



Labeling Guidelines & Terms of Use

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1.0 Introduction

These Labeling Guidelines & Terms of Use provide guidance and requirements for issuing claims and on-package labeling by certified operations and authorized licensees in connection with Regenerative Organic Certified™ (ROC™) products. ROC 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. Any products or materials that use a Regenerative Organic Certified™ mark must be approved, including:

- Packaging artwork with the Regenerative Organic Certified™ seal
- Packaging artwork with a Regenerative Organic Certified™ or regenerative organic ingredient claim
- Any other marketing or promotional materials that include the Regenerative Organic Certified™ seal

The ROC™ Labeling Guidelines & Terms of Use (“the Guidelines”) follow a structure and framework based on the United States National Organic Program (NOP) regulated labeling requirements for organic products. This document refers to the *Title 7, Subtitle B: Regulations of the Department of Agriculture* section of the U.S. regulatory code (found [here](#) or at [ecfr.gov](#)). In particular, this document refers to *Part 205: National Organic Program of Title 7*. Any ROC™ claims made must not conflict with the labeling or other requirements of the NOP.

2.0 Definitions

Authorized licensee: An authorized licensee includes, but is not limited to, any brand, broker, finished goods manufacturer, wholesaler, or other organization who is making a ROC claim and has a valid License Agreement with the ROA.

Brand owner: A brand is a name, term, design, symbol, or any other distinctive feature that identifies a product as distinct from other products. The brand owner is a person or company who sells any commodity under a registered brand label. For the purpose of this document brokers, finished goods manufacturers, or wholesalers making a ROC claim under a brand name will be referred to as brand owners. Brand owners will be referred to as brands throughout this document.

Certification level: The ROC™ level to which a product is certified, i.e. Gold, Silver, or Bronze.

Certified producers: A producer that has applied for or achieved ROC certification status and is making a ROC claim. Operations must have a valid License Agreement with the ROA. The farm or ranch that grows or raises crops, botanicals, and/or animals to be used for a food, cosmetics, or textile product. The first stage in the raw material supply chain. Certified producers will be referred to as “producers” and/or “operations” throughout this document.

Certified operation: See Certified producer.

Certified product: Raw material and/or packaged or processed goods that are certified under the Regenerative Organic Certified™ (ROC™) standard that is eligible for and intended to carry labeling claims

Chain of custody: The set of practices and documentation required to ensure that certified product (i.e. ROC plant or animal products) is segregated, identifiable, and traceable throughout the supply chain. Post-farm processors and handlers must maintain the proper chain of custody standards in order for a final consumer product to carry ROC claims.

Claimed material: The portion of a product that is intended to be used and eligible for ROC™ claims; see certified product.

Consumer facing content claims for textiles: These include but are not limited to hang/swing tags, claims displayed permanently on product, and alternative packaging.

Governing Documents: The Governing Documents consist of the ROA Marketing Guidelines for Brands and Farms, the ROC Framework, the Program Manual, the Operator Contract, the Supply Chain Guidelines, the Cost & Fee Structure, the License Agreement, and the Labeling Guidelines & Terms of Use. The Governing Documents are subject to change. Any expansion of or updates to the Governing Documents will be available at RegenOrganic.org/Resources.

Information panel: The labeled panel immediately to the right of the principal display panel, as displayed to the consumer. If the panel is not usable, due to package design and construction, then the information panel is the next label panel immediately to the right.

Principal display panel: The portion of a product packaging or label that is most likely to be displayed, presented, shown, or examined under customary conditions of display for sale.

Producer: See Certified producer.

Operation See Certified producer.

Regenerative organic ingredient(s): Agricultural material from a ROC™ Bronze, Silver, or Gold certified operation or portion of an operation.

ROC™ mark: Refers to the Regenerative Organic Certified™ name and all other trademarks, certification seals, logos, or any other proprietary designations owned by the Regenerative Organic Alliance.

