



for the health & wealth of the land

Regenagri CiC • 2 Old Court Mews 311a Chase Road, N14 6JS, London (UK)
Company n. 14596676 • VAT n. 437943267
info@Regenagri.org • +44 (0)203 393 3051

Regenagri Claims & Legal Manual

Version 2.0 – August 2025

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Misuse of Claims

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

Regenagri C.i.C. may suspend the license agreement temporarily with immediate effect while 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 licensed organisations will receive a written request for clarifications accompanied by a notification of the temporary suspension of the license. The licensed 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 licensed organisation has provided clarifications. If the misuse is confirmed, the temporary suspension is extended for an additional three months, during which the licensed 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 licensed organisation whether the license is reinstated or terminated.

Edit History

Version 1.0 – August 2024

Version 2.0 – August 2025

Log of Updates

Update	Update date	Effective date
Restructuring Example wording added Clarifications	August 2025	30 January 2026

I. Scope

This manual provides licensed organisations with detailed guidelines to on making communications or claims related to Regenagri and Regenagri certified materials. It aims to ensure compliance with relevant EU regulations and Regenagri standards to maintain transparency, integrity, and trustworthiness in marketing and product-related claims.

The rules and guidance contained in this document are designed to safeguard the reputation of Regenagri and the credibility of the Regenagri logo, labels and claims and to help organisations implement these rules.

Organisations wishing to use the Regenagri logo and make claims about Regenagri certified materials shall hold a license agreement with Regenagri and active Regenagri certification.

Organisations wishing to make claims about Regenagri content shall hold a license agreement with Regenagri.

Organisations wishing to make impact claims shall hold a license agreement with Regenagri and comply with the Regenagri Insetting Standard.

Brand owners and retailers who are not certified but want to make claims about Regenagri content or Regenagri certified materials shall hold a license agreement with Regenagri and shall meet the applicable terms and requirements.

Claims will be considered ‘authorised’ if they follow all of the relevant rules outlined in this document, together with Regenagri Claims Requirement, Regenagri Standard Criteria, Regenagri Content Standard (CS) and the applicable Regenagri product-specific standards. Any Regenagri claim that does not follow the guidelines in this document and documents listed above will be considered ‘unauthorised.’ Regenagri reserves the right to publish any cases of unauthorised communication, to request the offending organisation to comply with these rules, to make amends, and/or to take legal action against any organisations who engage in ‘unauthorised’ claims. Regenagri reserves the right to introduce or amend a formal claims approval basis when deemed required.

II. Definitions

Audit – An independent evaluation of compliance with the requirements of the Regenagri Chain of Custody (CoC) certification standard by a as part of the certification process.

Brand holder – A person and/or a legal entity who owns or licenses a brand or otherwise has rights to market a product under the brand.

Certification Body (CB) – An independent body that is accredited by an accreditation body for Regenagri to conduct certification audits against the requirements of the Regenagri CoC certification standard.

Communications / Consumer Facing Messages – Any statements, messaging, or content directed towards consumers or stakeholders regarding Regenagri, its programme, certified products, or impact achievements. This includes, but is not limited to, on-pack labels, websites, marketing materials, social media posts, reports, and promotional content.

Claim – Any communication (i.e. on-pack, website, sales documents, product specification document, and ACOP report) in any format of the presence of certified Regenagri products to any stakeholder group.

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

Consumer – refers to an individual or entity that purchases and uses products, intended for direct use without any further resale or transformation.

Distributors – Participants in the supply chain of Regenagri certified products that take legal ownership, and sell products to their customer bases, but do not physically handling, store, unpack, repack, or relabel those products at any stage. Distributors do not physically handle products, therefore, may not need a CoC certification. Distributors not complying with this definition, need to hold a CoC certification. e.g. exporters of bulk products from a port terminal or other sellers of bulk (unpacked) products, are required to obtain Regenagri CoC certification.

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

Legal owner – The person or entity that holds legal ownership of the physical products.

License Agreement – A formal agreement between Regenagri and an organisation granting the rights to use Regenagri claims, trademarks, and certified product references, subject to compliance with Regenagri standards and procedures.

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

Retailer – A business or person that sells finished products to the consumer, as opposed to a wholesaler or supplier, who normally sells their products to another business. Retailers of end products, where no further modification occurs, may not need Regenagri CoC certification.

Regenerative Farming / Regenerative Agriculture – Farming practices that restore soil health, improve biodiversity, reduce greenhouse gas emissions, conserve water, and enhance ecosystem resilience, aligned with the principles and standards of the Regenagri programme

Regenagri Certified Product – A product that has been verified and certified under the Regenagri programme as meeting all relevant standards, procedures, and impact verification requirements.

Regenerates the land – intended as a process of improving soil health, reducing emissions, and enhancing biodiversity.

Scope Certificate (SC) – is an official document issued by an accredited Certification Body (CB) to an organization that has demonstrated compliance with the relevant certification standards. The SC outlines the scope of certification, including Certified Products, Production Stages, Facility Details, Certification Standards and Validity Period

Scope of certification – The activities covered by the organisation’s supply chain certification.

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

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., roosting, milling, 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 Regenagri CoC certification standard to enable all certification bodies to operate in a consistent and controlled manner.

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

Trader – A participant in the supply chain of Regenagri certified products who takes legal ownership of products and/or purchases and sells futures without physically handling the products.

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

Wholesaler – A person or firm 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.

III. Communications – Consumer Facing Messages

This section is intended to provide guidance and examples of consumer facing communications related to Regenagri. These communications can be at product or organisation level.

Communications related to Regenagri include, but may not be limited to:

- Communications to explain the Regenagri programme
- Promotions of the adoption of the programme
- Promotions about certification of products and certification of organisation
- Communications about the impact achieved through the adoption of Regenagri
- Communications on benefits from the Regenagri certification

The following sections will explain how the Regenagri standards, procedures and systems meet the requirements of the applicable laws.

1. What is Regenagri?

Regenagri® is a global regenerative agriculture framework for securing the health of the land and the wealth of those who live on it.

It supports farms and organisations to transition to holistic farming systems that increase soil health, encourage biodiversity, reduce carbon footprint and enhance climate resilience.

Regenagri® provides standards and digital tools to verify and certify the impact of regenerative agriculture, and to assure the integrity of Regenagri certified products from farms to finished products.

In supporting regenerative farming, we hope to aid in the regeneration of our land and sustainably secure the future of agricultural products and their supply chains.

2. What does Regenagri certification mean?

Certification is a confirmation of compliance with a given certification programme.

The certification programme is a set of standards, procedures and related systems requirements.

Certification from Regenagri means the organisation and/or its products are found in compliance with the requirements of the Regenagri programme. The certification from Regenagri is executed and granted through an auditing and verification process carried out by third-party accredited certification bodies. Accredited CBs are accredited to standards applicable to the scope of the services it provides (including, but not limited to ISO 17065, ISO 14064, ISO 14065). As part of the accreditation, certification bodies shall have implemented a robust management system, incorporating processes for internal audits, corrective actions, management reviews, and continual improvement. This ensures compliance with standards like ISO/IEC 17021. Following this, the CB shall avoid and successfully manage any risks of conflicts of interest and ensure the credibility of the certification services. Certification bodies shall have processes in place to manage the competence of their staff, including auditors and decision-makers.

Given the sensitive nature of the data handled, including audit reports and organisational records, certification bodies shall have strong information security measures in place. A formal mechanism shall be in place for handling and resolving complaints and appeals from clients or other parties. This system ensures transparency and fairness. Also required is a risk management system that involves identifying, analysing, and managing risks associated with the certification activities, ensuring that the CB can operate effectively without jeopardizing the integrity of the certification process. Nonetheless, an audit management system is required to manage client information, certification scopes, audit planning, and certification status.

Certification claims are made to confirm and communicate that the organisation, and its products are compliant with the Regenagri standards, for the scope defined under certification. The scope of certification sets the details of the organisation, its facilities and the products that have been assessed.

3. Communications – Regenagri certifications

Regenagri® is a global regenerative agriculture programme driving the transition to regenerative farming. It helps farmers improve soil health, protect biodiversity, reduce carbon emissions, and strengthen climate resilience.

The Regenagri® standards certify the positive environmental impact of farms and ensure the integrity of Regenagri certified products, from farm to finished product. These standards provide a clear set of criteria for both farms and supply chains, guiding sustainable practices every step of the way.

Farm Certification:

- Farms are certified based on implementing of regenerative practices and measurable improvements in soil health (e.g., increased organic matter and microbial activity), biodiversity (e.g., wildlife habitats and pollinator populations), carbon footprint reduction (e.g., lower greenhouse gas emissions), and efficient use of water and energy.
- Certification is granted after a rigorous third-party audit, which verifies data and ensures compliance with Regenagri standards.
- The certification follows a continuous improvement model: farms shall show ongoing progress in these areas to maintain certification.

Supply Chain Certification:

- Supply chains are certified using a Chain of Custody (CoC) model, ensuring that every company, process, and shipment of materials is verified.
- This certification guarantees that products come from Regenagri certified farms and that companies implement due diligence systems aligned with both Regenagri standards and regulatory requirements.
- Only when all steps in the supply chain meet these standards is a finished product granted the Regenagri certification.

