Soil Association Standards
Feed processing

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The Soil Association standards put the principles of organic production into practice. These organic standards encompass *EU Regulations 834/2007, 889/2008 and 1235/2008* (referenced throughout as the EU Organic Regulation). These regulations are the legal basis for the control of organic farming and food processing in Europe and regulate how the word ‘organic’ can be used.

The Soil Association has higher organic standards than required by the EU Organic Regulation in key areas: delivering the highest levels of animal welfare, protecting human and animal health, safeguarding the environment and protecting the interests of organic consumers. These reflect our mission and vision as a charitable organisation.

Each standard has a reference which tells you which part of the EU Organic Regulation it refers to, or whether it is a Soil Association higher standard. Each Soil Association higher standard is accompanied by a ‘Why?’ box which explains the rationale behind the standard and why we expect our licensees to go further than required by the EU Organic Regulation.

Businesses across the world can become certified to the Soil Association standards. A ‘competent authority’ is authorised by EU Member States to make rulings on organic legislation. In the UK the competent authority is usually Defra or one of its devolved agencies who have delegated some controls to accredited organic certification bodies. The certification body that is appointed by the Soil Association to inspect and certify to Soil Association organic standards in the UK is Soil Association Certification. Throughout these standards ‘your certification body’ refers to Soil Association Certification. For further definitions, please refer to the separate Glossary document on our website.

The EU Organic Regulation does not cover processing of non-food crops such as for textiles and cosmetic products and certification of inputs.

The Soil Association offers standards for areas not covered by the EU Organic Regulation. These include:

- textiles
- cosmetics

Please contact us if you would like more information or visit our website.
Guide to using these standards

The standards are listed in the column on the left, with a white background for EU Organic Regulation standards and a blue background for Soil Association higher standards. Where necessary, guidance is provided in the column on the right, with a grey background to differentiate it from the standard.

- Each standard is referenced with the relevant article/s of the EU Organic Regulation or shows that it is a Soil Association higher standard.
- Each Soil Association higher standard has a Why? box to explain its purpose and rationale.

This symbol shows where you need to keep a record to demonstrate that you are meeting the standard. The specific requirements for the records will be detailed in the standard or guidance.

This symbol shows where additional relevant information is provided.

What is guidance?

Guidance provides supplementary information to the standards which explains how compliance will be assessed. It tells you where and how to provide the information required, for example through record keeping or demonstration at your inspection. The guidance may also provide examples of actions and measures to help you demonstrate compliance, and links to best practice guides and information.

### EXAMPLE Standards

#### 8.7.3 Complaints register
You must keep a complaint register for your business. This must record:

a) all complaints you make or receive  

b) any response to the complaint  

c) the action taken.

(EC) 834/2007 Art. 1(4)  
ISO17065 (4.1.2.2)(EC) 834/2007 Art. 29(2)

Keeping a record of any complaints you receive encourages transparency. It allows businesses to monitor issues and encourages good practice by ensuring there is a documented system for dealing with complaints.

The I symbol shows where additional relevant information is provided.

The relevant part of the EU organic regulation is referenced here.
### 8.13.3 Using rodent glue boards

1. You may only use glue boards for rodents as a last resort and you must:
   - a) provide evidence to show that other methods of trapping have failed or are not appropriate, before you use the glue boards;
   - b) use them according to industry best practice;
   - c) check rodent glue boards at least once every 12 hours including at weekends and Bank Holidays, as required by the *Pest Management Alliance* code of practice, and
   - d) keep a record of each check.

**Soil Association higher standard**

Records of checks

Glue boards should only be used as a last resort and you will need permission from your Certification Officer before using them. You will need to let us know what measures you have already tried, such as bait stations and proofing the unit.

- **R** Records of checks

Glue boards should not be viewed as a permanent solution to a pest problem. Certification Officers can give you permission to use glue boards but only for short periods of time to allow you to deal with a pest issue. Your pest controller will be able to make recommendations for how many trappings will be required.

This standard applies to the whole licensed unit. However, we recognise that in some cases you may not have ownership or control over the whole site – e.g. if you are renting a room in a storage facility. In these cases you must make all efforts possible to create a dialogue with the building manager and/or the pest control company responsible for the site to ensure that you are consulted prior to use of glue boards, or other pest control measures which could affect your organic status, such as fogging.

See the *Code of Practice on the Humane Use of Rodent Glue Boards* for more information.

**Why?**

In order to protect public health within high-risk environments, the use of rodent glue boards remains an important last option when all other control methods have been considered and deemed ineffective. However, their use does raise serious animal welfare concerns. This standard ensures that glue boards are only used as a last resort and only by persons who have been given adequate training and are competent in the effective and humane use of this technique.

