Annex: Sourcing organic ingredients

Contents
An introduction to sourcing organic ingredients.......................................................... 2
Using this annex............................................................................................................. 2
Driving Change............................................................................................................. 3
Using your influence................................................................................................... 3
Supporting you............................................................................................................ 3
Sourcing requirements by product type..................................................................... 4
1. Sourcing requirements for Plant Products.............................................................. 4
   1.1 Soil-based production (SA Standard 2.7.10)...................................................... 4
2. Sourcing Requirements for Pig Products................................................................. 4
   2.1 The use of Colistin is prohibited (SA Standard 3.4.12)................................. 4
   2.2 Pig mutilations are prohibited (SA Standard 3.5.3)....................................... 4
   2.3 Pasture access (SA Standard 3.6.1.3)............................................................. 4
3. Sourcing Requirements for Poultry Products.......................................................... 5
   3.1 Additional rules for the sourcing of non-organic poultry (SA Standard 3.2.7) 5
   3.2 Poultry mutilations are prohibited (SA Standard 3.5.4)................................. 5
   3.3 Number of birds permitted in each house (SA Standard 3.12.2).................... 5
   3.4 Floor area for poultry (SA Standard 3.12.4).................................................... 6
   3.5 Housing requirements and aerial perches (SA Standards 3.12.5 and 3.12.6). 6
   3.6 Artificial light (SA Standard 3.12.9)............................................................... 6
   3.7 Access to the outdoor range (SA Standard 3.12.11)...................................... 7
   3.8 Stocking density on the range (SA Standard 3.12.12).................................... 7
   3.9 Range quality and cover (SA Standard 3.12.16).......................................... 7
   3.10 Resting the range for laying poultry (SA Standard 3.12.17)...................... 8
4. Sourcing Requirements for Aquaculture Products.................................................. 8
   4.1 Sodium metabisulphite (SA Standard 6.4.4).................................................... 8
   4.2 Withdrawing feed (SA Standard 13.5.2)........................................................ 8
   4.3 Calcified seaweed is prohibited (SA Standard 13.8.2)................................. 8
   4.4 The use of organophosphates and avermectin is prohibited (SA Standard 13.10.6)................................................................. 9
5. Sourcing requirements for All Animal Products..................................................... 9
   5.1 Animals must always be pre-stunned (SA Standard 19.5.1)......................... 9
An introduction to sourcing organic ingredients

The Soil Association (SA) has higher organic standards than the legal minimum in the UK, EU and other parts of the world. These are in key areas such as animal welfare, conserving the environment, safeguarding public health and protecting the interests of organic consumers. Our standards put our principles into practice and are at the heart of our work. By certifying with us you can use the Soil Association symbol, which consumers recognise as a mark of integrity.

While we encourage you to source organic product certified to Soil Association standards, you may use products and ingredients certified to other organic standards, as long as they meet the requirements of this annex in addition to legal requirements. This recognises the need for a diversity of organic ingredients from global sources, many of which are certified to other organic standards. This also supports organic farmers the world over and meets consumer expectations of the organic market.

Using this annex

If you are a producer, you will have seen this symbol \( S \) throughout the Farming & Growing, Aquaculture, Seaweed and Abattoir standards as an indicator that an extra sourcing requirement applies to a particular product. We have signposted producer licensees to this annex for information purposes only.

If you are a processor sourcing organic products or ingredients certified to other organic standards, you need to check this annex to determine if an extra sourcing requirement applies (as described in Food and Drink Soil Association higher standard 6.10.1). The requirements are listed by product type. If a sourcing requirement does apply, you will need to seek our approval prior to use. If you are unclear whether extra sourcing requirements apply, please contact your certification officer.

We work in a number of ways to support you in sourcing organic ingredients that meet our extra requirements. This includes helping you to identify compliant sources and using our respective influence to drive wider change.
Driving Change
It is important that Soil Association works with other organic certifiers and stakeholders around the world to make positive changes to factors that affect organic production and processing across the whole organic sector. We raise awareness of issues important for animal welfare, environmental protection and health, so that the reasons behind our higher standards are well understood and they are adopted more widely.

In many cases, the best way Soil Association can increase the adoption of best practice is not just through our own standards but through influencing the practices and requirements of other organisations. We devote a lot of time working to change organic regulations which are the baseline for organic production and processing. Demonstrating their importance to policymakers is often the best way that we can have impact with our higher standards.