3.1 Benefits and outcomes from Regenagri certified farms and products.

- **Greenhouse gas (GHG) and carbon sequestration** (soil carbon and biomass carbon): Regenagri certification of farms confirms that farms are implementing regenerative farming systems (as per Regenagri standard criteria) and that positive outcomes are achieved over the course of certification.
- **Biodiversity**: the Regenagri certification process requires organisations to have a biodiversity development plan if that plan is implemented and what outcomes are observed.
- **Water**: reduced water consumption and stewardship of water quality
- **Energy**: better management of resources, transition to / increased of use of sustainable energy sources.

What does regenerative farming entail for a coffee farmer?

- **Reduction of synthetic inputs**: Regenerative farming minimises the use of synthetic fertilisers and pesticides, relying instead on organic compost, natural pest control, and other nature-based solutions.
- **Soil health, soil fertility and structure**: Emphasises building healthy soils through cover crops, composting, and reduced tillage.
- **Biodiversity and ecosystem**: Integrates diverse plant species and agroforestry systems, fostering a balanced ecosystem that enhances natural pest control, pollination, and soil biodiversity.
- **Water conservation and management**: Utilises techniques like mulching, contour planting, and shade trees to retain soil moisture, reduce erosion, and decrease the need for irrigation.
- **Carbon sequestration**: Encourages practices such as tree planting and maintaining permanent ground cover, which help sequester carbon in the soil and vegetation.
- **Natural pest and disease management**: Promotes the use of biological pest control methods, such as introducing beneficial insects or bacteria and fostering a habitat that reduces pest populations naturally, reducing reliance on synthetic pesticides.

What are the benefits of farming regeneratively?

- **Yields and crop quality:** Regenerative farming improves soil health and plants' health leading to higher-quality coffee beans. Healthier soils and ecosystems lead to more consistent yields.
- **Environmental sustainability and climate change mitigation:** By promoting biodiversity, reducing synthetic inputs and increasing carbon sequestration, this approach helps protect local ecosystems and contributes to climate change mitigation.
- **Improved farm resilience:** Healthier soils, a better water cycle, and diverse ecosystems make farms more resilient to extreme weather, pests, and diseases.
- **Reduced costs and increased profitability:** Cost reductions for synthetic fertilisers and pesticides, while potentially earning more through higher yields and premium prices for regeneratively grown coffee.
- **Access to new markets:** Farmers can tap into growing consumer demand for sustainable and ethically produced coffee, which can lead to higher market prices.

Reaction from farmers – have they embraced regenerative farming approaches?

- Farmers have embraced Regenagri positively. They know first-hand the benefits (above) of farming regeneratively and trust that the Regenagri programme allows them to develop a long-term improvement plan based on their context. They also recognise the additional value of supplying coffee that is produced regeneratively.
- Adopting the Regenagri programme also provides farms with an opportunity to access better markets and stronger collaborations.

3.2 Example of messages on benefits:

- *We adopt Regenagri / source Regenagri certified coffee because it comes from farming that improves the soil health, safeguards water, enhances biodiversity, and improves the livelihood of communities.*
- *By adopting the Regenagri certification we regenerate the soil, safeguard water, enhance biodiversity and improve the livelihood of communities.*
- *This product is grown using regenerative farming methods that improve soil health, reduce GHG emissions, improve water quality, and regenerate the land.*

- *Regenerative coffee farming adopts practices aimed at increasing biodiversity, protecting water resources, preserving soil health, and enhancing the resilience of agricultural systems.*

3.3 Example of communications of impact:

- Carbon footprint from production: *“Regenagri certified coffee has been produced with an average annual reduction of GHG emissions of 5.34 tonnes of CO₂ Eq per hectare and 1.99 tonnes of CO₂ Eq per tonne of coffee. The total average annual GHG emissions reduction associated with the certified coffee in Brazil/ [region name] is 242,089 tonnes of CO₂ Eq (equivalent to 242,089 carbon insetting units).”*
- Water reduction: *“The Regenagri certified coffee in Brazil/ [region name] has been produced with an average reduction in water use of 95,410 litres/Ha, equivalent to 43,368 litres per tonne of coffee.”*
- *“Regenagri certified coffee has been produced with practices that reduce GHG emissions, by improving soil quality and reducing the use of external synthetic inputs”.*
- *“The cultivation of Regenagri certified cotton generates approximately half the GHG emissions than conventionally produced cotton. Benefits of regenerative agriculture are carbon sequestration, secure yields, high quality produce, climate resilience, increased farm profitability, improved biodiversity, farmers livelihood.”*
- *“The Regenagri[®] certified cotton in Brazil, was grown with no irrigation, greater efficiency, and 48% fewer chemicals when compared to conventional cotton.”*
- Why regenerative agriculture matters? *“It ensures increased soil organic matter, promotes biodiversity, and improves water and energy management. This approach not only reduces our environmental impact but also fosters healthy ecosystems that can thrive for generations to come.”*

3.4 Marketing of products

- **‘[Brand’s] Coffee’** product, is 100% produced through regenerative agriculture methods.
- **‘[Brand’s] Coffee’** is produced through innovative farming practices that are Regenagri-certified.

IV. Claim Types and Compliance Requirements

An organisation seeking to make claims referring to Regenagri shall hold an active License Agreement with Regenagri and be compliant with all applicable requirements set by Regenagri standards and procedures (as outlined below).

Regenagri Licensing Agreements establish guidelines and regulations for organisations that are seeking to use claims referring to Regenagri. This includes defining the rights and allowances granted to these organisations, as well as setting up requirements for monitoring and controlling how these rights and claims are used.

Regenagri Licensing Agreements ensure organisations adhere to specific standards and practices when they use claims referring to Regenagri, helping to maintain the integrity of Regenagri standards and applicable European legislation.

VII. General Marketing Claims

1. General marketing claims definition

General marketing claims are statements made by a licensed organisation (the organisation shall hold an active license agreement with Regenagri about its commitments and ambitions towards regenerative agriculture, in accordance with the terms of the Regenagri's License Agreement. Such claims communicate information about the Regenagri programme and demonstrate the organisation's dedication to adopting regenerative agricultural practices. General marketing claims referring to a certified product are considered off-product claims, and the product claim requirements shall be followed. General marketing claims that do not reference impact, product certification, or commitment targets can be approved directly by Regenagri without verification by a Certification Body (CB).

General marketing claims that include impact elements shall comply with Impact Claims and be verified by a Regenagri-approved Certification Body before public use. Organisations shall provide clear, consumer-facing substantiation including scope, validity period, and data sources. All claims should emphasize ongoing improvement rather than implying that certification completes the work.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) - Article 6: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive - Articles 4, 5 and 10: Claims shall be verifiable and substantiated by evidence.
- Directive 2006/114/EC concerning misleading and comparative advertising - Article 3 and 4: Ensure that the advertisement has been verified for accuracy and is not misleading.

2. Requirements overview

2.1 Regenagri Claims Requirements - An organisation seeking to make general marketing claims shall hold an active license agreement with Regenagri.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) - Article 6: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive - Article 8: Requirements for environmental labelling schemes; Article 10 - Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.

- Directive 2006/114/EC concerning misleading and comparative advertising – Article 3 and 4: Ensure that the advertisement has been verified for accuracy and is not misleading; and Article 7: Requires that any comparisons shall be objective and based on verifiable and typical features of the products.

2.2 Regenagri Claims Requirements – Demonstrate dedication to adopting regenerative agricultural practices in accordance with Regenagri standards. Claims should be specific and detailed to avoid ambiguity. Such claims can be made in a range of materials, including websites, marketing materials, and sustainability reports.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) – Article 6: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive – Articles 4 and 5: Claims shall be verifiable and substantiated by evidence.
- Directive 2006/114/EC concerning misleading and comparative advertising – Article 3 and 4: Misleading advertising requirements.

2.3 Regenagri Claims Requirements – Application and approval of the claim by Regenagri before use.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) – Article 6: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive – Articles 6 and 7: Claims shall be approved by relevant authorities to ensure they are substantiated; Article 8: Requirements for environmental labelling schemes; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.
- Directive 2006/114/EC concerning misleading and comparative advertising – Article 3: Ensures that the advertisement has been verified for accuracy and is not misleading; and Article 7: Requires that any comparisons shall be objective and based on verifiable and typical features of the products.
- Regulation (EU) 2023/1115 (EUDR) – Article 3: List of prohibited products.

2.4. Regenagri Claims Requirements – Organisations shall notify Regenagri in writing of any changes to their claims before public use. Claims shall be re-assessed and re-approved by a Regenagri-approved CB at least every 3 years.

Reference to the applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) – Article 6: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive – Articles 6 and 7: Claims shall be approved by relevant authorities to ensure they are substantiated; Article 8: Requirements for environmental labelling schemes; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.

2.4 Regenagri Claims Requirements – Use of approved general marketing claims exactly as submitted

Reference to the applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) – Article 6: Prohibition of unfair and misleading commercial practices.
- Directive 2006/114/EC concerning misleading and comparative advertising – Article 3: Ensures that the advertisement has been verified for accuracy and is not misleading.

2.6. Regenagri Claims Requirements – Generic terms such as “eco-friendly,” “green,” or “biodegradable” shall not be used unless supported by measurable verified data. Offset-based climate claims are prohibited if based on actions outside the product value chain. Claims covering the whole product or business are not allowed when only part of the operation is certified.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) – Article 6: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive – Articles 4 and 5: Claims shall be verifiable and substantiated by evidence.
- Directive 2006/114/EC concerning misleading and comparative advertising – Article 3: Regular monitoring ensures ongoing compliance with the directive to prevent misleading claims; 4: Misleading advertising requirements.

