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Regenerative  
Organic  
Certified™

# Framework for Regenerative Organic Certification

Includes guidelines for:

- Soil Health and Land Management
- Animal Welfare
- Farmer and Worker Fairness

October 2019: Pilot Program Version

# I. Introduction

As agricultural practices continue to evolve, it is imperative that approaches to land management and associated processes are focused on contributing to the health of ecosystems, including human communities.

Regenerative Organic Certification builds upon and furthers the near 100-year legacy of organic movement visionaries like J. I. Rodale, Dr. Rudolf Steiner, Sir Albert Howard, and the generations of diverse holistic producers that they channeled for inspiration and direction.

Regenerative Organic Certification includes guidelines for farming and ranching operations, transportation, slaughter, and certain processing facilities that produce food and fiber. Using the United States Department of Agriculture's National Organic Program (USDA Organic) certified organic standard (or its international equivalency<sup>1</sup> as formally determined by NOP pursuant to a trade arrangement entered into with NOP) as a baseline requirement (i.e. to achieve Regenerative Organic Certification, an entity must also hold USDA organic certification or an equivalent formally recognized by NOP), Regenerative Organic Certification adds criteria and builds off these and other standards in the areas of soil health and land management, animal welfare, and farmer and worker fairness. The goal of Regenerative Organic Certification is to promote holistic agriculture practices in an all-encompassing certification that:

- Increases soil organic matter over time and sequesters carbon below and above ground, which could be a tool to mitigate climate change;
- Improves animal welfare; and
- Provides economic stability and fairness for farmers, ranchers, and workers.

Regenerative Organic Certification consists of three specific modules: Soil Health and Land Management, Animal Welfare, and Farmer and Worker Fairness.

Regenerative Organic Certification is a living document and thus, will be continuously reviewed and revised by a committee of experts as new best practices emerge. At the same time, Regenerative Organic Certification will always be tied, at a minimum, to all requirements, policies, interpretations and determinations of NOP and authorized third-party certifiers operating on NOP's behalf. Any ambiguity or issue that arises as to application of the Regenerative Organic Certification program shall always be resolved in favor of consistency with NOP requirements when the issue falls within the purview of NOP.

## Leveraging and Advancing Organic Standards

Regenerative Organic Certification does not aim to compete with or negate current organic standards, but instead serves as a mechanism to support these standards. For example, Regenerative Organic Certification includes as a minimum requirement that a qualifying product must be certified organic consistent with the U.S. NOP program requirements. Regenerative Organic Certification builds upon the standards set forth by USDA Organic as well as other programs internationally, particularly in the areas of animal welfare and farmer and worker fairness, with an additional emphasis on the regenerative organic practices that are aimed at increasing soil health and sequestering carbon in the process.

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<sup>1</sup> Criteria for international equivalent includes only those with which the USDA currently has a trade agreement.

# II. Scope & Structure

## Scope

Regenerative Organic Certification covers requirements for farming and ranching operations, transportation, slaughter, and certain processing facilities for food and fiber in small, medium, and large farms globally. Regenerative Organic Certification seeks to create change across a wide variety of farms and ranches in order to scale best practices to the widest audience possible.

The USDA provides national standards for organically-produced agricultural products, which assures consumers that products with the USDA Organic seal meet consistent, uniform standards. In addition to requiring adherence with NOP's organic program requirements, Regenerative Organic Certification also looks to international standards as the basis for Regenerative Organic Certification, with additional requirements included for Soil Health and Land Management, Animal Welfare, and Farmer and Worker Fairness.

As program manager of Regenerative Organic Certification, NSF will assist in building an oversight committee, creating a protocol and compliance system, certifying auditors, conducting ongoing monitoring and reporting, and acting as a registrar and system manager. The NSF administration will at all times take account of a participating entity's status under the NOP program. For example, a producer that loses its NOP certification would not be eligible to participate in the Regenerative Organic Certification program because NOP compliance is a prerequisite requirement for eligibility for Regenerative Organic Certification.

## Structure

There are three levels of Regenerative Organic Certification: Bronze, Silver, and Gold, with the Gold designation representing the highest achievable level and the Bronze level representing the beginning level. This tiered approach enables producers to adjust and adapt their practices over time and allows for continuous improvement.

### Levels of Regenerative Organic Certification at the Producer level:

- **Bronze Level:** Can be claimed publicly in marketing or web content; however, no product labeling is permitted. Annual recertification is required. An operation must advance to Silver or Gold level within three years to continue making public claims. Claims about organic and regenerative organic can only be made about products specifically grown on land that is already certified organic.
- **Silver Level:** Product labeling is permitted. Annual recertification is required. To claim Regenerative Organic Certification at the Silver level, at least 50% of fiber-or-food-producing land within an operation must be certified at initial certification and must reach at least 75% by year 5, and the certified portion must represent at least 50% of the operation's revenue derived from food or fiber production. Claims about organic and regenerative organic can only be made about products produced from land that is already certified organic. Any organic and regenerative organic labeling must also abide by USDA organic labeling regulations.
- **Gold Level:** Product labeling is permitted. Annual recertification is required. To claim Regenerative Organic Certification at the Gold level, 100% of fiber-or-food-producing land of an operation must be certified, representing 100% of revenue derived from food or fiber production. Any organic and regenerative organic labeling must also abide by USDA organic labeling regulations.

Labeling guidelines for manufacturing and final products are described in detail in the ROC Labeling and Chain of Custody Guidelines.

*\*Note:* Operations will not be eligible for Regenerative Organic Certification at any level until they achieve USDA

Organic certification. Engagement in transitional programs is encouraged but not required for Regenerative Organic Certification.

The Soil Health and Land Management, Animal Welfare, and Farmer and Worker Fairness modules contain “Guidelines” for each level of certification, which provide guidance that operations should meet, depending on the level of certification sought. Guidelines include practices that are:

- **Required Practices (R):** Practices that operations must meet for an operation to be eligible for Regenerative Organic Certification at the desired level.
- **Optional Practices (O):** Practices that are encouraged for all, but not required, at a particular level. Optional Practices (O) shift to Required Practices (R) as a producer advances from Bronze to Silver to Gold levels.
- **Critical Tolerances (CT):** Practices that require action on the part of producers and must be reported immediately and remediated within 30 days. If the Critical Tolerance (CT) is not resolved within 30 days, a producer cannot claim Regenerative Organic Certification.

To achieve the desired level of Regenerative Organic Certification, an operation must meet 100% of the Required Practices (R) for that level. Remember, participation at any level of Regenerative Organic Certification requires that the entity is properly certified as organic by a NOP-approved certifier and complies with all NOP requirements.

## Key Terms and Practice Areas

Regenerative practices are described in depth in each module: Soil Health and Land Management, Animal Welfare, and Farmer and Worker Fairness. The below bullets include important practices and definitions that are referred to and built upon in the guidelines for each module. For chemical and transitional producers, familiarity with these practices and definitions can serve as the first step in incorporating regenerative practices into their operation prior to officially applying for Regenerative Organic Certification.

### Soil Health and Land Management:

- **Agroforestry:** The practice of incorporating cultivation and conservation of trees as part of an agricultural operation.
- **Biodiversity:** Biodiversity, or biological diversity, is the diversity of life existing at three levels: genetic, species, and ecosystem. Biodiversity includes variety in all forms of life, from bacteria and fungi to grasses, ferns, trees, insects, and mammals. It encompasses the diversity found at all levels of organization, from genetic differences between individuals and populations (groups of related individuals) to the types of natural communities (groups of interacting species) found in a particular area. Biodiversity also includes the full range of natural processes upon which life depends, such as nutrient cycling, carbon and nitrogen fixation, predation, symbiosis and natural succession.
- **Carbon Sequestration:** The process by which atmospheric carbon dioxide is taken up by trees, grasses, and other plants through photosynthesis and stored as carbon in biomass (trunks, branches, foliage, and roots) and soils. For agricultural operations, increased carbon sequestration may be achieved through, for example, no-till or low-till practices, agroforestry, reforestation, or the use of biomass-containing amendments.
- **Compost:** Compost, when properly managed, results in a high-quality soil amendment. Compost may increase the water holding capacity of the soil, helping farmers to produce a good crop even in years of low rain. Compost improves soil structure and stability, recycles nutrients, stabilizes volatile nitrogen, converts

wastes into resources and suppresses soil-borne diseases. The composting process destroys weed seeds and pathogenic microorganisms, while beneficial microorganisms grow and multiply in great numbers. Synthetic amendments can provide soluble nutrients for plant growth, but do not build the soil's long-term biological reserves as well as compost does, and therefore are not permitted under Regenerative Organic Certification.