Each Soil Association higher standard has a Why? box to explain its purpose and rationale.
# 8 General standards for feed processing

## 8.1 Scope

### 8.1.1 Scope of the feed processing standards

1. These standards apply to any unit involved in the preparation of feed for use on the same unit or for use by a third party.
2. It does not apply to pet food and feed for fur animals.
3. In the UK operators who sell organic products directly to the final consumer or user and who don’t produce, prepare, store or import them from outside the EU, do not need to be certified.

   \[(EC) 834/2007\text{ Art. 1(2)(c); Art. 8 (EC) 889/2008 Art. 59; Art. 87}\]

In the EU it is a legal requirement that all stages of the organic supply chain hold organic certification. Other activities that require certification, in addition to processing, labelling, importing and exporting detailed above, include wholesaling, storage & warehousing, acting as the first consignee for imported products and any other activities that require the physical or financial ownership of organic products or ingredients.

Without adequate certification at each stage of the supply chain, the products may not be entitled to maintain their organic status.

If you are unsure as to whether the activity you are carrying out requires certification please contact us.

### 8.1.2 Products from hunting and fishing of wild animals

Products from the hunting and fishing of wild animals cannot be sold as organic.

\[(EC) 834/2007\text{ Art. 1(2)}\]

## 8.2 Principles

### What is this chapter about?

This section details the principles on which these organic standards are based. Organic is a ‘whole system’ approach to farming and food production. It recognises the close interrelationships between all parts of the production system from the soil to the consumer. This comprehensive set of organic principles guides our work and our standards.

### 8.2.1 General principles of organic production

An organic production system must meet the following principles and objectives:

1. To produce food of high quality and in sufficient quantity by the use of processes that do not harm the environment, human health, plant health or animal health and welfare. 

This comprehensive set of organic principles guides our work and our standards.
To work within natural systems and cycles at all levels, from the soil to plants and animals.

To maintain the long-term fertility and biological activity of soils.

To treat livestock ethically, meeting their species-specific physiological and behavioural needs.

To respect regional, environmental, climatic and geographic differences and the appropriate practices that have evolved in response to them.

To maximise the use of renewable resources and recycling.

To design and manage organic systems which make the best use of natural resources and ecology to prevent the need for external inputs. Where this fails or where external inputs are required, the use of external inputs is limited to organic, natural or naturally-derived substances.

To limit the use of chemically synthesised inputs to situations where appropriate alternative management practices do not exist, or natural or organic inputs are not available, or where alternative inputs would contribute to unacceptable environmental impacts.

To exclude the use of soluble mineral fertilisers.

To foster biodiversity and protect sensitive habitats and landscape features.

To minimise pollution and waste.

To use preventative and precautionary measures and risk assessment when appropriate.

To exclude the use of GMOs and products produced from or by GMOs with the exception of veterinary medicinal products.

To sustainably use products from fisheries.

(EC) 834/2007 Art. 3; Art. 4
### 8.2.2 Specific principles of processing of organic feed

1. In addition to the overall organic principles set out in standard 8.2.1, the production of processed organic feed must be based on the following specific principles:
   a) The production of organic feed from organic feed materials, except where a feed material is not available on the market in organic form.
   b) The restriction of the use of feed additives and processing aids to a minimum extent and only in case of essential technological or zootechnical needs or for particular nutritional purposes.
   c) The exclusion of substances and processing methods that might be misleading as to the true nature of the product.
   d) The processing of feed with care, preferably with the use of biological, mechanical and physical methods.

(EC) 834/2007 Art. 7

Only certain ingredients are permitted in non-organic form in limited quantities and only for some livestock species, refer to the standards in section 9 and 10 for more information.

### 8.3 Becoming Soil Association certified

**What is this chapter about?**

This chapter explains which activities require certification and how you can certify your business to the Soil Association standards.

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>8.3.1 Certifying your business</strong> To become certified to these organic standards you must have a certification contract with an independent, accredited certification body and comply with all relevant organic standards for your organic activity.</td>
<td>Businesses across the world can become certified to the Soil Association standards. In the UK, Defra is the competent authority and has delegated some control tasks to accredited organic certification bodies. The certification body that is appointed by the Soil Association to inspect and certify to Soil Association organic standards in the UK is Soil Association Certification. In the EU, businesses can only become certified to the Soil Association standards if they are already certified to the EU Organic Regulation by another approved certification body in the relevant country. Additionally, Soil Association Certification is accredited by IOAS (International Organic Accreditation Service) and authorised to offer organic certification in specific countries outside the EU</td>
</tr>
</tbody>
</table>

(EC) 834/2007 Art. 27(1)(4); Art. 28(1)
### 8.3.2 Activities that require certification

1. In the EU all stages of the organic supply chain must hold organic certification.

2. Your business must be certified if you produce, process, package, store, label, import or export, include wholesaling, storage and warehousing, acting as the first consignee for imported products and any other activities that require the physical or financial ownership of organic products or ingredients.

3. In the UK you do not need certification if you only sell organic products directly to the final consumer or user provided that you do not produce, prepare, store organic products other than in relation to the point of sale or import such products from outside the EU or have not contracted out such activities. In other EU countries certification may be required for these activities.

(EC) 834/2007 Art. 27(3); Art. 28(1); Art. 28(2)

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Without adequate certification at each stage of the supply chain, the products may lose their organic status.