2.7. Regenagri Claims Requirements All supporting evidence for general marketing claims shall be retained by the organisation for a minimum of 5 years.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) – Article 6: Prohibition of unfair and misleading commercial practices.

Regenagri CiC • 2 Old Court Mews 311a Chase Road, N14 6JS, London (UK)

Company n. 14596676 • VAT n. 437943267

info@Regenagri.org • +44 (0)203 393 3051

- Directive 2006/114/EC concerning misleading and comparative advertising – Article 3: Regular monitoring ensures ongoing compliance with the directive to prevent misleading claims.

3. Application and approval process

3.1 Application for approval of general marketing claims

An organisation seeking to make general marketing claims shall submit its request, together with supporting records and documentation, showing the exact claim the organisation is seeking to make, including artwork files, to Regenagri. The application shall include sufficient evidence to demonstrate that the claim complies with applicable EU legislation, including Directive (EU) 2024/825, the Proposed Green Claims Directive. The organisation shall also make clear how and where the claims will be presented (websites, other communication channels, marketing materials etc.).

Organisations shall submit claims to Regenagri for approval, providing supporting records, documentation, and artwork files. Claims that include product, content, or impact elements shall be approved via a Regenagri-approved CB.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) – Article 6 and 7: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive – Articles 6 and 7: Require ongoing monitoring and verification of claims; Article 8: Requirements for environmental labelling schemes; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.
- Directive 2006/114/EC concerning misleading and comparative advertising – Article 3: Ensures that the advertisement has been verified for accuracy and is not misleading; and Article 7: Requires that any comparisons shall be objective and based on verifiable and typical features of the products.

3.2 General marketing claims approval

Regenagri shall verify and approve the general marketing claims requested by the licensed organisation. The approval shall be confirmed in writing to the applicant by Regenagri.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) – Article 6: Prohibition of unfair and misleading commercial practices

- Proposed Green Claims Directive – Articles 6 and 7: Require ongoing monitoring and verification of claims; Article 8: Requirements for environmental labelling schemes; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.

3.3 Use of marketing daims

Once Regenagri has provided written approval, the licensed organisation is permitted to use the general marketing claims exactly as they were originally submitted for approval.

3.4 Regenagri C.i.C. monitoring, control and Regenagri Due Diligence procedure

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) – Article 6: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive – Articles 6 and 7: Require ongoing monitoring and verification of claims; Article 8: Requirements for environmental labelling schemes; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.
- Directive 2006/114/EC concerning misleading and comparative advertising – Article 3: Regular monitoring ensures ongoing compliance with the directive to prevent misleading claims.

4. General marketing daims – examples

Example 1 *“Our company is committed to promoting regenerative agriculture practices. By 2025, we aim to transition 80% of our supply chain to Regenagri certified sources, ensuring sustainable farming methods that improve soil health, reduce carbon footprint, and enhance biodiversity and natural resources.”*

Example 2 *“Our company is dedicated to nurturing the land. By 2027, we pledge to source 90% of our raw materials from Regenagri certified farms. This commitment ensures our products are produced using methods that regenerate the soil, decrease our carbon footprint, and enrich biodiversity.”*

Example 3 *“Join us on our journey to a more sustainable future. Our company is committed to transforming 75% of our operations to Regenagri certified practices by 2026. Our approach focuses on sustainable land management, reducing GHGs, and supporting the ecosystems we rely on.”*

Example 4 “Our company is weaving sustainability into every fabric of our business. By 2028, we aim to have 85% of our products made of Regenagri certified materials. Our initiative emphasises preserving natural resources, enhancing soil vitality, and supporting the communities where our materials are sourced.”

Example 5 “Our company is revolutionising the way we grow our food. We are committed to converting 95% of our supply chain to Regenagri certified providers by 2030, focusing on practices that promote soil regeneration, water conservation, and biodiversity.”

Example 6 “At our company, a goal is to cultivate change. By the end of this decade, we aim to ensure that 100% of our agricultural partners are Regenagri-certified. This commitment will help us support farming techniques that restore the environment and contribute positively to our land's health.”

Example 7 “By sourcing Regenagri certified (product/crop), we have supported (number) farmers/farms in our supply chain to apply regenerative agriculture practices as of (year).”

Example 8 “By sourcing Regenagri certified (product/crop), we promote regenerative agriculture with farm certificate holders.”

Example 9 “We have purchased (number/quantity) volumes of Regenagri certified (product/crop).”

Example 10 “We source Regenagri certified coffee because it is produced using farming methods that improve the soil health, safeguard water and biodiversity, as well as improve the livelihood of communities.”

Example 11 “The product that regenerates the land.”

Note: The examples above are illustrative. All claims shall be substantiated with verifiable evidence and approved by Regenagri prior to public use.

VIII. Commitment Claims

1. Commitment claims definition

Commitment claims communicate goals and timelines for implementing the Regenagri programme and/or sourcing Regenagri products (uptake and consumption targets) and/or sourcing from Regenagri certified supply chains.

Commitment claims shall use future-oriented, milestone-based language (e.g., ‘an important milestone on our path toward regenerative practices’) rather than implying that regenerative practices are fully achieved. Claims shall include clear, time-bound commitments for improvements in the organisation’s operations and supply chains. All commitment claims shall be verified by an independent, Regenagri-approved Certification Body prior to publication.”

Reference to applicable EU legislation:

- Directive (EU) 2024/825, Article 6 – Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive – Articles 4 and 5: Claims shall be verifiable and substantiated by evidence. Articles 6 and 7: Claims shall be approved by relevant authorities to ensure they are substantiated; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes
- Directive 2006/114/EC concerning misleading and comparative advertising – Article 3: Regular monitoring ensures ongoing compliance with the directive to prevent misleading claims; 4: Misleading advertising requirements.
- Regulation (EU) 2023/1115 (EUDR), Article 3 – Prohibition of misleading claims.

2. Requirements overview

2.1 Regenagri Claims Requirements – An organisation seeking to make commitment claims shall hold an active license agreement with Regenagri.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive), Article 6 – Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive, Article 8 – Requirements for environmental labelling schemes; Article 10 – Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.

- Directive 2006/114/EC concerning misleading and comparative advertising, Article 3 and 4 - Ensure that the advertisement has been verified for accuracy and is not misleading; and Article 7 - Requires that any comparisons shall be objective and based on verifiable and typical features of the products.

2.2 Regenagri Claims Requirements - Commitment claims should be set diligently and transparently, in accordance with the relevant target settings for the agricultural sector and its supply chains. The targets and commitments shall be based on a set of criteria as listed in Regenagri Claims Requirements. Targets shall align with the level of decarbonisation required to keep global temperatures increases to a maximum of 1.5°C above pre-industrial temperatures, consistent with the Paris Agreement. This usually means achieving net-zero emissions by 2050 at the latest. The implementation of targets should be addressed in two pathways: the sector pathway and the commodity pathway claims should be specific and detailed to avoid ambiguity. Such claims can be made in a range of materials, including websites, marketing materials, and sustainability reports.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) - Article 6: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive - Articles 6 and 7: Require clear, accurate, and substantiated claims to prevent misleading consumers. Article 3: Claims shall be specific and based on scientific evidence; Article 5, p. 2: Where the explicit environmental claim is related to the future environmental performance of a product or trader it shall include a time-bound commitment for improvements inside own operations and value chains; Article 8: Requirements for environmental labelling schemes; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.
- Regulation (EU) 2023/1115 (EUDR) - Article 3: Prohibition; Article 4: Obligations of operators; Article 5: Obligations for traders; Article 8: Due diligence to confirm non-deforestation origin; Article 9: Information requirements.
- Directive 2006/114/EC concerning misleading and comparative advertising - Article 3: Ensures that the advertisement has been verified for accuracy and is not misleading; and Article 7: Requires that any comparisons shall be objective and based on verifiable and typical features of the products.

2.3 Regenagri Claims Requirements - Commitment claims can be made in a range of materials, including websites, marketing materials, and sustainability reports.

Reference to applicable EU legislation:

- Proposed Green Claims Directive - Articles 4 and 5: Criteria for making environmental and sustainability claims.

2.4 Regenagri Claims Requirements - Application and approval of commitment claims by the CB in writing prior to being used.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) - Article 6: Prohibition of unfair and misleading commercial practice.
- Proposed Green Claims Directive - Articles 6 and 7: Claims shall be approved by relevant authorities to ensure they are substantiated; Articles 4 and 5: Specific requirements for making environmental claims; Article 8: Requirements for environmental labelling schemes; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.
- Directive 2006/114/EC concerning misleading and comparative advertising - Article 3: Ensures that the advertisement has been verified for accuracy and is not misleading.
- Regulation (EU) 2023/1115 (EUDR) - Article 3: Prohibition; Article 4: Obligations of operators; Article 5: Obligations for traders; Article 8: Due diligence to confirm non-deforestation origin; Article 9: Information requirements; Article 12: Establishment and maintenance of due diligence systems, reporting and record keeping; Article 10: Assessing and mitigating deforestation risks.

2.5 Regenagri Claims Requirements - Use of approved commitment claims exactly as submitted

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) - Article 6: Prohibition of unfair and misleading commercial practice.

2.6 Regenagri Claims Requirements - Reporting requirements

Organisations shall ensure that reported progress on commitments is accurate, time-bound, and consistent with Regenagri-approved CB Verification.

Reference to applicable EU legislation:

- Proposed Green Claims Directive - Articles 6 and 7: Requires ongoing monitoring, verification of claims and accountability in reporting claims.