- **Cover Cropping:** A cover crop is a crop planted primarily to reduce soil erosion and prevent desiccation of soil microbial communities, resulting from soil left exposed. Cover crops may suppress weeds, recycle nutrients back to the soil, increase soil organic matter, sequester carbon in the soil, and reduce erosion.
- **Crop Rotation:** Crop rotation is a systematic approach where producers rotate crop varieties and locations from one year to the next. The goals of crop rotation are to help manage organic soil fertility and also to help avoid or reduce problems with soil-borne diseases and some soil-dwelling insects, such as corn rootworms.
- **Invasive Species:** Invasive plants and animals that are non-native (or alien) to the ecosystem under consideration and whose introduction causes or is likely to cause economic or environmental harm or harm to human health. Invasive species can be plants, animals, and other organisms (e.g. microbes). Human actions are the primary means of invasive species introductions.
- **Pasture:** Pasture is a land use type having vegetation cover comprised primarily of native or introduced forage species that is used for livestock grazing.
- **Perennial Crops:** Crops which are alive year-round and are harvested multiple times before dying. Apples and alfalfa are examples of perennials that are already commercially grown and harvested. Perennial plants develop much greater root mass than annual crops and protect the soil year-round, leaving fields less vulnerable to wind, water, and soil erosion.
- **Riparian Areas:** Plant communities contiguous to and affected by surface and subsurface hydrologic features of perennial or intermittent moving and standing water bodies (e.g. rivers, streams, lakes, or drainage ways). Riparian areas have one or both of the following characteristics: 1) distinctly different vegetative species than adjacent areas, and 2) species similar to adjacent areas but exhibiting more vigorous or robust growth forms. Riparian areas are usually transitional between wetland and upland.
- **Rotational Grazing:** Rotational grazing is a livestock production system where livestock graze in one portion (a paddock) of a pasture that has been divided into several paddocks. Livestock are systematically moved from paddock to paddock based on the stage of growth of the forages and on the objectives of the grazing system. While one paddock is being grazed, the rest of the pasture rests. This rest and recovery time maintains forage plants and builds soil organic matter.
- **Silvopasture:** The practice of combining forestry and grazing of animals in a mutually beneficial way. A properly managed silvopasture operation enhances soil protection and increases long-term incomes due to the simultaneous production of trees and grazing animals.
- **Soil Health:** Improving soil health is one of the key targets of Regenerative Organic Certification. Soil health is measured by various factors, from the amount of nutrients in the soil (i.e. nitrogen), soil organic matter, humic acid (the component of soil that sequesters carbon over the long term), and biological life (among other metrics described in detail below).
- **Tillage:** Preparation of soil by mechanical agitation of various types, such as digging, stirring, and overturning. Regenerative Organic Certification aims to minimize tilling. Biological principles and mechanical cover crops may reduce or eliminate the need for tilling.

## Animal Welfare:

- **Body Condition Score:** A system of measuring how thin or fat an animal is by reference to a standardized scale.
- **Carrying Capacity:** The average number of animals that can be rotationally grazed on a given area of pasture for a year without harming it. It is a measure of a pasture's ability to produce enough forage to meet the requirements of grazing animals.
- **Concentrated Animal Feeding Operations (CAFO):** Concentrated Animal Feeding Operations (CAFOs), as defined by the U.S. Environmental Protection Agency (EPA), are agricultural operations where animals are kept and raised in confined situations. A CAFO is a lot or facility (other than an aquatic animal production facility) where animals have been, are, or will be stabled or confined and fed or maintained for a total of 45 days or more in any 12-month period, and crops, vegetation, forage growth, or post-harvest residues are not sustained in the normal growing season over any portion of the lot or facility. The EPA provides specific thresholds by animal sector for small, medium, and large CAFOs. For example, a large CAFO for cattle is defined as 1,000 or more "animal units" confined for over 45 days a year.
- **Commercial Livestock Operation:** Animals are raised with the primary purpose of generating a profit. Non-commercial animals are those that generally have functions outside of or alongside profit, such as draught power, transport, manure production, or for educational purposes. Contact the ROA for additional guidance on determining if your livestock operation is considered commercial under the ROC.
- **Five Freedoms:** The Animal Welfare module leverages the five freedoms for animal welfare, which include:
  1. Freedom from hunger or thirst by ready access to fresh water and a diet to maintain full health and vigor.
  2. Freedom from discomfort by providing an appropriate environment including shelter and a comfortable resting area.
  3. Freedom from pain, injury, and disease by prevention or rapid diagnosis and treatment.
  4. Freedom to express normal behaviors by providing sufficient space, proper facilities and company of the animal's own kind.
  5. Freedom from fear and distress by ensuring conditions and treatment that avoid mental suffering.
- **Handling:** The handling of animals covers the general treatment of animals during the various tasks performed and requirements of an operation. To minimize stress, pain, and suffering to an animal, Regenerative Organic Certification prohibits certain practices, such as prodding (jabbing of animal with instrument), hot / cold branding, wattling (cutting chunks out of an animal's hide to hang under the animal's neck), and disbudding (removal of horn buds).
- **Mobile Harvesting Unit:** A mobile harvest unit, or mobile slaughterhouse, enables livestock and poultry farmers to slaughter their animals humanely on-site. This decreases the exposure of animals to stressful and inhumane treatment at large scale slaughter facilities.
- **Monogastrics:** Monogastric animals have a simple single-chambered stomach and include dogs, pigs, horses, and rabbits. Their ability to extract energy from cellulose digestion is less efficient than in ruminants, and therefore are permitted to feed on grains.
- **Non-Ambulatory Animals:** Animals that cannot rise from a recumbent position or that cannot walk, including, but not limited to, those with broken appendages, severed tendons or ligaments, nerve paralysis, fractured vertebral column, or metabolic conditions.
- **Ruminants:** Ruminant species include cud-chewing animals such as cows, goats, bison, and sheep. Ruminants are designed to eat fibrous grasses, plants, and shrubs. A high-grain diet may cause physical problems for ruminants. Additionally, when ruminants are switched from pasture to grain, they can become afflicted with numerous disorders, including a common but painful condition called "subacute acidosis."



## Farmer and Worker Fairness

- **Atypical Employment:** The use of labor-only contracting arrangements, consecutive short-term contracts and/or false apprenticeship or other schemes by the organization to avoid meeting its obligations to personnel under applicable laws and regulations pertaining to labor and social security.
- **Capacity Building:** The process of developing and strengthening the skills, instincts, abilities, processes, and resources to improve the social and economic position of farmers and workers.
- **Democratic Organizations (International):** The ability for small-scale farmers to be democratically organized in order to be able to compete globally.
- **Equal Opportunity:** The policy of treating job applicants or employees equally without regard to the person's race, color, gender, pregnancy, sexual orientation, disability, marital status, age, religion, political opinion, national extraction, social origin, or other personal characteristics.
- **Fair Payments:** Payment sufficient to cover cost of production including living wages for any workers and equivalent income to farmers, plus reinvestment in farm.
- **Freedom of Association and Collective Bargaining:** The method whereby representatives of workers (unions) and producers (farmers/ranchers) negotiate the conditions of employment, often resulting in a written contract setting forth the wages, hours, and other conditions to be observed for a stipulated period. Collective bargaining should be conducted in good faith.
- **Living Wage:** The remuneration received for a standard work week by a worker in a particular place sufficient to afford a decent standard of living for the worker and her or his family. Elements of a decent standard of living include food, water, housing, education, health care, transport, clothing, and other essential needs including provision for unexpected events.
- **Routine Workplace Audits:** Routine third-party audits should assess that producers minimize exposure to disease, ensure access to safe inputs, provide clean facilities, document identification procedures, record use of treatment products, and properly train workers on the operation's protocols.
- **Smallholder:** Small farming operations where land and labor productivity are comparatively low due to limited resources. Smallholder farmers often rely on farming as a primary means of livelihood and are at greater risk of vulnerability in the supply chain. Smallholders rely primarily on family labor for farm operations. Smallholder size may vary by farm type and commodity; however, some certifications set thresholds so confirm with your certification program, if applicable. Most smallholders are organized by Internal Control System (ICS) for certification purposes. Contact the ROA for additional guidance on determining if your operation is considered a smallholder under the ROC.
- **Trafficked Labor:** Any work performed by a person who has been recruited, transported, harbored or obtained by means of the use of threat, force, coercion or deception for the purpose of exploitation.

## **Regenerative Organic Alliance and Stakeholder Review Process**

The Regenerative Organic Certification program is overseen by the Regenerative Organic Alliance, a non-profit established to continuously review and update the certification's guidelines. The Regenerative Organic Alliance (ROA) works in partnership with NSF International as the Scheme Manager for the ROC. ROA is made up of experts in farming, ranching, soil health, animal welfare, and farmer & worker fairness, and will regularly reevaluate certification guidelines and update the certification as necessary.

Organizations that are represented on the board of the Regenerative Organic Alliance include:

Compassion in World Farming	Dr. Bronners	Fair World Project
Lighthouse Farming Network	Patagonia	Rodale Institute (Chair)
Textile Exchange	White Oak Pastures	Wild Farm Alliance

Additionally, review subcommittees for the Soil Health and Land Management, Animal Welfare, and Farmer and Worker Fairness modules are comprised of the following stakeholders:

- Farmers, ranchers, and workers
- Auditors
- Social and animal welfare non-governmental organizations
- Veterinarians with farm animal expertise
- Agricultural economists
- Environmentalists and environmental non-governmental organizations
- Certification and standard experts and qualified trade organizations
- Retailers, food companies, and brands that support regenerative practices

The Regenerative Organic Certification will be continually reviewed and revised as necessary.

## III. Demonstration of Compliance

All levels of Regenerative Organic Certification require producers to be in compliance with local, provincial/state and national laws for animal welfare, labor rights, and land management. In addition, USDA organic requirements are a baseline for Regenerative Organic Certification, therefore, producers must comply with the requirements for geographically-appropriate organic certification requirements. The highest requirement, whether local law or Regenerative Organic Certification, applies for each of the sections in the standard.

Regenerative Organic Certification compliance is demonstrated by successfully receiving certification for existing standards noted within each module, as well as by undergoing third-party audits for additional elements required under Regenerative Organic Certification. In order to avoid redundant work and to conduct efficient audits, third-party auditors will only audit for additional requirements not found in existing certifications.

Each production or handling operation or specified portion of a production or handling operation that produces or handles crops, livestock, livestock products, or other agricultural products that are intended to be sold, labeled, or represented as organic and regenerative organic must meet all Regenerative Organic Certification requirements, as well as USDA organic requirements. No provision of this Framework or any element of the Regenerative Organic Certification program shall be read or applied in a manner that is inconsistent with NOP program requirements or policies.

### Audit Protocols & Oversight

Regenerative Organic Certification will leverage the audit protocols and auditor requirements of standards recognized under Regenerative Organic Certification. Where those requirements are unsatisfactory and/or to certify the additional requirements described under Regenerative Organic Certification, auditing steps should comply with the guidance outlined in the ROC Auditor Training guidelines.

