

Regenagri Background Assessment Study (2025) — 2026

Summary of findings

2025 assessment cycle - completed January 2026

Report detail	Assessment detail
Report title	Internal Assessment report – Regenagri 2025
Version & Date	v.1.0., date of the report 30.01.2026
Assessment period	1 January - 31 December 2025
Baseline	Internal Assessment Report 2024 (V1.0, dated 7 January 2025)
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Assessment basis. This report records the internal audit/assessment completed for the 2025 assessment cycle and finalised in January 2026. The supplied gap analyses are not treated as separate future exercises: their requirement-by-requirement review, findings and recommended improvements are consolidated as the evidence and findings of Regenagri's internal assessment. The assessment is also structured to provide the documented background assessment needed to inform scheme development, standards review, risk management, MEL and continual improvement. Where a gap analysis contains a proposed control or redraft, this report records it as the resulting improvement measure; it does not state that the control was implemented unless implementation evidence was supplied.

1. Executive Summary

Purpose: to document the internal audit/assessment undertaken for January-December 2025, completed in January 2026, by consolidating the six supplied gap analyses into one scheme-level assessment and background assessment. The output identifies the sustainability and scheme-integrity context, emerging risks and opportunities, possible unintended effects, areas within and outside Regenagri's influence, conformity strengths, gaps and improvement measures, and links these findings to risk management, MEL, standards development and governance review.

- Overall assessment conclusion: the gap-analysis programme constituted the detailed internal review for the 2025 cycle. Taken together, the analyses provide a systematic assessment of governance and oversight, certification-body requirements, complaints/appeals/grievance, Theory of Change, MEL and standard-setting against the referenced ISEAL and ISO requirements. The findings below are therefore presented as internal-assessment findings and improvement measures, rather than as a summary of separate draft gap-analysis documents.
- 2024 follow-up: Management confirms that all gaps and carry-over actions identified through the 2024 Internal Assessment have been closed. The 2025 assessment therefore treats the 2024 report as a completed baseline rather than an open corrective-action list.
- Goals and impact reporting: Achievement against Regenagri goals has been communicated through the 2024 Impact Report. The forthcoming 2025 Impact Report will provide the next annual public account of progress, results and achievements and will form part of the evidence base for MEL and continual improvement.

2. Scope and Methodology

Element	Updated scope
Time period	1 January - 31 December 2025; assessment completed January 2026
Geographic coverage	Global
Sectoral scope	Agriculture and agricultural supply chains within the scope of the Regenagri sustainability system, including farm-level production, producer groups, certification and assurance activities, chain of custody, traceability and associated claims.
Stakeholders considered	Farmers, farm groups, Certification Bodies, brands/buyers, governance bodies, staff, partners and affected stakeholders
Assessment framework	2024 internal-assessment structure plus ISEAL Code v1.1 / ISO references.
Sources	2024 Internal Assessment; 2025 gap analyses; January 2026 risk register; 2024 and forthcoming 2025 impact-reporting cycle.
Method	Documented internal audit/gap assessment, with integrated into the corresponding governance, assurance, complaints, ToC, MEL, standard-setting, claims/CoC and risk sections; cross-document consistency review; background assessment; risk and unintended-effects review; influence mapping; consolidation into improvement measures.
Limitation	Implementation evidence is distinguished from assessment conclusions.

3. ISEAL Background Assessment for Development & Continual Improvement

This section consolidates the background assessment arising from the 2025 internal audit. It is intended to provide the documented context for scheme development and improvement: priority sustainability and integrity issues, emerging risks and opportunities, possible unintended negative effects, the boundaries of Regenagri's influence, and the feedback routes through which findings are carried into the Theory of Change, MEL, standards, assurance and governance.

3.1 Priority sustainability and scheme-integrity context

The assessment confirms that Regenagri operates in a context shaped by soil and land degradation, biodiversity loss, climate and water pressures, farm economics and barriers to adoption, while scheme credibility also depends on reliable assurance, traceability, data quality, credible claims, stakeholder trust and consistent implementation across regions and certification bodies. These issues form the background against which the Theory of Change, standards and assurance system are reviewed. The conducted review adds an external scheme-design perspective: requirements need unambiguous scope, consistent terminology, clear separation of binding requirements from guidance, and implementation guidance sufficient to support consistent interpretation across the scheme.

3.2 Emerging risks and opportunities

The January 2026 risk snapshot identifies 33 risks, including three Critical and eighteen High risks. Opportunities identified through the assessment include stronger digital traceability and transaction evidence, more consistent CB calibration and oversight, clearer governance and impartiality arrangements, systematic complaints learning, and use of MEL evidence to improve standards and implementation, identified integrity-system risks that should be reflected in the controlled risk approach.

3.3 Possible unintended negative effects

The internal assessment requires unintended effects to be considered explicitly rather than assuming that intended sustainability outcomes are sufficient. Relevant effects to monitor include inconsistent or burdensome implementation for farmers and groups; exclusion or reduced access where requirements, language, data or audit processes create barriers; conflicts of interest or concentration of decision-making; and uneven assurance quality between CBs or regions. These are to be tested through MEL, complaints/grievance data, CB oversight, stakeholder consultation and risk review and landscape implementation.

The 2025 background assessment identified the possible unintended negative effects listed in this section through internal assessment, risk review, MEL and assurance evidence. Specific stakeholder input on these potential unintended effects has been collected as part of the latest Farm standard review and consultation completed between December 2024 and January 2026. Targeted stakeholder consultation included Farm organisations, Brand owners, external third-party consultancy.

