



Regenerative
Organic
Certified®

Textile Supply Chain Guidelines

Textile Supply Chain Guidelines	2
1.0 Objectives.....	2
2.0 Additional Baseline Standards Required.....	2
3.0 Applicability.....	2
3.1 Supply Chain Actors (SCAs)	2
3.2 Spot-Check Audits	2
4.0 License Agreement for Textile Supply Chain Actors	3
4.1 General.....	3
4.2 Cotton Gins	3
5.0 Documentation Requirements.....	3
5.1 Traceability Documentation.....	4
5.2 Volume Reconciliation	4

Textile Supply Chain Guidelines

1.0 Objectives

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

This document provides the 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.

2.0 Additional Baseline Standards Required

Any authorized licensee selling finished textile products making a Regenerative Organic Certified® claim must provide evidence of GOTS or Textile Exchange’s Organic Content Standards (OCS) certification, consistently throughout the entire supply chain, as part of their licensing agreement process with the ROA. For example, if the gin has GOTS certification, all other actors in the supply chain must also have GOTS certification. These requirements reinforce rather than replace labeling, separation, and documentation requirements outlined by these certifications. All certification evidence must be provided during the licensing process.

3.0 Applicability

3.1 Supply Chain Actors (SCAs)

This section applies to any business that processes or handles Regenerative Organic Certified® textile products and any company selling Regenerative Organic Certified® products to more than one entity. If the certified operation is processing Regenerative Organic Certified® products, they must hold an organic certification for the handler scope covering their facility.

3.2 Spot-Check Audits

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

4.0 License Agreement for Textile Supply Chain Actors

4.1 General

Anyone seeking to make a Regenerative Organic Certified® claim and sell to more than one organization is required to secure a license agreement with the ROA.

4.2 Cotton Gins

For cotton, the gin that receives the cotton from Regenerative Organic Certified® operations and the authorized licensee making the final claim are both required to license with the ROA.

The licensee fees are waived for the gin unless they are selling the Regenerative Organic Certified® product to more than one organization. All other actors between the gin and brand are reviewed under GOTS and/or OCS certifications and are not required to license with the ROA, unless selling to more than one organization (wholesale, retail, etc.). SCAs selling to more than one organization are required to secure a license agreement with the ROA.

5.0 Documentation Requirements

Organizations are required to maintain sufficient and appropriate documentation for demonstrating the chain of custody, identification, and traceability of the product from the producer to the finished form. Good management systems for demonstrating sufficient traceability and chain of custody are required.

Quality Control: Document policies, roles and responsibilities, procedures, training, communication, monitoring, and continuous improvement for tracking products and maintaining appropriate chain of custody practices.

Product Flow: The organization shall map the product flow up to the final location, including all intermediaries (storage, transport, processing units, warehouses, etc.) and activities carried out on the product.

Segregation: Products with the applied Regenerative Organic Certified® claim must be kept separate during storage, processing, and transport, and not mixed or blended with non-organic material until the final stage of production.

Inventory: Organizations must keep adequate records for tracking and traceability.

Cleaning: Clean-out is not required between Regenerative Organic Certified® claimed products and certified organic products. However, clean-out is required between Regenerative Organic Certified® claimed products and non-organic products.

Traceability: Shipping and transport documents must be available throughout the supply chain that attests to the origin of the claimed material.

Volume reconciliation: Accurate data on the ratios of raw materials going into finished goods must be available for review, including the average amount of loss to be expected during production processes.

5.1 Traceability Documentation

Complete documentation is required to be able to trace a product back from finished goods to the farm, starting with outgoing documentation (purchase invoice, incoming Bill of Landing (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 Regenerative Organic Certified® source, such as transaction certificates provided by organic certifiers, invoices, and certificates, etc. The ROA and approved certifying bodies reserve the right to verify this documentation at any time upon request.

5.2 Volume Reconciliation

The ROA or an approved certifying body may look at quantities of the certified crop(s), content(s), and/or product(s) over time. For a requested time period, SCAs must be able to supply the following information, including but not limited to:

- The beginning inventory of Regenerative Organic Certified® crop/ingredient/product,
- Receiving a quantity of certified crop/ingredient/product,
- Production quantity of certified products containing this ingredient/crop (amount produced),
- The ending inventory of certified crops/ingredients/products,
- The sales quantity of certified crop/ingredient/product.

Document Revisions

Version Number	Date Approved	Description of Changes
2.0	November 27, 2023	<ul style="list-style-type: none">• Removal of repeated language and guidance already presented in the Labelling Guidelines.• Update on the special requirements for textile supply chains (2.0 and 4.0)