The Regenerative Organic Alliance and NSF International will work with USDA-accredited certifiers, so that they are trained and able to grant Regenerative Organic Certification in the pillar for which they have proven competency. In addition to those organizations accredited and overseen by the Agricultural Marketing Service National Organic Program, NSF International will accredit certifying bodies for Regenerative Organic Certification, who will verify and document all Regenerative Organic Certification claims. NSF International will also oversee the misuse or misrepresentation of Regenerative Organic Certification claims, removing certification from those who do not comply with certification requirements.

NSF International will oversee the enforcement mechanism to address any misuse of the Regenerative Organic Certification label or incorrect claims regarding the Regenerative Organic Certification program. NSF International will oversee and conduct regular audits of certification bodies, investigate complaints, issue warning notices, and suspend or revoke accreditation of certification bodies. NSF International will also create a database of accredited certification bodies, Regenerative Organic certified entities, fraudulent certification claims, and entities who have had their certification suspended or revoked.

Regenerative Organic Certification certifying bodies will inspect operations on an annual basis, investigate violations, issue non-compliance notices, quickly correct any issues to bring an operation into compliance, and suspend or revoke certifications, when necessary.

### **Cost Structure of Inspection, Certification, and Labeling**

[Through the pilot program, more information will be available regarding the cost structure, including cost of inspection, cost of labeling, and how certification can be bundled with existing standards or certification bodies, etc.]

## **IV. Organic Baseline & Equivalents**

To receive Regenerative Organic Certification, all requirements listed in this document must be met and all products sold, labeled, or represented as regenerative organic must also comply with USDA organic regulations at 7 CFR Part 205, National Organic Program.

Additionally, all international organic standards from nations that have bilateral arrangements with the United States meet Regenerative Organic Certification equivalency requirements. In addition to the European Union, this includes Japan, Canada, Switzerland, Taiwan, and South Korea. The United States also recognizes India and New Zealand organic standards. Future equivalency arrangements will also meet the organic equivalency baseline requirement.

## **V. Soil Health & Land Management**

The Soil Health and Land Management module of Regenerative Organic Certification seeks to facilitate the adoption of agricultural practices that build, rather than degrade, soils, by increasing soil organic matter, biodiversity, and fertility.

# 1. Standards for Soil Health and Land Management

1. OPERATION MANAGEMENT	Practice Description	Bronze	Silver	Gold
1.1 Existing Certifications	Operation has proof of existing USDA Organic certification or recognized equivalent.	R	R	R
1.2 Regenerative Practices	<p>Operations incorporate the following practices to improve overall ecosystem health and productivity of operations:</p> <ul style="list-style-type: none"> <li>- Agroforestry</li> <li>- Anaerobic Digester</li> <li>- Buffer Strips or Buffer Zones (incl. Contour Buffer Strips)</li> <li>- Compost Application</li> <li>- Cover Crops</li> <li>- Crop Rotations</li> <li>- Forage &amp; Biomass Planting</li> <li>- Forest Stand Improvement and Forest Slash Treatment</li> <li>- Grassed Waterways</li> <li>- Herbaceous Wind Barriers &amp; Field Borders</li> <li>- Integrated Crops &amp; Animals</li> <li>- Moisture-Sensing Technologies for Irrigation</li> <li>- Mulching</li> <li>- Perennial Planting</li> <li>- Pollinator Habitats, Insectary Strips, or Wildlife Habitat</li> <li>- Reclamation of Mined Land or Landslide Treatment</li> <li>- Reduction of Off-Farm Inputs &amp; Recycling of On-Farm Biomass</li> <li>- Riparian Restoration</li> <li>- Silvopasture Establishment</li> <li>- Tree / Shrub Establishment</li> <li>- Vegetative Barriers</li> <li>- Water Conservation and/or Wetland Restoration</li> <li>- Windbreak &amp; Shelter Belt Establishment</li> </ul> <p>Operators document these interventions with photos, preferably linked to GPS coordinates.</p> <p>Requirements by level:</p> <ul style="list-style-type: none"> <li>- <b>Bronze:</b> Two (2) of the above practices used in operation.</li> <li>- <b>Silver:</b> Three (3) of the above practices used in operation.</li> <li>- <b>Gold:</b> Four (4) or more of the above practices used in operation.</li> </ul>	R	R	R
1.3 Natural Waterways	Operations conserve and restore natural bodies of water, wetland, riparian areas, and associated habitats. Documentation exists for alterations made by previous or adjacent landowners.	R	R	R
1.4 Deforestation	Operations do not clear primary or old growth secondary forests or convert high conservation value ecosystems.	R	R	R
1.5 Extractive Practices	Fracking, mining, and other extractive practices are not conducted on land within the operation. Exceptions exist in instances where the land owner does not own the mineral rights and therefore has no legal basis to prohibit a mineral owner to extract on their property; however, land owner should not aid or get compensated for extraction of any kind taking place on the property.	R	R	R
2. SOIL & CROP MANAGEMENT	Practice Description	Bronze	Silver	Gold

2.1 Cover Crops	<p>Producers incorporate the use of cover crops on an annual basis and/or perennial crops across all producing acreage.</p> <p>Land maintains adequate cover year-round. Roots remain in the ground (if possible), otherwise, maintenance of dead/rolled cover crop and/or leaves is required.</p> <ul style="list-style-type: none"> <li>– <b>Bronze</b> (Optional) / <b>Silver</b>: Incorporates perennials and/or one or more cover crops on an annual basis</li> <li>– <b>Gold</b>: Incorporates perennials and/or one or more cover crops on an annual basis, including one nitrogen-fixing cover crop (i.e. legumes).</li> </ul> <p>Silvopasture or food forest systems may not require the use of cover crops.</p> <p><i>CT: No cover crops or perennial crops used. Documentation is required when operations are unable to meet the above guidelines due to unforeseen factors, such as weather.</i></p>	R	R	R
2.2 Crop Rotations	<p>Operations use crop rotations. For both annual and perennial systems, crop rotations are implemented to provide for pest management.</p> <ul style="list-style-type: none"> <li>– <b>Bronze</b> (Optional) / <b>Silver</b>: Three-crop rotation or use of perennial system</li> <li>– <b>Gold</b>: Seven-crop rotation or use of perennial system</li> </ul>	O	R	R
2.3 Tillage	<p>Tillage should be infrequent and should only occur when necessary. Tillage should never be deeper than 10 inches, except during preparation/planting of certain perennials (i.e. orchards, nut trees, grape vineyards, etc.).</p> <p>No till practices have been shown to increase soil organic matter and sequester carbon. Inclusion of cover crops as outlined above will help reduce the need for tillage.</p> <ul style="list-style-type: none"> <li>– <b>Gold</b>: No-till practices must be incorporated, with no more than one tillage operation (no deeper than 10 inches) every three years for annual crops.</li> </ul>	R	R	R
2.4 Rotational Grazing	<p>Animals, excluding bison and pigs, are used in high concentrations for brief periods of time (i.e. mob grazing). Pastures divided into paddocks, with animals moved regularly.</p> <p>The number of animals per acre should follow Appendix F: Calculation of Stocking Rates outlined in Demeter’s Biodynamic Farm Standard.</p> <p>Sensitive areas (e.g. habitat for declining &amp; rare species, rare ecosystems, and natural wetlands &amp; riparian areas) are not grazed in times of the year when it could have a negative impact on the ecosystem or on local wildlife.</p>	O	R	R
2.5 Soilless Practices	<p>Aquaponics, hydroponics, and other soilless practices are not eligible for Regenerative Organic Certification. Exceptions are made for plants intended to be grown in water, such as water cress and certain ornamentals. Container growing where crops are never integrated into a field for the majority of a crop's life is not eligible for Regenerative Organic Certification.</p>	R	R	R
3. COMPOST, MANURE & FERTILIZERS	Practice Description	Bronze	Silver	Gold

3.1 General	The operation aims for self-sufficiency in its manures and fertilizers. Importation of fertilizers may only be used as demand dictates and must be approved under USDA Organic standards. All manure and fertilizer use should be included in the Regenerative Organic System Plan. Manure can be directly-deposited by rotationally grazing animals. The use of liquid manure is not permitted.	R	R	R
3.2 Synthetic Fertilizer	Operation does not use any synthetic fertilizers or other substance not permitted under USDA Organic or equivalent standards.	R	R	R
3.3 Imported Nitrogen and Phosphorous	In general, an operation does not import more than 36 lbs. N/acre and 31 lbs. P/acre over the crop rotation/cultivated area annually. In dryland areas during seasons with low rainfall, additional imported N & P may be allowed, but should be documented.	R	R	R

4. BIODIVERSITY	Practice Description	Bronze	Silver	Gold
4.1 Invasive Species	Farmers monitor and manage the infestation of unwanted exotic or invasive plants and animals, including insects, that may spread to natural areas on and off the farm. For example, managed grazing is an acceptable management practice for exotic weed control.	R	R	R
4.2 Endangered Plants and Animals	If not already prohibited by local or national laws, operation does not allow hunting, fishing, or gathering of rare or endangered animal species on the property, nor do they cause harm to the species' habitat. Wildcrafting or other types of harvesting from nature are permitted provided it does not result in overharvesting or other negative impacts to the natural ecosystem.	R	R	R
5. FACILITIES	Practice Description	Bronze	Silver	Gold
5.1 Wastewater	Operation does not directly discharge untreated wastewater into natural waterways or soil. Operation does not divert wastewater to bypass treatment. Industrial wastewater goes through Primary and Secondary treatment (onsite or offsite).  <i>CT: Leaking wastewater pipes; wastewater is not prevented from overflowing outside the proper effluent streams in the case of rain.</i> <i>CT: Lack of description and schematic diagram of onsite wastewater treatment system.</i> <i>CT: For a facility that produces more than 50 cubic meters (m3) per day of industrial wastewater and has onsite wastewater treatment, there are no measurements in the past 12 months of wastewater quality (pH, COD, BOD, and TSS) after the onsite treatment.</i>	R	R	R
5.2 Waste	Operation does not illegally dump waste. Documentation exists for disposal of hazardous waste. Operation does not bury or openly burn any waste on-site.  <i>CT: Non-disclosure of any and all onsite sources of air emissions. CT: Failure to identify, isolate, and properly handle and dispose of hazardous waste.</i> <i>CT: No Restricted Substances List and/or lack of a program to ensure compliance with it.</i>	R	R	R
6. USE OF PROHIBITED SUBSTANCES	Practice Description	Bronze	Silver	Gold