2.7 Regenagri Claims Requirements - Offset-based climate claims implying neutrality or reduced footprint (e.g., 'climate neutral', 'CO₂-neutral certified') are prohibited if based on offsets outside the product value chain. If a commitment relies in part on offsets (as defined in the Regenagri Carbon Standard and Regenagri Insetting Standard), the offset component shall be declared separately in percentage terms and excluded from actual reduction or insetting figures.”

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) - Article 6: Prohibition of unfair and misleading commercial practice.
- Proposed Green Claims Directive - Articles 6 and 7: Claims shall be approved by relevant authorities to ensure they are substantiated.

2.8 Regenagri Claims Requirements - Commitment claims shall include, as applicable, baseline data, reference year, methodology, implementation plan and monitoring cadence. The public substantiation shall clearly state whether the claim covers the entire organisation, product range, or specific parts; the methodology used to include data sources and significant exclusions; and the period of validity and date of underlying verification.”

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) - Article 6: Prohibition of unfair and misleading commercial practice.
- Proposed Green Claims Directive - Articles 4 and 5: Specific requirements for making environmental claims; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.

3. Application and approval process

3.1 Application for approval of making commitment claims

An organisation seeking to make commitment claims shall submit its request, together with supporting records and documentation, showing the exact claim the organisation is seeking to make, including artwork files, to Regenagri. The application should include evidence demonstrating that the commitment claim aligns with applicable EU legislation, including Directive (EU) 2024/825, the Proposed Green Claims Directive. The organisation shall also make clear how and where the claims will be presented (websites, other communication channels, marketing materials etc.).

Applications shall include supporting records and documentation, such as artwork files, Regenagri scope certificates, and Transaction Certificates (if applicable). Evidence shall demonstrate alignment with applicable EU legislations. Organisations shall indicate where and how the claims will be communicated (websites, marketing materials, sustainability reports, etc.).

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) - Article 6: Prohibition of unfair and misleading commercial practice.
- Proposed Green Claims Directive - Articles 4: Specific requirements for making environmental claims; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.
- Directive 2006/114/EC concerning misleading and comparative advertising - Article 3 and 4: Ensures that the advertisement has been verified for accuracy and is not misleading
- Regulation (EU) 2023/1115 (EUDR) - Article 3: Prohibition; Article 4: Obligations of operators; Article 5: Obligations for traders; Article 8: Due diligence to confirm non-deforestation origin; Article 9: Information requirements; Article 12: Establishment and maintenance of due diligence systems, reporting and record keeping; Article 10: Assessing and mitigating deforestation risks.

3.2 Approval of commitment claims

Regenagri shall verify and approve the general marketing claims requested by the organisation. The approval shall be confirmed in writing to the applicant by Regenagri.

Any change in a commitment claim shall be communicated in writing to Regenagri before public use. Re-assessment and re-approval shall be conducted by a Regenagri-approved CB at least every 3 years, even if no changes have occurred.”

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) – Article 6: Prohibition of unfair and misleading commercial practice.
- Proposed Green Claims Directive – Articles 6 and 7: Claims shall be approved by relevant authorities to ensure they are substantiated; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.
- Regulation (EU) 2023/1115 (EUDR) – Article 8: Due diligence to confirm non-deforestation origin; Article 12: Establishment and maintenance of due diligence systems, reporting and record keeping; Article 10: Assessing and mitigating deforestation risks.

3.3 Use of commitment claims

Once Regenagri has provided written approval, the organisation is permitted to use the commitment claims exactly as they were originally submitted for approval. Any change to the previously approved claim shall be approved by Regenagri prior to use.

3.4 Regenagri monitoring, control and Regenagri Due Diligence procedure.

Regenagri reserves the right to monitor all approved commitment claims and request updates or changes where necessary to ensure accuracy and compliance. Annual progress reporting shall be reviewed by a Regenagri-approved CB, with full re-verification every 3 years.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) – Article 6: Prohibition of unfair and misleading commercial practice.
- Proposed Green Claims Directive – Articles 6 and 7: Claims shall be approved by relevant authorities to ensure they are substantiated; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.
- Regulation (EU) 2023/1115 (EUDR) – Article 8: Due diligence to confirm non-deforestation origin; Article 10 – Assessing and mitigating deforestation risks.

4. Examples messages and claims

Example 1 *“Our company is committed to promoting regenerative agriculture practices. By 2025, we aim to transition 80% of our supply chain to Regenagri certified sources, ensuring sustainable farming methods that improve soil health, reduce carbon footprint, and enhance biodiversity and natural resources.”*

Example 2 *“Our company is dedicated to nurturing the land. By 2027, we aim to source 90% of our raw materials from Regenagri certified farms. This commitment ensures our products are produced using methods that regenerate the soil, decrease our carbon footprint, and enrich biodiversity.”*

Example 3 *“Join us on our journey to a more sustainable future. Our company is committed to transforming 75% of our operations to Regenagri certified practices by 2026. Our approach focuses on sustainable land management, reducing GHGs, and supporting the ecosystems we rely on.”*

Example 4 *“Our company is weaving sustainability into every fabric of our business. By 2028, we aim to have 85% of our products made of Regenagri certified materials. Our initiative emphasises preserving natural resources, enhancing soil vitality, and supporting the communities where our materials are sourced.”*

Example 5 *“Our company is revolutionising the way we grow our food. We are committed to converting 95% of our supply chain to Regenagri certified providers by 2030, focusing on practices that promote soil regeneration, water conservation, and biodiversity.”*

Example 6 *“At our company, a goal is to cultivate change. By the end of this decade, we aim to ensure that 100% of our agricultural partners are Regenagri-certified. This commitment will help us support farming techniques that restore the environment and contribute positively to our land's health.”*

Example 7 *“By 2025 we aim to have 80% of our materials Regenagri-certified.”*

Example 8 *“Our company has launched a global regenerative agriculture programme to offer traceable and sustainably grown cotton. The programme, which includes Regenagri certification for all directly sourced cotton in Côte d’Ivoire and specific areas in the U.S., aims to expand to Australia and Brazil within the same year (2024). This initiative supports the commitment to regenerative practices that enhance soil health, biodiversity, and water management while reducing GHG emissions.”*

Example 9 *“Our company is proud to announce our goal to achieve Regenagri certification by 2025 for our entire line of organic cotton products. This commitment reflects our dedication to enhancing soil health, increasing biodiversity, and reducing our carbon footprint across all operations.”*

Regenagri CiC • 2 Old Court Mews 311a Chase Road, N14 6JS, London (UK)

Company n. 14596676 • VAT n. 437943267

info@Regenagri.org • +44 (0)203 393 3051

Example 10 *“Our company is set to transform 30% of our supply chain to meet Regenagri standards by 2027. This transition will involve collaborating with our suppliers to adopt sustainable farming practices that improve land resilience and productivity.”*

Example 11 *“By 2028, we will ensure all our sourced ingredients come from Regenagri certified farms. This move is part of our broader strategy to support sustainable agriculture and offer our customers products that are not only high quality, but also environmentally responsible.”*

Example 12 *“Land health is important to [company/brand]. That’s why we commit by (year) to (goal%) of our (product/crop) from Regenagri certified sources.”*

Example 13 *“By sourcing (goal%) Regenagri certified (product/crop) by (year), we are committed to promoting regenerative farming practices that improve the health of the land.”*

Note: All examples are illustrative. Commitment claims shall be substantiated with clear, verifiable evidence and approved by Regenagri prior to public use. Claims shall also remain consistent with approved reporting and monitoring practices.

IX. Product Claims

Product claims are used to communicate the Regenagri certification of products and/or organisations, or the Regenagri content in products.

Regenagri recognises two types of product claims: content claims and certification claims.

Certification claims may be on or off-product. On products, certification claims are made on packaging or products. Off product certification claims are made in marketing material, sales material, e-commerce, and similar materials, where a specific claim is made on the certification status of products.

Content claims communicate the specific percentage of Regenagri-certified material in a product. Certification claims communicate the certification status of an organisation or product. Claims shall not exaggerate Regenagri content or imply full certification of the product if only components are certified. All product claims shall be approved in writing by a Regenagri-approved CB prior to public use.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) - Article 6: Prohibition of unfair and misleading commercial practice.
- Proposed Green Claims Directive - Articles 3, 4 and 5: Specific requirements for making environmental claims; Article 8: Requirements for environmental labelling schemes; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.
- Directive 2006/114/EC concerning misleading and comparative advertising - Article 3: Ensures that the advertisement has been verified for accuracy and is not misleading.
- Regulation (EU) 2023/1115 (EUDR) - Article 3: Prohibition; Article 4: Obligations of operators; Article 5: Obligations for traders.

1. Product claims definitions

- **Content claims** – claims that are made to communicate the Regenagri content in the products.
- **Product certification claims** – claims that communicate the certification status of an organisation, products and materials included in the Regenagri Scope Certificate. The claims communicate the implementation of the Regenagri programme and/or sourcing of Regenagri products and/or sourcing from Regenagri certified supply chains.

