regenagri

for the health & wealth of the land

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Regenagri
Chain of Custody Standard - Food

Version 3.0 – May 2025

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Misuse of Claims

Organisations can make claims related to Regenagri only when they have a valid licence agreement with Regenagri C.i.C. Claims shall be made according to the terms of the licence agreement.

Regenagri C.i.C. may suspend the licence agreement temporarily with immediate effect while a suspicion of breaching the terms of the agreement or the Regenagri® standards and principles is being investigated.

In the case of misuse or suspicious misuse of Regenagri claims, the licenced organisations will receive a written request for clarifications accompanied by a notification of the temporary suspension of the licence. The licenced organisation has two weeks from the date of notification to confirm receipt and provide Regenagri C.i.C. with the required clarifications. The temporary suspension shall remain in effect for a maximum period of one month after the licenced organisation has provided clarifications. If the misuse is confirmed, the temporary suspension is extended for an additional three months, during which the licenced organisation shall provide Regenagri C.i.C. with confirmation of correcting and preventive measures. Regenagri C.i.C. will review these corrective and preventive actions and will confirm in writing to the licenced organisation whether the licence is reinstated or terminated.

Edit History

Version 2.2 – April 2025
Version 3.0 – May 2025

Log of Updates

Update	Update date	Effective date
Section I - Update on scope of food products	1 December 2023	Publication date
Section 4.2 – Addition of EUDR requirements	1 December 2023	1 January 2024
Section IV – Addition of general information	1 December 2023	Publication date
Section 7. – Addition	1 December 2023	1 January 2024
Certified blends – minimum Regenagri content from 50% to 80%	1 January 2024	1 July 2024
Traceability Programme through tracer-based, forensic, and science-based solutions	23 February 2024	1 July 2024
Annex II update Distributor definition & Critical activities clarifications	25 September 2024	25 September 2024
Subcontractor clarification and remote audit clarification	3 April 2025	3 April 2025
TC clarifications	3 April 2025	3 April 2025
Restructuring Added: Certification process and timelines Multisite and Group certification criteria	24 April 2025	18 August 2025
Restructuring Added: NCs clarifications and timelines for reporting Auditing requirements for CB	24 April 2025	21 August 2025
Restructuring Added: Senior management responsibility criteria Grievance mechanism Chemical, cleaning and pest control requirements Equipment calibration requirements Updated requirements: Documented procedure – Responsible Business policy requirements, monitoring of legislation requirements Supplier approval and risk assessment requirements Animal welfare requirements for the first processor	24 April 2025	21 January 2026
Clarifications in sample selection for multisite and group certification.	September 2025	15 September 2025

In case of updates, the latest updated version of the Regenagri CoC Standard – Food is always available on Regenagri's website: https://regenagri.org/standards-documents/.

I. Scope

The Regenagri Chain of Custody (CoC) Standard is applicable to food products and their supply chains (please refer to Annex I). The applicability of the standard will be confirmed by the certification body upon application or by Regenagri if required. Products may go through many production and logistical stages between the first processing or sorting facilities to end products. The general CoC criteria of the Regenagri CoC Standard shall apply to any organisation, throughout the supply chain, that takes legal ownership and physically handles Regenagri certified products at locations under its control, including outsourced contractors. After the final process in the supply chain, there are no further standard criteria applicable to the products.

The Regenagri CoC criteria for individual certification outline the criteria for individual certificate holders and the criteria for multisite and group certification outlines the requirements and processes for obtaining multisite certification and group certification. This document aims to provide clarity on the differences between individual, multisite and group certifications and to ensure consistent application of certification protocols.

Regenagri certified products can be traded through the following supply chain traceability type that is implemented by this standard:

- ***Segregated (SG)*** - minimum of 80% Regenagri certified products and no more than a 20% blend of non-certified products.

All claims made in relation to Regenagri shall be in accordance with the current standard criteria. Independent mills and all other manufacturing and/or processing organisations require a CoC certification and shall comply with this standard.

All brand holders or final product processing organisations who hold an active license agreement with Regenagri are allowed to place final products on the market using the claim 'Regenagri-certified' and the Regenagri certification mark. They shall comply with all applicable requirements outlined in the Regenagri Logo Guide and related documents (available at www.regenagri.org).

The scope of the audit and certification against the standard of the full supply chain of a site shall include all the operators of that supply chain up to the last Regenagri certified site.

II. Acronyms

CB – Certification Body
CoC – Chain of Custody
GGAP - GLOBAL G.A.P. standards
NCs – Non-conformities
NGOs – Non-Governmental Organisations
RFA - Rainforest Alliance certification (Sustainable Agriculture Certification)
SC – Scope Certificate
TC – Transaction Certificate

III. Definitions

Accreditation Body (AB) - An independent organisation recognised under ISO/IEC 17011 to assess and accredit conformity assessment bodies such as CBs.

Annual Aggregated Volumes - The record shall consist of the aggregated volume purchased (input) and claimed (output) over a period of twelve (12) months.

Approved Code of Practice (ACOP) – refers to practical guide to compliance with legal duties under specific health and safety legislation, most notably under frameworks such as the UK's Health and Safety at Work etc. Act 1974. ACOPs are issued by regulatory bodies, such as the Health and Safety Executive (HSE) in the UK and serve as authoritative guidance.

Audit - An independent evaluation of compliance with the requirements of the RegenagriCS and Chain of Custody (CoC) certification standard by a certification body as part of the certification process.

Auditee – refers to an organisation, entity, site or group of sites, member or group of members, department, function, or individual being audited.

Blending - refers to combining multiple different material types into a single product.

Brand owner (Brand) - A person and/or a legal entity who owns or licenses a brand or otherwise has rights to market a product under the brand.

Buyer - The next commercial entity in the supply chain; the supplier (or seller) is the previous commercial entity in the supply chain.

Certification body (CB) - An independent body that is accredited to ISO 17065 by an accreditation body and approved by Regenagri to conduct certification audits against the requirements of the RegenagriCS and Regenagri CoC Certification Standard.

Claim - Any communication (i.e. on-pack, website, sales documents, product specification document, or Approved Code of Practice (ACOP) report in any format of the presence of certified Regenagri products to any stakeholder group (refer to Regenagri Claims requirements).

Client – An organisation whose system is being audited for certification purposes.

Critical activities – Any processing, transformation or modification of products that could affect compliance with Regenagri certification requirements. These activities include mixing or blending certified and non-certified materials, packing or re-packing, labelling or re-labelling, processing, or other forms of product transformation, outsourcing and subcontracting, volume reconciliation and shipping, selling and exporting bulk (unpacked) products. For subcontracted warehouses, this also involves assuming legal ownership of Regenagri products.

Desk-based audit – refers to an audit conducted by Regenagri-approved CBs accredited to ISO 17065 gather information without the need to be physically present. The desk-based audit refers to documentation review or off-site document verification and is focused exclusively on document and record review. It does not involve interviews, observations, or real-time interactions.

Dispatch - A physical transfer of a product from one organisation to another.

Distributors - Participants in the supply chain of Regenagri certified products that take legal ownership, store, and sell finished products to their customer bases but do not unpack, repack, or relabel those products at any stage. Distributors are allowed to handle products physically without any modification to the end products.

End Product – A product that is ready for sale, is not intended for further transformation, and is intended for consumption.

End product manufacturer – The manufacturer or processor that uses products for manufacturing products designed and intended for consumption or end use in any way without further processing, repackaging, or relabelling. For example, retailers who produce their own label products in-house. Retailers and distributors of end products, where no further modification occurs, may not need the CoC certification.

First processor – An organisation that carries out the earliest stage of transformation and processing of raw materials.