3.0 Applicability

The Guidelines apply to agricultural products and crops resulting from operations or portions of operations certified to the Regenerative Organic Certified™ (ROC™) standard. The Guidelines shall be administered consistent with the ROC™ Framework, the Supply Chain Guidelines, the License Agreement, the Program Manual, the Contract for Operators, and the Cost & Fee Structure (collectively known as the “Governing Documents”) and the Regenerative Organic Alliance (ROA) Marketing Guidelines for Brands and Farms.

ROC™ 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 ROC™ claims must meet all criteria for USDA/NOP Organic labeling 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.

ROC™ product includes both single-ingredients and multi-ingredient product, in raw or processed form, that has maintained appropriate chain of custody throughout the supply chain. In this document, the term “certified product” refers to agricultural material from a ROC™ Bronze, Silver, or Gold certified operation or portion of an operation as certified by a

ROC Approved Certifying Body.

3.1 Prerequisites for ROC™ Seal Use

Use of the ROC™ marks (the Regenerative Organic Certified™ name and all other trademarks, certification seals, logos, or any other proprietary designations owned by the Regenerative Organic Alliance) is dependent on meeting all requirements laid out in the Governing Documents. As the ROC Framework and Governing Documents are subject to change, use of the ROC™ seal is dependent on meeting all requirements in the version published at RegenOrganic.org at the time of audit. Producers use of the ROC™ seal is dependent on having been awarded ROC status and having provided all details required by the ROC Supply Chain Guidelines. Producers must have a valid ROC™ certificate issued by a ROC Approved Certifying Body in order to use the ROC™ seal or sell products as Regenerative Organic Certified™. Any brand using the ROC™ seal, “Regenerative Organic Certified™,” and/or “regenerative organic [noun/verb]” must be registered with the ROA or have completed a License Agreement and paid any relevant fees.

4.0 Seal & Content Claim Guidelines

4.1 Content Claims Criteria





The type of ROC™ 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 of claimable ingredients and the total weight of the product, excluding water and salt. Further detail on each allowable claim category is provided in Section 4.3 and the Content Claims Matrix in Section 10.0. Allowable content claims differ for textile products, please see Section 6.0 for the particular guidance for textile products.

| ROC™ Content | Allowable Claims | ROC™ Seal Use |
|----------------|---|---------------|
| 100% | 100% Regenerative Organic Certified™ | Yes |
| 95% or greater | Regenerative Organic Certified™ | Yes |
| 70% or greater | Made with Regenerative Organic Certified™ [Specified Ingredients] | No |
| Less than 70% | Specified Regenerative Organic Certified™ Ingredients | No |

The content claim must specify the certification level claimed (i.e. Bronze, Silver, or Gold) through the use of the Bronze, Silver, or Gold ROC™ seal (where allowed) or a text distinction (example provided below).

In cases where ROC™ Bronze, Silver, and/or Gold product are mixed, the content claim shall defer to the lower certification level (i.e. Bronze). That is, in order to carry a ROC™ Gold seal and content claim, the product must contain at least the minimum amount of certified ROC™ Gold material for that claim category. For example, a product must contain 100% ROC™ Gold material in order to carry the “100% Regenerative Organic Certified™ Gold” claim. If a product contains less than 100% ROC™ Gold material and the remainder is made up of ROC™ Silver material, the “Regenerative Organic Certified™ Silver” claim should be used. Additional labeling guidance for mixed products is provided in the Content Claims Matrix in Section 10.0.