Examples of businesses not requiring certification in the UK include supermarkets and mass caterers serving food e.g. restaurants, cafes, catering companies.

If you are unsure whether the activity you are carrying out requires certification please contact us.

For more information on the certification requirements for importing and exporting please refer to the Soil Association Food and drink standards, standard 6.8.

### 8.3.3 Organic certificate

1. You are not allowed to sell products with the Soil Association symbol or with reference to organic without a valid certificate that shows that your activity complies with these organic standards.

2. Certificates are issued once Soil Association Certification has inspected your organic activity and they are satisfied that your activity meets organic standards. The certificate will list all your certified activities and the crops, livestock and/or products you are certified to produce, process and/or sell as organic.

3. The certificate may be in electronic format.

(EC) 834/2007 Art. 29(1)(3)

(EC) 889/2008 Art. 63(1)(d); Art. 68

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Soil Association Certification will issue licensees with the following documentation:

- An annual certificate with valid from and to dates, your name, address and licence number
- A Trading Schedule with your certified products, activities and status
- For producers, an Information Schedule listing your licensed enterprises, holdings and fields.

If you are a farmer with land or crops in conversion, these will be shown as ‘in-conversion’ on your Trading Schedule. Once they have gone through the relevant conversion period they will be shown as ‘organic’ on your Trading Schedule and you can start trading as organic. If your livestock are shown as ‘converted breeding stock’ they cannot be traded as organic.

Annual renewal of your licence is linked to you continuing to meet the relevant standards and payment of the relevant renewal fee. Within a year of your original application date we will send you a renewal invoice.
Soil Association Certification
Since 1973 Soil Association Certification Limited (Soil Association Certification) has certified farm enterprises, foods and other products as organic. Soil Association Certification is a wholly owned subsidiary of the Soil Association charity. We are registered with Defra to certify organic food production and processing under the terms of EU Regulation No. 834/2007.

Certification bodies must be able to prove that they have the expertise, equipment, infrastructure and sufficient number of suitable qualified and experienced staff to carry out the task of certification. Soil Association Certification Limited is accredited and subject to an annual inspection by the United Kingdom Accreditation Service (UKAS) for UK licensees and IOAS for non-EU licensees.

To uphold organic integrity and in order to work efficiently, certification bodies are obliged to communicate and exchange relevant certification information about their licensees to control authorities and other certification bodies. This includes when:

a) licensees change certification bodies
b) non-compliances are found
c) organic status of a product is lost, and
d) certification is withdrawn.

Information
If you are interested in certifying your business, contact Soil Association Certification via:


Email: GoOrganic@soilassociation.org

Phone: 0300 330 0100

Post: Soil Association Certification, Spear House, 51 Victoria Street, Bristol BS1 6AD, UK.
# 8.4 Your obligations when certified

**What is this chapter about?**
This chapter explains your responsibilities and obligations when certified to these organic standards.

## Standards

### 8.4.1 Description of your activities

1. Before starting your organic enterprise, you must describe how you will comply with these organic standards. If you make any changes to your activity you must update your certification body accordingly.
2. You must include a full description of your premises, units and activities including:
   a) the facilities used for the reception, preparation and storage of the products intended for animal feed before and after the operations concerning them
   b) the facilities used for the storage of other products used to prepare feeding stuffs
   c) the facilities used to store products for cleaning and disinfection
   d) where necessary, the description of the compound feeding stuff that you intend to produce, in accordance with Article 5(1)(a) of Directive 79/273/EEC and the livestock species or class for which the compound feeding stuff is intended, and
   e) where necessary, the name of the feed materials that you intend to prepare.

   *(EC) 889/2008 Art. 63(1); Art. 64; Art. 88*

### 8.4.2 Contracted operations

If you contract out your organic activity, in part or whole, to a third party, the information in 8.4.1 must also include:

a) a list of the subcontractors, including their activities and the certification body or authority that they are certified by
b) a written agreement by the subcontractors that their operation will comply with the control measures required as part of organic certification, and

This would include contractors used for agricultural work, such as harvesting, spraying, seed cleaning or storage.

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You must let us know if and when you plan to expand into new areas. For example, if you want to start importing products from outside the EU. Depending on what you’re adding or expanding, we will need to update your certificates and you may need an additional inspection or licence.

Soil Association Certification will use the measures you describe to draw up a risk assessment of your operation. This will be used to inform the number and frequency of random sampling that you will be subject to.
c) details of all the practical measures taken to ensure and demonstrate full traceability of products.

**(EC) 834/2007 Art. 28(1)**

**(EC) 889/2008 Art. 86**

### 8.4.3 Declaration

You must sign a declaration stating that you:

a) have described your organic enterprise and activities as referred to in 8.4.1 accurately

b) will perform your operations according to organic rules

c) accept any enforcements in case of non-compliance

d) inform the buyers of loss of status of your product

e) accept exchange of information about your operation between different certification bodies or control authorities where dual certified

f) accept handing over information about your certification history when changing certification body or control authority

g) will inform your certification body or control authority immediately of any breaches affecting the organic status of your product or organic products received from other operators or subcontractors

h) in the case of withdrawing certification inform the certification body or control authority without delay

i) accept that your certification body or control authority retains your certification history for a minimum of 5 years

j) must inform the certification body of any changes to your activities.