2. Requirements overview

2.1 Regenagri Claims Requirements - A supply chain organisation seeking to make product claims shall have an active Regenagri certification and a License Agreement with Regenagri C.i.C. Supply chain organisations carrying out production, processing or trading activities and seeking to make product certification claims shall hold an active Regenagri certificate. Brand owners and retailers are not required to be certified to make claims. Brand owners and retailers shall, however, have a current License Agreement with Regenagri. Brands with manufacturing operations shall be certified in order to produce and claim Regenagri certified products. All product claims shall comply with Directive (EU) 2024/825, Proposed Green Claims Directive regarding due diligence, environmental labelling, and substantiation requirements.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) - Article 6: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive - Article 8: Requirements for environmental labelling schemes; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.
- Directive 2006/114/EC concerning misleading and comparative advertising - Article 3 and 4: Misleading advertising requirements.

2.2 RegenagriCS, Regenagri CoC standard and Regenagri Claims Requirements - The product shall contain a specific percentage of Regenagri content as per requirements of the Regenagri Content Standard and the Regenagri CoC standard).

At least the minimum content percentage shall be clearly stated in the content claim. Content claims that imply a higher percentage of Regenagri content than is actually present are strictly prohibited. Content claims shall not suggest the entire product is Regenagri certified if only certain components or materials are certified. Regenagri certified products can be claimed only if the requirements in Regenagri Content Standard and Regenagri CoC standards are met.

The products being claimed as Regenagri certified shall be included in the scope of the Regenagri certification and covered by Transaction Certificates.

Only products that meet the required percentage threshold (as specified in the product-specific CoC standards) and are within the scope of active Regenagri certification, are eligible to be claimed referring to Regenagri certification.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) - Article 6: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive - Article 3 and 4: Substantiation of explicit environmental claims; Article 5 and 8: Requirements for environmental labelling schemes; Ar-

Regenagri CiC • 2 Old Court Mews 311a Chase Road, N14 6JS, London (UK)

Company n. 14596676 • VAT n. 437943267

info@Regenagri.org • +44 (0)203 393 3051

title 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.

- Directive 2006/114/EC concerning misleading and comparative advertising – Article 3: Ensures that the advertisement has been verified for accuracy and is not misleading; and Article 7: Requires that any comparisons shall be objective and based on verifiable and typical features of the products.
- Regulation (EU) 2023/1115 (EUDR) – Article 3: List of prohibited products. Article 4 – Obligations of operators; Article 5: Obligations for traders; Article 9: Information requirements; Article 12: Establishment and maintenance of due diligence systems, reporting and record keeping.

2.3 RegenagriCS, Regenagri CoC standard and Regenagri Claims Requirements – The product claims shall be substantiated by a Regenagri Transaction Certificate (confirming the content of Regenagri materials).

A Transaction Certificate, issued for one or multiple shipments of products, confirm the specific content of Regenagri certified materials in the shipped products. The seller of Regenagri certified products shall provide the buyer with Transaction Certificates covering the shipments of Regenagri certified materials. Transaction Certificates shall be requested from the approved CB. The approved CB issues Transaction Certificates upon review of the application and supporting documentation (Scope Certificates, sales records, product information etc.).

All product claims shall be supported by Transaction Certificates issued by an approved CB. These certificates provide verifiable evidence of the content and certification status of the materials included in the claimed products.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) – Article 6: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive – Article 3: Substantiation of explicit environmental claims; Article 8 – Requirements for environmental labelling schemes; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.
- Directive 2006/114/EC concerning misleading and comparative advertising – Article 3: Ensures that the advertisement has been verified for accuracy and is not misleading; and Article 7: Requires that any comparisons shall be objective and based on verifiable and typical features of the products.
- Regulation (EU) 2023/1115 (EUDR) – Article 3: Prohibition; Article 4: Obligations of operators; Article 5: Obligations for traders; Article 9 – Information requirements; Article 12: Establishment and maintenance of due diligence systems, reporting and record keeping.

2.4 RegenagriCS, Regenagri CoC standard, Regenagri Logo Guide and Regenagri Claims Requirements - The claims shall include the Regenagri certification logo (for product certification claims) or Regenagri trademark '[Regenagri®]' (for content claims) and shall meet the requirements set in the Regenagri Logo Guide and the Regenagri Claims Requirements. Content claims cannot include the Regenagri certification logo but may use the Regenagri trademark [Regenagri®]. Content claims may use the [Regenagri®] trademark, but not the certification logo. Certification claims shall display the approved Regenagri certification logo. All logo or trademark usage shall comply with the Regenagri Logo Guide.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) - Article 6: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive - Articles 4 and 5: Requirements for making substantiated and transparent environmental claims; Article 3: Substantiation of explicit environmental claims; Article 8: Requirements for environmental labelling schemes; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.
- Directive 2006/114/EC concerning misleading and comparative advertising - Article 3: Ensures that the advertisement has been verified for accuracy and is not misleading; and Article 7: Requires that any comparisons shall be objective and based on verifiable and typical features of the products.

2.5 Regenagri Claims Requirements - The product claims shall be approved by the CB in writing before being used.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) - Article 6: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive - Articles 6 and 7: Claims shall be approved by relevant authorities to ensure they are substantiated & Articles 4 and 5: Specific requirements for making environmental claims; Article 8: Requirements for environmental labelling schemes; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.
- Directive 2006/114/EC concerning misleading and comparative advertising - Article 3: Ensures that the advertisement has been verified for accuracy and is not misleading; and Article 7: Requires that any comparisons shall be objective and based on verifiable and typical features of the products.
- Regulation (EU) 2023/1115 (EUDR) - Article 3: Prohibition; Article 4: Obligations of operators; Article 5: Obligations for traders; Article 9" Information requirements; Article

12: Establishment and maintenance of due diligence systems, reporting and record keeping.

2.6 Regenagri Claims Requirements - Use of approved content claims exactly as submitted.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) - Article 6: Prohibition of unfair and misleading commercial practices.
- Directive 2006/114/EC concerning misleading and comparative advertising - Article 3: Ensures that the advertisement has been verified for accuracy and is not misleading; and Article 7: Requires that any comparisons shall be objective and based on verifiable and typical features of the products.
- Regulation (EU) 2023/1115 (EUDR) - Article 3: Prohibition; Article 4: Obligations of operators; Article 5: Obligations for traders; Article 8: Due diligence to confirm non-deforestation origin; Article 9: Information requirements; Article 12: Establishment and maintenance of due diligence systems, reporting and record keeping.

2.7 Regenagri Claims Requirements - Content claims shall be supported by a Regenagri Transaction Certificate (TC), detailing the exact percentage of certified material, the metric used (weight, volume, etc.), and any exclusions. Public substantiation shall be provided through QR codes, weblinks, or other accessible documentation to ensure transparency and verifiability.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) - Article 6: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive - Articles 3, 4 and 5: Specific requirements for making environmental claims; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.
- Directive 2006/114/EC concerning misleading and comparative advertising - Article 3 and 4: Ensures that the advertisement has been verified for accuracy and is not misleading.
- Regulation (EU) 2023/1115 (EUDR) - Article 3: Prohibition; Article 4: Obligations of operators; Article 5: Obligations for traders; Article 9: Information requirements.

3. Application and approval process

3.1 Application for approval of product claims

An organisation seeking to make product claims shall submit its request, together with supporting records and documentation, showing the exact claim the organisation is seeking to make, including artwork files, to the CB and Regenagri. The organisation shall also make clear how and where the claims will be presented (websites, products, other communication channels, marketing materials etc.).

Applications shall include supporting documentation showing the exact claim, artwork files, scope certificates, and Transaction Certificates. Organisations shall indicate where the claims will be communicated (packaging, websites, marketing, e-commerce, reports, etc.). All claims shall comply with Directive (EU) 2024/825, Proposed Green Claims Directive, and other applicable EU legislation.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) - Article 6: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive - Articles 3, 4 and 5: Specific requirements for making environmental claims; Articles 6 and 7: Claims shall be approved by relevant authorities to ensure they are substantiated; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.
- Directive 2006/114/EC concerning misleading and comparative advertising - Article 3 and 4: Ensures that the advertisement has been verified for accuracy and is not misleading.
- Regulation (EU) 2023/1115 (EUDR) - Article 3: Prohibition; Article 4: Obligations of operators; Article 5: Obligations for traders; Article 9: Information requirements. Article 12: Establishment and maintenance of due diligence systems, reporting and record keeping.

3.2 Product claims approval

The CB shall verify and approve the product claims requested by the organisation. The CB shall confirm the approval to the applicant in writing and ensure the product claims are supported by Transaction Certificates.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) - Article 6: Prohibition of unfair and misleading commercial practice.
- Proposed Green Claims Directive - Articles 6 and 7: Claims shall be approved by relevant authorities to ensure they are substantiated; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.
- Regulation (EU) 2023/1115 (EUDR) - Article 8: Due diligence to confirm non-deforestation origin; Article 12: Establishment and maintenance of due diligence systems, reporting and record keeping; Article 10: Assessing and mitigating deforestation risks.

3.3 Product claims use

Once the CB has provided written approval, the organisation is permitted to use the content claims exactly as they were originally submitted for approval.

3.4 Regenagri monitoring, control and due diligence

Regenagri reserves the right to monitor approved product claims. Updates or changes may be required to ensure claims remain accurate and compliant. Annual verification is required for reporting, with full re-verification every 3 years.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) - Article 6: Prohibition of unfair and misleading commercial practice.
- Proposed Green Claims Directive - Articles 6 and 7: Claims shall be approved by relevant authorities to ensure they are substantiated; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.
- Regulation (EU) 2023/1115 (EUDR) - Article 8: Due diligence to confirm non-deforestation origin; Article 10 - Assessing and mitigating deforestation risks.

