must have a valid Regenerative Organic Certified® certificate issued by the ROA to use the Regenerative Organic Certified® Marks or to sell products as Regenerative Organic Certified®; and
- iv. Brands must have an approved License to use the Regenerative Organic Certified® Marks and/or make Regenerative Organic Certified® claims on products.

3.0 Labeling Terms of Use

3.1 Terms of Use

The Regenerative Organic Certified® Marks are certification marks owned by ROA and are used to indicate that the certified status of raw agricultural goods are sourced from a Certified Producer. Only Certified Producers and authorized licensees (e.g. Brands with a valid license agreement) may use the Regenerative Organic Certified® Marks.

Any use of the Regenerative Organic Certified® Marks is dependent on meeting all requirements laid out in section 2.1 Prerequisites of Regenerative Organic Certified® Marks Use and compliance with these Guidelines and the Governing Documents. Each entity throughout a supply chain (producers, finished goods manufacturers, or brand owners, etc.) making a Regenerative Organic Certified® claim must have entered into its own License Agreement to use or display the Regenerative Organic Certified® Marks.

3.2 Misuse of the Marks

The Regenerative Organic Certified® Marks may not be used in a misleading or deceptive fashion to mischaracterize one's products. Further, the Regenerative Organic Certified® Marks may not be used as a primary brand indicator or indicator of source or origin for any goods, but only as a certification mark to demonstrate the products comply with the standards set forth by ROA. The Regenerative Organic Certified® Marks 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 Regenerative Organic Certified® Marks.

Certified Producers and authorized licensees agree to use the Regenerative Organic Certified® Marks only in accordance with Regenerative Organic Certified® standards and to cease all use of Regenerative Organic Certified® Marks upon notice by the ROA. Any use of the Regenerative Organic Certified® Marks without the prior written consent of the ROA is strictly prohibited. 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.

3.3 Review of Marks Use

3.3.1 Review of Marks Use for Authorized Licensee (Brands)

Any use of the Regenerative Organic Certified® Marks by authorized licensees, such as brand owners or finished goods manufacturers, requires ROA's prior written consent. Authorized licensees must submit labels, packaging artwork, or any other marketing materials or communications bearing the Regenerative Organic Certified® Marks to the ROA for review and approval at label@regenorganic.org. Labels, packaging artwork, and other materials must be submitted to ROA prior to the printing of such materials, sale of product, or any other display of the Regenerative Organic Certified® Marks. Review and approval time will depend on the workload of the ROA staff. Contact ROA to coordinate timelines for label development purposes. Questions about product labeling or use of the Regenerative Organic Certified® Marks can be submitted to label@regenorganic.org.

Licensees should take into consideration that the certification level (Bronze, Silver, or Gold) of the certified producer they are sourcing from *may* change from year to year. Therefore, if packaging is chosen that specifies the certification level, keep in mind what is ordered and printed.

3.3.2 Review of Seal Use for Certified Producers (Farms)

Any use of the Regenerative Organic Certified® Marks by Certified Producers requires the prior written consent of the ROA certifying body or the ROA. *For crops*, operations must submit labels, packaging artwork, or any other marketing material or communication bearing the Regenerative Organic Certified® Marks to the ROA certifying body. *For processed products*, operations must submit labels, packaging artwork, or any other marketing material or communication bearing the Regenerative Organic Certified® Marks to the ROA (not the certifying body). Labels, packaging, and other materials must be submitted prior to the printing of such materials, sale of product, or any other display bearing the Regenerative Organic Certified® Marks.

3.4 Regenerative Organic Certified® Seal Distribution

Seal design files are available for download at Regenorganic.org/resources. All use of Regenerative Organic Certified® Marks, including the seal, must comply with these Guidelines and the Governing Documents.

3.5 Basic Regenerative Organic Certified® Labeling Requirements

All operations must have clear and distinct labeling that distinguishes between products that are: Regenerative Organic Certified® (i.e., Certified Products); organic but may be exempt by state or Federal law; certified transitional; and nonorganic product. The clear and distinct labeling requirement does not apply in situations where product is being marketed as conventional. All Certified Producers and licensees must submit all labels with any Regenerative Organic Certified® Marks for review and approval

prior to use. The Regenerative Organic Certified® Marks may not be used on products from acreage/animals/facilities in "Certification Pending" status.