Using your influence
As a licensee, you also have the power to influence change, particularly through the choices you make when buying organic ingredients. Very often the market can be a strong driver for change. For example, you can:

- Take steps to understand and minimise your supply chain challenges. See SA Certification’s report on "The Organic Supply Chain 2017";
- Choose ingredients from farms certified to higher organic standards, such as those of the Soil Association;
- Specify additional requirements in your contracts with suppliers;

Supporting you
Encouraging regulators and other standards setters to adopt similar higher standards will make it easier to find ingredients and products that meet these sourcing requirements. Where other standards setters already have similar standards to us, confirming product meets SA sourcing requirements can be quick and easy. We are continuing to develop resources to help with sourcing: working in cooperation with other standards bodies and certifiers globally to develop tools to identify organic product that meets the requirements of this annex. In addition, we liaise on your behalf with other certifiers and supply chains, regarding organic ingredients you want to use, to confirm they meet the SA’s sourcing requirements.

In a perfect world, all ingredients used in Soil Association products would be verified as meeting all of the SA higher standards across the whole supply chain. However, this is currently not practically possible or proportionate for us to check for some standards and for some types of organic ingredients. Our explanatory web page 'Working Together for Better Sourcing' explains these challenges and how the Soil Association is working with others to address them.
Sourcing requirements by product type

The following sections list, by product type, the Soil Association’s sourcing requirements for organic ingredients certified to other standards.

1. Sourcing requirements for Plant Products

1.1 Soil-based production (SA Standard 2.7.10)

Extra requirement: Plants must be grown in soil in connection with the subsoil and bedrock. Most organic production is carried out in the soil but there are some parts of the world, like the US, that allows container growing and hydroponics. It only affects some products, from some parts of the world. As a result, we will assess the risk of the ingredients you are using being grown in this way and we will contact you if this applies, however if you know that your product may be high-risk please contact us.

The following are excluded from this requirement:
   a) plant propagation
   b) aquatic plant production
   c) plants in pots or containers (including salad cress) sold direct to consumers, which are not intended to be grown on and harvested and sold as organic
   d) sprouted seeds, as long as they are produced only with the addition of water

Reason: Production in the soil is a fundamental principle of organic production, so where crops are grown, harvested and sold as organic they must be grown in the soil. In some instances, a stage of production of an organic plant has to be out of the soil, but this should be limited only to plant propagation.

2. Sourcing Requirements for Pig Products

2.1 The use of Colistin is prohibited (SA Standard 3.4.12)

Extra requirement: Pigs must not be treated with Colistin.

Reason: Scientists believe that colistin resistance is likely to be transferring from farm animals to humans. To protect its effectiveness as a life-saving human treatment of E. coli we will not accept any pig product from pigs treated with Colistin. Pigs have been identified as the highest risk species for use of this antibiotic.

2.2 Pig mutilations are prohibited (SA Standard 3.5.3)

Extra requirement: Pigs must not be subject, at any point in their lives, to the practices of ringing, castration, tail docking, teeth cutting or grinding.

Reason: Evidence shows that mutilations cause considerable pain and stress, and can reduce the ability of animals to perform natural behaviours. Pig mutilations often do not address the underlying cause of the problem which can be solved through changes in management practices which allow them to express natural behaviours.

2.3 Pasture access (SA Standard 3.6.1.3)

Extra requirement: Pigs must have permanent access to pasture or vegetated range, unless the following circumstances temporarily prevent this:
a) the health or welfare of the animal
b) the weather conditions and the state of the ground, or
c) community or national requirements or restrictions relating to specific animal or human health problems.

Reason: Providing pigs with access to pasture gives them a more natural life and the opportunity to express natural behaviours such as rooting and wallowing. All organic animals have a truly free-range life.

3. Sourcing Requirements for Poultry Products

3.1 Additional rules for the sourcing of non-organic poultry (SA Standard 3.2.7)
Extra requirement: Poultry must not be brought in from cage systems and poultry beaks must not be clipped or tipped. Different requirements apply for some specialist egg ingredients, see endnote1.

Reason: Using cage reared birds not only conflicts with organic principles but also presents a welfare risk to birds by predisposing them to a range of behavioural problems which can be carried over to their new free-range environment. Beak tipping or clipping birds, which is standard practice in non-organic systems, is a mutilation which is unnecessary when the birds are kept under conditions which satisfy their behavioural needs.