Fraud – refers to deliberate falsification, concealment, or manipulation of facts or records by any party involved in the certification process - including farms, supply chain entities, CBs, or associated entities, with the intent to obtain or retain Regenagri certification without meeting the required standards. mislead auditors, CBs, or Regenagri, misrepresent farm practices, land area, outputs, or inputs, issue or use invalid or manipulated SC, TC, data, or transaction records, claim certification status or materials where no valid Regenagri certification exists, benefit financially or reputationally through deceptive means.

Geolocation – refers to declared physical origin of a commodity or raw materials, defined by a point or polygon of geocoordinates (latitude and longitude values) that corresponds to the land plot, facilities, or land areas where production occurred.

Grievance mechanism - refers to a formalised process through which stakeholders, including employees, suppliers, farmers, clients, and third parties, can raise concerns, complaints, or allegations related to the implementation of Regenagri standards, certification procedures, or impacts of certified operations.

Independent mill - A mill operating independently with no legal relationship to any specific plantation. This includes working with parent or sister companies and taking into consideration the geographical accessibility of the plantation.

Internal Audit - A systematic, independent, and documented process carried out by the organisation to ensure that the management system has been properly implemented and to determine the effectiveness of the implemented management system.

Labelling - refers to the information about certification status or Regenagri certified materials and products status of that is shown directly on a product's packaging or container. Within the scope of this standard, 'labelling' does not include the addition of new labels, translation of existing labels, or the use of extra stickers or tags.

Legal owner - Person or entity that holds legal ownership of the physical products.

Merchant – A merchant is a legal entity or business that buys goods and resells them, either to consumers (retail) or to other businesses (wholesale). The merchant takes legal possession of the goods.

Mixing – refers to combining multiple different grades of the same raw material into a single product.

Non-certified mills - Mills that have not been certified by CB under RegenagriCS and CoC.

On-site audit - A physical visit to an organisation by representative(s) of a Regenagri-approved certification body.

Physical handling - Activities that may include receipt, storage, and dispatch, or where a product undergoes physical transformation, repacking, or relabelling.

Processor – Refers to an entity or facility involved in the various stages of converting raw materials into finished products

Receiving - Receipt of Regenagri certified products at a site under the control of the organisation (including outsourced contractors).

Regenagri certified product – refers to a product or material that meets the requirements of the Regenagri standards (including the Regenagri content standard and the Regenagri Chain of Custody standard) and which are included in the scope certificate and are covered by TC (refer to Regenagri CS). These products or materials are eligible to be claimed Regenagri-certified.

Relabel - Any changes to the original label on the Regenagri certified material.

Remote audit – The auditing process by which Regenagri-approved CBs accredited to ISO 17065 perform an audit without the need to be physically present. A remote audit refers to any audit that is conducted off-site, using digital communication tools like video conferencing, file sharing, remote desktop applications, etc. It mirrors an on-site audit, covering interviews, document reviews, and even virtual tours of facilities where feasible. The auditor may request real-time demonstrations, share screens, and ask for immediate document access.

Retailer - A business or person that sells end-consumer products to the consumer, as opposed to a wholesaler or supplier, who normally sells their products to another business.

Retrospective TC – refers to a transaction certificate issued by the CB after the related transaction (sale, shipment, or invoice) has already occurred, based on verified documentation that proves the certified status of the product and compliance with applicable certification and chain of custody requirements

Scope of certification - The activities covered by the organisation's supply chain certification.

Segregated (SG) - The Segregated (SG) supply chain traceability type assures that Regenagri certified products delivered to the end user come only from Regenagri certified sources.

Site – The location with geographical boundaries, at which defined activities under the control of an organisation may be carried out.

Stakeholders - any individual, group, or organisation that can affect or be affected by the implementation, operation, outcomes, or impacts of Regenagri-related activities. This includes, but is not limited to farmers and producers involved in regenerative agriculture practices, certification bodies (CBs) and auditors conducting assessments, supply chain actors such as processors, traders, and brands using Regenagri certified materials, implementing organisations, technical support providers, and consultants, local communities and indigenous groups, consumers, especially those relying on product carrying certification claims, NGOs, civil society organisations, and regulators with an interest in sustainable agriculture, environmental impact, or social performance.

Subcontractor – Company or legal entity hired by a primary contractor to perform specific tasks or services without taking legal possession of the goods.

Supplier (or seller) - The previous commercial entity in the supply chain; the buyer (or customer) is the next commercial entity in the supply chain

Supply chain - The series of processes or steps through which agricultural raw materials pass from the primary producer through to the end product manufacturer (i.e., storage, transport, manufacture, end product, etc.).

Supply chain certification systems – *A* document that defines the minimum requirements of a consistent methodology for enabling certification against the requirements of the applicable Regenagri CoC Certification Standard, to enable all certification bodies to operate in a consistent and controlled manner.

Suspension of Scope certificate - means that the Certification Body (CB) has temporarily invalidated a client's Scope Certificate for a specified period of time. During suspension, the client must not make any certification claims or request any Transaction Certificates issuance related to the suspended scope.

Traceability Programme via tracer-based solutions - A set of standards, methods, and protocols to provide organisations with traceability of products and materials throughout their supply chains. The Regenagri Traceability Programme implements technologies and solutions suitable to the scope of application, including tracer-based, forensic, and science-based testing.

Trader - Participant in the supply chain who takes legal ownership of products, and/or purchases and sells the products. This includes distributors, merchants, wholesalers, retailers.

Transaction Certificate (TC) - confirms that the products being sold or shipped are certified and meet the requirements of Regenagri Content standard and applicable Regenagri Chain of Custody standard and that they come from a certified source.

Transaction certificate (TC) recall – refers to formal withdrawal of a previously issued transaction certificate by the CB, typically due to an error, non-compliance, or the identification of fraud, with the intention of rendering the transaction certificate invalid and preventing its further use in the supply chain.

Warehouse – Facility used for the storage of goods and products. It serves several key functions, including storage, distribution, inventory management, handling and packing, logistic support etc.

Wholesaler - A person or organisation that buys a large quantity of end products from various producers or vendors, warehouses them, and resells them to retailers without further modification. Wholesalers of end products, where no further modification occurs, may not need CoC Certification.

Withdrawal of Scope certificate – means that the Certification Body has permanently cancelled the client's Scope Certificate. Once withdrawn, the certificate holder loses the right to use any certification claims, logos, or issue further TCs (refer to RegenagriCS) under the withdrawn scope.

IV. Understanding the Chain of Custody Criteria

This document includes the following components:

1. ***General Chain of Custody Criteria for the Supply Chain,*** apply to all organisations in the supply chain.

2. ***Supply Chain Traceability Types*** – Requirements for the supply chain traceability types for all Regenagri products in the scope of certification. These set out the differing criteria that apply to each of the different supply chain criteria applicable to organisations in the supply chain.

3. ***CoC Criteria for Individual Certification***, which apply to all organisations that hold an individual scope certificate or sites and members of multisite and group certification.

4. ***Animal Welfare Criteria for First Processors***, which apply to all organisation that handle and have in their scope live animals (livestock).

5. ***Multisite Certification Criteria,*** which apply to all organisations seeking multisite certification.

6. ***Group Certification Criteria,*** which apply to all organisations seeking group certification.

7. ***Audit and Certification Requirements***, which apply to all organisations seeking Regenagri certification and to certification bodies (CBs).

This document shall be used when required, in conjunction with the Regenagri Standard Criteria and related add-ons. The standard is available at www.regenagri.org.

V. General Information

A1. References.

The Regenagri Content Standard implements chain of custody and traceability requirements. The Regenagri Content Standard shall be used in conjunction with this Regenagri Chain of Custody Standard for Food. For the avoidance of doubt, in cases of differences between the Regenagri Content Standard and this specific standard, the requirements of the Regenagri Chain of Custody Standard prevail.

