

# Regenerative Organic Certified™ FAQ

## 1. Who can be certified?

ROC is a holistic standard that applies to producers of agricultural products including, but not limited to, plant or animal products for food, textile, or personal care. Any company handling ROC products, regardless of size or geographic location, can participate in the program if they meet the eligibility requirements.

- **Individual farmers, Grower groups, farmer cooperatives, and production group collectives** are eligible to apply for Regenerative Organic Certified.
- **Brands and retailers** are not required to obtain certification. However other criteria apply if the ROC claim will be applied to product packaging or marketing materials:
  - 1) All brands, retailers, and finished good distributors requesting use of a ROC claim are required to submit a License Agreement as described in the Supply Chain Guidelines section 4.
  - 2) For a brand to label a finished product with a Gold Level ROC seal, at least one stage in the post-producer supply chain must also be certified to ROC.
- **Processors and handlers** handling ROC-claimed product must be USDA Organic certified or certified to an approved international equivalent. However, only for ROC Gold level, at least one stage in the post-producer supply chain must also be certified to ROC. Processors are otherwise not required to achieve separate certification to ROC.

However, processors and handlers that represent a major stage in the supply chain are required to register with the ROA. Processors and handlers are considered SCAs. The Supply Chain Guidelines contain the chain of custody requirements for Supply Chain Actors (SCAs) that buy, sell, store, process, or transport product intended to carry Regenerative Organic Certified™ (ROC™) claims (i.e., certified product).

**Exempt operation:** An entity that meets the exemption criteria of the USDA NOP rules. Exempt operations still need to abide by the chain of custody requirements and the supply chain guidelines for ROC but are not required to apply with the ROA and are not subject to a ROC chain of custody audit. Exempt operations include entities that do not handle the raw unpackaged organic product. They include entities that store or transport packaged bulk or finished goods, and wholesalers and retailers that sell packaged, labeled organic product.

Certain growing methods such as soilless practices, aquaponics/hydroponics, and container growing where crops are never integrated into a field are not eligible for ROC.

## 2. ROC Baseline Certification Requirements

All applicants must meet minimum qualifying criteria to be eligible for ROC:

- 1) The applicant must obtain USDA Organic certification or an approved equivalent.

NOTE: Fields and livestock operations in their final year of transition to organic status may pursue ROC concurrently with USDA Organic.

2) The applicant must obtain a required baseline certification in Social Fairness and Animal Welfare, if applicable. Refer to the ROC website Resources page for a list of Required Baseline Standards.

NOTE: Operations in the Global North are not required to obtain an additional Social Fairness certification and instead will be audited directly to the Social Fairness pillar of the ROC Framework.

### 3. Certification process

The applicant shall

- 1) Submit an initial application and contract at the ROA website
- 2) Submit a Regenerative Organic System Plan (ROSP) to the ROA
- 3) **Get paired with a certifying body** → at this stage, we get involved. Not before.
- 4) Complete an audit to ROC Framework
- 5) Final review by the CB (certifying body)
- 6) Certificate issued by ROA

An annual audit is required to maintain ROC status.

### 4. Fee structure

A **certified company** will incur the following fees when applying for ROC:

- One-time, non-refundable application fee
- Any associated Certifying Body (CB) fees
- Annual ROA fee based on estimated crop/product value
- Additional fees, if applicable

A **brand that is both brand owner and finished goods manufacturer** making ROC claims will submit a license agreement with the ROA. There is a \$1,000 annual membership cost for companies with \$2 million in gross annual sales. The licensing fee is .2% of ROC sales, or flat fee of \$400, whichever is greater. In the initial year of licensure ROA will accept estimates sale values. Subsequent years will be based on actual sales. Private Label brand owners will submit a Private Label License Agreement and an annual \$1,000 membership cost for companies with over \$2 million in gross annual sales. Private labels brand owners are expected to transparently communicate the retail value of the finished good to their finished goods manufacturer. This information must be sufficient to enable the license finished goods manufacturer to calculate the gross retail revenue. Private label brand owners are required to pay for increases in supply chain production costs incurred by the finished goods manufacturer for ROC.

**Finished Goods Manufacturers**, the last actor in a supply chain to process and package finished goods into a product with ROC claims will sign a License Agreement. The finished goods manufacturer will pay a license fee based on the gross revenue of the estimated retail price of

finished goods. Fees are collected whenever companies place a claim that a product contains certified crops or ingredients. Reference Supply Chain Guidelines for additional documentation to submit. The annual license fee is .2% of ROC sales, or flat fee of \$400, whichever is greater. In the initial year of licensure ROA will accept estimates sale values. Subsequent years will be based on actual sales.

For **NOP-exempt Supply Chain Actors** that own and market ROC product, the ROA requires any supply chain actor who comes into ownership of ROC product and then markets product as ROC to sign a license agreement. All supply chain actors should review the Supply Chain Guidelines in full for more details on any applicable. A supply chain actor that would normally be exempt from holding organic certification but does come into ownership and markets product as non-retail ROC products would sign a license agreement and pay the .1% fee based on their product value.

**Label Review Fee:** Labels carrying any type of permissible ROC claim will be reviewed and approved prior to use. For labels reviewed and approved by the ROA, a \$50 fee per label will be assessed.