6.1 Synthetic Chemicals	Operation does not use any substances not permitted under USDA Organic or equivalent standard for pest control, weed control, fertilizer, or other application. Pesticides that are highly toxic to pollinators, as defined by Xerces Society’s “Toxicity of Common Organic-Approved Pesticides to Bees” are not allowed.	R	R	R
6.2 Genetically Modified Inputs & Cloning	Operation does not use any genetically modified additives or processing aids, such as fertilizers, pesticides, herbicides, seeds, or crops derived from genetically modified sources, including emerging technologies that edit or regulate genes such as RNAi, CRISPR, and TALEN. Cloned animals are not eligible for Regenerative Organic Certification.	R	R	R

7. MEASUREMENT	Practice Description	Bronze	Silver	Gold
7.1 Soil Health Lab Test <i>See Soil Sampling Guidelines for detailed instructions</i>	Producers conduct Regenerative Organic Certification Soil Health Lab Test in accordance with procedures laid out by an accredited organization, such as a university, lab, or private organization with an expertise in analyzing soil health. Refer to the ROC Soil Sampling Guidelines and appendices for specific guidance. Tests are to be conducted at initial certification inquiry, and then every 3 years thereafter.  The same lab should be used for all testing to ensure consistency.	R	R	R
7.2 Soil Health In-Field Test <i>See Soil Sampling Guidelines for detailed instructions</i>	Producers conduct soil health in-field tests and follow Regenerative Organic Certification Soil Health In-Field Test instructions in the Soil Sampling Guidelines.	O	O	O
7.3 Computer Models	Operators utilize computer-based modeling tools (e.g. COMET- Farm Voluntary Carbon Reporting Tool, Cool Farm Tool, etc.) to determine annual GHG emissions and sequestrations. Operators document practices in the computer-based models, review annually with auditor, and submit documentation to certifying body.	O	O	O

## 2. Leveraging Existing Standards

As described previously, producers can demonstrate compliance by leveraging existing certifications and having third- party verification of any required Regenerative Organic Certification standards not met by the existing certification.

Producers wishing to fulfill the Soil Health and Land Management module of Regenerative Organic Certification may do so by meeting certain existing certifications, plus additional “bolt-on” requirements. Please refer to the separate equivalency analysis to see what guidelines are already met by existing certifications.

# VI. Animal Welfare

The Animal Welfare module within Regenerative Organic Certification seeks to ensure humane practices in the raising and/or handling of animals that intend to be sold or marketed using Regenerative Organic Certification claims. For operations that do not involve any animals, this section is not applicable and will be considered met for the purposes of achieving Regenerative Organic Certification.

## 1. Standards for Animal Welfare

The below standards are intended to incorporate the five freedoms of animal welfare, along with any additional

species-specific requirements. As stated in Section IV, to receive Regenerative Organic Certification, all requirements listed in this section must be met, and all products sold, labeled, or represented as regenerative organic must also comply with USDA organic regulations at 7 CFR Part 205, National Organic Program. Additionally, any livestock or livestock products with organic and regenerative organic claims must comply with the USDA organic regulations, and operations must comply with all federal humane handling, transportation, and slaughter requirements, as outlined by the USDA Food Safety and Inspection Service and the Humane Methods of Livestock Slaughter Act of 1978.

1. GENERAL	Practice Description	Bronze	Silver	Gold
1.1 Existing Certifications	Operation has proof of existing animal welfare certification recognized under the Regenerative Organic Certification, as applicable to the operation being certified.	R	R	R
1.2 General	Operations have researched all applicable laws regarding animal welfare (general and species specific) and are in compliance with all local, provincial/state, and national laws.	R	R	R
1.3 Applicability	Animal welfare requirements apply to animals on an operation depending on the following categorizations: <ul style="list-style-type: none"> <li>– <b>Bronze:</b> Applicable to animals used for dairy, meat, or fiber production.</li> <li>– <b>Silver:</b> Applicable to animals used for dairy, meat, or fiber production.</li> <li>– <b>Gold:</b> Applicable to all animals on an operation, including those used for dairy, meat, or fiber production and farm operations (e.g. dogs used to control predators, horses used for herding, etc.)</li> </ul>	R	R	R
1.4 Concentrated Animal Feeding Operation	Operation does not feed animals in a manner that meets the EPA's definition of a CAFO: "A farm in which animals are raised in confinement that has over 1,000 animal units confined for over 45 days a year."	R	R	R
2. NUTRITION & WATER	Practice Description	Bronze	Silver	Gold
2.1 General	Feed and water must be distributed in such a way that livestock can eat and drink without undue competition. Animals have access to sufficient feed quantity to satisfy hunger & promote satiety. If applicable, feed is stored to maintain freshness and hygiene, avoiding mildew, mold, or contamination.	R	R	R
2.2 Water	Animals have access to fresh and clean water for drinking. Water fowl should also have access to fresh or clean water for bathing. <i>CT: Limited fresh water access.</i>	R	R	R
2.3 Feed for Monogastrics	Monogastric feed comes from regenerative organic, organic, or on-farm sources. Requirements by level: <ul style="list-style-type: none"> <li>– <b>Bronze:</b> 0%-50% from regenerative organic or on-farm sources; remainder organic</li> <li>– <b>Silver:</b> &gt;50% from regenerative organic or on-farm sources; remainder organic</li> <li>– <b>Gold:</b> &gt;75% from regenerative organic or on-farm sources; remainder organic</li> </ul> <p>Note: On-farm sources are derived from regenerative organic or organic certified land.</p>	R	R	R
2.4 Feed for Ruminants	Ruminant feed comes from grass/forage/baleage/hay ("grass-fed") or organic sources. Requirements by level: <ul style="list-style-type: none"> <li>– <b>Bronze:</b> &gt;50% grass-fed; remainder from organic sources</li> </ul>	R	R	R



	<ul style="list-style-type: none"> <li>– <b>Silver:</b> &gt;75% grass-fed; remainder from organic sources</li> <li>– <b>Gold:</b> 100% grass-fed (including finishing)</li> </ul> <p>Supplementation for nutritional purposes using minerals, vitamins, and/or molasses is allowed. All feeding practices must abide by organic guidelines.</p>			
2.5 Forced Feeding	Operations do not force feed animals, unless it is for life-saving purposes.	R	R	R
2.6 Malnutrition	Farming practices promote proper nutrition, avoiding malnutrition.	R	R	R
<b>3. ENVIRONMENT &amp; SHELTER</b>	<b>Practice Description</b>	<b>Bronze</b>	<b>Silver</b>	<b>Gold</b>
3.1 General	<p>Environment considers an animal’s welfare needs. Environment is designed to protect animals from physical and thermal discomfort, fear, distress, and allows them to perform natural behaviors conducive to good animal welfare.</p> <p>Selection of species and types of livestock made with regard to suitability for site-specific conditions and resistance to prevalent diseases and pests.</p>	R	R	R
3.2 Indoor Shelter	Animals are provided with shelter adequate for their physical and behavioral needs. Shelter for animals and birds may be provided by natural features such as shade, trees, or by buildings. Housing may also be used as shelter. In extreme weather there must be a means to feed and water animals in a sheltered environment.	R	R	R
3.3 Confinement	<p>Operations do not use any type of permanent confinement that restricts mobility, and livestock live, eat, and sleep outdoors the majority of the time in alignment with the principles of the Five Freedoms.</p> <p>Temporary confinement may be used only when necessary and must be in alignment with the ROC-approved baseline Animal Welfare standards.</p>	R	R	R
3.4 Light	Animals have exposure to natural light and are not exposed to artificial light for more than 16 hours. A minimum period of 8 hours of continuous darkness must be provided, unless located in geographies where there is less than 8 hours of darkness at night. Natural light must be sufficient indoors on sunny days, such that an inspector can read and write when all lights are turned off. In the case of hens, artificial light intensity is lowered gradually to encourage hens to move to perches or settle for the night.	R	R	R
<b>4. HANDLING &amp; MANAGEMENT</b>	<b>Practice Description</b>	<b>Bronze</b>	<b>Silver</b>	<b>Gold</b>
4.1 General	Producers promote compassionate care and handling of animals. Daily inspections of animals occur.	R	R	R
4.2 Animal Abuse, Cruelty, and Physical Modifications	<p>Operations do not abuse animals or treat animals with cruelty and do not use the practices listed below. Exceptions to these prohibited practices are allowed in alignment with the ROC-approved baseline Animal Welfare standards.</p> <ul style="list-style-type: none"> <li>• Beak Trimming / De-Beaking</li> <li>• Caponization</li> <li>• Cattle Wattling</li> <li>• Clipping, Grinding, or Filing of Teeth (unless deemed best for the animal)</li> <li>• De-Clawing/ Toe Clipping</li> <li>• De-Horning</li> </ul>	R	R	R