3.2 Poultry mutilations are prohibited (SA Standard 3.5.4)
Extra requirement: Poultry must not have been subject, at any point in their lives, to any mutilations including, the practices of pinioning or clipping primary flight feathers, de-snooing, de-toeing, dubbing, de-spurring, caponising or any other mutilations. Different requirements apply for some specialist egg ingredients, see endnote1.

Reason: Evidence shows that mutilations cause considerable pain and stress, and can reduce the ability of animals to perform natural behaviours. Poultry mutilations often do not address the underlying cause of the problem which can be solved through changes in management practices which allow them to express natural behaviours.

3.3 Number of birds permitted in each house (SA Standard 3.12.2)
Extra requirement: The number of birds in a poultry house must not exceed: 2000 for laying chickens; or 1000 for other laying birds and table chickens. Different requirements apply for some specialist egg ingredients, see endnote1.

Reason: Flock size is limited to help ensure consistently high levels of animal welfare. Larger flock sizes can be more difficult to manage and data from organic flocks shows that larger flocks are associated with a higher risk of bird welfare being compromised. Giving birds a truly free-range life is important and evidence suggests that smaller flocks make more use of the range than larger ones.
3.4 Floor area for poultry (SA Standard 3.12.4)

**Extra requirement:** At least 50% of the floor area of poultry housing must be solid, that is, not of slatted or grid construction. Different requirements apply for some specialist egg ingredients, see endnote\(^1\).

**Reason:** Giving poultry access to dry, loose litter provides them with a vital material for foraging and dust bathing, allowing them to express these natural behaviours. This reduces the risk of welfare problems developing. Feather pecking is thought to be a redirected foraging or ground-pecking behaviour which can arise when birds do not have the opportunity to express these natural behaviours.

3.5 Housing requirements and aerial perches (SA Standards 3.12.5 and 3.12.6)

**Extra requirement:** Poultry perching must meet the following requirements:

- a) laying hens: 18 cm aerial perch space per bird
- b) guinea fowl: 20 cm aerial perch space per bird
- c) Muscovy ducks: 40cm aerial perch space per bird
- d) turkeys: elevated perches or surfaces provided

Different requirements apply for some specialist egg ingredients, see endnote\(^1\).

**Reason:** Most species have a behavioural motivation to perch. Providing aerial perches allows birds to exhibit a greater range of natural behaviours, reducing the risk of feather pecking and enabling birds to escape from any ground level harassment from other birds. Wild turkeys roost in trees at night and domestic turkeys retain this strong instinct to perch. Similarly, Muscovy ducks, unlike other domestic ducks, have not descended from the wild mallard and have long claws which allow them to perch and they will roost in trees in the wild.

3.6 Artificial light (SA Standard 3.12.9)

**Information requirement:** Information must be provided regarding the following:

For poultry production, is artificial light used to prolong day length?

If yes, further details must be provided, including any measures in place to allow birds to anticipate changes in light levels. For example:

- gradual dimming of the lights
- a stepped lighting programme, to guide the birds to the perches

We will review the data collected and update this annex accordingly in November 2020.

**Reason:** Poultry use a reduction in light intensity as a signal for night roosting. Gradually dimming the lights allows birds to anticipate changes in light which may prevent stress. In particular, it allows laying hens to find a suitable perch for the night without causing injury. It has been shown to stimulate feeding behaviour in broilers and laying hens which may prevent hunger during the night.
3.7 Access to the outdoor range (SA Standard 3.12.11)

**Extra requirement:** Table birds must have easy daytime access to the outdoor range by the following ages:

a) 10 weeks for geese or two thirds of their life, whichever is earlier
b) 10 weeks for turkeys or two thirds of their life, whichever is earlier
c) Two thirds of their life for other species

**Reason:** Giving poultry early access to the range encourages birds to use the range more. The range provides birds with plenty of opportunities to express natural behaviours, such as ground pecking and foraging. Improved range use has been shown to decrease the risk of injurious feather pecking.

3.8 Stocking density on the range (SA Standard 3.12.12)

**Extra requirement:**

a) For laying chickens the outdoor stocking density must not exceed: 1,000 birds/ha over the life of the flock. Different requirements apply for some specialist egg ingredients, see endnote 1.
b) For ducks, guinea fowl, turkey and geese in mobile housing, the outdoor stocking density must not exceed:
   i. ducks: 2,222 birds/ha
   ii. guinea fowl: 2,500 birds/ha
   iii. turkeys: 1000 birds/ha at any one time
   iv. geese: 666 birds/ha at any one time

**Reason:** These poultry species range extensively and are kept on ranges for sustained periods of time. Requiring a lower stocking rate helps prevent damage to the range, ensuring the birds have access to a stimulating environment where they can express their natural behaviours.