4.0 Marks & Content Claim Guidelines

4.1 Content Claims Criteria

The type of Regenerative Organic Certified® Mark allowed on-product is dependent on the claimable material content of the product. The following matrix presents the minimum content criteria for each category of product label allowed. Content percentages are calculated using the weight or volume of claimable ingredients and the total weight or volume of the product, excluding water and salt.

Allowable content claims differ for textile and alcohol products. Please refer to the specific sections of this document for specific guidance.

The content claim has the option to specify the certification level claimed, if Bronze or Silver, by using the Bronze or Silver Regenerative Organic Certified® seal (where allowed) or a text distinction (example provided below).

The content claim must specify the certification level claimed when Gold level certification is achieved by using the Gold Regenerative Organic Certified® seal (where allowed) or a text distinction (example provided below).

Where multiple levels of Regenerative Organic Certified® products are mixed (Bronze, Silver, and/or Gold), the content claim shall defer to the *lowest* certification level or opt not to specify the certification level. For example, a product must contain 100% Regenerative Organic Certified® Gold material to carry the "100% Regenerative Organic Certified® Gold" claim. If a product contains less than 100% Regenerative Organic Certified® Gold material and the remainder is made up of Regenerative Organic Certified® Silver material, then the label claim may specify "Regenerative Organic Certified® Silver" or used an unspecified level seal.

A lower-level claim or an unspecified claim may be applied to a final product that contains a higher-level product. For example, a Regenerative Organic Certified® Bronze claim may be made on packaging that contains Regenerative Organic Certified® Bronze, Silver, and/or Gold ingredients.

Regenerative Organic Certified® claims must not conflict with USDA/NOP Organic Standards Section §205 for organic content claims.

Any remaining non-claimed material (up to 5% of the product, by weight or volume) may be organic or nonorganic (conventional). Any nonorganic ingredients must meet the criteria of USDA/NOP Organic Standards Section §205 for allowable production methods and excluded substances (e.g., non-irradiated, non-GMO, etc.).

4.2 Content Claims Summary

7.2 C	ontent Claim	is summary		
Regenerative Organic Certified® Content	Claim	Seal	Claim Description	Requirements
100%	100% Regenerative Organic Certified®	Regenerative Organic Certified OR Regenerative Organic Certified BRONZE OR Regenerative Organic Certified Certifi	 Product claim allowed on principal display panel When Regenerative Organic Certified® Gold seal is used it must include Gold level designation. *Bronze or Silver level designation may use the Regenerative Organic Certified® unspecified level seal or choose to specify as Bronze/Silver. Regenerative Organic Certified® ingredients may be identified on the information panel 	 Product contains 100% Regenerative Organic Certified® ingredients by weight or volume, excluding water and salt Product is certified 100% USDA/NOP Organic (or an approved international equivalent)
Greater than or equal to 95%	Regenerative Organic Certified®	Regenerative Organic Certified OR Regenerative Organic Certified BRONZE OR Regenerative Organic Certified Certifi	 Product claim allowed on principal display panel When Regenerative Organic Certified® Gold seal is used it must include Gold level designation. *Bronze or Silver level designation may use the Regenerative Organic Certified® unspecified level seal or choose to specify as Bronze/Silver. Regenerative Organic Certified® ingredients may be identified on the information panel 	 Product contains at least 95% Regenerative Organic Certified® ingredients by weight or volume, excluding water and salt Product is certified at least 95% USDA/NOP Organic Remaining ingredients can be organic or nonorganic Nonorganic ingredients must meet the criteria of the USDA/NOP Organic §205
Greater than or equal to 70%	Made with Regenerative Organic Certified® [Specified Ingredients]	No Regenerative Organic Certified® seal use permitted	 "Made With" claim on principal display panel, which may not list more than three Regenerative Organic Certified® ingredients or food groups Regenerative Organic Certified® ingredients may be identified on the information panel 	 Product contains at least 70% Regenerative Organic Certified® ingredients by weight or volume, excluding water and salt Remaining ingredients can be organic or nonorganic Nonorganic ingredients must meet the criteria of USDA/NOP Organic §205
Less than 70%	Specified Regenerative Organic Certified® Ingredients	No Regenerative Organic Certified® seal use permitted	 No "Regenerative Organic Certified®" principal display panel claim allowed No "Made with Regenerative Organic Certified® [Specified Ingredients]" principal display panel claim allowed Regenerative Organic Certified® ingredients may be identified on the information panel The ROA recommends specifying the percentage of each ingredient on the non-primary display panel. 	 Product contains less than 70% Regenerative Organic Certified® ingredients by weight or volume, excluding water and salt Remaining ingredients can be organic or nonorganic Nonorganic ingredients must meet the criteria of USDA/NOP Organic §205

