



REGENEVATE CHAIN OF CUSTODY STANDARD

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Version	Date	Section	Change Summary
1.0	12.08.2022	-	First issue
1.1	31.05.2023	All	Redactive and visual changes
1.2	12.10.2023	All	Redactive changes

1. PURPOSE and SCOPE

This standard defines the requirements for tracking and verifying the supply chain of products claiming to be Regenerate Certified. The standard applies to any product that claims to be Regenerate Certified or includes Regenerate Certified materials, besides farm level.

A chain of custody certificate provides a credible guarantee that all chain of custody operations within the scope of a certificate conform to all applicable requirements of the relevant Regenerate normative documents

The Regenerate Standard applies to products that contain at least 5% regenerate-grown material, calculated as a percentage of the entire product excluding accessories and trims.

An %X Regenerate blended product may have a minimum of 5% and a maximum of 94.99% certified content (e.g. Fabric with 5% Regenerate Cotton / 95% cotton) and the remaining content may be any material.

A Regenerate product may have a minimum of 95% and a maximum of 100% certified content (e.g. Fabric with 95% Regenerate Cotton / 5% recycled polyester) and the remaining content may be any material – as long as it is of a different type.

Individual components of a product may be identified as certified to the Regenerate Standard but only in a manner that makes it completely clear that only the identified component contains Regenerate content and not the whole product. For example, only the inner fabric of a jacket is made with regenerate cotton, while the outer fabric is polyester.

2. GENERAL REQUIREMENTS

- 2.1. The organization shall demonstrate that it is a legal entity or a defined part of a legal entity.
- 2.2. The organization must retain all records proving compliance with the standard for at least 5 years.
- 2.3. The organization shall document duties, responsibilities, and authorities regarding the implementation of the standard.
- 2.4. The organization's top management shall appoint a management representative, irrespective of other responsibilities.
- 2.5. Internal audits shall be performed at least once every 12 months for the audit of conformity to the standard.
- 2.6. Entities shall have a system to address and track non-conformities and corrective actions.
- 2.7. All complaints, disputes, or allegations of nonconformities received by the organization shall be recorded and provided to the certification body on demand.
- 2.8. All relevant personnel involved in the implementation of the standard should be trained and records of training shall be kept.
- 2.9. The organization shall establish, implement, and maintain documented procedures and/or work instructions covering all applicable criteria of the Regenerate Standard.
- 2.10. The organization shall maintain a documented management plan that describes processes, including the points of risk as well as a material and process flow diagram.

2.11. The organization shall provide the certification body with access to complete, up-to-date, and accurate information, along with access to their operations to demonstrate conformity with the Regenevate Standard. Access shall at minimum include the following:

- Access to all parts of the physical site;
- Access to all documents and records related to conformity with the Regenevate Standard and the standard upon which claims are made, which may include financial records;
- Access for auditors to interview personnel without restriction and observation by management representatives; and

Equivalent access to all sites and associated subcontractors included in the scope certificate. The organization shall demonstrate that it is a registered legal entity with legal permission to operate. It shall maintain a listing of the name, location, and processes performed at each site, along with documentation of legal permission to operate for all processing sites.

2.12. The organization may outsource the handling and processing of the claimed materials. The organization shall maintain full responsibility for the conformity of outsourced materials to the Standard. Subcontractors shall not have common ownership with the contracting organization. The organization shall classify each subcontractor as an associated subcontractor or independently certified subcontractor.

3. TRACEABILITY SYSTEM REQUIREMENTS

3.1. General rules about certified material traceability system and rules to prevent unintended contamination of certified and non-certified materials shall be documented. An up-to-date and easy-to-audit balance table containing balance/mass calculations between certified raw materials and products shall be kept.

3.2. Scope Certificate holders shall maintain records of the claimed material and its chain of custody, including the name and location of the supplier and Transaction Certificate of the claimed material. In the traceability chain, all material inputs and outputs must be traceable with a Transaction Certificate. For the first year of each certified organization, raw material input can be good agriculture practices certified, organic in-conversion material.