**(EC) 889/2008 Art. 63(2); Art. 64**

This is covered in the contract and declaration you sign after every inspection.

### 8.4.4 Other statutory requirements

You must make sure your organic business and operations comply with all statutory regulations in your country.

**(EC) 834/2007 Art. 1(4); Art. 34(2)**

This includes but is not limited to requirements concerning:

- premises
- equipment
- staff facilities
- general hygiene
8.4.5 Employment

You must **not** use forced or involuntary labour or child labour that interferes with their education.

*Soil Association higher standard*

Note that this standard is also a requirement of several EU Directives including 94/33/EC Protection of Young People at Work, and 2011/36 Preventing and combating trafficking in human beings and protecting its victims. If you are outside the EU, it may be a requirement of the International Labour Organisation Conventions that have been ratified in your country. If it is not you must still meet this requirement.

Labour management tools, such as Sedex, can be a useful way of helping to ensure that you meet this standard and identify, mitigate and manage risks in your supply chain.

**Why?**

Organic food which has been produced in a way that compromises the basic rights of people is counter to the principles and expectations of the organic movement and organic consumers.

8.4.6 Certification code

1. Each certification body is issued with a unique certifier code. In the UK the Soil Association Certification’s code is ‘GB-ORG-05’.

    *(EC) 834/2007 Art. 27(10)*
    *(EC) 889/2008 Art. 58*

2. You must use this code if you are packing and labelling products yourself or if another Soil Association certified business in the UK is packing or labelling the product on your behalf.

Please refer to the labelling section 8.8 for more information on labelling requirements.

If you are certified outside of the UK you can find the certifier code in Annex IV of *Commission Regulation (EC) No 1235/2008*. 
## 8.5 Inspections

### What is this chapter about?
This chapter explains the certification and inspection process and details your obligations as a licensee and the obligations of the certification body during the inspection process.

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
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</table>
| **8.5.1 Inspection visits** | We may carry out additional inspections if:  
- you wish to add a new enterprise to your licence  
- you move to new premises  
- we receive a complaint regarding your business  
- it is necessary to inspect seasonal activity or at different times of year  
- we need to inspect again to make sure you have corrected non-compliances  
- you are selected as part of our additional inspection programme and/or our risk assessment of your operations suggests the need for this. |
| 1. A physical inspection of your organic certified activities must be carried out once per year. You may be subject to additional announced or unannounced inspections based on an assessment of risk. |  
We may charge you for these additional inspections if we consider they are needed because of non-compliances.  
At least 10% of a certification body’s inspections must be unannounced and 10% must be risk-based extra inspections. These are based on the general evaluation of the risk of non-compliance with the organic production rules, taking into account at least the results of previous controls, the quantity of products concerned and the risk for exchange of products. |
| 2. If you are a wholesaler dealing only with pre-packaged products you may be subject to a reduced frequency of inspections. |  
(EC) 834/2007 Art. 27(3)(5)  
(EC) 889/2009 Art. 65(1)(4); Art. 92c(2) |
| 3. You may also be inspected by your competent authority as part of their surveillance of our inspection procedures. |  
As part of the closing meeting your Inspector will explain any non-compliances found during your inspection and will ask you to sign a Declaration and explain the need to complete an Action Summary Form (usually left with you at the end of inspection) which lists the outcomes of the inspection. This includes any areas that do not comply with the standards and asks how you will correct them. It may also ask for extra information to complete the approval process. |

### 8.5.2 What happens at the inspection
1. At your inspection Soil Association Certification will:  
   a) verify that the description of your activities provided in your declaration is accurate  
   b) verify whether your activities are compliant with organic standards, and  
   c) compile an inspection report with any possible deficiencies and non-compliances found.  
2. You or an appointed representative must sign the inspection declaration stating that you agree with the outcomes of the inspection and to undertake necessary corrective actions.  
   (EC) 889/2008 Art. 63(2); Art. 65(3); Art. 82(3)  
As part of the closing meeting your Inspector will explain any non-compliances and supply any other information requested, before the deadline given. When we have received your returned form and agreed the information you have given is satisfactory, we will approve your corrective actions and issue/reissue your certificate.
### 8.5.3 Access to facilities
You must give Soil Association Certification or your control authority:

- **a)** access to all parts of your unit and all premises, including any non-organic production units and any storage premises for input products which it deems necessary in order to certify your organic activities.
- **b)** access to accounts and relevant supporting documents which it deems necessary in order to certify your organic activities.
- **c)** any information reasonably necessary for the purposes of certifying your organic activities, and
- **d)** when requested, the results of your own quality assurance programmes.

(EC) 899/2009 Art. 63(3); Art. 67(1); Art. 73; Art. 79; Art. 79d

### 8.5.4 Sampling
You must allow Soil Association Certification to take samples which will be analysed for the presence of prohibited substances and checking compliance to organic standards.

