



Supply Chain Guidelines

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Reference ROA Terms & Definitions document on regenorganic.org/resources.

1.0 Objectives

This document contains the requirements for Supply Chain Actors (SCAs) that buy, sell, store, process, or transport products intended to carry Regenerative Organic Certified® claims. These requirements aim to ensure that products carrying a Regenerative Organic Certified® claim maintain appropriate separation from non-certified products throughout the supply chain, are sourced from certified operations, and are produced following the ROA Governing Documents.

This document provides the requirements to maintain an auditable system that documents the chain of custody of the product.

In this document, the term “organizations” refers to SCAs, and “operation” refers to Regenerative Organic Certified® producers.

2.0 Background

The Regenerative Organic Certified® program, overseen by the Regenerative Organic Alliance (ROA), aims to promote holistic agricultural practices that build upon the United States Department of Agriculture’s National Organic Program (USDA NOP) and other internationally recognized standards. The program encompasses three pillars: Soil Health & Land Management, Animal Welfare, and Farmer and Worker Fairness at three certification levels - Bronze, Silver, and Gold. In line with these pillars, the program aims to:

- Increase soil organic matter over time and sequester carbon below and above ground;
- Improve animal welfare; and
- Provide economic stability and fairness for farmers, ranchers, and workers.

The Regenerative Organic Certified® program covers requirements for farming and ranching operations that produce food, fiber, and botanicals for both U.S. and international markets. USDA/NOP Organic certification (or an approved international equivalent formally recognized by trade agreements) is a prerequisite for Regenerative Organic Certified® eligibility. Organizations and operations must comply with all USDA/NOP Organic chain of custody requirements and policies.

3.0 Scope and Applicability

This document applies to all organizations and operations that are making or applying Regenerative Organic Certified® claims on products in different parts of the world. The scope can cover a single or a group of organizations and/or operations and can vary depending on the type of activities.

Any organization and operation taking legal ownership and engaging in the purchase or sale of the certified product must be licensed with the ROA. This could include organizations or sites that do not take physical ownership of the certified product.

If the organization is both a farm producer and processor, the Regenerative Organic Certified® operation's Producer License Agreement contains licensing terms and conditions. The operation will detail applicable processing and handling information in their Regenerative Organic System Plan (ROSP).

All procedures and documentation required by the NOP shall be followed as the baseline for Regenerative Organic Certified®

4.0 License Agreement

Organizations applying a Regenerative Organic Certified® claim on product(s) are required to secure a License Agreement with the ROA in place before releasing the product claim into the marketplace.

Farming operations holding an organic certification for processing or handling scope must apply for a license with the ROA to make the Regenerative Organic Certified® claim on the finished product.

Organizations exempt from the USDA NOP regulations are required to license with the ROA if they are making a Regenerative Organic Certified® claim. The ROA requirements for exempt organizations align with the National Organic Program (NOP) standard Subpart B, §205.101.

4.1 Organization Exempt to license with the ROA

Some organizations which take ownership or handle certified products do not need to be licensed.

- Retail food establishments that handle, but do not process, certified product for sale to consumers.
- Retail food establishments that sell packaged, labeled product to consumers, but do not own the product brand.
- Processing or handling organization that only handles certified product that amounts to less than 70% of the finished product by weight.
- Entity that does not take legal ownership of the certified product, such as for transportation or distribution of finished goods.
- Entity that executes activities covered by another Regenerative Organic Certified® operation or licensed organization.
- Entity that is only transporting Regenerative Organic Certified® products.

- Entities purchasing finished products labeled Regenerative Organic Certified® and ready for sale to consumers.

5.0 Audits

Organizations that are licensed with the ROA are subject to audits to verify the chain of custody and are responsible for any costs or fees associated with these audits. Audits may be also scheduled due to a complaint, risk assessment, labeling verification, or to investigate a report of alleged fraudulent activity.

6.0 Chain of Custody Requirements

6.1 Supply Chain Actor Disclosure (SCAD)

A ROA licensee must complete a Supply Chain Actor Disclosure form with the ROA that identifies all organizations in the supply chain going back to the certified farm where the agricultural product was harvested.

6.2 Separation Guidance

Products carrying the Regenerative Organic Certified® claim must be identified and kept separate from other non-Regenerative Organic Certified® products throughout the chain of custody.

All Supply Chain Actors handling raw product(s) carrying the Regenerative Organic Certified® claim must ensure adequate identification of certified product throughout the supply chain to prevent commingling, including the appropriate claim level (i.e., Regenerative Organic Certified® Bronze, Silver, or Gold),

Organic chain of custody requirements and policies or international organic program equivalent recognized by the ROA must be followed.

6.3 ROA Approval of Processing Facilities for Gold Level Claims

Licensed processors applying the Regenerative Organic Certified® Gold claim to product(s) must have a social fairness certification, or at least one major stage in the product supply chain must have a social fairness certification.

Processors applying the Regenerative Organic Certified® Gold Level claim to a product(s) must have an annual onsite audit or desk audit by the ROA or designated inspection body. The audit timing will be determined on a case-by-case basis based on a risk assessment by the ROA.

Organizations that process Regenerative Organic Certified® agricultural products and apply a Gold Level claim must undergo an onsite audit by the ROA or by a ROA-approved inspection body that includes a risk assessment.

6.4 Requirements for Textile Manufacturers

Textile manufacturing will follow ROA policy as outlined in the document Regenerative Organic Certified® Textile Guidelines can be found at [Regenorganic.org/resources](https://regenorganic.org/resources).

6.5 Requirements for Brands

The Procedure for Licensing and related documents can be found in the [Regenorganic.org/resources](https://regenorganic.org/resources) > Brands section of the page.

7.0 Documentation Requirements for Licensing

SCAs applying the Regenerative Organic Certified® claim to products 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: 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 product 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.

7.1 Traceability

During the audit of an SCA licensee, the ROA will trace ingredients or inputs from a Regenerative Organic Certified® claimed product back to the certified farm where they originated. The ROA will trace the product back to production, starting with outgoing documentation (sales invoice or outgoing Bill of Lading). From there, the ROA will trace ingredients back to the certified farm through purchasing/receiving documentation (e.g., purchase invoice, incoming BOL, Certificate of Analysis, etc.).

Organizations must provide adequate documentation to demonstrate ingredients originated from a Regenerative Organic Certified® source.

7.2 Volume reconciliation

The ROA looks at quantities of the Regenerative Organic Certified® crop(s), ingredient(s), and/or product(s) over time. For the requested time period organizations 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 crop/ingredient/product,
- The sales quantity of Certified crop/ingredient/product.