4.3 Allowable Content Claims

4.3.1 100% Regenerative Organic Certified®

Product that contains 100% Regenerative Organic Certified® claimed material by weight or volume may use the "100% Regenerative Organic Certified®" claim and/or the applicable Regenerative Organic Certified® seal. The "100% Regenerative Organic Certified®" claim may be used on the principal display panel. The Gold certification claim must specify the certification level through seal color/text and/or written description, while Silver or Bronze level claims may choose to specify the certification level or use the plain unspecified level seal. See Section 5.2 for examples.

4.3.2 Regenerative Organic Certified®

Product that contains at least 95% Regenerative Organic Certified® material by weight or volume may use the "Regenerative Organic Certified®" claim and/or the applicable Regenerative Organic Certified® seal. The "Regenerative Organic Certified®" claim may be used on the principal display panel. The Gold certification claim must specify the certification level through seal color/text and/or written description, while Silver or Bronze level claims may choose to specify the certification level or use the plain unspecified level seal. See Section 5.2 for examples.

4.3.3 Made with Regenerative Organic Certified® [Specified Ingredients]

Product that contains at least 70% and less than 95% Regenerative Organic Certified® material by weight or volume may use the "Made with Regenerative Organic Certified® [Specified Ingredients]" claim on the principal display panel, where up to three certified ingredients or food groups may be specified. The finished product cannot be represented as a Regenerative Organic Certified® product and cannot display the Regenerative Organic Certified® seal anywhere on packaging.

The "Made with" claim may not list more than three ingredients or food groups that are fully claimable as Regenerative Organic Certified®. For example, allowable claims include "Made with Regenerative Organic Certified® carrots, tomatoes, and onions;" "Made with Regenerative Organic Certified® vegetables;" or "Made with Regenerative Organic Certified® nuts and wheat." Only the following food groups may be claimed, in alignment with NOP regulations: beans, fish, fruits, grains, herbs, meats, nuts, oils, poultry, seeds, spices, sweeteners, vegetables, or processed milk products.

4.3.4 Specified Regenerative Organic Certified® Ingredients

Product that contains less than 70% Regenerative Organic Certified® material may not display the Regenerative Organic Certified® seal anywhere on packaging or use the "Regenerative Organic Certified®" Marks on the principal display panel. Any use of Regenerative Organic Certified® to identify an ingredient is limited to a non-primary display (e.g., an ingredient list on what consumers perceive as the back label) and the specified ingredient must immediately follow the term "Regenerative Organic Certified®" (e.g., "Regenerative Organic Certified® Carrots") substances. Product that contains the same ingredients with different certification statuses (i.e., Certified Organic and Regenerative Organic Certified®) must comply with advertising guidelines, regulations, and laws with respect to informing consumers about the

nature of the product and its ingredients. In such cases, the ROA recommends specifying the percentage of each ingredient on the non-primary display panel.

5.0 Marks & Language Use Guidance

5.1 Written Usage: Regenerative Organic Certified®

For all text claims, including those on the principal display panel and any other copy, the complete phrase Regenerative Organic Certified® must be used and must be accompanied by the registered trademark symbol "®":

Regenerative Organic Certified®

Avoid using the acronym ROC on the principal display panel or any other copy.

The use of "Regenerative Organic", "On our way to Regenerative Organic Certified®," or "Regenerative Organic Certified® pending" is prohibited on packaging, labels, or other materials.