	<ul style="list-style-type: none"> <li>• De-Snooding</li> <li>• De-Spurring</li> <li>• Disbudding</li> <li>• Dubbing</li> <li>• Ear Notching</li> <li>• Forced Molting</li> <li>• Hot / Cold Branding</li> <li>• Mulesing</li> <li>• Pinioning</li> <li>• Prodding</li> <li>• Tail Docking of Cattle</li> <li>• Tail Docking of Sheep shorter than Distal End of Caudal Fold</li> <li>• Tusk Removal</li> </ul> <p>See specific definitions of these practices in Appendix.</p>			
<b>5. HEALTH</b>	<b>Practice Description</b>	<b>Bronze</b>	<b>Silver</b>	<b>Gold</b>
5.1 General	<p>Treatment for sick, injured, or diseased animals is undertaken at the first reasonable opportunity to alleviate any unnecessary pain or distress. Operation does not withhold medical treatment from a sick animal in order to preserve certification status.</p> <p>Treatment is also undertaken for non-ambulatory livestock, even if the treatment causes the livestock to lose its certified status or to be humanely euthanized.</p> <p><i>CT: Animals are not treated effectively or promptly for injuries or sickness, or euthanized if necessary, using humane euthanasia methods as described in Euthanasia Section.</i></p>	R	R	R
5.2 Vaccines & Antibiotics	<p>When recommended by a veterinarian or if homeopathic, herbal, and other non-antibiotic treatments are not available, antibiotics are used to treat sick or injured animals. Vaccines are used for prevention of disease to minimize future use of antibiotics. Growth hormones or non-therapeutic use of substances to induce heat are prohibited.</p> <p>In an emergency, a producer must use antibiotics if necessary to save the life of the animal or to prevent suffering and are based on the recommendation of a vet. Withholding treatment of antibiotics from animals to maintain their organic status is prohibited. If a producer uses antibiotics, they must do the following:</p> <ul style="list-style-type: none"> <li>– Record the event in their health records.</li> <li>– Notify their certifier of the situation.</li> <li>– Segregate the animal to prevent contamination of organic products. For example, a dairy cow must be marked to prevent the milk from going in the bulk tank. In addition, the milk may not be fed to calves.</li> <li>– Sell the animal to a non-organic market or remove from organic management and use for other purposes</li> <li>– Document the sale of the animal.</li> </ul> <p>For the offspring of the treated animal to qualify as organic, the treatment must not occur during the last third of gestation. In addition, the offspring cannot nurse on an animal that has been treated.</p> <p>A producer of livestock may not sell, label, or represent as organic or</p>	R	R	R

	regenerative organic any animal or edible product derived from any animal treated with antibiotics, any substance that contains a synthetic substance not allowed under USDA organic requirements section §205.603, or any substance that contains a non-synthetic substance prohibited in USDA organic requirements section §205.604.			
<b>6. SLAUGHTER/ KILLING</b>	<b>Practice Description</b>	<b>Bronze</b>	<b>Silver</b>	<b>Gold</b>
6.1 General	All slaughter/killing systems need to be designed and managed to ensure animals are not caused unnecessary or intentional distress or discomfort before slaughter. If slaughter does not occur on farm, approved ROC third-party animal welfare audit records of the slaughter facility must be provided.	R	R	R
6.2 Pre-slaughter	Operations work to minimize the pre-slaughter handling of animals. This includes but is not limited to handling animals without abuse, ensuring animals have good traction on flooring and do not slip or fall during unloading and movement around the farm or plant, and have their view of the slaughter floor obscured as to avoid any unnecessary stress or discomfort. If slaughter does not occur on farm, approved ROC third-party animal welfare audit records of the slaughter facility must be provided.	O	R	R
6.3 Slaughter Methods	Slaughter is performed using stunning methods that result in immediate insensitivity, such as a shot to brain or penetrative bolt stunning followed by bleeding. Pre-shackle, multi-step controlled-atmosphere stunning may be used in poultry. If slaughter does not occur on farm, approved ROC third-party animal welfare audit records of the slaughter facility must be provided.	R	R	R
6.4 Euthanasia	Animals experiencing pain or suffering from which they are unlikely to recover must be promptly euthanized on the farm in a manner that renders the animal immediately insensible to pain. Prohibited euthanasia practices include: <ul style="list-style-type: none"> <li>– Suffocation</li> <li>– Manual blow to head by blunt instrument or any manual blunt force trauma</li> <li>– Use of equipment that crushes the neck (incl. killing pliers or Burdizzo clamps)</li> </ul> <i>CT: Euthanizing in a way that causes unnecessary pain or suffering.</i>	R	R	R
<b>7. TRANSPORTATION</b>	<b>Practice Description</b>	<b>Bronze</b>	<b>Silver</b>	<b>Gold</b>
7.1 General	Animal transport systems are designed and managed to ensure animals are not subjected to unnecessary distress or discomfort. Operations and handlers have emergency plans in place that address possible animal welfare problems that may arise during transport. If the producer does not control the transportation of animals off-farm: <ul style="list-style-type: none"> <li>• Approved ROC third-party animal welfare audit records must be provided for the transport operator</li> </ul> OR <ul style="list-style-type: none"> <li>• The producer must keep records of all off-farm transportation, including date of transport, number of animals transported and destination, type of vehicle and company used, and transport time.</li> </ul>	R	R	R
7.2 Transport Time	Transportation time from loading of first animal to last animal unloading is less than 13 hours. Food and water are not withdrawn for more than 12 hours prior to slaughter.	O	R	R

	<p>If the producer does not control the transportation of animals off-farm:</p> <ul style="list-style-type: none"> <li>Approved ROC third-party animal welfare audit records must be provided for the transport operator</li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>The producer must keep records of all off-farm transportation, including date of transport, number of animals transported and destination, type of vehicle and company used, and transport time.</li> </ul>			
<b>8. TRAINING &amp; PERSONNEL</b>	<b>Practice Description</b>	<b>Bronze</b>	<b>Silver</b>	<b>Gold</b>
8.1 Personnel	Operations ensure that all employees working with animals are trained on basic measures of animal welfare and have the relevant and necessary skills to perform their duties. Producers are thoroughly trained, skilled, and competent in animal husbandry, animal transport, slaughter, and have a good working knowledge of their system and animals under their care.	R	R	R
<b>SPECIES SPECIFIC</b>	<b>Practice Description</b>	<b>Bronze</b>	<b>Silver</b>	<b>Gold</b>
SPECIES SPECIFIC	Species specific requirements to be incorporated into above sections by species experts.	N/A	N/A	N/A

## 2. Leveraging Existing Standards

As described previously, producers can demonstrate compliance by leveraging existing certifications and having third-party verification of any required Regenerative Organic Certification standards not met by the existing certification.

Producers wishing to fulfill the Animal Welfare module of Regenerative Organic Certification may do so by meeting certain existing certifications, plus additional “bolt-on” requirements. Please refer to the separate equivalency analysis to see what guidelines are already met by existing certifications.

# VII. Farmer and Worker Fairness

The scope of the Farmer and Worker Fairness module within Regenerative Organic Certification includes guidelines for farmers, workers, and buyers.

The Farmer and Worker Fairness module accepts several existing certifications, with certain additional requirements. Equivalency with existing standards allows for lower costs and faster implementation of Regenerative Organic Certification, with the goal of implementing better labor practices around the world.

Monitoring and enforcement should benefit and prioritize workers. Violations should not be ongoing indefinitely, and progress and plans must be documented. Emphasis should be on capacity building and continuous improvement to better the social and economic position of farmers and workers.

## 1. Standards for Farmer and Worker Fairness

<b>1. LAW AND CODE COMPLIANCE</b>	<b>Practice Description</b>	<b>Bronze</b>	<b>Silver</b>	<b>Gold</b>
1.1 Existing	Operation has proof of existing social fairness certification recognized under Regenerative Organic Certification, as applicable to the	O*+	R*	R

Certifications	operation being certified, except in specified regions. In all cases, all criteria within the ROC social pillar must be met.  * Optional in U.S./Canada only + Operations in all regions (other than U.S./Canada) must prove they are working towards a ROC-approved social certification, if not in place.			
1.2 Business License	Operations have a valid business license and/or building permit where required by law to operate.	R	R	R
1.3 Labor Laws & Legal Compliance	Operations have researched all applicable laws related to labor conditions, working conditions, health and safety, and terms of employee and are in compliance with all local, provincial/state and national laws. Operation is in compliance with all Freedom of Association and Collective Bargaining laws, as outlined by the International Labor Organization. ( <a href="http://www.ilo.org/declaration/principles/freedomofassociation/lang-en/index.htm">http://www.ilo.org/declaration/principles/freedomofassociation/lang-en/index.htm</a> ). Workers also understand and are trained on their rights.  <i>CT: Lapse in enforcement or implementation of national Freedom of Association and Collective Bargaining laws, such as not holding elections in a timely manner or not posting the names of worker representatives as required by law.</i> <i>CT: Lack of proper, valid, up-to-date licenses and/or permits as required by law; inability to show proof of meeting all requirements of the permits and all relevant legal regulations. (Examples: operation of onsite boilers and generators, water extraction, wastewater discharge, emissions to air, storage and disposal of the hazardous and non-hazardous waste produced onsite, storage and use of hazardous substances that are stored or used onsite, and any incineration done onsite.)</i>	R	R	R
<b>2. CHILD LABOR</b>	<b>Practice Description</b>	<b>Bronze</b>	<b>Silver</b>	<b>Gold</b>
2.1 Child Labor	With the exception of the operator's family members, no children below the lowest of 15, legal age, or age of compulsory schooling are employed. Children under 18 do not perform work that jeopardizes health, safety, education, and emotional or physical development.  <i>CT: Missing age verification system with no commitment to remediation.</i> <i>CT: Missing or falsified age documentation.</i>	R	R	R
2.2 Family Members	If an operator's children or children of any employee, farmer, or worker work onsite, the operator must ensure that a child's employment does not interfere with his or her schooling, safety or physical development. Work performed should be light work, under the supervision of an adult, and never at night.  <i>CT: Children of operators involved in more than just light work, or involved in light work that: is dangerous and harmful to health or development; prejudices attendance at school or during holidays; is inappropriate to the child's age and physical condition and jeopardizes the child's social, moral, or physical development; is conducted without parental supervision and/or guidance.</i>	R	R	R
2.3 Work Restrictions for Children and Young Workers	Children (including those residing on the farm and those of migrant workers) should not engage in hazardous work, such as heavy lifting, exposure to dangerous agriculture production activities, including exposure to chemicals/pesticides.	R	R	R