4.2 Content Claims Summary

| ROC™ Content | Claim | Seal | Claim Description | Requirements |
|------------------------------|--|--|--|--|
| 100% | 100% Regenerative Organic Certified™ |  Regenerative Organic Certified™ OR  Regenerative Organic Certified™ BRONZE | <ul style="list-style-type: none"> Product claim allowed on principal display panel ROC™ seal must be used with appropriate level designation Regenerative Organic Certified ingredients must be identified on the information panel | <ul style="list-style-type: none"> Product contains 100% ROC ingredients (by weight, 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 | <ul style="list-style-type: none"> Product claim allowed on principal display panel ROC™ seal must be used with appropriate level designation Regenerative Organic Certified ingredients must be identified on the information panel | <ul style="list-style-type: none"> Product contains at least 95% ROC ingredients (by weight, excluding water and salt) Product is certified at least 95% USDA/NOP Organic (or an approved international equivalent) Remaining ingredients can be organic or nonorganic Nonorganic ingredients must meet the criteria of the USDA/NOP Organic labeling standards (e.g. non-irradiated, non-GMO) |
| Greater than or equal to 70% | Made with Regenerative Organic Certified™ [Specified Ingredients] | No ROC™ seal use permitted | <ul style="list-style-type: none"> “Made With” claim on principal display panel, which may list up to three Regenerative Organic Certified ingredients or food groups Regenerative Organic Certified ingredients must be identified on the information panel | <ul style="list-style-type: none"> Product contains at least 70% ROC ingredients (by weight, excluding water and salt) Remaining ingredients can be organic or nonorganic Nonorganic ingredients must meet the criteria of NOP Organic labeling standards |
| Less than 70% | Specified Regenerative Organic Certified™ Ingredients | No ROC™ seal use permitted | <ul style="list-style-type: none"> 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 must be identified on the information panel | <ul style="list-style-type: none"> Product contains less than 70% ROC ingredients (by weight, excluding water and salt) Remaining ingredients can be organic or nonorganic Nonorganic ingredients must meet the criteria of NOP Organic labeling standards |

4.3 Allowable Content Claims

4.3.1 100% Regenerative Organic Certified™

Product that contains 100% ROC™ claimed material by weight may use the “100% Regenerative Organic Certified™” claim and/or the applicable ROC™ seal. The “100% Regenerative Organic Certified™” or “100% Regenerative Organic” claim may be used on the principal display panel. The certification claim must specify the certification level through seal color and/or text distinction, i.e. “100% Regenerative Organic Certified™ Silver” or “100% Regenerative Organic Certified™ Gold.” The seal used must be appropriate to the certification level of the claimed material (i.e. Bronze, Silver, or Gold). The 100% ROC™ claim must not conflict with NOP requirements for organic content claims.

If the product contains any combination of Bronze, Silver, and/or Gold content, any claims must defer to the lower certification level.

4.3.2 Regenerative Organic Certified™

Product that contains at least 95% ROC™ material by weight may use the “Regenerative Organic Certified™” claim and/or the applicable ROC™ seal. The “Regenerative Organic Certified™” or “Regenerative Organic” claim may be used on the principal display panel, and the seal used must be appropriate to the certification level of the claimed material. The certification claim must specify the certification level through seal color and/or text, i.e. “Regenerative Organic Certified™ Silver” or “Regenerative Organic Certified™ Gold.” The ROC™ claim must not conflict with NOP requirements for organic content claims.

The remaining non-claimed material (up to 5% of the product, by weight) may be organic or nonorganic (conventional). Any nonorganic ingredients must meet the criteria of NOP labeling standards for allowable production methods and excluded substances (e.g. non-irradiated, non-GMO, etc.).

If the product contains any combination of Bronze, Silver, and/or Gold content, any claims must defer to the lower certification level.

4.3.3 Made with Regenerative Organic Certified™ [Specified Ingredients]

Product that contains at least 70% and less than 95% ROC™ material by weight may use the “Made with Regenerative Organic Certified™ [Specified Ingredients]” claim on the principal display panel, where up to three certified ingredients or ingredient categories may be specified. The finished product cannot be represented as a Regenerative Organic Certified™ product or state “Made with Regenerative Organic Certified™ Ingredients.” The ROC™ claim must not conflict with NOP requirements for organic content or ingredient claims.

The “Made with” claim may list up to three ingredients or ingredient categories that are fully claimable as ROC™. 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 ingredient categories 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. The ingredient or category claim may be specified as ROC™ Bronze, Silver, or Gold.

The remaining non-claimed material (up to 30% of the product by weight) may be organic or nonorganic (conventional). Any nonorganic ingredients must meet the criteria of NOP labeling standards for allowable production methods and excluded substances (e.g. non-irradiated, non-GMO, etc.).

If the product contains any combination of Bronze, Silver, and/or Gold content, any claims must defer to the lower certification level.