A.2. The Regenagri Chain of Custody Certification Standard for Food provides the standard requirements applicable to any organisation throughout the related supply chains that take legal ownership of and/or physically handles Regenagri certified products. This document can be requested by contacting info@regenagri.org.

A.3. Supply chain entities certified to other chain of custody programmes (such as organic) are still required to undergo a Regenagri audit and certification to verify compliance with the RegenagriCS and CoC standard (Food). However, the Regenagri audit can be conducted remotely after confirmation by the CB and when the following conditions are met:

- No critical activities are part of the scope of the audit and certification.
- The organisation is a trader.
- When an organisation is certified under other CoC certifications including but not limited to RFA and GGAP (refer to Annex V). This is applicable when the audit is an initial audit and there are no pending NCs identified. In order to be verified, the organisation may be asked to provide the latest audit report(s) issued under the other standard(s) (if the audit is not combined).

VI. Regenagri Chain of Custody Criteria for Individual Certification

No.	*Compliance criteria*	*Intent and clarifications*
1.	***Applicability of the general CoC criteria for the supply chain***	
1.1.	A certification and licensing agreement is signed between the Certification Body (CB) and an organisation seeking certification.	The first processor can only use the segregated supply chain traceability type.
2.	***Senior Management responsibilities (when applicable)***	
2.1.	Senior Management shall ensure strategic leadership implementation and management commitment to responsible business conduct.	Senior management shall demonstrate a clear and proactive commitment to the principles of regenerative agriculture, traceability, and sustainability through: ✓ Establishing and maintaining a policy, which aims to promote a regenerative mindset that supports biodiversity, soil health, social fairness, and long-term environmental protection though their supply chains. Senior management shall ensure the maintenance of active involvement in stakeholder dialogues, including engagement with employees, suppliers, civil society, community, NGOs and regulatory bodies.
2.2.	Management review is conducted annually, and Continuous improvement is a key aspect of these reviews	A formal Management review shall be conducted at planned intervals (at least annually), encompassing: ✓ Review of internal and external audit findings, non-conformities, corrective actions, and stakeholder feedback. ✓ Assessment of legal and regulatory changes and their implications for the business. ✓ Monitoring of stakeholders' feedback and actions taken if required. ✓ Identification of opportunities for improvement of Regenagri requirements implementation internally and across the supply chain, resources and other need identifications, timelines etc. All outcomes from the management review must be documented, and relevant decisions and actions shall be communicated effectively within the organisation indicating the responsible personnel.

No.	*Compliance criteria*	*Intent and clarifications*
2.	***Senior Management responsibilities (when applicable)***	
2.3.	Organisational structure and roles	To ensure operational control and compliance, senior management shall: ✓ Define and document a clear organisational structure, delineating responsibilities and reporting lines for all personnel involved in compliance with Regenagri CoC standard requirements, legislation, and internal management requirements. ✓ Identify the role of the person responsible for and authority over the implementation and compliance with these criteria. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard. ✓ Establish internal committees or working groups, where needed, to support cross-functional coordination and decision-making.
2.4.	Allocation of resources	Senior management is responsible for ensuring that adequate resources (human, financial, and technical) are allocated to implement, monitor, and improve the management system for Regenagri standard implementation. Key personnel shall have the necessary competence and training to manage responsibilities effectively.
2.5.	Due Diligence and risk management	Organisations shall implement the principles of risk-based due diligence to identify, prevent, mitigate, and, where necessary, remediate actual or potential adverse impacts in their supply chains. The approach should be appropriate to the organisation's scale, context, and risk level, and may include collaboration with upstream and downstream partners, stakeholder engagement, and grievance mechanisms. Where required by applicable laws or regulations, organisations shall implement due diligence systems that meet the specific obligations set out in those legal frameworks.

No.	*Compliance criteria*	*Intent and clarifications*
3.	***Documented procedures***	
3.1.	The mills and/or site shall have written Responsible Business Conduct policy, procedures or work instructions, or equivalent, and grievance mechanism to ensure the implementation of all elements of the CoC Standard.	This shall include, at a minimum, the following: ✓ Documented procedures and/or work instructions (incl. records) covering the implementation of all the elements of the CoC standard. ✓ Responsible Business Conduct policy which covers all operations, supply chain partners, and business relationships. The policy shall address direct and indirect adverse impact on human rights and labour conditions, environmental protection and climate changes (including deforestation, water use, waste and biodiversity), occupational health and safety, supplier engagement and compliance with this policy. The policy shall be aligned with OECD Due Diligence Guidance for Responsible Business Conduct or UN Guiding Principles on Business and Human Rights and shall be reviewed annually. ✓ Documented procedure for monitoring changes in all applicable local and international legislation. The certificate holder shall identify, document, and comply with all applicable local, national, and international legislation relevant to its operations and the Regenagri Chain of Custody standard. This includes, but is not limited to, laws and regulations concerning human right and labour, environmental, occupational health and safety, labelling and trade, business integrity and governance. ✓ Grievance mechanism that enables individuals or groups—including internal and external stakeholders—to confidentially and safely report concerns related to any aspect of the certificate holder's activities under the Regenagri CoC. This mechanism shall apply to grievances involving technical, environmental, social, labour, or economic issues**,** and must be designed to be fair, accessible, inclusive, and transparent. The grievance mechanism may be operated directly by the certificate holder or through a qualified and impartial third-party service provider**.** The site shall define the responsible personal for handling grievances and shall make sure the grievance-maker is protected from any negative treatment.

No.	*Compliance criteria*	*Intent and clarifications*
3.	***Documented procedures***	
3.2	The site and/or mill shall have a written and documented procedure to conduct annual internal inspections.	The site and/or mill shall be able to demonstrate that the site conforms to the criteria in the Regenagri CoC certification standard and that this is under control. The internal inspection shall be conducted by personnel knowledgeable of the criteria of this standard. Any non-conformities found during the internal audit shall be addressed, and actions to correct them shall be taken. The organisation shall maintain internal inspection records and reports.
4.	***Purchasing and goods intake***	
4.1.	The site and/or mill keep an up-to-date list of all suppliers and their valid certification status.	
4.2.	The site shall have a supplier approval procedure.	The supplier approval procedure shall include as a minimum verification of certification status, risk assessment conducted against the Responsible Business Conduct policy (including, but not limited to human rights and labor, environmental protection, health, safety and wellbeing, etc.). There is a documented process in place for checking the certification status of all suppliers the organisation is sourcing from by using Regenagri public registers: https://regenagri.org/certified-companies/ and https://regenagri.org/deregistered-companies/. Records of these checks shall be made available in place.

No.	*Compliance criteria*	*Intent and clarifications*
4.	***Purchasing and goods intake***	
4.3.	The site and/or mill shall ensure that the purchases of Regenagri certified products comply (checking the certification status of the supplier) with this standard and that all records are kept up to date.	The following minimum information for Regenagri certified products is made available by the supplier on the delivery documentation that accompanies the delivered goods: ✓ The name and address of the seller. ✓ The name and address of the receiver. ✓ The loading or shipment/delivery date. ✓ The date on which the documents were issued. ✓ Regenagri Transaction Certificates; ✓ A description of the product, including Regenagri product identification. For blend content, the Regenagri certified content must be presented as part of the product description. ✓ The quantity of the products delivered and their unique identification. ✓ If a mill and/or a first processing site source directly from farms, the following details of the farm(s) are required to be presented on the delivery documentation: Farmer Name and Address Geolocation (latitude and longitude coordinates) Regenagri Certificate Number The quantity of products harvested and sold to the mills (where applicable) Identification number (batch number, lot number or article number etc.) and the date of delivery. ✓ If a site sources commodities or products listed in Annex I of EUDR (EU Deforestation Regulation) directly from farms, the following details are required to be presented on the delivery documentation: Geolocation (latitude and longitude coordinates) Information, documents, and data showing that the relevant products comply with Article 3 of the EUDR.
4.4.	The site shall have a procedure in place for handling non-conforming Regenagri products and/or documents.	A documented procedure shall be made available that clearly states all processes for handling non-conformities, and all responsibilities shall be clearly distributed. All records shall be kept up to date.
4.5.	For traders and/or agents involved in primary procurement (i.e. purchasing directly from a mill and/or other sources like farms, cooperatives, etc.), the site shall maintain a list of all supplying mills and/or other sources like farms, cooperatives, etc. (certified and non-certified). The list shall include mill, cooperative, or farm names; GPS coordinates; parent company; and country.	The list shall be updated quarterly and made available in place. On the delivery documentation, the traders and/or agents must pass on the certificate number of the certificate holder they are sourcing from.