	<p><i>CT: Missing required documents for young workers (health checks, work permits, list of all young workers with their entry dates, proof of age, and description of their assignment, etc.).</i></p> <p><i>CT: Improper job assignment or working hours for young workers.</i></p>			
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3. FORCED LABOR & HIRING	Practice Description	Bronze	Silver	Gold
3.1 Human Trafficking and Forced Labor	<p>People are not forced to work or remain on premises against their will.</p> <p><i>CT: Mandatory overtime (in practice or in written policy).</i></p> <p><i>CT: Unreasonable restriction of movement or curfews.</i></p>	R	R	R
3.2 Hiring Practices & Brokerage Fees	<p>Hiring practices are not deceptive and do not result in forced labor. Operator must not facilitate human trafficking.</p> <p><i>CT: Spouses and adult children of hired workers are required to work and are not voluntarily contracted.</i></p> <p><i>CT: Labor brokerage fees that must be paid back by workers.</i></p>	R	R	R
3.3 Contractors	<p>If recruited or contracted labor is used, the employer must pay any fees associated with recruitment and employees must have same rights and benefits as direct employees. All standards apply to all employees whether hired directly or through a contractor, including access to a grievance process for any complaints, the right to be free of forced labor, and no unfair deductions from paycheck. The use of recruiters and subcontractors is allowed only when employer can document a need.</p>	R	R	R
4. HARASSMENT, ABUSE AND DISCIPLINARY PRACTICES	Practice Description	Bronze	Silver	Gold
4.1 Physical Abuse	<p>No physical abuse.</p> <p><i>CT: Verbal or psychological abuse: threats, foul language towards workers, intimidation.</i></p> <p><i>CT: Demoralizing or overly harsh treatment or disciplinary action.</i></p> <p><i>CT: Monetary fines.</i></p> <p><i>CT: Disciplinary action administered by security personnel.</i></p> <p><i>CT: Lack of action taken by management to discipline personnel (supervisors or workers) who engage in any sort of harassment or abuse.</i></p>	R	R	R
4.2 Sexual Harassment	<p>No cases of sexual harassment experienced before, during, or after end of employment relationship.</p> <p><i>CT: Opposite sex pat-down.</i></p>	R	R	R
4.3 Disciplinary Procedure	<p>All operators must have a documented disciplinary procedure, with an escalation process before dismissal is considered. No worker should be subject to the procedure without due cause. Where contextually appropriate, workers are allowed to have a representative with them at disciplinary meetings.</p>	R	R	R
5. DISCRIMINATION	Practice Description	Bronze	Silver	Gold
5.1 Discrimination	<p>Operations do not discriminate in any aspect of the employment relationship. This can include but is not limited to recruitment, hiring, compensation, benefits, work assignments, access to training, advancement, discipline, termination, or retirement.</p>	R	R	R
5.2 Equal Pay	<p>Operators must have a documented commitment to the principle of equal pay for equal work.</p>	R	R	R
6. FREEDOM OF ASSOCIATION &		Bronze	Silver	Gold

COLLECTIVE BARGAINING	Practice Description			
6.1 Protection Against Retaliation	<p>Operation does not interfere with and is seen to welcome free association and collective bargaining. Operators do not interfere with worker efforts to assemble, strike, or hold elections in an independent manner. This includes interference or prevention of strikes; employer proposed or initiated worker elections; worker elections conducted or facilitated by management; mandatory worker participation in elections; prevention of worker organizations from presenting to workers; prevention of trade union representatives from regular and reasonably free access to workers during workers' free time.</p> <p>Operation does not threaten or intimidate workers directly or indirectly with termination, pay cuts, loss of benefits, or plant closure, and does not coerce workers with promises to keep them from freely participating in union or other activities.</p>	R	R	R
6.2 Employer Instituted Unions	Employers do not institute unions or alternative associations used by employers to hinder union organization (such as solidarity associations in Latin America). Employers do not utilize protection contracts (such as in Mexico).	R	R	R
6.3 Precarious Employment	Operation does not utilize atypical employment contracts in order to avoid workers' full or partial enjoyment of social benefits and statutory entitlements, or as a way of limiting workers' ability to freely associate and collectively bargain.	R	R	R
6.4 Group Protection	Standards are in place to protect the farmer, worker, and farm producer groups (co-ops etc.).	R	R	R
7. EMPLOYMENT RELATIONSHIP	Practice Description	Bronze	Silver	Gold
7.1 Free Access to Audits	<p>Auditors are granted access to the entirety of requested audits. Operation does not offer bribes to auditors.</p> <p><i>CT: Denied access to parts of requested audits.</i></p>	R	R	R
7.2 Worker Voice	<p>All farm operations have processes to listen and address worker complaints in a transparent way. In large operations workers are trained in worker rights and a grievance procedure is provided in a culturally appropriate way (i.e. language-accessible as well as using interactive materials and not only posted). An external workers' association or workers' right group and/or an internal independently- elected workers committee is present for and is involved in all or part the training. An independently-elected workers committee must also be involved in grievance investigation and resolution.</p> <p><i>CT: Complete lack of an internal grievance management system for personnel to voice their concerns.</i></p>	R	R	R
7.3 Worker Independence & Empowerment	If workers would like to form an association, they are free to do so. If desired, workers hold independent, democratic elections to form worker associations for contract negotiations involving pay and conditions on farm/ranch and to create committees to address relevant ongoing challenges and opportunities, for example premium fund administration and health & safety.	O	R	R
7.4 Employment Contracts & Terms	<p>Employment contracts are negotiated and executed in good faith and the operator honors any commitments made in a contract.</p> <p>The operator recognizes the right of all employees to negotiate their terms of employment, whether individually, as a group or through democratically</p>	R	R	R

	<p>appointed representatives.</p> <p>Under no circumstances may any recruitment fees be paid by an employee. The operator must formally recognize the “Employer Pays” principle.</p> <p>The use of agency supplied labor is permitted but the increased risks around this must be recognized by the operator and reasonable steps must be taken to seek assurance, including collaboration within the area/sector.</p> <p><i>CT: Requiring workers to consent to arrangements by signing any document that is blank or is not written in a language that they understand.</i></p> <p><i>CT: Operator does not take sole responsibility for fees associated with employment of workers.</i></p> <p><i>CT: Misclassification of personnel (for example: apprentices, student workers, vocational students, OT exempt vs. non-exempt).</i></p> <p><i>CT: Failure to meet terms of required labor contract.</i></p>			
<b>8. WAGES &amp; BENEFITS</b>	<b>Practice Description</b>	<b>Bronze</b>	<b>Silver</b>	<b>Gold</b>
8.1 Wages	<p>Operations pay wages and benefits in accordance with the law with any deductions also being in accordance with the law and formally agreed in advance with the worker concerned.</p> <p>Operators must not pay wages to anyone other than the employed individual.</p> <p><i>CT: Wage violation.</i></p> <p><i>CT: Illegal cash payment.</i></p> <p><i>CT: Benefit payment violation.</i></p> <p><i>CT: Unreasonable quota system.</i></p> <p><i>CT: Illegal or excessive legal deductions (including charges/deposits for tools, equipment, uniforms, etc.).</i></p> <p><i>CT: Pay below minimum wage.</i></p>	R	R	R
8.2 Commitment to a Living Wage	<p>Operations pay wages in accordance with the requirements as described below.</p> <p>All operations must demonstrate a commitment to pay a living wage and an intent to progress towards paying a living wage as defined in the Appendix.</p> <p>If an operator cannot pay a living wage, the operation must:</p> <ol style="list-style-type: none"> <li>1) Assess wage gaps against the target living wage estimate; and</li> <li>2) Communicate transparently with workers about why a living wage cannot be paid.</li> </ol> <p><b>To achieve Gold-level certification, operations must demonstrate that a living wage is paid to workers, without exception.</b></p> <p><b>Small-scale farms/farmer organizations:</b> Salaries and benefits for workers are set according to relevant national laws, or at regional average wages, or at official minimum wages for similar occupations, whichever is the highest. Wages are specified for all employee functions and employment terms, such as piecework.</p> <p><b>Medium and large-scale operations:</b></p>	R	R	R



	<p>Workers are paid the national minimum wage or, if there is one, the wage according to a negotiated collective bargaining agreement (CBA), whichever is higher.</p> <p>By year 3 of certification operators must demonstrate that wages paid to all workers are equal to or above a living wage. This can be inclusive of social benefits, in-kind benefits and bonuses.</p> <p><i>See the Appendix for additional guidance on calculating living wage and definitions for small-, medium-, and large-scale operations.</i></p>			
8.3 Manipulated or Manipulative Records	<p>No double records or off-clock work  <i>CT: Double books; employee coaching; off-clock work.</i>  <i>CT: Lack of, manipulated, or inadequate time records, payroll records, labor contracts, pay slips, and/or hiring notices.</i>  <i>CT: Labor contracts not provided to workers, written in a language other than what the worker speaks, or (for those that are illiterate or for informal workplaces) are not explained to workers in order to ensure that they understand their contents.</i>  <i>CT: Conflicting employee testimonies with payroll, time, and/or training records that result in wage or training deficiencies.</i></p>	R	R	R
8.4 Housing	<p>If housing is provided as a voluntary benefit, it does not represent a financial burden. Where workers are provided with housing, housing should meet local rental requirements, with rent values at or below market value, and the conditions and infrastructure of the housing ensure a reasonable level of comfort, including sanitation, safety, ventilation, reasonable protection from heat and cold, privacy, and security. This may include but is not limited to a clean personal bed and space for personal belongings, protection from extreme temperatures, good ventilation and air quality, clean water for cooking, drinking, and bathing, access to functional toilets, and access to recreational areas.</p>	R	R	R
8.5 Timely Payment of Wages	<p>Operators must have systems in place to ensure timely payment of wages to employees no less than every two weeks unless agreed in writing with the employee.</p> <p>Payments must be in accordance with the law and fully itemized pay slips must be provided and records kept.</p>	R	R	R
<b>9. HOURS OF WORK</b>	<b>Practice Description</b>	<b>Bronze</b>	<b>Silver</b>	<b>Gold</b>
9.1 Hours of Work	<p>Operators shall not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular work week shall not exceed 48 hours or the maximum allowed by the law of the country of manufacture, whichever is less.</p> <p>Operators shall allow workers regular resting breaks during the work day and allow at least 24 consecutive hours of rest in every seven-day period. Employers shall not request overtime hours on a regular basis or require that workers work overtime. The sum of regular and overtime hours in a week shall not exceed 72 hours or the maximum allowed by the law of the county of manufacture, whichever is less. If total regular and overtime hours exceed 60 hours per week, this does not occur for more than 6 months per year. Exceptions may exist in certain scenarios, such as during harvest (may not exceed 3 consecutive weeks), particularly for perishable crops as long as workers willingly engage in additional hours of labor. In such instances, documentation exists.</p> <p>For salaried positions, hours of work must be included in any employment</p>	R	R	R