3.3. The claimed material must be physically separated from non-claimed material at all stages of the supply chain, and any blending or mixing of claimed materials must be documented and tracked.

3.4. To make claims about Regenevate-certified material, an organization shall have a valid Regenevate Scope Certificate. Retailers are not required to be certified unless they are brands or are conducting processing that is not minor in nature.

To ensure traceability all facilities shall ;

- Have a valid Scope Certificate

or

- Be stated in the Scope Certificate as an Independently Certified Subcontractor

or

- Be stated in the Scope Certificate as an associated subcontractor.

3.5. Entities shall make certified material claims in accordance with Regenerate Logo and Label Usage Guideline rules.

4. VOLUME RECONCILIATION

The objective of volume reconciliation is to ensure that certified output volume does not exceed available certified input (from transaction certificates) after factoring in production losses. Detailed records or systems must be maintained that identify which inputs were used in the production of a given output product.

Certified product is kept physically separate from non-certified product through each stage of the supply chain, with the exception of being blended with non-certified product.

Certified product may be mixed: Different batches of certified physical products may be mixed only with other batches of physical product certified to the same standard, or two standards which recognized equivalence.

The documentation associated with certified physical product clearly distinguishes between certified and non-certified materials and may be used to track each individual batch of certified physical product separately in the associated documentation.

The organization shall maintain records of technical specifications for all Regenerate Standard materials – including regenerate raw material inputs on file.

The organization shall maintain a system that controls and quantifies volumes of claimed input and output materials at all times. The organization shall maintain:

- Complete and up-to-date records of the description, quantities, origins, and/or destinations of all claimed materials purchased, sold, received, or delivered;
- Transaction certificates for any incoming claimed materials; and
- Volume reconciliations performed.

5. CERTIFICATION REQUIREMENTS

To achieve a Regenerate Scope Certificate, entities shall be subjected to conformity assessment including an audit of all operational sites according to this standard, and shall have complete successfully of this process annually. Desk audits may be conducted:

- The site does not take physical possession of certified materials or products,
- The site is used for the storage of finished and labeled products only.

Conformity assessment activities may also include additional unannounced audits of certified entities.

The certification body is obliged to take a positive or negative certification decision within 60 days from the date of the audit.

5.1. Providing Information, Access to Information and Activities

- 5.1.1. All entities in the supply chain must cooperate with any requests for information or documentation related to the claimed material and its chain of custody.
- 5.1.2. Documents containing the rules established for the implementation of the standard should be submitted to the certification body at the application stage.
- 5.1.3. Certificate holders and entities requesting certification shall give access to all parts of the unit and the entire facility as well as to accounts and related supporting documents for conformity assessment purposes to the certification body.
- 5.1.4. Entities shall provide the certification body with all necessary information to assess compliance with the standard. Certified entities shall provide evidence concerning the application of the rules of this standard. Necessary practices determined by considering the size of the organization and the complexity of the practices should be provided to the certification body as documented information.
- 5.1.5. In case of a change in the information (legal ownership, change of address, etc.) given during the application, the organization should immediately inform the certification body.

5.2. Suspending, Withdrawing, or Reducing the Scope of Certification

The certification body shall suspend/withdraw certification in cases ;

Non-Conformance: The organization has persistently or seriously failed to meet the requirements of this standard.

Failure to Remediate: The organization fails to remediate non-conformities within the specified period by the certification body.

Misuse of Mark: The organization is found to be misusing the Regenerate logo/mark or making false or misleading claims about the certification.

Changes to Scope or Ownership: If there are significant changes to the scope or ownership of a supply chain site, the certification body may require a new application and audit and may suspend or withdraw the certificate if the site fails to comply with the requirements of the CCS Certification.

Fraudulent Activity: The organization is found to be engaged in fraudulent activity related to Regenerate.