3.9 Range quality and cover (SA Standard 3.12.16)

**Information requirement:** Information must be provided regarding the following:

a) Are the outdoor stocking density requirements above provided within:
   • 100m of the house for layers, turkeys, geese and guinea fowl
   • 50m of the house for ducks?
b) What types of shelter and natural cover are provided on the range and accessible to the laying hens, broilers, turkeys or guinea fowl?
c) Are shelters or natural cover provided across the whole of the range?
d) Is at least one area of natural cover or shelter available within 20m of the pop-holes.
e) The maximum distance between areas of shelter/natural cover?
f) Is natural cover provided at an area equal to at least 5% of the area available to the operator’s poultry.

We will review the data collected and update this annex accordingly in November 2020.
Reason: The provision of natural shelter, particularly trees, is an effective method to encourage birds to range and range further, which in turn will lead to animal welfare and environmental benefits. Shelter helps protect poultry from adverse weather conditions and predators, as well as providing birds with more choice and variation in their environment. Tree cover in particular can also provide other environmental benefits.

### 3.10 Resting the range for laying poultry (SA Standard 3.12.17)

**Extra requirement:** For laying poultry, is the pasture rested for at least nine months between each flock of laying birds.

Different requirements apply for some specialist egg ingredients, see endnote 1.

Reason: Laying poultry require a longer resting period because they live for longer and range more widely than table birds, which puts more pressure on the range in terms of vegetation depletion and manure deposition. Giving a nine-month fallow period allows vegetation to fully recover between flocks, using up the excess nutrients in the soil and also helps break disease cycles.

### 4. Sourcing Requirements for Aquaculture Products

#### 4.1 Sodium metabisulphite (SA Standard 6.4.4)

**Extra requirement:** Sodium metabisulphite must not be used as an additive, including for crustaceans.

Reason: Sodium metabisulphite is used to prevent microbial spoilage and the appearance of unsightly marking on crustaceans after harvesting. However, sodium metabisulphite can cause allergic reactions in some people so should be avoided.

#### 4.2 Withdrawing feed (SA Standard 13.5.2)

**Extra requirement:** The maximum starve period before harvest, for salmon, trout and Arctic charr, is 50 degree days.

Reason: If feed is not withdrawn before handling or transport this can lead to poor water quality which has health implications for the fish. However, farmed fish become used to being fed regularly so the withdrawal of feed for prolonged periods is a welfare concern. One of the principles of good animal welfare is freedom from hunger, therefore the Soil Association sets a limit on the permitted withdrawal period for feed for farmed fish before harvest. We use degree days as a measurement because in the wild, fish naturally eat less in colder waters.

#### 4.3 Calcified seaweed is prohibited (SA Standard 13.8.2)

**Extra requirement:** Aquaculture livestock must not be fed calcified seaweed, lithothamne or maerl.

Reason: Calcified seaweed, lithothamne and maerl refer to a group of coralline algae, primarily of the species *Phymatolithon calcateum*, *Lithothamnion glaciare* and *Lithothamnion corallioides*. Calcified seaweed beds are relatively scarce and are important habitats which hold impressive levels of biodiversity, harbouring many rare and commercially valuable species. Owing to their extremely slow growth rate, calcified seaweed beds are very fragile and cannot sustain even limited extraction
without deterioration. Commercial extraction from the sea has already led to the destruction of several beds in Europe and current levels of protection provided are unlikely to prevent further destruction and deterioration.

4.4 **The use of organophosphates and avermectin is prohibited (SA Standard 13.10.6)**

**Extra requirement:** Fish must not be treated with organophosphate or avermectin-based veterinary medicines.

**Reason:** Organophosphates (OPs) are the basis for a wide and commonly used range of insecticides and in veterinary medicine are used to treat external parasites. OPs are acutely toxic and have been linked with a range of problems including decreasing male fertility, foetal abnormalities, chronic fatigue syndrome and Parkinson’s disease. OPs are especially toxic to the aquatic environment and have a detrimental effect on marine species. Avermectins are a group of drugs (e.g. ivermectin) used to treat insect infestations in livestock. When used on aquaculture animals, residues are excreted with the faeces and have detrimental effects on the aquatic environment, particularly on sediment-dwelling organisms.