	contract. <i>CT: Employees work 14 consecutive days without day of rest or one or more of the following: Daily work hours exceed 12 per day; Regular work week exceeds legal limit or 48 hours per week; Total hours exceed legal limit or 72 hours per week.</i>			
<b>10. HEALTH &amp; SAFETY</b>	<b>Practice Description</b>	<b>Bronze</b>	<b>Silver</b>	<b>Gold</b>
10.1 Health, Safety, and Potential Hazards	<p>Operation minimizes number of immediate threats to workers lives. Operations provide the following:</p> <ul style="list-style-type: none"> <li>– Personal protective equipment at the employers' expense that is functional and properly maintained, along with training for how to use and store protective equipment.</li> <li>– Protection from excess heat and/or access to shade, particularly in hot climates, and an allowance to take rests/breaks to access shade and/or consume water.</li> <li>– Access to clean drinking water.</li> <li>– Access to toilet and sanitation facilities.</li> <li>– Emergency preparedness training and access to first aid equipment with instructions.</li> <li>– Access to healthcare, at least for cases of workplace accidents and injuries.</li> <li>– Training for proper handling or storage of flammable materials/chemicals.</li> </ul> <p>Operators must ensure that health and safety concerns of all employees are listened to and acted upon as appropriate. Operators with 20 or more employees or more must formally establish a Health and Safety Committee with a remit to review Health and Safety performance and any issues arising. Appointments to the Committee must be open and democratic.</p> <p><i>CT: Substandard, unsafe, or unsanitary conditions that pose danger to employees or the environment</i>  <i>CT: Unsafe exposure to airborne particles or chemical vapors</i>  <i>CT: Unsafe handling and/or storage of hazardous chemicals</i>  <i>CT: Use of chemicals and hazardous substances that are not allowed by local law or by international standards</i></p>	R	R	R
10.2 Exits	Buildings on an operation have at the higher of two exits or whatever is required by law, that ensure safe evacuation for all workers. All exits remain unlocked.	R	R	R
10.3 Buildings	Policies in place to minimize environmental impacts with respect to energy, air emissions, water, waste, hazardous materials, and other significant environmental risks. All necessary ventilation, plumbing, electrical, noise and lighting services shall be installed and maintained to conform to applicable laws and to prevent or minimize hazardous conditions to workers in the facility.	O	R	R
10.4 Privacy	Workers living in employer-provided housing have a right to privacy. The employer/owner has a right to inspect and enter the housing for the purposes of routine maintenance and/or repairs, but must, except for an emergency, notify residents. Such work must be done with a minimum of disturbance to any personal belongings. In order to meet additional workers' privacy needs, management agrees with the workers on the privacy needs of the individual worker through a documented discussion.	R	R	R
10.5 Reduction of	Records must be maintained of all health and safety related incidents and	R	R	R

Accidents	operators must demonstrate a commitment to the reduction and elimination of such incidents over time.			
11. BUYERS	Practice Description	<b>Bronze</b>	<b>Silver</b>	<b>Gold</b>
NOTE	<i>Criteria in this section may not be applicable to all operations. Where farmers do not have control or leverage over the actions of their buyers, these requirements will be considered outside the scope of the farm-level audit.</i>			
11.1 Buyers	<p>All contracts between producers and buyers are fair and equitable. This includes fairly negotiated and equitable contracts with producers, fair conflict resolution, openness to long-term commitments, and buyers' right to require up-to-date farmer certification of all applicable products.</p> <p>Buyers make timely payments and provide a sourcing plan to producers with estimates of future purchases. Buyers also respect and work with existing producer groups, rather than to circumvent established groups to contract directly with an individual producer or producer subgroup.</p> <p>Buyers must enter long-term commitments when desired by farmers or be transparent with farmers and the certification body if they do not enter long-term commitments with farmers.</p> <p>Buyers do not break commitments that adversely affect producers. Producers do not break commitments that adversely affect buyers.</p>	<b>O</b>	<b>R</b>	<b>R</b>
11.2 Bargaining	<p>All farmers have the right to freedom of association and to organize and engage in collective bargaining, free from retaliation of any kind by the buyer or his/her agents.</p> <p>If farmers so choose, contracts between buyers and farmers are negotiated using a collective bargaining process.</p> <p>If a farmer chooses to select a representative, the buyer recognizes and negotiates with representatives chosen by the farmer or democratically chosen by the farmer's association in the case of collective bargaining.</p>	<b>R</b>	<b>R</b>	<b>R</b>
11.3 Fair Pricing	<p>Pricing between buyers and producers is mutually agreed by all through dialogue and participation by both to provide fair pay to producers.</p> <ul style="list-style-type: none"> <li>– Where Fair Trade pricing structures exist, these are used as a minimum.</li> <li>– Where Fair Trade pricing structures do not exist, pricing should be based on the socially acceptable remuneration (in the local context) considered by producers themselves to be fair.</li> </ul> <p>Fair Pricing and Fair Payments guidelines are not applicable to producers acting as buyers when buying organic or non-organic commodity grains on an open market.</p>	<b>O</b>	<b>R</b>	<b>R</b>
11.4 Fair Payments	<p>Payments received by farmers should always meet the cost of production which includes paying living wages, as described in Regenerative Organic Certification requirements. Documented real costs of productions calculated by producers or producer groups or average costs calculated regionally should be prioritized. When real costs are not known, local market prices or established fair trade minimum prices can be used if these can be determined to cover cost of production; if these prices do not cover cost of production, 10% should be added.</p> <p>Fair Pricing and Fair Payments guidelines are not applicable to producers</p>	<b>R</b>	<b>R</b>	<b>R</b>

	acting as buyers when buying organic or non-organic commodity grains on an open market.			
11.5 Transparent Negotiation	<p>Negotiations between producers and buyers include:</p> <ul style="list-style-type: none"> <li>– Transparent communication of pricing and contracting terms</li> <li>– Openness to exploring and negotiating all terms of contracts and clarifying expectations clearly</li> <li>– Providing market information on demand, supply, pricing, and transfer of value in the chain</li> </ul>	O	R	R
11.6 Capacity Building	<p>The operation works towards an increase in the capacities of its members and the organization. Mechanisms for training are developed to facilitate the process of building capacities in the productive, technical, social, organizational, commercial and public impact areas.</p> <p>For example, buyers can work directly with small producers to develop specific activities to help these producers improve their management skills, production capabilities and access to local / regional / international / Fair Trade and mainstream markets as appropriate.</p>	O	R	R
11.7 Production Obligations	Production contracts obligate the producer to deliver only what is harvested from the acres covered by the contract. Under no circumstances shall farmers be required to purchase crop from outside the farm to fulfill delivery requirements of a production contract. Suffering the loss of crop due to natural-occurring flood, drought, wind, hail or other causes beyond the producer's control must never place additional burden on the farmer to source replacement crop.	O	O	R
<b>12. OTHER</b>	<b>Practice Description</b>	<b>Bronze</b>	<b>Silver</b>	<b>Gold</b>
12.1 Grower Groups	Small-scale farmers must be free to organize in some way. In the Global South, to mitigate the risk of exploitation of small-scale producers who are not organized into formal democratic structures should still hold annual meetings and take on some of the responsibilities of a traditional farmer organization (i.e. electing representatives to negotiate with buyers).	O	R	R
12.2 Split Operations	<p>Workers are paid a consistent rate for same or similar work and subject to consistent working conditions, whether they are working on the portion of the operation that is certified or not.</p> <ul style="list-style-type: none"> <li>– <b>Bronze and Silver:</b> Allows for 50% split operations</li> <li>– <b>Gold:</b> No split operations</li> </ul>	R	R	R
<b>13. INTERNS &amp; APPRENTICES</b>	<b>Practice Description</b>	<b>Bronze</b>	<b>Silver</b>	<b>Gold</b>
13.1 Interns and Apprentices	<p>Operators may use internships and apprenticeships in the spirit in which these have been established i.e. to educate, to develop and to create opportunity but avoiding any possibility of the arrangement being exploitative.</p> <p>All interns and apprentices must have clear and comprehensive contracts agreed, their rights explained to them clearly in writing and a fair stipend paid to cover living expenses.</p>	R	R	R
<b>14. SUPPLY CHAIN</b>	<b>Practice Description</b>	<b>Bronze</b>	<b>Silver</b>	<b>Gold</b>
14.1 Supply Chain Requirements	A ROC-approved social certification must be attained at one or more major stages of manufacturing and processing.	O	O	R

## 2. Leveraging Existing Standards

As described previously, producers can demonstrate compliance by leveraging existing certifications and having third- party verification of any required Regenerative Organic Certification standards not met by the existing certification.

Producers wishing to fulfill the Farmer and Worker Fairness module of Regenerative Organic Certification may do so by meeting certain existing certifications, plus additional “bolt-on” requirements. Please refer to the separate equivalency analysis to see what guidelines are already met by existing certifications.

## VIII. Additional Requirements

All aspects of Regenerative Organic Certification shall apply to different stages of production and should be guided by a Regenerative Organic System Plan. Below are specific requirements.