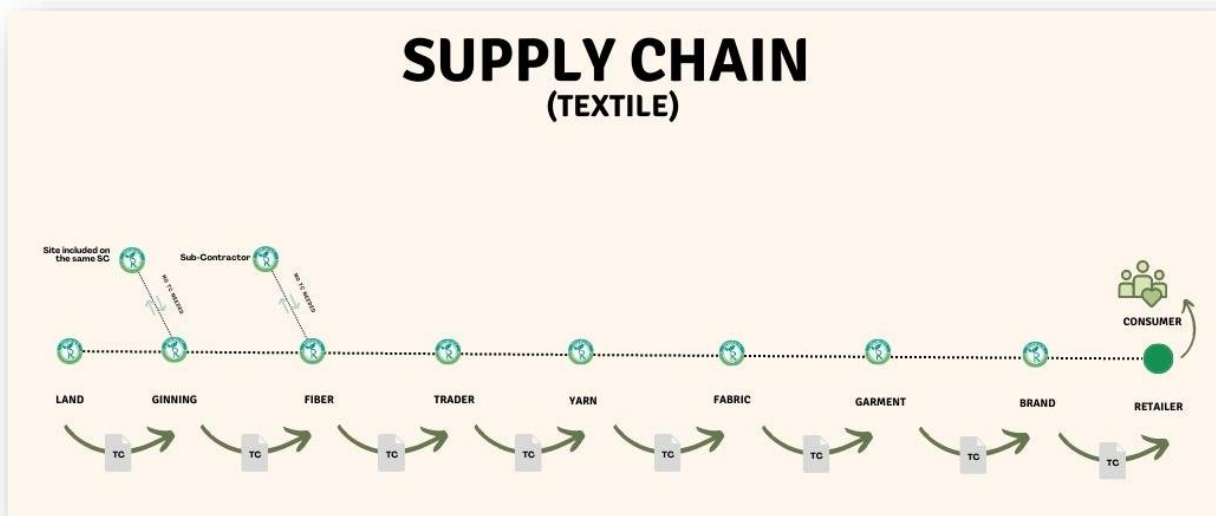
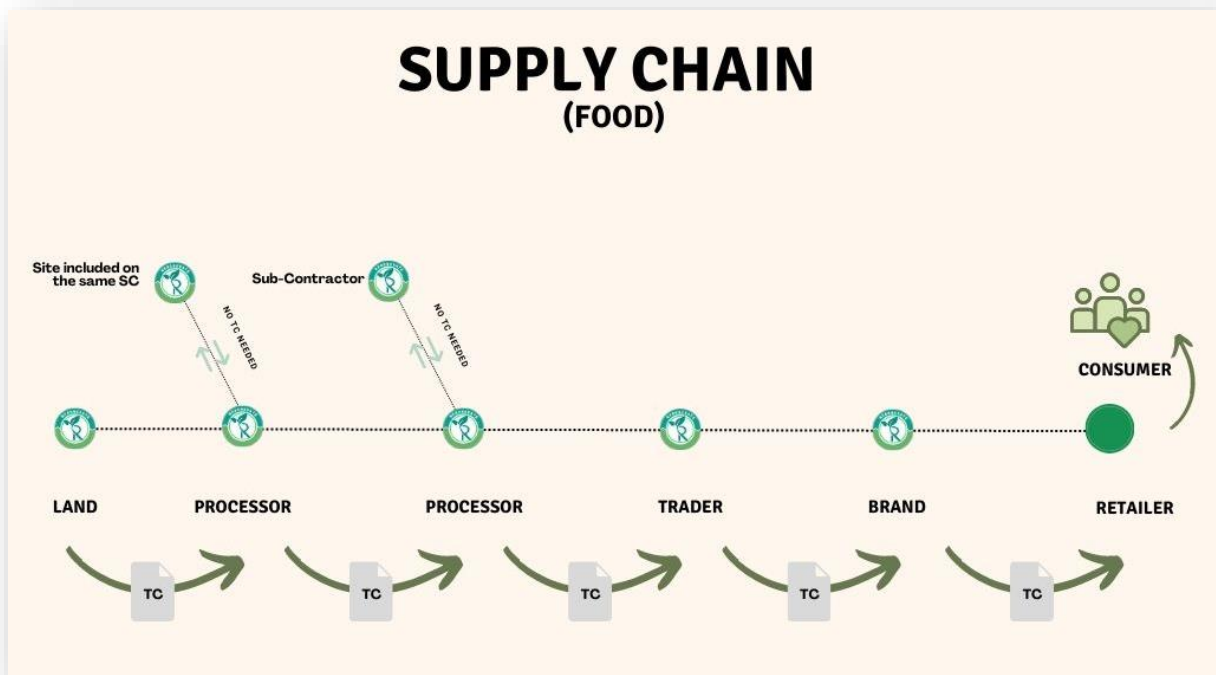
If a certificate is suspended or withdrawn, the certification body may publicly notify stakeholders, including customers and other interested parties, about the suspension or withdrawal.