3.4 Influence mapping - where Regenagri can and cannot act

Regenagri is well placed to influence scheme design, standard content, claims rules, CB approval and oversight requirements, training and calibration, traceability/data requirements, stakeholder consultation, complaints and appeals routes, public information, MEL priorities and management response. It can support and provide evidence for corporate sustainability due diligence, but the assessment confirms that the scheme should not be presented as discharging a company's own due-diligence obligations. Regenagri also has limited direct control over external regulation, climate and crop shocks, independent stakeholder behaviour, market conditions, misinformation, and conduct outside the scheme; these require monitoring, engagement, escalation and adaptive response rather than claims of direct control.

3.5 How the assessment feeds development and improvement

Findings from this background assessment are inputs to: (a) Theory of Change review and assumptions; (b) the MEL learning agenda and management response; (c) standards development/revision and stakeholder consultation; (d) CB requirements, oversight and competence controls; (e) governance, impartiality and integrity arrangements; (f) complaints, appeals and grievance improvement; and (g) risk treatment and re-rating. This closes the loop between background context, internal assessment, implementation evidence and continual improvement.

No complaints or grievances were received during 2025. The absence of cases is recorded as an assessment-period result and does not remove the need to maintain an accessible complaints, appeals and grievance process, monitor for barriers to use, and review any future cases for systemic learning.

Regenagri's goals and achievements are reported through its annual impact-reporting cycle. Achievements were published in the 2024 Impact Report, and the upcoming 2025 Impact Report will report the next annual results and progress. These impact reports support the MEL evidence base, management review and the continual-improvement loop.

Complaints, Appeals and Grievance procedure substantially strengthened through the 2025 gap analysis; no complaints or grievances were received during 2025.

3.6. Governance fit confirmation

Management reviewed the findings of this Background Assessment and confirmed that Regenagri's governance and decision-making arrangements remain appropriate. The existing governance structure is considered appropriate for overseeing the sustainability issues, risks and opportunities, potential unintended effects and areas of influence identified through this assessment.

Responsibility for acting on the findings is allocated through the relevant governance, management, standards, assurance, MEL and risk-management processes. No change to the overall governance model is considered necessary as a direct result of this Background Assessment. Any governance or integrity improvements identified through separate internal assessment processes are managed through the relevant continual-improvement and management-review processes.

3.6 Review

This Background Assessment will be reviewed and updated at least every five years, and earlier where material changes in the operating context warrant review.

4. Theory of Change

Internal assessment finding: Largely aligned and strategy improvements identified.

- the earlier ToC undated, questioned how parts of the vision would be achieved where pricing is outside the scheme, and noted vague activities and an incomplete activity-to-goal pathway. The 2025 assessment therefore requires explicit pathways and a clear statement of what Regenagri can influence versus external market conditions.
- Assumptions, preconditions and milestones and recommended stakeholder discussion of assumptions. These observations are integrated into the background assessment, stakeholder self-identification/registry, target reconciliation and dated milestone actions.

5. Monitoring, Evaluation & Learning

Internal assessment finding: Substantively aligned.

- Review of MEL v1.0 concluded that, with revisions, it could constitute an MEL framework but at that time fell short of most ISEAL Code requirements and was not dated. The later 2025 MEL gap analysis records ISEAL 5.1-5.7 as met in substance; this is treated as the updated internal-assessment position.
- Accordingly, the remaining actions focus on controlled version/date identification, governance naming, explicit annual Board sharing and management response, while scheme-integrity risk controls remain governed under the risk/governance framework.

6. Consolidated Risk Assessment and Mitigation Summary

The January 2026 register contains 33 risks. Distribution: 3 Critical, 18 High, 11 Moderate and 1 Low.

6.1 Critical risks

Critical risks are related to Media Investigation, Social Misinformation and Data security.

10.2 High-risk themes requiring management attention

High risks are related to Claims and reputation, Assurance integrity, Governance and oversight and Stakeholder trust.

10.3 Moderate and Low risks

Moderate risks include measurement data accuracy, data-quality inconsistency, scientific dispute, policy shifts, regulatory misalignment, climate-related crop failures, governance review delays, employee criticism, stakeholder miscommunication and technology platform outage. The single Low risk is internal sustainability criticism. These should remain on the operational register with named owners, triggers, monitoring evidence and escalation thresholds; moderate risks that trend upward should be re-rated promptly.

10.4 Cross-cutting mitigation priorities

- Adopted controlled risk methodology and rating scale across governance, standards and operational registers; document risk owner, due date, residual rating and evidence of closure.
- Prioritise assurance consistency include mandatory CB training, annual calibration, two-year witness cycle and controlled transition guidance for revised standards.
- Close governance and impartiality architecture: ToR, RACI, impartiality and integrity mechanism and oversight controls.
- Strengthen data and technology controls include validation rules, data-quality KPIs, privacy and security monitoring, incident response and platform continuity arrangements.
- Protect claims credibility includes controlled claims guidance, misuse monitoring, evidence packs, traceability and TC controls and rapid-response communications.
- Use MEL as the feedback loop to high-risk topics which drive update of learning questions, with findings feeding risk re-rating, management response and standards revision.

7. Evidence reviewed

Evidence source	Purpose
Regenagri Theory of Change	Strategy/outcomes/influence
MEL evidence / Impact Report	Sustainability performance and learning
Risk Register	Emerging risks/opportunities
Farm Standard consultation records	Stakeholder input/unintended effects
Complaints/grievance records	Potential unintended effects
Internal/assurance reviews	Implementation and integrity context