(EC) 889/2008 Art. 65(2)

We will take samples if there is a risk that organic standards have not been complied with or to verify that sufficient measures are in place to prevent contamination of organic products. Certification bodies are obliged to take samples from the equivalent of 5% of their licensees per year.

### 8.5.5 Specific rules for feed processing inspections
1. If you process organic feed you must be subject to a full physical inspection of all your premises.
2. At your inspection your certification body will pay particular attention to the critical control points of your activity to establish whether your surveillance and checking procedures are carried out correctly.
3. You may be subject to further inspections based on an evaluation of your operation’s potential risk to organic integrity.

(EC) 889/2009 Art. 90
## 8.6 Non-compliance with the standards

### What is this chapter about?
This chapter deals with non-compliances. A non-compliance is when an activity does not comply with an organic standard.

### Standards

#### 8.6.1 Non-compliances

1. Where you are found not to comply with organic standards Soil Association Certification will issue you with a non-compliance. The level of sanction will be proportionate to the severity and extent of the non-compliance and the risk it poses to the integrity of the organic product. Soil Association Certification will always apply the precautionary principle when making decisions on compliance to organic standards.

2. Depending on the severity of the non-compliance Soil Association Certification may suspend or even withdraw your licence. If your licence is suspended or withdrawn you must **not** trade as organic.

   *(EC) 834 Art. 27(2)(6)(12); Art. 30(1)*

   *(EC) 889/2008 Art. 92d*

<table>
<thead>
<tr>
<th>Standards</th>
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<tbody>
<tr>
<td>After your inspection we will draw up an <em>Action Summary Form and Declaration</em> (either at inspection or we will send it to you afterwards). This lists areas that do not comply with the standards and asks how you will correct them. The different grades of sanctions are as follows:</td>
<td></td>
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<tr>
<td>• minor non-compliance</td>
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<tr>
<td>• major non-compliance</td>
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<td>• critical non-compliance, or</td>
<td></td>
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<td>• manifest infringement.</td>
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<tr>
<td>You are required to complete the <em>Action Summary Form and Declaration</em> with the actions you will take to comply with the standards, and return it to us with any other information we request before the deadline given. When your Certification Officer has received your completed form and agreed that the information you have given is satisfactory they will approve the <em>Action Summary Form and Declaration</em> and renew your licence.</td>
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<tr>
<td>We may suspend or withdraw your licence in the following cases:</td>
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<tr>
<td>• if you are in breach of your contract with us</td>
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<tr>
<td>• if you do not pay your fee within the deadlines</td>
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<tr>
<td>• failure of licensee to return certified sales declaration (CSD)</td>
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<tr>
<td>• we are unable to arrange an inspection</td>
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<tr>
<td>• an inspector is refused access to premises</td>
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<tr>
<td>• an inspector is refused permission to take a sample</td>
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</tr>
<tr>
<td>• if you do not send the completed <em>Action Summary Form and Declaration</em>, or the information we request, within the deadlines</td>
<td></td>
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<tr>
<td>• severe or repeated non-compliance resulting in loss of organic integrity of an operation, product or batch</td>
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<tr>
<td>• a fraudulent activity is reported by an authority.</td>
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</tbody>
</table>

### 8.6.2 Reporting non-compliances

You must inform your Certification Officer if you have any suspicion that a product may not meet organic standards and stop any further sale of the product as
1. If you consider or suspect that any of your products do not meet organic standards, then you must inform Soil Association Certification immediately and share all relevant information to assist with any further investigation to determine the organic status of the product. You must also either:
   a) Withdraw any reference to organic in relation to the product.
   b) Separate or identify the product and only allow it to be further processed or sold as organic once any doubt has been eliminated and this has been agreed with us.

   *(EC) 889/2008 Art. 91(1)*

2. If we have a substantiated suspicion that you intend to place a product on to the market as organic which does not meet organic standards, we will tell you to withhold the product for a set time period whilst we investigate. Before we make this decision we will give you opportunity to comment. You will need to cooperate fully with any investigation to resolve the suspicion.

   If the suspicion is confirmed, then you must remove any reference to organic from the product. If the suspicion is not confirmed within the set time period, then you no longer have to withhold the product from sale.

   *(EC) 889/2008 Art. 91(2)*

### 8.6.3 Exceptions
You may only deviate from the standards when explicitly permitted in these standards. Permission may be granted or confirmed by your certification body.

*(EC) 834/2007 Art. 27(7)(b)*

### 8.6.4 Appeals and complaints
We appreciate there may be occasions when you wish to make a formal complaint to us. This could be regarding service, standards, policy, another licensee or an unlicensed company. We have formal complaints and appeals.

If you have a complaint please send details in writing to cert@soilassociation.org or telephone Client Services on 0117 987 4564.

If you wish to appeal a certification decision please send full details to your Certification Officer.