6. TRANSACTION POLICY

6.1. General Transaction Rules

- 6.1.1. Certified brands are not required to request outgoing transaction certificates. However, the certification body shall issue transaction certificates naming the brand as the seller upon receipt of a complete and valid application from the certified brand.

- 6.1.2. The certification body shall not issue a transaction certificate unless the certified organization holds a valid scope certificate for the standard(s) with the same certification body on the applicable shipment date(s). A suspended, withdrawn, or expired scope certificate is not considered to be valid.
- 6.1.3. The certification body shall issue a transaction certificate if a complete and valid application is received within 90 calendar days after the earliest shipment date and shall not issue a transaction certificate if a complete and valid application is not received within 180 calendar days after the earliest shipment date.
- 6.1.4. The certification body shall issue a transaction certificate if a complete and valid application is received within 30 calendar days after the scope certificate expires without being renewed or is withdrawn and shall not issue a transaction certificate if a complete and valid application is not received within 90 calendar days after the scope certificate expires without being renewed or is withdrawn.
- 6.1.5. The certification body shall not issue a transaction certificate if a scope certificate has been suspended or withdrawn due to critical or major non-conformities, including if the scope certificate was valid on the shipment date.
- 6.1.6. Transaction certificates shall not be issued for the following situations:
 - Sales or shipment of products between sites included on the same scope certificate (including groups);
 - and
 - Sending and receiving products between the organization and its subcontractors.



6.2. Amendment and Invalidation of Transaction Certificates

6.2.1. After it is issued, the transaction certificate may be amended in the following ways:

- a. To reduce the quantity of claimed material included on the transaction certificate, if further evidence shows that it was inaccurate;
- b. To correct typographical errors (including increasing the quantity of claimed materials), within one month of issuance only;
- c. To invalidate the transaction certificate.

6.2.2. The certification body shall invalidate a transaction certificate if the certification body learns that any of the following apply:

- a. The organization presented falsified or fraudulent documents to obtain the transaction certificate;
- b. The certification body identifies that they issued the transaction certificate in error;
- c. The applicable input transaction certificate is invalidated; or
- d. The claimed materials/products are otherwise shown to be ineligible for the claim being made.

NOTE: If a transaction certificate is amended or invalidated after it is issued, the certification body shall ensure that an updated transaction certificate is provided to the buyer's certification body (if applicable) and the buyer. The organization may take responsibility to notify the buyer provided that documentation of this is provided to the certification body.

7. OUTSOURCING

The organization may outsource the handling and processing of claimed materials to subcontractors. In this case, the organization is acting as a contracting organization. The organization shall maintain full responsibility for conformity with the Standard for outsourced materials. Subcontractors shall not have common ownership with the contracting organization.

The organization shall classify each subcontractor as either:

- a- An associated subcontractor who is not independently certified to the Standard, and who is audited as needed under the organization's scope certificate; or
- b- An independently certified subcontractor, who holds a scope certificate to the Standard independent from the organization.