4. Product claims examples

Example 1 “*This product or [Brand name] is made with 30% Regenagri® hemp fibre.*”

Example 2 “*This product or [Brand name] contains 25% Regenagri® cotton/ [certified ingredient].*”

Example 3 “*[Brand’s] coffee’ is Regenagri certified and is 100% coffee produced through regenerative agriculture.*”

Example 4 “*[Brand’s] coffee’ is 100% produced through regenerative agriculture by Regenagri certified farms.*”

Example 5 “*[Brand’s] coffee’ is Regenagri certified and produced through regenerative farming practices that are Regenagri-certified.*”

Example 6 “*This product is Regenagri certified and made through regenerative farming methods that improve soil health, reduce GHG emissions, improve water quality, and regenerate the land.*”

Example 7 “*% of the (name of material) in this product comes from Regenagri® certified farms.*”

Example 8 “*By achieving/maintaining Regenagri Certification, (number) of (product/product line) contains (product) that support regenerative agriculture.*”

Example 9 “*This product is produced through Regenagri-certified regenerative farming practices.*”

Example 10 “*This product is made through regenerative farming that improves soil health, reduces greenhouse gas emissions, improves water quality and regenerates the land.*”

Note: Product claims shall be substantiated by Regenagri-approved CB issued Transaction Certificates (TCs) and approved prior to public use. Claims shall be consistent with the approved scope of certification and any monitoring or due diligence reporting.

X. Impact Claims

1. Impact claims definition

Impact claims refer to Regenagri and are made by organisations seeking to communicate the impact achieved through the implementation of Regenagri principles.

Impact claims communicate the positive or reduced environmental impacts achieved through implementation of Regenagri practices. Claims shall clearly state the functional unit, scope, baseline, and methodology. Comparative claims shall use consistent methodologies, system boundaries, and assumptions, and shall not imply general environmental superiority beyond the scope of the claim.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) – Article 6: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive – Articles 4 and 5: Requirements for making substantiated and transparent environmental claims; Article 3: Substantiation of explicit environmental claims; Articles 6 and 7: Claims shall be approved by relevant authorities to ensure they are substantiated; Article 8: Requirements for environmental labelling schemes; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.
- Directive 2006/114/EC concerning misleading and comparative advertising –Article 3: Ensures that the advertisement has been verified for accuracy and is not misleading; and Article 7: Requires that any comparisons shall be objective and based on verifiable and typical features of the products.
- Regulation (EU) 2023/1115 (EUDR) – Article 3: Prohibition; Article 4: Obligations of operators; Article 5: Obligations for traders; Article 9: Information requirements. Article 12: Establishment and maintenance of due diligence systems, reporting and record keeping.

2. Requirements overview

2.1 Regenagri Claims Requirements and Regenagri Insetting Standard – An organisation seeking to make impact claims shall hold an active license agreement with Regenagri and shall ensure that all requirements of the Regenagri Insetting Standard are met.

Reference to EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) – Article 6: Prohibition of unfair and misleading commercial practices.

- Proposed Green Claims Directive - Articles 6 and 7: Claims shall be under the control of the relevant authorities to ensure they are substantiated; Article 8: Requirements for environmental labelling schemes.

2.2. **Regenagri Claims Requirements** - Comparative impact claims shall:

- Use consistent functional units, system boundaries, and methodology.
- Be substantiated using ISO-compliant LCA methods (ISO 14040/44) for multi-stage claims.
- Clearly state baseline/reference, scope, and verification date.
- Not imply general superiority beyond the verified claim.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) - Article 6: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive - Articles 4 and 5: Requirements for making substantiated and transparent environmental claims; Article 3: Substantiation of explicit environmental claims.
- Directive 2006/114/EC concerning misleading and comparative advertising -Article 3: Ensures that the advertisement has been verified for accuracy and is not misleading; and Article 7: Requires that any comparisons shall be objective and based on verifiable and typical features of the products.

2.3. **Regenagri Claims Requirements** - Offsets or carbon neutrality claims shall be separately declared and not included in main reduction figures unless clearly distinguished. Misleading environmental neutrality claims are prohibited.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) - Article 6: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive - Article 3: Substantiation of explicit environmental claims; Articles 6 and 7: Claims shall be approved by relevant authorities to ensure they are substantiated.

2.4. **Regenagri Claims Requirements** - All impact claims shall be substantiated using verified data from Regenagri-approved CB audits. Substantiation shall include functional unit, methodology, ISO references, baseline, data sources, exclusions, verification date, and claim validity.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) – Article 6: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive – Articles 4 and 5: Requirements for making substantiated and transparent environmental claims; Article 3: Substantiation of explicit environmental claims; Articles 6 and 7: Claims shall be approved by relevant authorities to ensure they are substantiated; Article 8: Requirements for environmental labelling schemes; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.
- Proposed Green Claims Directive – Article 3: Substantiation of explicit environmental claims; Articles 6 and 7: Claims shall be approved by relevant authorities to ensure they are substantiated.

2.5. Regenagri Claims Requirements – Impact claims are valid for a maximum of 12 months. Claims beyond this require re-assessment, re-verification, and updated Impact Certificate. Any material change in data, scope, or methodology during validity shall trigger immediate withdrawal or re-substantiation.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) – Article 6: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive – Articles 6 and 7: Claims shall be approved by relevant authorities to ensure they are substantiated; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.
- Regulation (EU) 2023/1115 (EUDR) – Article 8: Due diligence to confirm non-deforestation origin; Article 10 – Assessing and mitigating deforestation risks.

2.6. Regenagri Claims Requirements – Impact claims shall be specific to the application (a whole product or activity, or a partial claim); based on widely recognised scientific evidence; proven significant from a life-cycle perspective; complete with an environmental performance claim that shall include all elements that affect the performance; beyond the equivalence of what is already imposed by (local) law; proven to avoid any harm to environmental or social performance outside its scope; and transparent on all types of information (primary and secondary) used to substantiate the claim.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) - Article 6: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive - Article 3: Substantiation of explicit environmental claims; Article 4: Substantiation of comparative explicit environmental claims; Article 5: Communication of explicit environmental claims; Articles 6 and 7: Require clear, accurate, and substantiated claims to prevent misleading consumers; Article 8 - Requirements for environmental labelling schemes; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.
- Directive 2006/114/EC concerning misleading and comparative advertising - Article 3 and 4: Ensure that the advertisement has been verified for accuracy and is not misleading; and Article 7: Requires that any comparisons shall be objective and based on verifiable and typical features of the products.
- Regulation (EU) 2023/1115 (EUDR) - Article 3: Prohibition; Article 4: Obligations of operators; Article 5: Obligations for traders; Article 8: Due diligence to confirm non-deforestation origin; Article 9: Information requirements; Article 12: Establishment and maintenance of due diligence systems, reporting and record keeping; Article 10: Assessing and mitigating deforestation risks.

3. Application and approval

3.1. Application for approval of product claims

Applications shall include supporting documentation showing the exact claim, artwork files, scope and impact certificates, and Transaction Certificates (if applicable). Organisations shall indicate where claims will be presented (websites, products, marketing, reports).

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) - Article 6: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive - Article 4: Substantiation of comparative explicit environmental claims; Article 5: Communication of explicit environmental claims; Articles 6 and 7: Claims shall be approved by relevant authorities to ensure they are substantiated; Article 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.
- Directive 2006/114/EC concerning misleading and comparative advertising - Article 3: Ensures that the advertisement has been verified for accuracy and is not misleading; and Article 7: Requires that any comparisons shall be objective and based on verifiable and typical features of the products.

- Regulation (EU) 2023/1115 (EUDR) – Article 3: Prohibition; Article 4: Obligations of operators; Article 5: Obligations for traders; Article 8: Due diligence to confirm non-deforestation origin; Article 9: Information requirements; Article 12: Establishment and maintenance of due diligence systems, reporting and record keeping; Article 10: Assessing and mitigating deforestation risks.

3.2. Impact claims approval

Approval by Regenagri is conditional on verification by a Regenagri-approved CB. Approval shall be confirmed in writing and supported by relevant documentation (Scope Certificate, Transaction/Impact Certificates).

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) – Article 6: Prohibition of unfair and misleading commercial practices.
- Proposed Green Claims Directive – Articles 6 and 7: Claims shall be approved by relevant authorities to ensure they are substantiated 10: Verification and certification of the substantiation and communication of environmental claims and environmental labelling schemes.

3.3. Use of Impact claims

Once approved, impact claims shall be used exactly as submitted. Regenagri retains the right to monitor claims, require updates, or revoke claims if they become outdated or inaccurate.

Reference to applicable EU legislation:

- Directive (EU) 2024/825 (Consumer Empowering Directive) – Article 6: Prohibition of unfair and misleading commercial practices; Article 7: Prohibition of unfair and misleading commercial practices
- Proposed Green Claims Directive – Articles 6 and 7: Claims shall be approved by relevant authorities to ensure they are substantiated 10: Verification and certification of the substantiation.
- Regulation (EU) 2023/1115 (EUDR) – Article 8: Due diligence to confirm non-deforestation origin; Article 9: Information requirements; Article 10: Assessing and mitigating deforestation risks.

3.4. Regenagri monitoring, control and due diligence

Regenagri reserves the right to monitor approved product claims. Updates or changes may be required to ensure claims remain accurate and compliant. Annual verification is required for reporting, with full re-verification every 3 years.