The text claims "Regenerative Organic Certified®" cannot be used as part of the legally registered product or business name. "Regenerative Organic Certified® [product name]" 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 level may be listed separately from the Regenerative Organic Certified® claim, where use of the full Regenerative Organic Certified® claim with certification level is prohibitive due to design and construction. In such cases the Gold certification level must be represented below or next to the primary Regenerative Organic Certified® claim, while Bronze or Silver certification levels may also be represented below or next to the primary Regenerative Organic Certified® claim or the level can remain unspecified.

5.2 Correct Versions of the Regenerative Organic Certified® Seal

The Regenerative Organic Certified® seal may only be used for products that meet the "100% Regenerative Organic Certified®," "Regenerative Organic Certified®," and the "Made with Regenerative Organic Certified® [Specified Ingredients]" criteria. The Gold level certification seal must indicate the certification level of the product by using either the gold colored seal, as defined below, or the black and/or white seal with text that specifies the Gold certification level. The Silver and Bronze level certification seals may choose to indicate the certification level of the product by using the appropriate color seal, or the black and white seal with text that specifies the Silver or Bronze certification level, or they may choose to use the Unspecified Level Seal, shown below. 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.







Bronze Seal Color: RGB: 155, 103, 69 Hex: #9b6745

CMYK: 32, 59, 77, 17 Pantone: P22-14U/P22-14 Silver Seal Color:

RGB: 178, 178, 178 Hex: #b2b2b2 CMYK: 31, 25, 25, 0

Pantone: P179-5U/P179-5

Gold Seal Color: RGB: 229, 293, 49

Hex: #e5c131 CMYK: 12, 21, 95, 0

Pantone: P4-16U/P4-16

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







Similarly, the below Regenerative Organic Certified® seals may be used in black or white on a transparent background as Unspecified Level Seals for Silver or Bronze certification level only:





The below seal without the "Regenerative Organic Certified®" text may be used for products that meet the "100% Regenerative Organic Certified®," "Regenerative Organic Certified®," and the "Made with Regenerative Organic Certified® [Specified Ingredients]" criteria, only where use of the full Regenerative Organic Certified® seal is prohibitive due to package design and construction or where a full Regenerative Organic Certified® seal has already been used in a more prominent manner. The written mark, Regenerative Organic Certified®, must be prominently displayed somewhere on the packaging. The seal must replicate the form and design of the examples shown below. These seals must be used in black or white on a transparent background, printed legibly and conspicuously, and must not be modified in any way. The Regenerative Organic Certified® seal may be used with text that specifies the certification level attained (i.e., Bronze, Silver, or Gold) as shown below.







Similarly, the seal below without the "Regenerative Organic Certified®" text may be used in the same manner for Unspecified Level Seals for Silver and Bronze certification level only:





5.3 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 Regenerative Organic Certified® seal be prohibitive due to the package design and construction, use of the alternate version of the Regenerative Organic Certified® Seal 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. A clear space, no smaller than half the seal radius, must be left around the seal.

5.4 Non-Consumer Facing Product Packaging/Unfinished Products/Bulk Products

Certified Products must be stored and clearly labeled as Regenerative Organic Certified® (i.e., soybeans, cotton, unprocessed mango, unroasted coffee beans), and comply with all requirements in this document and the Supply Chain Guidelines.

5.5 Regenerative Organic Certified® Produce

All Regenerative Organic Certified® produce must display the Regenerative Organic Certified® Marks. The Gold certification claim must specify the Gold certification level through seal color/text and/or written description, while Silver or Bronze certification claims may choose to specify certification level or apply the Unspecified Level Seal. See Section 5.2 for examples. The Regenerative Organic Certified® claim must not conflict with NOP requirements for organic content claims.

- For loose produce, each piece may carry the seal, either as a standalone sticker or incorporated into the PLU sticker.
- For packaged produce, such as clamshell containers, each package must have the seal displayed on the front.

Exceptions may be granted for products sold in non-grocery retail environments, such as farmer's markets or farm stands.