1. GENERAL	Practice Description	Bronze	Silver	Gold
1.1 Regenerative Organic System Plan	<p>Operation has a documented Regenerative Organic System Plan, which includes implementation and timing of:</p> <ul style="list-style-type: none"> <li>– Soil Health and Land Management Practices</li> <li>– Animal Welfare Practices</li> <li>– Farmer and Worker Fairness Practices</li> </ul> <p>Plan also includes:</p> <ul style="list-style-type: none"> <li>– Annual inventory &amp; assessment of top 10 (highest volume) native plants and top 10 (highest volume) animals on farm</li> <li>– Annual inventory &amp; assessment of farmers &amp; workers on farm</li> <li>– Plan to overcome shortcomings, where operations are not able to meet certain Supplemental items.</li> </ul> <p>Operations are encouraged to use the Cool Farm Tool to understand the carbon sequestration potential for incorporating certain practices within an operation.</p> <p><i>CT: No plan in place</i></p>	R	R	R

# IX. Appendix

## A-1. Definitions for Prohibited Animal Handling & Management Practices

- **Beak Trimming / De-Beaking:** The removal of all or a portion of the beak of a bird.
- **Caponization:** Castration of chickens, turkeys, pheasants, and other avian species.
- **Cattle Wattling:** The surgical separation of two layers of the skin from the connective tissue for along a 2 to 4-inch path on the dewlap, neck, or shoulders used for ownership identification.
- **Clipping, Grinding, or Filing of Teeth:** Shaving or removing an animal's teeth.
- **De-Clawing / Toe Clipping:** The removal of an animal's claws by amputating all or a part of an animal's nail and distal joint.
- **De-Snooding:** The removal of the turkey snood (a fleshy protuberance on the forehead of male turkeys).
- **De-Spurring:** Removing spurs from animals.
- **Disbudding:** The removal or destruction of horn-producing cells before an animal's horns become attached to its skull.
- **Dubbing:** The removal of poultry combs and wattles.
- **Forced Molting:** The induced shedding old feathers, hair, or skin, or an old shell, to make way for a new growth by unnatural methods or by withdrawal of feed.
- **Hot / Cold Branding:** Creating identification markers on animals by pressing an extremely hot or cold branding iron onto their flesh.
- **Mulesing:** The removal of skin from the buttocks of sheep, approximately 2 to 4 inches wide and running away from the anus to the hock.
- **Pinioning:** Surgically removing a bird's pinion joint.
- **Prodding:** Striking, poking or electrocuting animals with an implement to influence and control their movement.
- **Tail Docking:** The cutting or shortening of an animal's tail.
- **Tusk Removal:** The amputation of an animal's tusks.

## A-2. Soil Health Lab & In-Field Tests

Regenerative Organic Certification relies on two methods of testing: a Soil Health Lab Test (**Required**) and a Soil Health In-Field Test (**Recommended**). While both tests provide producers with valuable information, when used together, they provide a holistic and cost-effective method of understanding soil health and the impact of agricultural practices.

The Soil Health Lab Test should be performed by an accredited lab or organization, such as a university, C-MASC lab, or private organization with an expertise in analyzing soil health. Tests are to be conducted at initial certification inquiry, and then every 3 years thereafter.

Refer to the ROC Soil Sampling Guidelines for more information on the required soil testing.

### **A-3. Living Wage Calculation and Definitions**

#### **A-3.1 Living Wage Definition**

For the purposes of the Regenerative Organic Certification, a living wage is defined as:

*“The remuneration received for a standard workweek by a worker in a particular place sufficient to afford a decent standard of living for the worker and her or his family. Elements of a decent standard of living include food, water, housing, education, health care, transportation, clothing, and other essential needs including provision for unexpected events.” (Global Living Wage Coalition)*

#### **A-3.2 Living Wage Calculation**

Living wage must be calculated using one of the following methods or tools:

Agricultural Justice Project Living Wage Toolkit

- MIT Calculator + 10%, based on one working adult
- Global Living Wages benchmarks per region
- Global Living Wage Coalition calculation manual
- Fair Labor Association benchmarks
- Anker Methodology by the Global Living Wage Coalition
- Calculation in accordance with SAI Guidance Document for Social Accountability 8000 (SA8000, 2004) definition for “basic needs wage”:
  - A “basic needs wage” enables workers to support half the average-sized family above the poverty line, based on local prices near the workplace. Basic needs include essential expenses such as food, clean water, clothes, shelter, transport, education, a discretionary income, as well as legally mandated social benefits (which may include health care, medical insurance, unemployment insurance, retirement plan, and so on).

#### **A-3.3 Operation Scale Definitions**

For the purposes of the ROC requirement *8.2 Commitment to a Living Wage*, the following definitions shall be used to determine scale of operations:

- **Small-scale farms**
  - ≤5 permanent workers and no more than 25 total workers on-site at the management unit at any time (FT-USA, FFL)
- **Small-scale farm organizations**
  - More than 2/3 of member farms meet the criteria for small-scale
  - A maximum of 1/3 of member farms may have up to 2 times the parameters defined
- **Medium-scale farms**
  - 6-25 permanent workers and no more than 100 total workers on-site at the management unit at any time

- **Medium-scale farm organizations**
  - More than 2/3 of member farms meet the criteria for medium-scale
  - A maximum of 1/3 of member farms may have up to 2 times the parameters defined
- **Large-scale farms/farm organizations**
  - All other situations

#### **A-4. Auditor Requirements for All Modules of Regenerative Organic Certification**

Auditor remuneration is not incentive based, nor based on the outcome of inspections. All approved auditors must receive initial training, as well as ongoing continuous education and periodic evaluation.

Visual inspections should be approached with collaboration and mutual respect towards suppliers at all levels, with a focus on education and sustainable remediation. Farm, ranch, or facility visits are preferred during the production cycle, with special attention paid to periods of increased risk to animal welfare, such as castration or other mutilations, birthing, shearing, loading, and similar. The scope of the on-site audit should include, but is not limited to, a walk-through of the facility and review of the following items:

- Visual inspection of the treatment of the workers and animals (if applicable to the entity);
- Visual inspection of the workers' and animals' environment (if applicable to the entity);
- Review of product labeling practices and procedures;
- Review of segregation and separation practices and procedures;
- Review of traceable supply chain process implementation;
- Worker interviews to ensure proper implementation of traceability policies, procedures, documentation, training, and animal welfare legal compliance;
- Issues identified during the document review;
- Complaint policies;
- All other requirements as required by Regenerative Organic Certification.

Documentation required to demonstrate compliance must be made available for review during the audit or pre-audit process at all levels of the supply chain. Additionally, auditors must be allowed to conduct private management and worker interviews in the local language at all levels of the supply chain to assess proper implementation of traceability policies, procedures, and documentation, training, and animal welfare compliance. The maximum period between on-site assessments should not be more than 18 months.

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References and Resources:

- **ISO 19011: Guidelines for auditing management systems**  
Section 7.2 “Determining auditor competence to fulfill the needs of the audit programme”  
<https://www.iso.org/obp/ui/#iso:std:iso:19011:ed-2:v1:en>
- **GSCP (Global Social Compliance Programme)**  
Table A - Core auditor competence and prerequisite reference requirements (for social and environmental compliance assessment), pg. 13  
[http://www.theconsumergoodsforum.com/images/the\\_forum\\_images/strategic-focus/gscp/gscp-work/reference\\_tools/pdf/GSCP\\_Auditing\\_Competence.pdf](http://www.theconsumergoodsforum.com/images/the_forum_images/strategic-focus/gscp/gscp-work/reference_tools/pdf/GSCP_Auditing_Competence.pdf)
- **APSCA (Association of Professional Social Compliance Auditors)**  
Competency Framework for Social Compliance Auditors  
[http://www.theapsca.org/uploads/7/3/4/0/73406857/apsca\\_competency\\_framework\\_v5\\_.pdf](http://www.theapsca.org/uploads/7/3/4/0/73406857/apsca_competency_framework_v5_.pdf)

## A-5. Resources

Once you decide to begin your journey to regenerative certification, the following resources can provide guidance. These documents are available at the Regenerative Organic Alliance website at [www.regenorganic.org](http://www.regenorganic.org). For additional questions, please contact [info@regenorganic.org](mailto:info@regenorganic.org).

Resource	Description
<a href="#">Approved Baseline Certifications</a>	List of approved pillar-specific standards/certifications that meet the ROC baseline eligibility requirements, and the international organic standards recognized as NOP equivalent.
<a href="#">Chain of Custody Requirements</a>	Guidelines for maintaining and documenting appropriate chain of custody throughout the product supply chain.
<b>Communication &amp; Marketing Guidelines (In Progress)</b>	Guidance and requirements for communicating participation in ROC and farm or product certification status.
<a href="#">Equivalency Gap Analysis</a>	Recognized standards and certifications that meet some requirements of the ROC standard. The equivalency analysis helps you understand how to leverage your existing certifications and identify gaps to meet the additional ROC requirements.
<b>Grievance Submittals Process (In Progress)</b>	Process for submitting concerns, complaints, appeals, or reports of misuse of the ROC seal to the Regenerative Organic Alliance.
<a href="#">Labeling Guidelines</a>	Guidelines and requirements for product certification labeling.
<b>List of Approved Certification Bodies (In Progress)</b>	Names and contact information for certification bodies approved to audit to ROC.
<a href="#">Participant FAQs</a>	Frequently asked questions regarding specific components of the framework, application process, auditing, and implementation.
<b>Program Application Form (In Progress)</b>	Complete this form when you are ready to apply for Regenerative Organic Certification.
<a href="#">Regenerative Organic System Plan</a>	Template for the Regenerative OSP to be completed by participants.

**[Sampling Methodology and Group Certification](#)**

Requirements for group certification and audit sampling approach.

**[Soil Sampling Guidelines](#)**

Details on the soil sampling requirements of the Soil Health pillar and guidance for finding a lab and conducting tests.