4.3.4 Specified Regenerative Organic Certified Ingredients

Product that contains less than 70% ROC™ material may not display the ROC™ seal anywhere on packaging or use the term "Regenerative Organic Certified" or "Regenerative Organic" on the principal display panel. The remaining non-claimed material (over 30% of the product by weight) may be organic or nonorganic (conventional). Any nonorganic ingredients must meet the criteria of NOP labeling standards for allowable production methods and excluded substances.

If the product contains any combination of Bronze, Silver, and/or Gold content, any claims must defer to the lower certification level.

5.0 Seal & Language Use Guidance

5.1 Written Usage: Regenerative Organic Certified™

For all text claims, including those on the principle display panel and any other copy, the complete phrase "Regenerative Organic Certified™" must be used in the first instance and must be accompanied by the trademark indicator "™." The abbreviation "ROC™" may be used in subsequent instances. If you plan to use the "ROC™" abbreviation, the first instance must be made with the "™" immediately following the full statement "Regenerative Organic Certified™."

Regenerative Organic Certified™

Regenerative Organic Certified™ (ROC™)

5.2 Correct Versions of the ROC™ Seal

The ROC™ seal may only be used for products that meet the “100% Regenerative Organic Certified™” or “Regenerative Organic Certified™” criteria. The seal must denote the certification level (Bronze, Silver, or Gold) either via the colored seals or via the black and/or white seal with text that specifies the certification level attained. 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.



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



The ROC™ seal without text “Regenerative Organic Certified™” may be used for products that meet the “100% Regenerative Organic Certified™” or “Regenerative Organic Certified™,” where use of the full ROC™ is prohibitive due to package design and construction. 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. The seal can be used in black or white on a transparent background, otherwise, the seal may not be modified in any way. The seal must be used with additional text that specifies the certification level attained (i.e. Bronze, Silver, or Gold) as shown below.



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. Should the size of the ROC™ seal be prohibitive due to the package design and construction use of the alternate version of the seal without text 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. The words "Regenerative Organic Certified™" in the seal must remain legible.

5.4 Non-Consumer Facing Product Packaging/Unfinished Products

Regenerative Organic Certified™ products must be stored in packaging marked with Regenerative Organic Certified™ (i.e. soybeans, cotton, unprocessed mango, unroasted coffee beans). On-package use of ROC™ is dependent on meeting all requirements laid out in Section 3.1 Prerequisites of Labeling Use and alignment with the Governing Documents. Use of the ROC™ seal to identify non-consumer facing/unfinished products is prohibited unless the seller has a valid License Agreement and has paid any applicable fees.

5.5 ROC™ Produce

All Regenerative Organic Certified™ produce must display the ROC™ seal. The certification claim must specify the certification level through seal color and/or text, i.e. "Regenerative Organic Certified™ Silver" or "Regenerative Organic Certified™ Gold." The ROC™ claim must not conflict with NOP requirements for organic content claims.

- For loose produce, each piece must carry the seal, either as a standalone sticker or incorporated into the PLU sticker.
- For packaged produce, such as clamshells, 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 ROC™ Alcohol Products

Specific guidance for labeling of Regenerative Organic Certified™ alcohol products, such as wine, beer, or non-beverage alcohol products, will be released at a future date and will be available at RegenOrganic.org/Resources.

6.0 ROC™ Textiles

6.1 General

In order to display the ROC™ seal on product, the product must meet all requirements for the labeling of textiles products as organic under the NOP and in accordance with the 2011 USDA Policy Memo on Labeling of Textiles That Contain Organic Ingredients, addressing processing facilities and GOTS. 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. In order for a ROC™ claim to be made, all processors/handlers in the supply chain must be certified to GOTS or OCS. The ROC™ claim must not conflict with NOP

requirements for organic content claims for textiles. 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.

6.2 Allowable Content Claims

Consumer facing content claims for textiles include, but are not limited to, hang/swing tags, claims displayed permanently on product, and alternative packaging. Claimable textile material must be specified as Regenerative Organic Certified™ and the percentage of ROC™ 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 ROC™ claim where use of the full ROC™ claim with certification level is prohibitive due to design and construction. In such cases the certification level must be represented below or next to the primary ROC™ claim.