5.6 Use of Trademark by Region

The Marks are fully registered in the United States (US), the United Kingdom (UK), all countries in the European Union (EU) and in Japan, with full registration pending in other regions of the world. For all packaging, marketing and other claims made for products sold in the US, UK, EU and Japan, the Marks must contain the "®" symbol in all uses of Regenerative Organic Certified® or in use of the seal with text. For packaging and claims made on products sold outside of these countries, the Marks must contain the "™" symbol in all uses of Regenerative Organic Certified™ or in use of the seal with text. The seal files with both ® and ™ can be found on the ROA website.

6.0 Packaging Requirements

6.1 Principal Display Panel

Principal display panel text claims may be used for "Regenerative Organic Certified®" or "Made with Regenerative Organic Certified® [Specified Ingredients]" products.

Use of "Regenerative Organic" cannot be used as part of the legal product name or listed in front of the product name. The term "regenerative organic" cannot be used anywhere on product packaging, front or back panels, in an ingredient list or in other marketing materials.

"Regenerative Organic Certified®" can be used as a text claim on the principal display panel above or below the legal product name so long as the registration symbol immediately follows the phrase. Text claims must be displayed in accordance with the NOP organic labeling requirements.

ALLOWED FORMAT:

Regenerative Organic Certified®

Regenerative Organic Certified® Coffee

Prohibited Format:

Regenerative Organic Coffee

6.2 Information Panel

The term "Regenerative Organic Certified®" may be used on the back of pack as part of the product copy and/or information panel (i.e., the side or back panel to the right of the principal display panel, where the ingredient statement appears).

Any reference to "regenerative organic" agriculture, ingredients, farming, etc. must include the full phrase Regenerative Organic Certified® and is reserved for products that contain Regenerative Organic

Certified® ingredients and must not be used on packaging for products that do not contain Regenerative Organic Certified® material.

Claimable ingredients must be specified as Regenerative Organic Certified® and may be identified in the information panel and the percentage of Regenerative Organic Certified® ingredients may be listed. Identification of Regenerative Organic Certified® ingredients must not conflict with NOP requirements for identification of ingredients as "organic." Single ingredient products that contain 100% Regenerative Organic Certified® product are not required to specify the claimable ingredients as Regenerative Organic Certified® in the information panel.

Below are formats that satisfy the above requirement:

PREFERRED FORMAT:

THE EMPERICANT.
Ingredients: organic wheat, organic milk, organic eggs, sugar, salt, water Company Address Certified Organic by Wheat and milk: Regenerative Organic Certified® by [Certifying Body]
Alternative Format:
Ingredients: organic wheat, organic milk, organic eggs, sugar, salt, water Company Name and Address Certified Organic by Contains: Regenerative Organic Certified® wheat and milk
Alternative Format:
Ingredients: organic wheat*, organic milk*, organic eggs, sugar, salt, water *Regenerative Organic Certified® Company Name and Address Certified Organic by
Alternative Format:

Organic Ingredients*: wheat*±, milk*±, eggs, sugar, salt, water ±Regenerative Organic Certified® **Company Name and Address** Certified Organic by _____

6.3 'Certified By' Statement

The information panel may identify the certifying body that certified the finished Regenerative Organic Certified® product by including the statement "Regenerative Organic Certified® by [Certifying Body]." The statement may include other identifying information of the certification body such as address, website, or telephone number. The "Certified By" statement must not conflict with NOP requirements for identifying the organic certifying agent. Use of a "Regenerative Organic Certified® By" statement can be made in addition to the "Certified Organic By" statement for organic products but cannot serve as a replacement for the "Certified Organic By" statement required under the NOP §205.303.

7.0 Marketing & Communication Materials

All promotional materials (digital or printed) that use any of the Regenerative Organic Certified® Marks must comply with requirements in these Guidelines, including Sections 4 and 5, and should be approved by the ROA prior to use.

All promotional materials (digital or printed) that make claims about "Regenerative Organic Certified®" must be made in reference to product or contents that have received certification and comply with the applicable Governing Documents. "Regenerative Organic Certification" is **not** an acceptable term for describing certification status, or the Regenerative Organic Certified® standard. Use of the "Regenerative Organic Certified®" Marks with products or ingredients that are not Regenerative Organic Certified® is in violation of the Guidelines. Furthermore, use of the term "regenerative organic" (without "Certified®") is prohibited. All Regenerative Organic Certified® claims must be in reference to the certification status of the farm, it's certified crops or ingredients, and must not imply certification of the full supply chain.