No.	*Compliance criteria*	*Intent and clarifications*
5.	***Subcontracted activities (when applicable)***	

5.1.	There are two (2) types of subcontractors – Independent (independently certified) and associated (within the Scope Certificate of the contracting organisation).	Two (2) types of subcontractors are recognized under Regenagri Chain of Custody (CoC) certification:
		
		a. Independent Subcontractors
		
		• Hold their own valid Regenagri CoC Scope Certificate.
		• Must be declared on the Transaction Certificate of the contracting organisation in the product information/additional information section.
		• The CoC SC (refer to RegenagriCS) of the contracting organisation shall include, in its annex:
		  o A list of all independent subcontractors engaged.
		  o The full range of products and activities undertaken by each subcontractor.
		• The products and activities listed in the annex shall also appear on the independent subcontractor's own SC (refer to RegenagriCS), confirming they are certified for those specific processes and product categories.
		• Activities or products not listed on the subcontractor's SC (refer to RegenagriCS) shall not be undertaken as certified operations.
		
		b. Associated Subcontractors
		
		• Do not hold their own independent Regenagri certification.
		• Operate under the scope of the contracting organisation's certification.
		• The CoC SC (refer to RegenagriCS) of the contracting organisation shall include, in its annex:
		  o A list of all associated subcontractors.
		  o The full range of activities undertaken by each associated subcontractor.
		
		Note:
		
		• Subcontractors that do not perform critical activities may not need to be added in the SC of the contracting organisation.
		• Subcontractors are distinct from "facilities." Facilities are physical sites owned or controlled by the certified organisation and covered directly under its certification.
		• An independently certified entity may also operate as a subcontractor when carrying out certified activities on behalf of a contracting organisation, provided it is declared in the contracting organisation's Scope Certificate annex and TC (refer to RegenagriCS).

No.	*Compliance criteria*	*Intent and clarifications*
5.	***Subcontracted activities (when applicable)***	
5.2.	In cases where an organisation seeking or holding certification subcontracts outsourced activities to independent third parties (e.g., subcontractors for storage, transport, or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the Regenagri Chain of Custody Standard - Food.	Sites that use subcontracted activities within the scope of their Regenagri Chain Custody certificate shall ensure the following: ✓ The site has legal ownership of all input material to be included in outsourced processes. ✓ The site has a signed agreement or contract covering the outsourced process with each subcontractor. The responsibility is on the site to ensure that certification bodies (CBs) have access to the subcontractor's organisation or operation if an audit is deemed necessary. ✓ The site has a documented control system with explicit procedures for the outsourced process, which are communicated to the relevant contractor. The CB is made aware of any new subcontracted outsourced activities in advance and prior to conducting its next audit. The organisation shall obtain the CB' s approval before engages their services.
5.3.	The site shall keep a list of all subcontractors.	The list shall contain the names and contact details of all contractors used for the processing or physical handling of Regenagri certified products, including independent or associated subcontractors
6.	***Sales of Regenagri certified products***	
6.1.	The supplying site shall ensure the Regenagri certified products are identifiable as being certified. The supply chain traceability type is presented in the sale documentation.	The site shall ensure that the following minimum information for Regenagri certified products is made available on the sale documentation: ✓ The name and address of the seller. ✓ The name and address of the receiver. ✓ The loading or shipment/delivery date. ✓ The date on which the documents were issued. ✓ Regenagri Transaction Certificates (refer to Regenagri CS). ✓ A description of the product, including clear identification of Regenagri products. For blends, the Regenagri certified content must be presented as part of the product description. ✓ Certificate number. ✓ The quantity of the products delivered and their unique identification. ✓ For all blends, the content of the Regenagri certified content must be presented as part of the product description. ✓ If a site is primary processor who sources commodities or products relevant to the EUDR directly from farms, shall ensure that the following details are presented on the sale documentation: Geolocation (latitude and longitude coordinates) Information, documents, and data that demonstrate that the relevant products comply with Article 3 of the EUDR.

No.	*Compliance criteria*	*Intent and clarifications*
7.	***Training***	
7.1	The organisation shall have an annual documented training program on Regenagri Chain of Custody Standards criteria.	Appropriate training shall be delivered annually by the organisation to the personnel involved in all tasks critical to the effective implementation of the chain of custody certification criteria. Training shall be specific and relevant to the task(s) performed by the personnel. Training records shall be maintained and kept up to date in place.
8.	***Record keeping***	
8.1.	The organisation shall maintain accurate, complete, up-to-date, and accessible records and reports covering all aspects of these Regenagri certification standard criteria.	Retention times for all records and reports shall be at least four years and shall comply with legal and regulatory requirements and confirm the certified status of raw materials or products held in stock.
8.2.	Where exact quantities are not available, the organisation shall provide a calculated estimate of the aggregated volume of Regenagri certified products that have been used. The organisation shall keep an up-to-date record of the volume purchased (input) and actual or estimated claimed (output) over 12 months. This record is required for audit purposes.	Closing stock = (Opening stock + crop production + crops brought in) – (sales + crops consumed)
8.3.	For mills, including independent mills, the estimated tonnage of Regenagri certified products shall be included in the CoC certificate.	This volume represents the total certified volume of product the certified mill can deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual report.
9.	***Equipment calibration (applicable to critical activities)***	
9.1.	All equipment used to determine the weight or volume of certified products shall be calibrated at least once per year to ensure accuracy and reliability.	The site shall have a list with all equipment which require calibration and keep all calibration records up-to-date.
10.	***Colorings and additives management***	
10.1	Use of colourings or food additives in processing must comply with Codex Alimentarius and local legislation.	The site shall keep an up-to-date list of all approved colourings or food additives permitted for use. The approval shall, at the minimum, comply with the applicable legislation.

No.	Compliance criteria	Intent and clarifications
11.	***Cleaning, cleaning detergents and agents (when applicable)***	
11.1.	The site shall have documented procedures for cleaning and sanitising production and storage areas.	As a minimum, the procedure shall include cleaning schedule, frequency, method of cleaning and cleaning detergents and responsible staff.
11.2.	The site shall have a list with approved cleaning detergents, agents, and disinfectants (e.g., soaps, detergents, surface cleaners) are allowed in facilities.	Cleaning detergents, agents and disinfectant used on equipment or in storage areas must meet the applicable legislation and local industry standards for environmental and toxicological criteria (e.g., biodegradable, non-toxic, free from hazardous substances). Facilities must maintain Safety Data Sheets (SDS) for all cleaning agents and train staff in their safe use.
11.3.	All cleaning detergents, agents and disinfectants shall be stored in a proper way following manufacturer's instructions.	All detergents, agents and disinfectants shall be stored safely in appropriate storage with restricted access. Properly labelled if stored not in their original containers.
11.4.	Cleaning agents and disinfection substances shall be used in ways that prevent contamination of certified goods.	The personnel who are conducting the cleaning shall be well trained. Supportive documentation shall be made available, showing there is no risk of contamination such as: ✓ Input purchase records ✓ Safety Data Sheets (SDS) ✓ Application logs (dates, dosages, personnel) ✓ Evidence of training
12.	***Pest Management***	
12.1	Pest management in storage or production facilities must follow integrated pest management (IPM) principles.	The site shall make sure preventative, non-chemical, mechanical and biological control methods are used whenever possible and preferred. The site shall ensure the pest control substances do not contaminate the Regenagri certified products. All treatments shall be documented and conducted by well-trained professionals and in line with the applicable legislation. Use of synthetic or toxic chemicals (e.g., phosphine, methyl bromide) shall comply with the applicable regulations and shall be managed according to the required health and safety criteria