5. **Sourcing requirements for All Animal Products**

5.1 **Animals must always be pre-stunned (SA Standard 19.5.1)**

**Extra requirement:** Animals must always be stunned before slaughter. This process must cause unconsciousness and insensibility instantaneously, without distress, and until the animal dies.

**Reason:** Scientific evidence strongly suggests that slaughtering animals while still conscious causes them significant pain and distress.

5.2 **Natural casings (SA Standard 6.6.3)**

**Extra requirement:** Non-organic casings, such as for sausage skins, must be of natural origin.

**Reason:** Natural casings are more in line with consumer expectations and there is potential for them to be certified organic if there was a market demand, unlike other casing-types which use processing aids and techniques that are not allowed under the organic regulation.

6. **Sourcing requirements for bottles or containers of alcohol**

6.1 **Free sulphur dioxide levels (SA Standard 6.4.3)**

**Extra requirement:** The free sulphur dioxide (SO$_2$) levels in bottles or containers of fruit wines, cider, perry or mead for recertification/re-sale must not exceed 30 mg/l

**Reason:** Free SO$_2$ can cause allergic reactions in people with a sensitivity to sulphur dioxide, especially affecting people with asthma, so should be minimised as much as possible.
6.2 Sulphur dioxide levels for Soil Associated certified wine (SA Standard 6.9.4)

Extra requirement: The sulphur dioxide levels in bottles or containers of wines must not exceed the following levels:

<table>
<thead>
<tr>
<th>Maximum sulphur dioxide (SO₂) levels</th>
<th>Wine with a residual sugar level &lt; 2 g/l</th>
<th>Wine with residual sugar level of 2 – 4.9g/l</th>
<th>Wine with sugar level of ≥5g/l</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Red</strong></td>
<td>90 mg/l (25mg/l free SO₂)</td>
<td>100 mg/l (30mg/l free SO₂)</td>
<td>130 mg/l (50mg/l free SO₂)</td>
</tr>
<tr>
<td><strong>White &amp; rosé</strong></td>
<td>100 mg/l (30mg/l free SO₂)</td>
<td>140 mg/l (30mg/l free SO₂)</td>
<td>160 mg/l (50mg/l free SO₂)</td>
</tr>
<tr>
<td><strong>Sparkling Wine</strong></td>
<td></td>
<td>100 mg/l (10mg/l free SO₂)</td>
<td>270-370 mg/l (50mg/l free SO₂)</td>
</tr>
<tr>
<td><strong>Other wines as listed in Annex IB of EC Regulation 606/2009</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Reason: Free SO₂ can cause allergic reactions in people with a sensitivity to sulphur dioxide, especially affecting people with asthma, so should be minimised as much as possible.

7. Sourcing requirements for All Products

7.1 Using organic additives (SA Standard 6.4.1)

Extra requirement: Organic additives must be used, if available and in sufficient quantity.* Non-organic forms of the following additives must not be used:

a) Locust bean gum
b) Guar gum
c) Arabic gum

* In cases where organic additives are available, but not suitable for the product, the Soil Association Certification Committee may review whether sufficient justification is provided for not using them.

Reason: Organic ingredients should always be used where they are available and are of sufficient quality and quantity. This helps to grow the market for organic ingredients and by doing so, increases the positive impacts of organic production.

7.2 Ingredients which must be organic (SA Standard 6.6.2)

Extra requirement: Products must use the following list of ingredients in organic form:

a) gooseberries (*Ribes uva-crispa*)
b) watercress (*Nasturtium officinale*)
c) spirulina (*Arthrospira platensis*)
d) chlorella

**Reason:** The EU Organic Regulation allows some specific ingredients to be used as non-organic because they are not thought to be widely available in organic form. However, the EU list of permitted non-organic ingredients is outdated, and some of the items are now available as organic. Where this is the case, licensees must use the organic version. This meets consumer expectations of organic products, helps to grow the market for organic ingredients and by doing so, increases the positive impacts of organic production.

---

1 At present, for the following organic egg products, there is a shortage of product that meets the SA’s sourcing requirements: egg yolk, albumen & dried whole egg and organic processed liquid whole egg. Therefore, you may apply to us to use non-compliant organic products of these types in processed SA standard products to a maximum of 30% of the total end product and must be identified on the ingredients panel as being to EU organic regulation requirements. You will need to provide written justification for your use of organic egg ingredients that do not meet SA higher standards. And, in addition for liquid whole egg, demonstrate that you have attempted to source organic product compliant with SA higher standards, for example by providing evidence from suppliers.