6.2.1 100% Regenerative Organic Certified™ [Specified Materials]

Product that contains 100% ROC™ claimed material by weight may use the "100% Regenerative Organic Certified™ [Specified Materials]" claim and/or the applicable ROC™ seal. 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 be represented as a "Regenerative Organic Certified™" product*. The certification claim must specify the certification level and textile material, i.e. "100% Regenerative Organic Certified™ Silver Cotton" or "100% Regenerative Organic Certified™ Gold Hemp." The 100% ROC™ claim must not conflict with NOP requirements for organic content claims for textiles.

All claimed materials identified in these products must be produced in accordance with the 2011 USDA Policy Memo on Labeling of Textiles That Contain Organic Ingredients. All processors in the supply chain must be certified to GOTS or OCS. If the product contains any combination of Bronze, Silver, and/or Gold content, any claims must defer to the lower certification level.

*Only products that are eligible to be labeled as organic finished products, i.e. an organic t-shirt, and are eligible to use the USDA seal on-product are eligible to make ROC™ finished product claims.

6.2.2 Regenerative Organic Certified™ [Specified Materials]

Product that contains at least 95% ROC™ material by weight may use the “Regenerative Organic Certified™ [Specified Materials]” claim and/or the applicable ROC™ seal. The “Regenerative Organic Certified™ [Specified Materials]” claim may be used as a consumer facing claim. The finished product cannot be represented as a “Regenerative Organic Certified™” product. The certification claim must specify the certification level and textile material, i.e. “Regenerative Organic Certified™ Silver Cotton” or “Regenerative Organic Certified™ Gold Hemp.” The ROC™ claim must not conflict with NOP requirements for organic content claims for textiles.

The remaining non-claimed material (up to 5% of the product, by weight) may be organic or nonorganic (conventional). Any nonorganic material must meet the criteria of NOP labeling standards for allowable production methods and excluded substances (e.g. non-irradiated, non-GMO, etc.).

All claimed materials identified in these products must be produced in accordance with the 2011 USDA Policy Memo on Labeling of Textiles That Contain Organic Ingredients. All processors in the supply chain must be certified to GOTS or OCS. If the product contains any combination of Bronze, Silver, and/or Gold content, any claims must defer to the lower certification level.

6.2.3 Contains Regenerative Organic Certified™ [Specified Materials]

Product that contains at least 50% and less than 95% ROC™ material by weight may use the “Contains Regenerative Organic Certified™ [Specified Materials]” claim as a consumer facing claim, where up to three certified materials may be specified. The finished product cannot be represented as a “Regenerative Organic Certified™” product or state “Made with Regenerative Organic Certified™ Content.” The ROC™ claim must not conflict with NOP requirements for organic content claims for textiles.

The “Contains” claim may list up to three materials that are fully claimable as ROC™. 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 ROC™ Bronze, Silver, or Gold.

The remaining non-claimed material (up to 50% of the product by weight) may be organic or nonorganic (conventional). Any nonorganic material must meet the criteria of NOP labeling standards for allowable production methods and excluded substances (e.g. non-irradiated, non-GMO, etc.).

All claimed materials identified in these products must be produced in accordance with the 2011 USDA Policy Memo on Labeling of Textiles That Contain Organic Ingredients. All processors in the supply chain must be certified to GOTS or OCS. If the product contains any

combination of Bronze, Silver, and/or Gold content, any claims must defer to the lower certification level.

6.2.4 Specified Regenerative Organic Certified™ Material Content

Product that contains less than 50% ROC™ material may not display the ROC™ seal anywhere on packaging or use the term “Regenerative Organic Certified™” or “Regenerative Organic” on the consumer facing claim. The remaining non-claimed material (over 50% of the product by weight) may be organic or nonorganic (conventional). Any nonorganic material must meet the criteria of NOP labeling standards for allowable production methods and excluded substances. The ROC™ claim must not conflict with NOP requirements for organic content claims for textiles.