No.	*Compliance criteria*	*Intent and clarifications*
13.	***Waste Management***	
13.1.	The organisation shall comply with local legal obligations for waste management.	
13.2.	The organisation shall ensure that all waste is handled, stored and disposed safely.	The organisation shall identify and categorize all waste types, including raw material residues, packaging waste, sludge, by-products. The hazardous waste streams shall be separated from non-hazardous waste streams. The hazardous waste shall be labelled and stored properly and easily distinguished: Especially for flammable, corrosive, or toxic substances. The storages of hazardous waste shall be locked with strictly controlled access.
13.3.	The organisation shall use only licensed waste handlers and never dispose any waste illegally.	All collection, transport, treatment, or disposal must be documented and legally handled.
13.4.	The organisation shall maintain all required documentation.	The organisation shall maintain all required documentation by law and as a minimum as follows: • Contract with service providers. • Waste transfer notes/manifests. • Proof of disposal or treatment, including pre-treatment prior to discharge. Training of responsible staff is made available, and all records are maintained by the organisation.
13.5.	The organisation shall have a waste minimisation plan.	The Waste Minimisation Plans shall include as a minimum: source reduction, improved process efficiency, cleaner production methods, time boundaries, responsibility distribution and monitoring methods etc.

No.	*Compliance criteria*	*Intent and clarifications*
14.	***Blending, Segregation and Traceability criteria***	
14.1.	The segregated approach requires that Regenagri certified products are kept separate from non-Regenagri certified products at every stage of production, processing, and manufacturing throughout the supply chain.	The site shall assure and verify through clear procedures and record keeping that the Regenagri certified product is kept segregated from non-certified products, including during transport and storage, to strive for 100% separation. At a minimum, the procedure shall provide clear instructions for marking and differentiating certified materials and products from non-certified ones. The mills shall be able to trace back to a single source of Regenagri certified products. (The source may be a cooperative, a single farm, or a group of farms, etc.).
14.2.	The basis of the supply chain criteria for blended products shall consist of a reconciliation between the quantity of Regenagri certified content in the product weight, blended, and the quantity of Regenagri certified product content claimed and sold. This includes control of purchases and sales of Regenagri certified products and the Regenagri certified content, which shall be independently verified.	Regenagri certified food products shall contain a minimum of 80% Regenagri certified material by total product weight.
14.3.	Segregation of certified and non-certified volumes at the site level is always required during any process. Blended product inputs and outputs (volume or weight) at the physical site are monitored.	The site shall ensure that the quantity of physical Regenagri blended product inputs and outputs (volume or weight) at the physical site is monitored. The system shall ensure the blends contain at least 5% Regenagri certified products and when certification claims – at least 80% Regenagri certified products used the blend. Additionally, all records associated with the monitoring shall be made available.
15.	***Conversion factor***	
15.1	The correct methodology for the calculation of conversion factors is demonstrated and documented for each certified product and reflected accordingly in the traceability process.	Organisations may determine and set their own conversion rates, which shall be based upon experience, documented, and applied consistently. Conversion factors shall be periodically updated to ensure accuracy against actual performance or the industry average, if appropriate.

No.	*Compliance Criteria*	*Intent and Clarifications*
16.	***Product certification claims***	
16.1	A product certification claim shall be made when the content requirements are met and shall include the Regenagri certification logo (according to the Regenagri logo guide and Regenagri claims requirements).	Minimum content requirements: No less than 80% of the total weight of products (excluding trims and accessories) shall be RegenagriCS certified materials.
16.2.	Product certification claims shall be approved by the CB.	The certification claims shall comply with Regenagri Claims requirements and Regenagri Logo guide. The claims and associated artwork shall be approved by the CB.

VII. Regenagri Animal Welfare Criteria for First Processors

**All Regenagri documentation and implementation requirements can be integrated into the organisation's existing manuals, documentation, and management systems.*

No.	*Compliance criteria*	*Intent and clarifications*
1.	***Animal welfare management – first processor (when applicable)***	
1.1.	First processor shall ensure any physical modification are conducted in a timely manner and in compliance with applicable legislation. As part of this procedure, there shall be a risk assessment for all sources of animal products.	Physical modifications such as but not limited to slaughtering, dehorning, break trimming, moulting, tail docking, carcass dressing, evisceration, deboning, skinning, and initial chilling or freezing shall be not practiced and restricted, unless deemed to be necessary practices and shall be performed only when essential for the animal's welfare, when there are no alternatives and with pain relief and under professional supervision. The first processor shall conduct a risk assessment of the animal product's origin and have documented procedures to verify the absence of the above-listed practices and shall confirm compliance with this requirement. The local and applicable legislation shall be taken in consideration.
1.2.	First processor shall ensure that handling systems are designed and operated to prevent pain, injury, distress, or prolonged suffering.	Animals must be handled calmly and respectfully, using methods that do not cause fear or panic. All activities must be performed by trained and competent personnel.
1.3.	Transport and handling of animals during transport shall be adequate and done in a human manner.	Animals must be fit for transport and not show signs of severe injury, illness, or late-stage pregnancy. Vehicles must provide adequate ventilation, protection from weather, and non-slip flooring. Overcrowding is strictly prohibited; species-specific space allocations must be followed. Unloading must be performed without causing falls, slipping, or physical abuse (e.g., hitting or electric prods). Animals shall have access to clean drinking water and food during transportation and have proper rest breaks if transportation is more than 8 hours. Exporting live animals across national borders, either directly for slaughter or via traders who will then export them alive, is not allowed.

No.	*Compliance criteria*	*Intent and clarifications*
1.	*Animal welfare management – first processor (when applicable)*	
1.4.	First processor handling (shearing or other) shall be done in a human manner.	Animals must be provided with: • Access to clean water, if held longer than 12 hours, suitable feed. • Space to lie down and recover from transport. • Lighting, ventilation, and quiet surroundings to minimize stress. Animals must be inspected on arrival, and any unfit individuals must be treated, or, if needed, humanely euthanized immediately. Movement paths should be curved or designed to avoid visual distractions, including sight of the slaughter floor or other animals being killed. Mulesing is not allowed. Shearing must be done by trained, competent shearers.
1.5.	Euthanasia (planned or emergency) shall be done in a human manner.	Animals that are suffering or unlikely to recover must be euthanized immediately using methods that ensure: • Instant unconsciousness • Absence of prolonged suffering Prohibited methods include: • Suffocation • Manual blunt trauma to the head • Neck crushing devices (e.g., killing pliers, Burdizzo).
1.6.	Stunning is mandatory and must render the animal immediately unconscious and insensible to pain.	Acceptable methods include: • Captive bolt • Electrical stunning • Controlled atmosphere (CO_2) Stunning effectiveness must be monitored and recorded; re-stunning is required if signs of consciousness persist. Bleeding (exsanguination) must occur promptly post-stunning to ensure death before recovery. Hoisting or shackling conscious animals is not permitted under any circumstance.