The Regenerative Organic Certified® Marks may be used for general reference to a licensee's program if a) the certification of the producer for raw ingredients is current, b) the licensee has at least one product licensed to make Regenerative Organic Certified® claims, c) the licensee does not imply or infer that their entire line of products is Regenerative Organic Certified® or misrepresent products that are not certified.

The Regenerative Organic Certified® Seal without the "Regenerative Organic Certified®" text must be used with "Regenerative Organic Certified®" referenced in the copy directly below the seal. When referencing a specific certified product or ingredient, the full Regenerative Organic Certified® seal must be used.

All claims must be displayed in accordance with the USDA/NOP Organic Standards Section §205 labeling requirements.

8.0 Regenerative Organic Certified® Alcoholic Beverages

8.1 General

To make a Regenerative Organic Certified® claim on an alcoholic beverage product, the product must meet all requirements for the labeling of organic alcohol beverages as set by the Alcohol and Tobacco

Tax and Trade Bureau (TTB) and the NOP. The TTB requires that alcohol beverage labels be reviewed through the Certificate of Label Approval (COLA) application process. All labeling must also abide by any other government regulations regarding the labeling of alcohol that may be applicable to the locality in which the product is being produced and/or sold.

Regenerative Organic Certified® claims must not conflict with USDA/NOP Organic Standards Section §205 for organic content claims.

Any remaining non-claimed material (up to 5% of the product, by weight or volume) may be organic or nonorganic (conventional). Any nonorganic ingredients must meet the criteria of USDA/NOP Organic Standards Section §205for allowable production methods and excluded substances (e.g., non-irradiated, non-GMO, etc.).

8.2 Allowable Content Claims for Wine

8.2.1 Regenerative Organic Certified® Wine

Product that contains at least 95% Regenerative Organic Certified® contents by volume and contains **no added sulfites** may use the "Regenerative Organic Certified®" claim and/or the applicable Regenerative Organic Certified® seal. All the grapes in the wine must also be certified organic. The "Regenerative Organic Certified®" claim and seal may be used on the principal display panel. The Gold certification claim must specify the Gold certification level through seal color/text and/or written description, while Silver or Bronze certification claims may choose to specify certification level or apply the Unspecified Level Seal. See Section 5.2 for examples.

8.2.2 Made with Regenerative Organic Certified™ Claim

Product that contains at least 95% Regenerative Organic Certified® material by volume and up to 100 ppm added sulfites may use the "Made with Regenerative Organic Certified®" claim on the principal display panel. The finished product cannot be represented as a Regenerative Organic Certified® product. If the claim refers to grapes (and any varietal thereof), all of the grapes in the wine must also be certified organic. The "Made with Regenerative Organic Certified®" claim may not be more than half the size of the largest text on the label.

The Regenerative Organic Certified® seal may be used on the principal display panel. The Gold certification claim must specify the Gold certification level through seal color/text and/or written description, while Silver or Bronze certification claims may choose to specify certification level or apply the Unspecified Level Seal. See Section 5.2 for examples.

8.2.3 Specified Regenerative Organic Certified® Ingredients

Product that contains less than 95% Regenerative Organic Certified® material may not display the Regenerative Organic Certified® seal anywhere on packaging or use the term "Regenerative Organic Certified®" on the principal display panel. If an ingredient or content claim is present on the label, then the percentage of Regenerative Organic Certified® contents may be included. The ROA recommends transparency with respect to disclosing the percentages of all certified product.

8.3 Use of Regenerative Organic Certified® Marks

All uses of the Regenerative Organic Certified® Marks, including the Regenerative Organic Certified® seal, must adhere to Section 5 Seal & Language Use Guidance.