*Note: If you receive a positive detection, but from the information you have, you believe that the product still meets organic standards, then you do not have to inform us of the detection. You need to have justification as to why you believed it still met organic standards and keep that information on file so that we can check it at inspection if necessary. If you are unsure what action to take, please contact the technical team at sacl.notifications@soilassociation.org.*
8.7 Record keeping

What is this chapter about?
This chapter details all the records that you will need to keep and have available at your inspection.

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>8.7.1 General record keeping</td>
<td>Standards 8.7.1 – 8.7.3 apply to all licensees. More specific record keeping requirements for feed operations follow below.</td>
</tr>
<tr>
<td>1. You must have a record keeping system in place which allows you to prove the organic status of your products. Your records need to cover all production stages from everything produced or bought in through to all goods sold or dispatched and must allow you to demonstrate the balance between input and output. They must also allow retrospective traceability.</td>
<td>Your records need to be sufficient for us to be able to carry out successful mass balance (input and output) and traceability exercises at your inspection. You will need to be able to demonstrate that you have bought/received sufficient organic material for the quantity you have sold/dispatched.</td>
</tr>
<tr>
<td>2. You must keep stock and financial records at your unit or premises which make it possible to verify the following information for every product:</td>
<td>You need to have a system to keep track of procedures and records to ensure they are correct, up-to-date and effective.</td>
</tr>
<tr>
<td>a) the suppliers, sellers or exporters</td>
<td></td>
</tr>
<tr>
<td>b) the nature and quantities of organic products delivered, including where relevant:</td>
<td></td>
</tr>
<tr>
<td>i) nature and quantities of all materials bought and the use of such materials</td>
<td></td>
</tr>
<tr>
<td>ii) the composition of compound feed stuffs</td>
<td></td>
</tr>
<tr>
<td>c) the nature and quantities of organic products held in storage</td>
<td></td>
</tr>
<tr>
<td>d) the nature, quantities, and consignees or buyers (other than final consumers) of any products which have left your unit, premises or storage facility.</td>
<td></td>
</tr>
<tr>
<td>3. If you do not store or physically handle organic products, you will still need to keep records of:</td>
<td></td>
</tr>
<tr>
<td>a) the nature and quantities of organic products bought and sold</td>
<td></td>
</tr>
<tr>
<td>b) the nature and quantities of organic products sold</td>
<td></td>
</tr>
<tr>
<td>c) the nature, quantities, and consignees or buyers (other than final consumers) of any products which have left your unit, premises or storage facility.</td>
<td></td>
</tr>
</tbody>
</table>

Your records need to include:

- checked organic status of goods delivered as per standard 8.14.3
- quantities, batch codes and invoices and delivery notes of goods received
- quantities and batch codes of ingredients used in production/packing
- quantities produced in each production/packing run
- evidence that you processed organic and non-organic products separately
- evidence that you cleaned according to these standards before production
- batch codes of goods out
- what you have sold/dispatched, how much and to whom
- the organic products sale value
- annual stock takes
- any pest control treatments used
- Certificates of Inspection (COIs) if applicable.
b) the suppliers, and where different, the sellers or the exporters

c) the buyers, and where different, the consignees.

\[(EC\) 889/2008 Art. 26(2)(3)(5)(c); Art. 66(1)(2)\]

You do not have to record sales value if you do not sell the product, for example, if you store product on behalf of another licensed organic company and do not sell that product to anyone.

You need to carry out at least annual stock takes and record these (however, if you are handling a large volume of goods it may be beneficial to you to do this more frequently). These are necessary for our Inspector to have a starting point to conduct a mass balance.

It is up to you to choose a traceability code system that works for you and your products. Some companies will use a batch code system, whereas others may be able to use the best before date on a product. Please see the record keeping standards below for more information about the importance of traceability in organic systems.

You need to keep all records for at least shelf-life plus 12 months (or if product can be frozen then the records should be kept for shelf-life plus frozen time plus 12 months), with the exception of Certificates of Inspection which must be kept for 2 years. Please refer to section 6.8 Importing, of the Soil Association food and drink standards for details.

Also, make sure that your records meet any other legally required time scales that might be specific to your products.

### 8.7.2 Verifying certification documents

1. You must verify the certification documents of your suppliers and check that they:
   a) identify your supplier,
   b) cover the type or range of products you are purchasing, and
   c) are valid at the time you are making the purchase.

2. You must make a record of these checks.

\[(EC\) 834/2007 Art. 29(2)\]

A certification document will be the organic certificate, or in the case of Soil Association Certification licensees this includes the certificate and trading schedule. The name and address on the certificate must match the name and address of your supplier (the company you are purchasing from).

When you receive goods, you will also need to make the checks detailed in 8.14.3

Tools such as BioC could be used as a way of doing this.

### 8.7.3 Complaints register

You must keep a complaint register for your business. This

\[I\]

Keeping a record of any complaints you receive encourages transparency. It allows businesses to monitor issues and encourages good practice by...
8.8 General labelling

What’s this chapter about?
This section contains the labelling standards which need to be met if you wish to label your product as organic.

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
</table>
| **8.8.1 Using the term organic** | If you wish to refer to organic in relation to an agricultural food or feed product anywhere on a label, in advertising materials or commercial documents, you must meet the requirements of these standards. 