No.	*Compliance criteria*	*Intent and clarifications*
1.	***Animal welfare management – first processor (when applicable)***	
1.7.	Facility design and equipment shall be suitable, well-maintained and used correctly.	Floors must be ***non-slip,*** and pens must avoid sharp edges or surfaces that can cause injury. Stunning equipment must be: • Well-maintained**,** calibrated, and used correctly • Checked daily and serviced regularly Emergency backup stunning equipment must be available and functional.

VIII. Regenagri CoC Criteria for Multisite Certification

**All Regenagri documentation and implementation requirements can be integrated into the organisation's existing manuals, documentation, and management systems.*

No.	*Compliance criteria*	*Intent and clarifications*
1.	***Eligibility***	
1.1.	Multisite certification applies to a legal entity with multiple locations or sites (more than one site) operating under a unified management system.	This standard is intended for organisations that wish to certify their entire network of sites collectively under one certificate. Individual sites within a multisite certification cannot operate or sell certified products independently of the central management system unless specifically agreed upon with certificate holder and documented accordingly.
1.2.	Each individual site, including the central management system (CMS) shall be compliant with the criteria given in Regenagri CoC criteria for individual certification.	All CoC criteria for multisite certification shall be implemented in addition to the criteria for individual certification.
2.	***Supply chain traceability type***	
2.1.	All sites within the multisite certification can only use the same segregation supply chain traceability type as their supplier.	All sites shall implement segregation for all Regenagri products. This shall be ensured by the central management system (CMS) and is subject to verification by the CB.
3.	***Central management system and documented procedures***	
3.1.	There shall be a CMS with overall responsibility for all sites included in the multisite certification. The CMS shall have written centrally administrated and documented procedures and responsible business policy, or equivalent, to ensure the implementation of all elements of this Regenagr CoC criteria for individual and multisite certification.	This shall include, at a minimum, the following: ✓ Site-specific and CMS procedures for implementation of all applicable criteria in this standard. ✓ Identify the role of the person responsible for and authority over the implementation and compliance with these criteria. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard and shall ensure that all operational sites comply with the criteria of this standard. ✓ The CMS shall maintain an accurate list of all sites, including location and name and contact of the responsible person on site.

No.	*Compliance criteria*	*Intent and clarifications*
3.	***Central management system and documented procedures***	
3.2	The CMS has written and documented procedures to conduct annual internal inspections on the CMS's effectiveness and the requirements of this standard implemented by individual sites.	The CMS shall be able to demonstrate that all sites conform to the criteria in the Regenagri product-specific CoC Certification Standard and that this is under control. The CMS shall also be able to provide evidence of self-evaluation showing the effectiveness and compliance of the CMS with this standard. The internal inspections shall be conducted by personnel knowledgeable of the criteria of this standard and the product-specific standards annually. There shall be an internal audit programme in place including self-evaluation and internal audits for all sites. Any non-conformities found during the internal audits shall be addressed, and actions to correct them shall be taken. The organisation shall maintain internal inspection records and reports.
3.3.	The CMS shall have a procedure for non-conformities and corrective action handling.	The CMS shall ensure that any non-conformities identified are satisfactorily closed within a timely manner and all corrective actions are undertaken by all sites and responsible employees. Such a procedure shall give clear instructions on inclusion and exclusion from the multisite certification (in case the non-conformities (NCs) cannot be closed satisfactorily or in a timely manner as specified in CMS manual).
3.4.	The CMS shall have implemented a continuous accounting system which tracks all inputs, produced volumes, outputs and available volumes of all sites.	The system shall ensure the quantity of physical Regenagri blended product inputs and outputs at the physical site is monitored on a real-time basis. All volumes of products delivered are deducted from the material accounting system according to conversion ratios.
4.	***Sales of Regenagri certified products***	
4.1.	All sales are made only by CMS.	
5.	***Training***	
5.1.	The CMS shall have an annual documented training programme on the Regenagri CoC Standard criteria, Regenagri CoC standard for multisite certification and internal procedures or instructions.	Appropriate training shall be delivered annually by the CMS to all sites and all personnel involved in any tasks critical to the effective implementation of the CoC certification criteria, including multisite certification criteria. Training shall be specific and relevant to the task(s) performed by the personnel. Training records shall be maintained and kept up to date.

No.	*Compliance criteria*	*Intent and clarifications*
6.	***Record keeping***	
6.1.	The CMS shall maintain accurate, complete, up-to-date, and accessible records and reports covering all aspects of these Regenagri CoC Certification Standard criteria for multi-site certification and product-specific CoC criteria.	Retention times for all records and reports shall be at least four years and shall comply with legal and regulatory requirements and confirm the certified status of raw materials or products held in stock.
6.2.	The CMS shall provide a calculated estimate of the aggregated volume of Regenagri certified products that have been used by all sites. The CMS shall keep an up-to-date record of the volume purchased (input) and actual or estimated claimed (output) over a period of 12 months for all sites (including waste, rejected products, and claimed materials sold without certification claims). This record is required for audit purposes.	Closing stock = (Opening stock + crop production + crops brought in) – (sales + crops consumed)
6.3.	For claimed materials transferred between sites within the same organisation, there must be supporting records.	For claimed materials transferred between sites within the same organisation, there must be supporting records that clearly reference the original claimed materials and provide details on quantity, quality, blend or mix percentages, and a description sufficient to link the received materials to the corresponding incoming transaction certificate.

IX. Regenagri CoC Criteria for Group Certification

**All Regenagri documentation and implementation requirements can be integrated into the organisation's existing manuals, documentation, and management systems.*

No.	*Compliance criteria*	*Intent and clarifications*
1.	***Eligibility***	
1.1.	Group certification applies to a collection of legally independent entities or organisations operating under common ownership or group control. This set of criteria is intended for groups that seek to certify all members collectively under one certificate.	Group members must operate under a central group management system (CGMS), which oversees compliance and maintains certification integrity across all group members. Group members may independently sell certified products, provided that all transactions are recorded and reported to the CGMS.
1.2.	Each individual member, including the CGMS, shall be compliant with the criteria given in Regenagri CoC criteria for individual certification.	All CoC criteria for group certification shall be implemented in addition to the criteria for individual certification.
2.	***Supply chain traceability type***	
2.1.	All members within the group certification can only use the same segregation supply chain traceability type as their supplier.	All shall implement segregation for all Regenagri products. This shall be ensured by the CGMS and is subject to verification by the CB.
3.	***Central Group Management System (CGMS) and documented procedures***	
3.1.	There shall be CGMS with overall responsibility for all sites included in the multisite certification. The CGMS shall have written centrally administrated and documented procedures and responsible business policy, or equivalent, to ensure the implementation of all elements of this Regenagri CoC criteria for individual and multisite certification.	This shall include, at a minimum, the following: ✓ Site-specific and GCMS procedures for implementation of all applicable criteria in this standard. ✓ Identify the role of the person responsible for, and holding authority over, the implementation and compliance with these criteria. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard and shall ensure that all operational sites comply with the criteria of this standard. ✓ The CGMS shall maintain an accurate list of all members, including the location, name and contact of the responsible person.