Reference to applicable EU legislation:

- Proposed Green Claims Directive – Articles 6 and 7: Requires ongoing monitoring, verification of claims and accountability in reporting claims.
- Regulation (EU) 2023/1115 (EUDR) – Article 8: Due diligence to confirm non-deforestation origin; Article 10: Assessing and mitigating deforestation risks.

4. Impact claim – examples

Example 1 *“Regenagri certified coffee has been produced with an average annual reduction of GHG emissions of 5.34 tonnes of CO₂ Eq per hectare and 1.99 tonnes of CO₂ Eq per tonne of coffee. The total average annual GHG emissions reduction associated with the certified coffee in Brazil/ [region name] is 242,089 tonnes of CO₂ Eq (equivalent to 242,089 carbon insetting units).”*

Example 2 *“The Regenagri certified coffee in Brazil/ [region name] has been produced with an average reduction in water use of 95,410 litres/Ha, equivalent to 43,368 litres per tonne of coffee.”*

Example 3 *“This coffee is Regenagri-certified, produced through practices that have reduced its carbon footprint by 30% and improved soil health.”*

Example 4 *“The Regenagri certified cotton was grown in Brazil, with no irrigation, greater efficiency, and 48% fewer chemicals when compared to conventional cotton.”*

Example 5: *“Our regenerative farming practices have increased soil microbial biodiversity by 30% over the past three years, leading to improved nutrient cycling and disease suppression.”*

Example 6: *“After implementing cover cropping and no-till practices, our soil's water holding capacity has improved by 25%, enhancing drought resilience.”*

Example 7: *“The introduction of compost and reduced tillage has resulted in a 15% increase in soil organic matter levels over three years, significantly boosting soil fertility.”*

Example 8: *“Our soil structure has improved within 1 year, as evidenced by a 40% decrease in bulk density over four years, indicating enhanced porosity and aeration.”*

Example 9: “*Our Regenagri practices have increased soil species richness by 50%, enhancing ecosystem resilience and stability.*”

Example 10: “*The implementation of hedgerows and cover crops has created new habitats, resulting in a 40% increase in beneficial insect populations and enhanced soil biodiversity.*”

Example 11 “*By sourcing Regenagri certified (product/crop), we have supported (number) farmers/farms in our supply chain to apply regenerative agriculture practices as of (year).*”

Note: All examples are illustrative. Actual impact claims shall be supported by verified data and documents, approved by Regenagri, and aligned with the Regenagri Insetting Standard. Claims shall clearly indicate units, scope, time period, and methodology where applicable.

XI. Regenagri Certification Standards and System Overview

Regenagri standards and certification systems provide assurance of validity and accuracy of data and claims made by licensed and Regenagri certified organisations, as well as any other organisation eligible to make different types of claims.

Certifications and verification services to the Regenagri standards shall be carried out by accredited certification bodies. CBs shall be accredited to standards applicable to the scope of the services they provide (including, but not limited to ISO 17065, ISO 14064, ISO 14065).

CBs are approved by Regenagri upon an assessment aimed at assuring, among other factors, that the CB has the appropriate expertise, technical capabilities, management systems and capacity to provide the services. It is essential that CBs implement a robust management system, incorporating processes for internal audits, corrective actions, management reviews, and continual improvement. This ensures compliance with standards like ISO/IEC 17021. Following this, the CB shall avoid and successfully manage any risks of conflicts of interest and ensure the credibility of the certification services. CBs shall have processes in place to manage the competence of their staff, including auditors and decision-makers. Given the sensitive nature of the data handled, including audit reports and organisational records, CBs shall have strong information security measures in place. A formal mechanism shall be in place for handling and resolving complaints and appeals from clients or other parties. This system ensures transparency and fairness. A risk management system is also required that involves identifying, analysing, and managing risks associated with the certification activities, ensuring that the CB can operate effectively without jeopardizing the integrity of the certification process. Nonetheless, an audit management system is required to manage client information, certification scopes, audit planning, and certification status. All these aspects are subject to assessment conducted by Regenagri before a CB is approved and authorised to perform certification services against Regenagri standards.

1. Directive (EU) 2024/825 (Consumer Empowering Directive) and related Regenagri provisions and Directive 2006/114/EC concerning misleading and comparative advertising.

1.1 Directive (EU) 2024/825 (Consumer Empowering Directive) - Article 1: Certification scheme requirements and use of a corresponding sustainability label

The criteria of the article are aligned and assured by the requirements incorporated in the Regenagri standard setting procedure, Regenagri Theory of Change and Regenagri Equal Opportunities and Inclusiveness Policy.

Regenagri provisions:

- Regenagri standards (Standard Criteria & CS) are made publicly available on the Regenagri website <https://Regenagri.org/standards-documents/>. Additional documents such as methodologies, procedures and guidelines are also provided.
- The Regenagri standard setting procedure provides all processes and requirements for standard development.
- The standards development and update processes include stakeholders' consultation. The stakeholder's feedback is evaluated periodically.
- There are grievance and/ or whistle-blowing procedures in place to be used by any interested parties with concerns. The channels for raising concerns are communicated to all internal and external stakeholders and any concerns are investigated and kept in consideration during standard reviews, updates or changes.
- The Regenagri Theory of Change also presents the Regenagri vision, mission and actions related to stakeholders, and the Regenagri Monitoring Evaluation and Learning document provides a clear explanation of how stakeholder feedback is evaluated and considered during any developments.
- Any deviations or non-compliances in meeting Regenagri criteria and standards are handled in compliance with requirements incorporated in the Regenagri Auditing and Certification requirements, Assessment Methodology and Due Diligence requirements (providing procedure requirements for both producers and supply chains companies).
- For supply chain certifications (CoC) – the applicable standards (CS, CoC standards and claim requirements) set the requirements for certification and certification claims. Certification requires annual audits carried out by a third-party approved CB to confirm compliance.
- Prerequisite of certification is adherence to the Regenagri Due Diligence risk assessment and verification procedure. Claims shall be approved (or rejected/suspended/revoked) by either the CB and/or Regenagri (depending on the type of claims).
- The Regenagri standards include provisions explaining actions required in case of misuse of claims, including the suspension of license agreements.
- The requirements for monitoring of compliance are covered by the Regenagri assurance requirements, the Regenagri Auditing and Certification requirements, CB Implementation procedure guidance, Claims Requirements and Regenagri Due Diligence requirements.

Regenagri CiC • 2 Old Court Mews 311a Chase Road, N14 6JS, London (UK)

Company n. 14596676 • VAT n. 437943267

info@Regenagri.org • +44 (0)203 393 3051

1.2 **Directive (EU) 2024/825 (Consumer Empowering Directive)** – Articles 5, 6 and 7 (amended articles of Directive 2005/29/EC): Prohibition of unfair and misleading commercial practices

And

1.3 **Directive 2006/114/EC** concerning misleading and comparative advertising – Article 3 and 4: Ensure that the advertisement has been verified for accuracy and is not misleading; and Article 7: Requires that any comparisons shall be objective and based on verifiable and typical features of the products.

Regenagri provisions:

- Each organisation wishing to make a claim shall meet specific requirements and criteria, which vary depending on the type of claim being made.
- Organisations seeking to make claims shall have a current licensing agreement with Regenagri.
- Commitment claims and general marketing claims shall be made in compliance with the Regenagri claim requirements, be approved by Regenagri prior to use, and observe regular reporting on the progress of the claims made. An evaluation of the claim over time (e.g. was the commitment reached) shall be part of the annual monitoring conducted by Regenagri.
- Organisations seeking to make product claims shall hold an active Scope Certificate (the Regenagri Farm Certificate and/or the Regenagri CS Certificate).
- Brands or retailers seeking to make claims do not need to be certified but need to hold a current licensing agreement. Claims of brands and retailers shall be approved by Regenagri prior to use.
- For product claims, in addition to the Scope Certificate, a Transaction Certificate is required to substantiate such claims. Both, the scope and Transaction Certificates are issued by an accredited CB approved by Regenagri. A Transaction Certificate is issued by the CB based on verification of supportive documentation and data (purchase, sell documentation, Scope Certificates, traceability documentation etc.).
- All organisations holding Regenagri certification are subject to annual audits by the CB and also fall under the monitoring, control and due diligence control of Regenagri under Regenagri Due Diligence requirements. Organisations shall meet all requirements in Section B (Principles of RegenagriCS certification), C (Verification of regeneratively

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info@Regenagri.org • +44 (0)203 393 3051

grown products), D (CoC principles) and Section E (Transaction Certificates) of RegenagriCS and all applicable requirements of product-specific CoC requirements.

- Impact claims: claims shall be substantiated and shall not give the impression of greenwashing and shall be: specific to the application (a whole product or activity, or a partial claim); based on widely recognised scientific evidence; proven significant from a life-cycle perspective; complete – an environmental performance claim shall include all elements that affect the performance; beyond the equivalence of what is already imposed by (local) law; proven to avoid any harm to environmental or social performance outside its scope; transparent on all types of information (primary and secondary) used to substantiate the claim.
- Impact claims can be made in a range of materials, including websites, products, marketing material, and sustainability reports, Regenagri will verify the claim.
- An organisation seeking to make impact claims shall hold an active license agreement with Regenagri and shall ensure that all requirements of the Regenagri Insetting Standard are met. ‘Misuse of claims’ presented in each document; Section 7. Transaction Certificate of CoC, CS Point B.2. Claims and Section C – Verification of regeneratively grown product.
- The RegenagriCS certification is not mandatory for brand owners and/or retailers. However, if brand owners and/or retailers are seeking to purchase Regenagri certified products, they should hold an active license agreement with Regenagri and any claims shall be approved by Regenagri upon request and prior to being used.