(EC) 834/2007 Art. 23(1) | Labelling refers to the way in which you identify your products and show their organic status. The labelling standards apply to:
- retail packaging
- bulk packaging
- the labelling of loose produce for sale in retail outlets
- information on delivery notes or invoices for products that are transported in bulk, such as milk
- marketing materials, and
- web content.

Defra have provided guidance to UK certification bodies regarding marketing of pet food. If a pet food product is marketed as Organic then organic certification of the product is required and use of the EU organic logo would be permitted, although not required. If reference to organic is made in the ingredients list only, organic certification is not required and the EU organic logo could not be used. |

| 8.7.4 Additional records for units preparing feed | In addition to standard 8.7.1 your records must include information on the origin, nature and quantities of feed materials, additives, sales and finished products. 

(EC) 889/2008 Art. 89 | ensuring there is a documented system for dealing with complaints. |

must record:  
- all complaints you make or receive  
- any response to the complaint  
- the action taken. 

(EC) 834/2007 Art. 1(4)  
ISO17065 (4.1.2.2) | Defra have provided guidance to UK certification bodies regarding marketing of pet food. If a pet food product is marketed as Organic then organic certification of the product is required and use of the EU organic logo would be permitted, although not required. If reference to organic is made in the ingredients list only, organic certification is not required and the EU organic logo could not be used. |
This includes reference to organic not just in the product name or sales description, but also in relation to ingredients of a food or feed product. For example, a cereal bar making organic claims about some of the ingredients may only do so if the cereal bar is certified to the organic regulation.

This only applies to food and feed products. However, if you make such claims on non-food and feed products (such as textiles, health and beauty products, and pet food) your claims must still be true. In the UK all products are governed by the *Trade Descriptions Act*.

Examples of other references to organic include, "organically grown"; "organically produced"; "grown/produced using organic principles"; "grown/produced using organic methods".

### Labelling legislation
Along with meeting these standards for labelling, you will also need to make sure your labels meet other relevant labelling legislation such as *Regulation 1169/2011* on the provision of food information to consumers, and the *Food Information Regulations*.

---

<table>
<thead>
<tr>
<th><strong>8.8.2 Using the EU organic logo</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. You must display the EU logo on labels of packaged organic food products produced in the EU.</td>
</tr>
<tr>
<td>2. The EU logo is published for use in green as shown below. The reference for single colour printing is Pantone 376, or if you print using four colour process, 50% cyan, 100% yellow.</td>
</tr>
</tbody>
</table>

The use of the logo is mandatory for all organic pre-packaged food produced within the European Union. The use of the logo is not mandatory for pre-packaged animal feed. If you wish to use the logo on voluntary basis you must meet the requirements on its use as set out in this standard and in the standards in section 9. The terms of its use are set by the EU and more information can be found online.

You can download the EU logo in various formats from here.

The white EU logo with the black stars is designed to be used on a dark background only. When the EU logo is used it must appear within a box or a black outline.
3. Where colour is not possible you may use black and white.

4. The EU organic logo must:
   a) appear at least 9mm high and 13.5mm wide, or
   b) appear 6mm high for very small packages, and
   c) have a proportional height to width ratio of 1:1.5.

5. The EU organic logo may appear:
   a) in negative, if the background of your packaging is dark.
   b) in the single colour of your packaging if you are only able to print one colour.
   c) with an outer line around it to improve how it stands out on coloured backgrounds.

If your product is being packed outside the EU, you do not need to apply the EU logo. However, due to the widespread recognition of the EU logo across Europe you may wish to apply it if the products are destined for the EU market.

Products without packaging do not need to display the EU logo (see standard 8.14.2 for details of what you need to include).
6. You do not have to use the EU organic logo on products imported from countries outside the EU, but if you do, you must also use the declaration of where the ingredients have been farmed and the certifier code. If you do not use the EU logo and code, you must identify your certifier by name.

(EC) 834/2007 Art. 24(1)(b)(c); Art. 25

### 8.8.3 Declaring ingredient origin

1. Where the EU logo is used you need to include a declaration of where the ingredients have been farmed or grown as 'EU agriculture', 'non-EU agriculture', or 'EU/non-EU agriculture'. This must appear:
   a) in the same visual field as the EU organic logo;
   b) below the certifier code, and
   c) no more prominent than the sales description.

2. You can replace 'EU' or 'non-EU' with a particular country if all ingredients were farmed or grown there. You do not have to count small amounts of ingredients up to a total of 2% of the agricultural ingredients.

(EC) 834/2007 Art. 24(1c)
(EC) 889/2008 Art. 58(2)

### 8.8.4 Using the Soil Association symbol on products

1. You can only use the Soil Association symbol on organic products that meet the Soil Association standards.

2. You must reproduce the symbol from original artwork and it must appear:
   a) complete and upright
   b) in proportion to the product description
   c) at least 10mm in diameter (example 'A')
   d) in black or white (examples 'B' and 'C')

For more information on how to become certified to the Soil Association standards and the use of our symbol, please refer to section 8.3. Retailers who are exempt from being certified (standard 8.3.2) may sell Soil Association certified products which include the SA symbol on their labelling, and make use of the Soil Association symbol in the marketing of those products provided it is clear and unambiguous as to which products the symbol applies.