No.	*Compliance criteria*	*Intent and clarifications*
3.	***Central Group management system (CGMS) and documented procedures***	
3.2	The CGMS has written and documented procedures to conduct annual internal inspections on the CGMS's effectiveness and the requirements of this standard implemented by individual members.	The CGMS shall be able to demonstrate all sites conform to the criteria in the Regenagri product-specific CoC Certification Standard and that this is under control. The CGMS shall also be able to provide evidence of self-evaluation showing the effectiveness and compliance of the CGMS with this standard. The internal inspections shall be conducted by personnel knowledgeable of the criteria of this standard and the product-specific standards annually. There shall be an internal audit programme in place, including self-evaluation and internal audits for all members. Any non-conformities found during the internal audits shall be addressed, and actions to correct them shall be taken. The organisation shall maintain internal inspection records and reports.
3.3.	The CGMS shall have a procedure for non-conformities and corrective action handling.	The CGMS shall ensure any non-conformities identified in the CGMS or its members are satisfactorily closed in a timely manner, and all corrective actions are undertaken by all members and responsible employees. Such procedure shall give clear instructions on inclusion in and exclusion from the group certification (in case the NCs cannot be closed satisfactorily or in a timely manner and specified in CGMS manual).
3.4.	The CGMS shall monitor and have visibility on the mass balance of each member on a real-time basis.	This shall include inputs, produced volumes, available volumes and outputs. All volumes of products delivered are deducted from the material accounting system according to conversion ratios.
4.	***Sales of products and Transaction Certificates***	
4.1.	Group members are permitted to sell certified products independently, provided that all sales transactions are recorded and reported to the CGMS.	Group members must report sales and product handling data regularly to the CGMS, including copies of Transaction Certificates, which in turn reports this information to the CB.
4.2.	The CGMS shall keep copies of all Transaction Certificates provided to the buyers by each member.	
5.	***Training***	
5.1.	The CGMS shall have an annual documented training programme on Regenagri CoC standards criteria, Regenagri CoC standard for group certification and internal procedures or instructions.	Appropriate training shall be delivered annually by the CGMS to all group members and all personnel involved in any tasks critical to the effective implementation of the CoC certification criteria, including multisite certification criteria. Training shall be specific and relevant to the task(s) performed by the personnel. Training records shall be maintained and kept up to date in place.

No.	*Compliance criteria*	*Intent and clarifications*
6.	***Record keeping***	
6.1.	The CGMS shall maintain accurate, complete, up-to-date, and accessible records and reports covering all aspects of these Regenagri CoC Certification Standard criteria for group certification and product-specific CoC criteria.	Retention times for all records and reports shall be at least four years and shall comply with legal and regulatory requirements and confirm the certified status of raw materials or products held in stock.
6.2.	The CGMS shall provide a calculated estimate of the aggregated volume of Regenagri certified products that have been used by all sites. The CGMS shall keep an up-to-date record of the volume purchased (input) and actual or estimated claimed (output) over a period of 12 months for all members (including waste, rejected products, and claimed materials sold without certification claims). This record is required for audit purposes.	Closing stock = (Opening stock + crop production + crops brought in) – (sales + crops consumed)

X. Regenagri CoC Criteria for Audit and Certification Processes

No.	*Compliance criteria*	*Intent and clarifications*
1.	***Audit and certification process requirements***	
1.1.	An organisation seeking Regenagri certification shall hold a contract approved by Regenagri CB for auditing and certification services (refer to Annex I of Regenagri Content standard.	An organisation seeking Regenagri certification shall submit application form for audit and certification services to the CB. After review and approval of the application by the CB, a contract shall be signed by both parties, and the initial audit can be planned.
1.2.	Audit planning and conducting requirements.	The audit shall always be conducted physically every year, unless A.3. as described above applies. The CB shall confirm the eligibility for remote audit during the application review and consider it during the audit planning. Audit planning should be aligned with the operational cycle of the organisation and all sites involved. This includes: ✓ Seasonal production periods (e.g., milling, harvesting) ✓ Times when certified material is being processed or handled. For seasonal operations, the audit should take place during or just after the season, when processes are active and documentation is available. If the processor only handles certified material at certain times of the year, the audit should be ideally ***conducted*** during that window or supported by retrospective sampling and verification. Initial audits shall be planned between the certified organisation and the certification body and shall be conducted no later than three (3) months from the date of contract agreement with the CB. All re-certification audits shall be scheduled in a timely manner (ideally two (2) months prior), but not latest then one (1) month prior the certificate expires and earlier than 8 months from the last date of the audit. All re-certification audits shall be conducted within the expiry date of the certificate but ideally should be conducted at least two months prior to the certificate expires.

No.	*Compliance criteria*	*Intent and clarifications*
1.	***Audit and certification process requirements***	
1.3.	Audit plan submission	An audit plan is prepared and sent to the auditee, 14 calendar days before the audit date.
1.4.	Audit duration shall be based on the type and size of entities.	The following minimum duration shall be considered: • Traders - 2 hours • Warehousing - 2 hours • Mechanical processing/ Manufacturing - 4 hours • Chemical or wet processing - 5 hours • Subcontractors - based on the type of activity.
1.5.	Sampling selection for multisite certification	If an organisation has five (5) or fewer sites, all must be audited. For multisite certifications with more than five sites, a sampling approach will be applied. The number of sampled units requiring audits is calculated as the square root of the total number of units, with a minimum of 5 units to be audited. The greater of these two values (square root or minimum number of units) will determine the required number of sampled units for the audit. When sites are located in different countries, each country's sites must be audited. Sampling is not permitted across different countries, ensuring that the certification process covers diverse geographical operations. At least one site member in each country must be audited annually to maintain certification. The CB reserves the right to expand the selected sample and include all units engaged in critical activities, based on the CB's risk assessment approved by Regenagri. Applicable to surveillance audits: The CB shall guarantee representation and choose different sites that were not audited in the prior year, ensuring that all sites are audited within a certain period and that there is an ongoing rotation in the auditees.

No.	*Compliance criteria*	*Intent and clarifications*
1.	***Audit and certification process requirements***	
1.6.	Sampling selection for group certification	If an organisation has five or fewer members, all must be audited. For group certification with more than five (5) sites, a sampling approach will be applied. The number of sampled members requiring audits is calculated as the 1.4 square root of the total number of members, with a minimum of 5 members to be audited. The greater of these two values (1.4 square root or minimum number of members) will determine the required number of sampled members for the audit. When members are located in different countries, each country's member must be audited. Sampling is not permitted across different countries, ensuring that the certification process covers diverse geographical operations. At least one member in each country must be audited annually to maintain certification. The CB reserves the right to expand the selected sample and include all members engaged in critical activities, based on the CB's risk assessment approved by Regenagri. Applicable to surveillance audits: The CB shall guarantee representation and choose different members that were not audited in the prior year, ensuring that all sites are audited within a certain period and that there is an ongoing rotation in the auditees.
1.7.	Communication of audit outcome	The auditor communicates the audit outcome to the organisation both verbally and in writing, including any non-conformities identified, on the final day of the audit (typically during the closing meeting).
1.8.	NCs handling (if applicable)	In case NCs are identified during the audit (either remote or on-site), these shall be classified as major or minor NC and verbally and in writing communicated by the auditor to the organisation at the last day of the audit. A corrective action plan (CAP) shall be submitted to the auditor for addressing all NCs within 30 calendar days from the date of the formal communication in writing. CAP shall include the root cause analysis, corrective action, and preventive action for each NC. All minor NCs shall be satisfactorily closed within 60 days and all major NCs shall be satisfactory closed within 30 days from the date of the formal communication in writing. Evidence of correction and corrective action shall be submitted to the auditor within the timeline specified above or as agreed between the auditor and the organisation. Failure to address NCs (either providing a CAP or evidence for NC closure as specified above) within the specified timeframe may result in suspension or withdrawal of the certificate.

No.	*Compliance criteria*	*Intent and clarifications*
1.	***Audit and certification process requirements***	
1.9.	Audit reporting finalisation by the auditor	The auditor shall complete the audit report seven (7) calendar days after audit completion when they are no NCs identified and seven (7) calendar days after all NCs (major and minor) are satisfactory closed. The completed report shall then be submitted to the certifier for final review and the certification decision.
1.10.	Certification decision and Scope Certificate issuance	The review of the audit paperwork and certification decision shall be taken a maximum of 15 working days from the date when the certifier receives all the information required for the reviewing process. If the decision is positive, the CB issues the Scope Certificate.
1.11.	Certification decision communication	The organisation shall be informed by the CB about the certification decision and provided with Scope Certificate (when applicable) within two (2) working days from the date the certification decision was taken. The CB shall report to Regenagri about all SCs (refer to RegenagriCS) issued quarterly (first week of the following quarter).