Alcohol products that are eligible to make a "Made with Regenerative Organic Certified®" claim may use the Regenerative Organic Certified® seal on the primary display panel or on the back of the label. The seal from the relevant organic certifying body/NOP Accredited Certifying Agency (ACA) may be present anywhere on the label, if the "Certified organic by" statement is on the back panel. In the instance that the Regenerative Organic Certified® certifying body and the NOP ACA issuing organic certification differ, the seal of the NOP ACA issuing organic certification should be displayed on the label. The Regenerative Organic Certified® certifying body will defer to any decision on organic labeling compliance of the NOP ACA issuing organic certification.

8.4 Relevant information for NOP and TTB Label Approvals

When seeking approval for organic labels that feature a Regenerative Organic Certified® claim and logo, it is important to provide sufficient context and reminders to the labeling approval officers. The following language is recommended for use when communicating with the National Organic Program (NOP) and the Alcohol and Tobacco Tax and Trade Bureau (TTB):

8.4.1. From the Deputy Administrator of the National Organic Program (NOP)

Regenerative Organic Certified® products must also comply with USDA organic regulations at 7 CFR Part 205, National Organic Program. Use of the Regenerative Organic Certified® mark or claims does not misrepresent non-organic products as organic.

8.4.2 From the Alcohol and Tobacco Tax and Trade Bureau (TTB) Quality Assurance Coordinator

If the product qualifies for an organic claim on the principal display panel, then using Regenerative Organic Certified® claims and logo is allowed.

9.0 Regenerative Organic Certified® Textiles

9.1 General

To display the Regenerative Organic Certified® seal, the product must meet all requirements for the labeling of textiles products as organic under the NOP and in accordance with the in accordance with the 2011 USDA Policy Memo on Labeling of Textiles That Contain Organic Contents. 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.

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.

To make a Regenerative Organic Certified® claim, all the processors/handlers in the supply chain of a product must be certified to the same qualifying organic textile standard, GOTS or the Textile Exchange's Organic Content Standards (OCS).

9.2 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 Regenerative Organic Certified® 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 Regenerative Organic Certified® claim where use of the full Regenerative Organic Certified® claim with certification level is prohibitive due to design and construction. In such cases the Gold certification level must be represented below or next to the primary Regenerative Organic Certified® claim, while Bronze or Silver certification levels may also be represented below or next to the primary Regenerative Organic Certified® claim or the level can remain unspecified.

9.2.1 100% Regenerative Organic Certified® [Specified Materials]

Product that contains 100% Regenerative Organic Certified® claimed material by weight or volume may use the "100% Regenerative Organic Certified® [Specified Materials]" claim and/or the applicable Regenerative Organic Certified® seal. The product weight for Regenerative Organic Certified® textiles is based on the weight of the textile *minus* the weight of 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 (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., "Cotton T-Shirt-100% Regenerative Organic Certified® Silver" or "Hemp Pants-100% Regenerative Organic Certified® Gold."

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 Regenerative Organic Certified® finished product claims.

9.2.2 Regenerative Organic Certified®

Product that contains at least 95% Regenerative Organic Certified® material by weight or volume may use the "Regenerative Organic Certified®" claim and/or the applicable Regenerative Organic Certified® seal. The "Regenerative Organic Certified®" claim may be used on the principal display panel. The certification Gold claim must specify the Gold certification level through seal color/text and/or written description, while Silver or Bronze level claims may choose to specify the certification level or use the plain unspecified level seal. See Section 5.2 for examples.

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 or remain unspecified.

9.2.3 Contains Regenerative Organic Certified® [Specified Materials]

Product that contains at least 50% and less than 95% Regenerative Organic Certified® material by weight or volume may not display the Regenerative Organic Certified® seal anywhere on packaging but 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 Regenerative Organic Certified® 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 "Contains" claim may not list more than three materials that are fully claimable as Regenerative Organic Certified. 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 Regenerative Organic Certified Bronze, Silver, or Gold.

The remaining non-claimed material (up to 50% of the product by weight or volume) 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-Regenerative Organic Certified® Content for Textiles form, attesting that all non-Regenerative Organic Certified® contents in these products meet the NOP standards.