All claimed materials identified in these products must be produced in accordance with the 2011 USDA Policy Memo on Labeling of Textiles That Contain Organic Ingredients. All processors in the supply chain must be certified to GOTS or OCS. If the product contains any combination of Bronze, Silver, and/or Gold content, any claims must defer to the lower certification level.

6.3 Use of ROC™ seal

Use of the ROC™ seal is restricted to textile products are in alignment with the 2011 USDA Policy Memo on Labeling of Textiles That Contain Organic Ingredients. 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 6.2.

If the product contains any combination of Bronze, Silver, and/or Gold content, any claims must defer to the lower certification level.

6.4 Product Specific Claim

Text claims such as “Regenerative Organic Certified™” or “Regenerative Organic” cannot be used as part of the legally registered product name. “Regenerative Organic Certified™ [textile/material]” 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 claim must specify the certification level and textile product, i.e. “Regenerative Organic Certified™ Silver Cotton Shorts” or “Regenerative Organic Certified™ Gold Hemp Sweater.” On consumer facing content claims the certification level may be listed

separate from the ROC™ claim where use of the full ROC™ claim with certification level is prohibitive due to design and construction. In such cases the certification level must be represented below or next to the primary ROC™ claim.

If the product contains any combination of Bronze, Silver, and/or Gold content, any claims must defer to the lower certification level.

The ROC™ claim must not conflict with NOP requirements for organic content claims. Products 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.

7.0 Packaging Requirements

7.1 Principal Display Panel

Principal display panel text claims may be used for “Regenerative Organic Certified™” or “Made with Regenerative Organic Certified™ [Specified Ingredients]” products. All words in the text claim must be in the same format, without highlighting.

Text claims such as “Regenerative Organic” or “Regenerative Organic Certified™” cannot be used as part of the legal product name or listed in front of the product name.

“Regenerative Organic Certified™” can be used as a text claim on the principal display panel below the legal product name. Text claims must be displayed in accordance with the NOP organic labeling requirements.

Allowed Format

Coffee

Regenerative Organic Certified™

Prohibited Format

~~**Regenerative Organic
Coffee**~~

7.2 Information Panel

The term “Regenerative Organic Certified™” or “regenerative organic [noun/verb]” may only be used on the back of pack as part of the product romance 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). If the product contains any combination of Bronze, Silver, and/or Gold content, any claims must defer to the lower certification level.

Reference to “regenerative organic” agriculture, ingredients, farming, etc. is reserved for products that contain ROC 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 ROC ingredients may be listed. Identification of ROC ingredients must not conflict with NOP requirements for identification of ingredients as “organic.”

Below are formats that satisfy the above requirement:

Preferred Format:

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 Address

Certified Organic by _____

Contains: Regenerative Organic Certified™ wheat and milk

Alternative Format:

Ingredients: wheat*, milk*, eggs, sugar, salt, water

*Regenerative Organic Certified™

Company Address

Certified Organic by _____

7.3 'Certified By' Statement

The information panel may identify the Certifying Body that certified the finished ROC™ 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. The ROC “Certified By” statement must be made in addition to the “Certified By” statement for organic and cannot serve as a replacement for the “Certified By” statement required under the NOP.

8.0 Marketing & Communication Materials


All promotional materials (digital or printed) that use Regenerative Organic Certified™ seal be approved by the ROA prior to use. Use of the seal must be done in alignment with the requirements around seal use and content claims laid out in Section 5.2.

All promotional materials (digital or printed) that make claims about “Regenerative Organic Certified™” or “regenerative organic [noun/verb]” must be done in reference to product or ingredients that have received certification and are in compliance with the Governing Documents. “Regenerative Organic Certification” is not an applicable term to describe certification status or the Regenerative Organic Certified™ standard. Use of the terms “regenerative organic” or “Regenerative Organic Certified™” in association with products or ingredients that are not ROC™ is in violation of the Guidelines. All ROC claims must be in reference to the certification status of the farm level and must not imply certification of the full supply chain.

The ROC™ seal and “Regenerative Organic Certified™” can be used for general reference to the overall program as long as products or ingredients without ROC status are not misrepresented as having achieved certification. The abbreviated ROC™ 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 ROC™ seal must be used.