No.	*Compliance criteria*	*Intent and clarifications*
1.	***Audit and certification process requirements***	
1.12.	The CoC Scope Certificate is valid one (1) year and shall include (refer to RegenagriCS) all required information.	The scope certificate shall include the following information: • "Scope Certificate No." • "Organisation Name: XXXXX." • License Number: CB-XXXX • "Address": XXXXX • Product categories: XXXX • "Processing steps/ activities: XXXXX" • Validity ("Valid from" and "Valid to"). • For CoC certifications (where applicable), an annex is included detailing all sites, entities, and subcontractors (individually certified or associated), along with their corresponding activities and products The CoC Scope Certificate shall include the full range of activities conducted by the organisation (milling, drying, trading, storing etc.) – for SC refer to RegenagriCS. Applicable to multisite certification: All entities under the scope of certification shall be listed in the annex to the CoC Scope Certificate (this includes both independent or associated subcontractors) along with the associated products and conducted activities. Applicable to group certifications: All members under the certification scope shall be listed in the annex to the CoC Scope Certificate along with the associated products and conducted activities.
1.13.	Audit frequency	The site must undergo an annual audit to maintain certification. This includes reviewing the management system, procedures, policies, sales records, mass balance data, and overall compliance with Regenagri CoC requirements. Applicable to multisite and group certification: The CMS and sampled sites or members must undergo an annual audit to maintain certification. This includes reviewing the CMS or CGMS, sales records, mass balance data, and overall compliance with Regenagri CoC requirements. The CB must guarantee representation and choose different units or members that were not audited in the prior year, ensuring that all sites are audited within in the consecutive years and that there is an ongoing rotation in the auditees.

No.	*Compliance criteria*	*Intent and clarifications*
2.	***Scope change***	
2.1.	Any changes to the original scope such as the addition of new subcontractor, entities or members shall be communicated to the CB in a timely manner, but not later than 3 months prior the next audit date. All changes must be approved by the CB.	The CB must be informed of any scope changes before they take effect. Upon notification, the CB will conduct a risk evaluation of the intended changes. All scope alterations must be reflected in an updated SC (refer to RegenagriCS), which must be issued before any related cultivation, production, or shipments begin. It is essential that these changes are communicated to the CB in a timely manner Changes to the original scope such as the addition of new subcontractor, entities or members, require risk evaluation conducted by the CB and may require a new initial audit prior to implementing those changes. Newly added members when group certification or entities when multisite certification must undergo an initial audit to ensure they meet the standard requirements. In this case, the new members will be included in the recertification audit scope along with the sampled members. The validity of the certificate will remain unchanged regardless of when the extension audit is conducted, meaning that the recertification audit must still occur according to the original certificate's expiration date. If the change results in a modification equal to or greater than 20% of the original certification scope, an initial audit must be conducted.

XI. Regenagri Traceability Programme

No.	*Compliance criteria*	*Intent and clarifications*
1.	***Regenagri Traceability Programme through tracer-based, forensic, and science-based testing solutions and Traceability Assurance certificates***	
1.1.	Regenagri Traceability Programme through tracer-based, forensic, and science-based testing solutions	This traceability program is optional and only applicable if the technology is available and applicable to the Regenagri certified products (e.g., Coffee). The technology is applied at the first processing stage, or when possible, it could be applied at the next processing stages (e.g., milling, drying, packaging, blending), but it is mandatory considering the minimum content of Regenagri certified material required for certification or the maximum blending required by the technology (the greater of the two). All requests for using this traceability program shall be made directly to Regenagri, and confirmation of its suitability shall be confirmed by Regenagri before implementation. In some cases, a validation of the process might be required in order to make sure the tracer-based, forensic, and science-based detection is calibrated properly (this shall be communicated to Regenagri in advance).
1.2.	Traceability Program through tracer-based, forensic, and science-based testing solutions shall be implemented only at units that are Regenagri certified and are registered in the Regenagri traceability program database.	The organisation implementing the traceability program shall hold an active Regenagri SC. The organisation shall be listed on the publicly available Regenagri traceability program database.
1.3.	An organisation is eligible to request a Traceability Assurance certificate when it holds an active Regenagri license and is registered on Regenagri traceability program database.	The organisation requesting the implementation of a traceability program shall hold an active Regenagri license. The organisation shall be listed on the publicly available Regenagri traceability program database.

No.	*Compliance Criteria*	*Intent and Clarifications*
1.	***Regenagri Traceability Programme through tracer-based, forensic, and science-based testing solutions and Traceability Assurance certificates***	
1.4.	Unique traceability codes are used for every primary processing unit to ensure authentication at any point up to the finished product (e.g., packaged food products) and beyond (for extended producer responsibility).	Depending on the scope and detection method applicability, tracer markers or forensic, and science-based testing are provided to the primary processing unit. The primary processing unit needs to keep an updated database of batch or lot numbers of products that have been marked or tested and report them.
		The traceability solution shall be validated by Regenagri and approved by Regenagri traceability solution providers (refer to Annex II).
1.5.	The system shall be applied for and shall work in accordance with the system's requirements described above in point 10.1.	This shall be verified by the certification body, and this is a condition of the applicability of the entire traceability program and traceability certification issuing (described below).
1.6.	The licensed organisation shall notify the certification body prior to the technology (e.g., tracer) being applied and provide access to the certification body to witness its application.	The application of the technology (tracers and others, depending on the scope) shall be witnessed by the certification body. The witnessing of the technology application may be combined with the required annual certification audit.
1.7.	The licensed organisation shall provide access to the certification body, allowing the certification body to take samples for analysis.	When a test is required downstream, the approved certification body shall take samples and carry out the required analysis to detect and measure the testing or the tracer. The analysis shall be done following the applicable laboratory standards (either at the facility site when it has the appropriate laboratory environment or at the certification body's laboratory).

No.	*Compliance Criteria*	*Intent and Clarifications*
1.	***Regenagri Traceability Programme through tracer-based, forensic, and science-based testing solutions and Traceability Assurance certificates***	
1.8.	Traceability Assurance Certificates shall be made available by the licensed organisation and shall accompany all products sold.	The Traceability Assurance certificate shall be issued by the approved certification body. The licensed organisation shall request the Traceability Assurance Certificate from the certification body within three months after the products have been dispatched and/or shipped. This can only be done during the validity of the Regenagri certificate. The licensed organisation shall provide access to the certification body to carry out a traceability test based on sample selection (the sample can be selected during a visit to the certification body or through samples and documents sent by the licensed organisation). This is the subject of a decision by the certification body.
1.9	Traceability Program database with marked or tested products and testing reports has been the subject of the annual internal inspection.	The licensed organisation shall keep the testing reports and up-to-date Traceability Program database as part of these traceability type requirements and as proof of the origin of the products. This will be a subject of annual control by the certification body.

Annex I – List of Product Groups in Scope

1. Coffee
2. Cocoa
3. Fruit trees
4. Nuts
5. Sugar
6. Grapes

Other supply chains may be eligible to join the Regenagri programme, however, eligibility must be confirmed by Regenagri.

Annex II – Approved Traceability Solution Providers

1. Haelixa

Annex III – CoC Standards

1. Global G.A.P.
2. Rainforest Alliance Sustainable Agriculture Standard
3. Fairtrade International Standard
4. For Life / Fair for Life
5. All Organic Standards included under the IFOAM Global umbrella organisation
6. RSPO (Roundtable on Sustainable Palm Oil)
7. Bonsucro
8. Regenerative Organic Certified (ROC)


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