2. Proposed Green Claim Directive and related Regenagri provisions

2.1 Proposed Green Claim Directive – Articles 3 to 6: Substantiation of explicit environmental claims and substantiation of comparative explicit environmental claims.

Regenagri provisions:

- Organisations seeking to make product claims shall hold a current licensing agreement with Regenagri and shall hold an active Scope Certificate (a Regenagri Farm Certificate if certified against the Regenagri standard criteria and/or a Regenagri CS Certificate if certified against the Regenagri CoC product-specific standards).
- The Regenagri standard criteria together with the Regenagri Auditing and Certification requirements set requirements that all farming activities carried out by the organisation are in the scope of the assessments and certification, which ensures that all environmental aspects are covered by the assessments.

Regenagri CiC • 2 Old Court Mews 311a Chase Road, N14 6JS, London (UK)
Company n. 14596676 • VAT n. 437943267
info@Regenagri.org • +44 (0)203 393 3051

- The requirements and criteria for assessing the environmental aspects and the environmental impacts are described in the Assessment Methodology and Regenagri Auditing and Certification requirements. The Regenagri Assessment Methodology and the Regenagri Auditing and Certification requirements also sets the requirement for continuous improvement.
- In addition to Scope Certificates, Transaction Certificates are required to make product claims., Transaction Certificates confirm the certified content of products sold.
- Both, the Scope and Transaction Certificates are issued by an approved CB. Transaction Certificates are issued by the CB based on verification of supporting documentation and data (purchase, sell documentation, Scope Certificates, traceability documentation etc.).
- All organisations holding Regenagri certification are subject to annual audits by the CB and also fall under the monitoring, control and due diligence control of Regenagri under Regenagri Due Diligence requirements. Organisations shall meet all requirements in Section B (Principles of RegenagriCS certification), C (Verification of regeneratively grown products), D (CoC principles) and Section E (Transaction Certificates) of the RegenagriCS and all applicable requirements of product-specific CoC requirements.
- The RegenagriCS certification is not mandatory for brand owners and/or retailers. However, if brand owners and/or retailers are seeking to purchase Regenagri certified products, they should hold an active license agreement with Regenagri and any claims shall be approved by Regenagri upon request and prior to being used.
- For impact claims Regenagri is committed to avoiding claims that are not substantiated and may give the impression of greenwashing. For Regenagri impact claims, claims shall be: specific to the application (a whole product or activity, or a partial claim); based on widely recognised scientific evidence; proven significant from a life-cycle perspective; complete – an environmental performance claim shall include all elements that affect the performance; beyond the equivalence of what is already imposed by (local) law; proven to avoid any harm to environmental or social performance outside its scope; transparent on all types of information (primary and secondary) used to substantiate the claim.
- Impact claims can be made in a range of materials, including websites, products, marketing material, and sustainability reports, Regenagri will verify that such a claim.

2.2 Proposed Green Claim Directive – Article 7 to 8: Requirements for environmental labelling schemes.

Regenagri provisions:

- Regenagri Standard Criteria, RegenagriCS and product-specific CoC standards, together with Regenagri Auditing and Certification requirements, Regenagri Assessment Methodology, Regenagri Claims Requirements and Regenagri Insetting Standard set the requirements for certification and impact claims.
- The criteria of the articles 7 and 8 are aligned and assured by the requirements incorporated in Regenagri Standard Setting procedure, Regenagri Theory of Change and Regenagri Equal Opportunities and Inclusiveness Policy.
- Regenagri standards (Standard Criteria & CS) are made publicly available on the Regenagri website <https://Regenagri.org/standards-documents/>. On the Regenagri website there is a full list of all the methodologies, documentation, standards and procedures which are provided to all interested parties upon request of receiving them.
- The Regenagri Standard Setting procedure provides all processes and requirements for standard development. The standards development and update processes include stakeholders' consultation. Following this, the stakeholder's feedback is evaluated periodically. There are grievance and/ or whistle-blowing procedures in place to be used by any interested parties with concerns. The channels for raising concerns are communicated to all internal and external stakeholders and any concerns are investigated and kept in consideration during standard reviews, updates or changes.
- The Regenagri Theory of Change also presents the Regenagri vision, mission and actions related to stakeholders and the Regenagri monitoring evaluation and learning document provides a clear explanation on how stakeholders' feedback is evaluated and considered during any developments.
- Any deviations or non-compliances in meeting Regenagri criteria and standards are handled in compliance with requirements incorporated in the Regenagri Auditing and Certification requirements, assessment methodology (including requirements for certificate suspension or withdrawal) and Due Diligence requirements (providing procedure requirements for both producers and supply chains companies).
- For supply chain certifications (CoC) – the applicable standards (CS, CoC standards and claim requirements) set the requirements for certification and content and certification claims-making. Certification requires annual audits by accredited and approved by Regenagri third-party CB to confirm compliance. The prerequisite of certification is adherence to the Regenagri Due Diligence risk assessment and verification procedure. Claims shall be approved (or rejected/suspended/revoked) by either the CB and/ or Regenagri (depending on the type of claims). In each standard, there is a section explaining the actions in case of misuse of claims, including the suspension of license agree-

ments. 'Misuse of claims' presented in each document (beginning of the documents) also gives a framework of compliance and actions that Regenagri has the right to take in case of breakages or deviations identified.

- The requirements related to compliance monitoring are covered by the Regenagri Assurance requirements, the Regenagri Auditing and Certification requirements, CB Implementation Procedure guidance, Claims Requirements and Regenagri Due Diligence requirements.

2.3 Proposed Green Claim Directive – Article 10 to 11: Verification and certification

Regenagri provisions:

- The Regenagri certifications – Assurance requirements set requirements for verifications and certifications. All audits and certification services shall be conducted by accredited CB approved by Regenagri.
- The Regenagri Auditing and Certification requirements and CB Implementation Procedures provide certification service and approval requirements.
- The CB Implementation Procedures include the provision of training to CB personnel by Regenagri. Training is a mandatory requirement for the qualification of auditors and certifiers.

3. Regulation (EU) 2023/111 (EUDR) and related Regenagri provisions

3.1 Regulation (EU) 2023/111 (EUDR) – Article 3: List of prohibited products

Regenagri provisions:

- Eligibility criteria of Regenagri Standard Criteria set the requirements to producers for deforestation cut-off dates and request compliance with Regulation 2023/111. The criteria require evidence of compliance (farm maps, Due diligence policies etc.) which shall be verified by CB during the regular certification and surveillance audits.
- Organisations certified to the Regenagri CoC standards shall be compliant with RegenagriCS (Section B, p. B1.6.; and section C, p. C1.2. and C.3. Due diligence policy requirements) and to the product-specific Regenagri CoC standard (Section Purchasing and goods intake and sales of Regenagri certified products).

3.2 Regulation (EU) 2023/111 (EUDR) – Article 4 to 12: Obligation of operators and traders, Due Diligence and information requirements, risk assessment and mitigation; and reporting.

Regenagri provisions:

- Compliance with EUDR requirements is assured by Regenagri Auditing and Certification requirements (Section audit procedure, audit preparation, on-farm audit, completion of audit and data verification, final data reporting in Regenagri platform and monitoring and continuous improvement), Regenagri CB Implementation Procedure guidance.
- Organisations certified to the Regenagri CoC standards shall be compliant with RegenagriCS (Section B, p. B1.6.; and section C, p. C1.2. and C.3. Due Diligence policy requirements), product-specific Regenagri CoC standard (Section: purchasing and goods intake and sales of Regenagri certified products) Due Diligence procedure which set the requirements for verification.
- Regenagri is committed to ensuring compliance with EUDR requirements. The Regenagri Due Diligence procedures require a risk assessment of the proposed or licensed project. This shall be conducted and based on the risk level of the project in order to verify compliance with the eligibility criteria and with the requirements set in Regenagri Due Diligence procedures. The risk assessment required by the Regenagri Due Diligence procedures shall be in addition to the certification and surveillance audit.

References

Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on substantiation and communication of explicit environmental claims (Green Claims Directive).

Directive (EU) 2024/825 of the European Parliament and of the Council of 28 February 2024 amending Directives 2005/29/EC and 2011/83/EU as regards empowering consumers for the green transition through better protection against unfair practices and through better information.

Directive 2005/29/EC of the European Parliament and of the Council of 11 May 2005 concerning unfair business-to-consumer commercial practices in the internal market and amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC of the European Parliament and of the Council and Regulation (EC) No 2006/2004 of the European Parliament and of the Council ('Unfair Commercial Practices Directive').

Directive 2006/114/EC of the European Parliament and of the Council of 12 December 2006 concerning misleading and comparative advertising.

Regenagri Assessment methodology

Regenagri Assurance Requirements

Regenagri Chain of Custody Standard – Food

Regenagri Chain of Custody Standard – Textile

Regenagri Content Standard

Regenagri Claims requirements

Regenagri Due Diligence Procedure

Regenagri Insetting Standard

Regenagri Auditing and Certification requirements

Regenagri Implementation procedure guidance for certification bodies

Regenagri Logo Guide

Regenagri Standard criteria

Regenagri Standard Setting Procedure

Regenagri Theory of Change

Regulation (EU) 2023/1115 of the European Parliament and of the Council of 31 May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010 (Text with EEA relevance), 2023.



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