All regenerative organic claims must be displayed in accordance with the NOP organic labeling requirements.

| Criteria | 95%-100% | >70% & <95%** | <70% | Example |
|--|----------|---------------|------|---|
| May use ROC™ seal (in reference to certified products) | ✓ | ✓ | ✗ |  |
| May make “Made with Regenerative Organic Certified™ [Specified Ingredients]” statement in reference to certified ingredients only* | ✓ | ✓ | ✗ | Now Made with Regenerative Organic Certified™ Tangerine and Strawberry |
| May use “Regenerative Organic Certified™” or | ✓ | ✓ | ✓ | Now sourcing ROC™ cotton! Strawberries are now |

| | | | | |
|---|---|---|---|---|
| "ROC™" to describe ROC sourcing status | | | | Regenerative Organic Certified™! |
| May use "regenerative organic [noun/verb]" to describe the certified producers practices* | ✓ | ✓ | ✓ | Our farms use regenerative organic farming practices. |
| May use ROC™ seal and "Regenerative Organic Certified™" can be used for general reference to the certification. | ✓ | ✓ | ✓ |  <p>Our food system is in dire need of change—that's why we support Regenerative Organic Certified™.</p> |

*Must comply with NOP labeling guidelines

**The "Contains" category claim for textiles is >50% & <95%

9.0 Labeling Terms of Use

9.1 Terms of Use

The ROA exists to promote Regenerative Organic Certified™ as the highest standard for regenerative organic agriculture around the world. We aim to empower eaters and farmers to create a better world through regenerative organic farming. The ROC™ marks are trademarks owned by ROA and are used to indicate that ingredients in a product are sourced from a farm that is certified per ROA's guidelines found in the ROC Framework. Only Regenerative Organic Certified™ producers and authorized licensees (ex. brands with a valid license agreement) may use the ROC™ marks. Use of the ROC™ marks is dependent on meeting all requirements laid out in section 3.1 Prerequisites of Labeling Use, alignment with the Governing Documents, and compliance with these Guidelines. Each legal entity throughout a supply chain (brand owners, producers, or finished goods manufacturers, etc. making a ROC™ claim) must complete its own License Agreement in order to carry forth the ROC™ marks.

9.2 Misuse of the Seal

The ROC™ seal may not be used in a misleading or deceptive fashion to mischaracterize one's products. Further, the ROC™ seal may not be used as a primary brand indicator or indicator of source or origin for any goods, but only as a certification mark and should not appear more than half as large as the primary product branding. The ROC™ seal 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 ROC™ seal or in any manner that violates the rights of any third parties.

The ROC™ seal can be used in Bronze, Silver, or Gold (to indicate the certification level) or in Black or White on a transparent background. No other color variations are allowed and the ROC™ seal may not be modified in any way. Avoid placing the seal on brightly colored, patterned, or otherwise busy backgrounds.

Certified producers and authorized licensees agree to use the ROC™ name and seal(s) only in accordance with ROC standards and ceasing all use of ROC's name and seal upon notice by the ROA. Any use of ROC's names or marks, without the expressed consent of the ROA, is strictly prohibited and constitutes an infringement of the ROA's rights. 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.

9.3 Review of Seal Use

All use of the ROC™ marks by ROC™ operations, brands, or finished goods manufacturers are required to undergo review and approval prior to printing packaging or sales as "Regenerative Organic Certified™." Certified producers will submit labels to the ROC Approved Certifying Body (CB). Authorized licensees will submit labels to the ROA. Review of labels prior to printing will save your operation considerable expense and avoid issues arising with non-compliances. Review and approval time will depend on the workload of the ROA and CB staff. Contact and work closely with the ROA staff and relevant CB to coordinate timelines for label development purposes. Operations and brands should plan for a minimum of four weeks for the review and approval of any packaging making a ROC™ claim. Clients with any questions about product labeling should contact ROA staff for additional guidance. Any marketing and/or communications use of the ROC™ seal must be explicitly approved by the ROA and the ROC™ seal graphic files must be directly obtained from the ROA.