9.2.4 Specified Regenerative Organic Certified® Material Content

Product that contains less than 50% Regenerative Organic Certified® material by weight or volume may not display the Regenerative Organic Certified® 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 or volume) may be organic or nonorganic (conventional). Product that contains the same ingredients with different certification statuses must comply with advertising guidelines, regulations, and laws with respect to informing consumers about the nature of the product and its ingredients. The ROA recommends specifying the percentage of each ingredient on the non-primary display panel.

9.3 Textile Content Claims Summary

Regenerative Organic Certified® Content	Claim	Seal	Claim Description	Requirements
100%	100% Regenerative Organic Certified®	Regenerative Organic Certified' OR Regenerative Organic Certified' OR Regenerative Organic Certified' Certified' Certified' Regenerative Organic Certified'	 Product claim allowed on principal display panel When Gold Regenerative Organic Certified® seal is used it must include Gold level designation. *Bronze or Silver level designation may use the Regenerative Organic Certified® unspecified level seal or choose to specify as Bronze/Silver. Regenerative Organic Certified® contents may be identified 	 Product contains 100% Regenerative Organic Certified® contents (by weight or volume) Product is certified 100% USDA/NOP Organic (or an approved international equivalent)
Greater than or equal to 95%	Regenerative Organic Certified®	Regenerative Organic Certified Organic Certified Organic Certified Organic Certified Certified Certified Certified Organic Certified Organic Certified Organic Certified Organic Certified Certified Organic Organic Certified Organic	 Product claim allowed on principal display panel When Gold Regenerative Organic Certified® seal is used it must include Gold level designation. *Bronze or Silver level designation may use the Regenerative Organic Certified® unspecified level seal or choose to specify as Bronze/Silver. Regenerative Organic Certified® contents may be identified 	 Product contains at least 95% Regenerative Organic Certified® contents (by weight or volume) Product is certified at least 95% USDA/NOP Organic (or an approved international equivalent) Remaining contents can be organic or nonorganic Nonorganic contents must meet the criteria of the USDA/NOP Organic standards
Greater than or equal to 50%	Regenerative Organic Certified® [Specified Contents]	No Regenerative Organic Certified® seal use permitted	 "Contains" claim may not list more than three Regenerative Organic Certified® contents Regenerative Organic Certified® content may be identified on the information panel The ROA recommends specifying the percentage of each ingredient on the non-primary display panel. 	 Product contains at least 50% Regenerative Organic Certified® content (by weight or volume) Remaining content can be organic or nonorganic Nonorganic contents must meet the criteria of NOP Organic standards
Less than 50%	Specified Regenerative Organic Certified® Contents	No Regenerative Organic Certified® seal use permitted	 No "Regenerative Organic Certified®" principal display panel claim allowed No "Contains Regenerative Organic Certified® content]" claim allowed Regenerative Organic Certified® content may be identified on the content claim The ROA recommends specifying the percentage of each ingredient on the non-primary display panel. 	 Product contains less than 50 % Regenerative Organic Certified® content (by weight or volume) Remaining content can be organic or nonorganic

9.4 Use of Regenerative Organic Certified® Seal

Use of the Regenerative Organic Certified® seal is restricted to textile products that are in alignment with the 2011 USDA Policy Memo on Labeling of Textiles That Contain Organic Contents and have demonstrated final product certification with a complete chain of custody by the Organic Cotton Standard or the Global Organic Textile Standard. 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 9.2. If the product contains any combination of Bronze, Silver, and/or Gold content, any claims must defer to the lowest certification level or remain unspecified.

Document Revisions

Version Number	Date Approved	Description of Changes
3.4	July 02, 2025	 Edited wording throughout the document to reflect the introduction of the Unspecified Level Seal option and the changes associated with it. Minor wording and formatting updates throughout the document.
3.3	January 03, 2024	 Included reference from the NOP and the TTB for alcoholic beverages labelling. Item 8.4.
3.2	December 21, 2023	 Swapped location of Gold Seal with Bronze Seal at the top of page 9 to be correctly associated with corresponding color codes
		 Added 5.6 including guidance on trademark usage in different countries and regions Included coated Pantone values Section 8.2.2 removed requirement that "Made with" copy must
3.1	November 27, 2023	accompany used of seal