The organization shall maintain a list of all subcontractors who may be used to store or process claimed materials, including the subcontractor's name, address, contact details, and outsourced processing steps. For independently certified subcontractors, the list shall also include the subcontractor's certification body, license number, and scope certificate expiry date.

The organization shall receive approval from the certification body and an updated scope certificate before outsourcing to a new subcontractor.

Before sending each shipment of claimed material for outsourcing to an independently certified subcontractor, the organization shall:

- a- Ensure that a current and valid scope certificate is on file for the subcontractor;
- b- Inform the certification body of the outsourcing and follow the certification body's instructions regarding transaction certificates for outsourcing; and
- c- Ensure that sufficient transport records are used to track the movement of outsourced claimed materials, both when materials are sent to the subcontractor and when they are returned to the organization.

8. DEFINITIONS

Associated Subcontractor: A subcontractor who is not certified independently from the contracting organization and is instead audited as part of the contracting organization's audit.

Blending: The process of combining multiple different materials of different types into a single product. See also mixing.

Brand: An organization that controls the design, development, and purchase of final products for sale under their own name or private label. Brands may sell to wholesalers, retailers, or directly to consumers. This does not include organizations that sell a branded intermediate product for use in further processing steps.

Certification: The provision by an independent certification body of written assurance (a scope certificate) that the product, service, or system in question meets specific requirements.

Claimed Material: The material or ingredients in a product that are claimed to be or include regenerative agriculture.

Chain of Custody: The documented series of processes and activities that ensure the integrity of the claimed material from the original input source to the final product.

Facility: Any geographically distinct unit included as a site or a subcontractor within a certificate scope.

Final Product: A product that will be sold to a consumer in its current state and without further processing. Final products may be sold business to business (e.g. from the final processor in the supply chain to the brand).

Independently Certified Subcontractor: A subcontractor that holds their own certification to the Standard, independently of any contracting organization.

Mixing: The process of combining multiple different grades of the same raw material into a single product (e.g. two different grades of cotton).

Non-Conformity: Lack of conformity with the Standard or with applicable requirements.

Critical Non-Conformity: Critical non-conformities represent serious failures to meet the fundamental principles of the Standard.

Major Non-Conformity: Major non-conformities occur if, either alone or in combination with further non-conformities relating to other criteria, they result in, or are likely to result in, a fundamental or systematic failure to achieve the objectives of the standards system.

Minor Non-Conformity: Minor non-conformities occur when a single observed lapse has been identified in a procedure required as part of the client's management system.

Organization: A legal entity that is certified to or in the process of becoming certified to Regenerate. A scope certificate is held by an organization, and an organization has one or more sites.

Outsourcing: The process of sending claimed material to a subcontractor for services to be provided.

Scope Certificate (SC): A document issued by the certification body which verifies that an organization is competent to produce and sell specified claimed materials in conformity with Regenerate.

Subcontractor: A legal entity hired by an organization to perform services (e.g. storage, processing) on a claimed material. Subcontractors take physical possession but not legal ownership of claimed materials and are independent of the organization that outsources the material.

OR

An independent legal entity hired by an accreditation body to provide services related to accreditation activities, excluding freelancers.

OR

An independent legal entity hired by a certification body to provide services related to certification activities, excluding freelancers.

Supply Chain: The progression of business entities involved in the supply and purchase of materials, goods, or services from raw materials to the final product.

Suspension: The limitation of a scope certificate or accreditation due to a specific non-conformity or issue. A suspension may be lifted when the non-conformity or issue is resolved, and the scope certificate or accreditation becomes active again immediately.

Transaction Certificate (TC): A document issued by a certification body that verifies that products being sold or shipped from one organization to another conform to Regenevate and may be treated as claimed materials by the receiver.

Unannounced Audit: On-site audit of 2% of the organizations that have been certified in the last 1 year, with a maximum of 48 hours notice.

Withdrawal: The of a scope certificate due to a specific non-conformity or issue, or at the request of the certified party. Following a withdrawal of certification, a new assessment/audit is required for certification to return to an active status.