9.4 ROC™ Seal Distribution

Regenerative Organic Certified™ producers may request the ROC™ seal files from the relevant ROC Approved Certifying Body. Authorized licensees must request the ROC™ seal files from the ROA. Use of the Regenerative Organic Certified™ seal must follow the requirements set forth in the Guidelines and the Governing Documents. Any marketing and/or communications use of the ROC™ seal must be explicitly approved by the ROA and the ROC™ seal graphic files must be directly obtained from the ROA.

9.5 Basic ROC™ Labeling Requirements

All operations must have clear and distinct labeling that distinguishes between products that are: Regenerative Organic Certified™, 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 regenerative organic product is being marketed as conventional. All certified producers must submit all labels with any ROC™ claim to the relevant ROC Approved Certifying Body to verify compliance with the Guidelines, ROC Supply Chain Guidelines, and all Governing Documents. The ROC™ seal may not be used on products from acreage/animals/facilities in “Certification Pending” status. Authorized licensees must submit labels to the ROA for review and approval. A Claimed Material & Product Formulation Worksheet and a Supply Chain Map must be submitted for each product that carries a ROC™ claim. A sample Supply Chain Map is included as part of the Claimed Material & Product Formulation Worksheet available at [RegenOrganic.org/Resources](https://www.RegenOrganic.org/Resources).

9.6 Traceability Requirements for ROC™ Product Claims

Regenerative Organic Certified™ product intended for processing must maintain and demonstrate current certification to USDA/NOP Organic (or an approved international equivalent) and; further, must appear as a unique and distinct product on a current NOP organic certificate. ROC™ product includes both single-ingredients and multi-ingredient product, in raw or processed form, that has maintained appropriate chain of custody throughout the supply chain subject to inspection/verification.

Certified product must maintain appropriate separation from non-certified product throughout the supply chain and must comply with USDA/NOP Organic chain of custody requirements and policies.

Certified product from a single origin must be maintained separate from other product throughout transport and storage. Certified product must not be physically mixed with non-certified product or with certified product from another source (i.e. organic coconut oil must be separated from ROC coconut oil) until it reaches its final processing facility. This ensures that product carrying a ROC claim is sourced from ROC™ certified farms. Exemptions may be allowed for unique circumstances but must comply with USDA/NOP organic regulations. Exemptions are granted by ROC Approved Certifying Bodies (see ROC Supply Chain Guidelines available at [RegenOrganic.org/Resources](https://www.RegenOrganic.org/Resources) for details.)

10.0 Content Claims Matrix

The following table summarizes the allowable claims based on the certified content of a finished product and in the case of mixed certification levels (i.e. ROC™ Bronze, Gold, and Silver).

| Label | Product Content | | | | | Allowable Claim | Principal Display Panel | Information Panel |
|------------------------------|-----------------|--------|--------|--------------|---------------|---|---------------------------|--|
| | Gold | Silver | Bronze | Non-ROC | Total ROC | | | |
| ROC™ Seal Allowed | 100% | 0% | 0% | 0% | 100% | 100% Regenerative Organic Certified™ Gold | Text claim & Gold Label | Regenerative Organic Certified™ Ingredients may be specified |
| | <100% | >0% | 0% | 0% | 100% | 100% Regenerative Organic Certified™ Silver | Text claim & Silver Label | |
| | <100% | <100% | >0% | 0% | 100% | Regenerative Organic Certified™ Bronze | Text claim & Bronze Label | |
| | >95% | <5% | <5% | <5% | >95% | Regenerative Organic Certified™ Gold | Text claim & Gold Label | |
| | <95% | >0% | >0% | <5% | >95% | Regenerative Organic Certified™ Silver | Text claim & Silver Label | |
| | <95% | <95% | >0% | <5% | >95% | Regenerative Organic Certified™ Bronze | Text claim & Bronze Label | |
| ROC™ Seal not Allowed | >70% and <95% | | | >5% and <30% | >70% and <95% | Made with Regenerative Organic Certified™ [Specified Ingredients] | Text claim | |
| | <70% | | | >30% | <70% | Specified Regenerative Organic Certified™ Ingredients | NONE | |