You can download the symbol pack directly from our [website](#). We also have the symbol available for use in Welsh and Gaelic.
3. The symbol must not appear:
   a) against a background that affects the legibility of the symbol (example ‘E’)
   b) incomplete
   c) at an angle
   d) within an extra circle either of an outline or solid colour (example ‘F’)
   e) in more than one colour (example ‘G’)
   f) with a different font or typeface (example ‘H’)

Examples of how not to use the symbol are shown below.
The Soil Association symbol is the most recognised organic certification mark in the UK and has gained the trust, respect and confidence of consumers and producers across the globe. The Soil Association symbol demonstrates that an organic food or non-food compliant product meets our higher standards for animal welfare, health, consumer protection and the protection of the natural environment.

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>8.8.5 Using the Soil Association symbol off-product</strong></td>
<td>You can download the symbol pack directly from our <a href="#">website</a>. We also have the symbol available for use in Welsh and Gaelic.</td>
</tr>
<tr>
<td>You may use the symbol on company stationery, promotion, literature and websites if we certify a range of your products, providing it is not misleading to the consumer as to which products the symbol applies.</td>
<td></td>
</tr>
</tbody>
</table>

**Why?**

The Soil Association symbol should only be used in relation to products or enterprises certified to Soil Association standards to avoid misleading consumers.
### 8.9 Detailed labelling requirements for feed

**What is this chapter about?**
This section contains the specific requirements for labelling feed.

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>8.9.1 Rules on describing feed</strong></td>
<td>If you cannot source 100% organic ingredients you need to demonstrate to us you have tried to source that ingredient as organic, recording who you have contacted and why an alternative organic ingredient is not suitable or available. You must obtain our permission before you use that non-organic ingredient.</td>
</tr>
<tr>
<td>1. You may only describe livestock feed as organic, use the organic logo or refer to it as organic in trademarks or sales descriptions if:</td>
<td>Refer to standard section 9 for the list of permitted non-organic ingredients for livestock feed and standard section 10 for permitted non-organic ingredients for aquaculture animal feed.</td>
</tr>
<tr>
<td>a) the processed feed complies with these standards, and</td>
<td>These permissions will normally be for three months at a time. If you are replenishing your stocks within this time, you must source the ingredient as organic if it has become available</td>
</tr>
<tr>
<td>b) 100% of the ingredients of plant or animal origin are certified organic, and</td>
<td></td>
</tr>
<tr>
<td>at least 95% of the total dry matter of the product is certified organic agricultural ingredients.</td>
<td></td>
</tr>
<tr>
<td>2. You must not describe feeds as organic that contain:</td>
<td></td>
</tr>
<tr>
<td>a) in-conversion ingredients</td>
<td></td>
</tr>
<tr>
<td>b) permitted non-organic ingredients, and</td>
<td></td>
</tr>
<tr>
<td>c) more than 5% of total dry matter permitted non-agricultural ingredients.</td>
<td></td>
</tr>
<tr>
<td>3. You may use the following statement on feeds which meet point 1 a) and point 2:</td>
<td></td>
</tr>
<tr>
<td>'may be used in organic production in accordance with Regulations (EC) No 834/2007 and (EC) No 889/2008'.</td>
<td></td>
</tr>
</tbody>
</table>

### 8.9.2 Labelling requirements for feed

1. The term organic on feed labels must be: | |
| b) presented in a colour, format or character font that does | |
not draw more attention to it than the description or name of the feed
c) accompanied in the same field of vision by details of the following on a dry matter basis:
   i. percentage of organic feed ingredients
   ii. percentage of in-conversion feed ingredients
   iii. percentage of non-organic feed ingredients
   iv. percentage of feed ingredients of agricultural origin
d) accompanied by a list of all feed ingredients.

2. The label may be accompanied by a reference to the requirement to use feedstuffs in accordance to standards 9.1.12 and 9.1.13.

8.9.3 In-conversion products

1. In conversion products of plant origin may bear the indication ‘product under conversion to organic farming’ providing that:
   a) it has to have been grown on land that has gone through at least a 12 month conversion period before the crop was harvested
   b) the indication must not be more prominent in colour, size and style of lettering than the sales description of the product. The words ‘organic farming’ must not be more prominent than the words ‘product under conversion to’
   c) the product contains only one agricultural ingredient, which must be of plant origin, either processed or unprocessed, and
   d) the indication includes the certifier code.

2. You must not use the EU logo on in-conversion products.
8.9.4 Compulsory indications for labelling feed

1. Where feed products are labelled as organic, the labelling must include the following:
   a) When the EU logo is used, an indication of where the ingredients were farmed as referred to in standard 8.8.3.
      (EC) 834/2007 Art. 24(1)(c)
      (EC) 889/2008 Art. 58(2)
   b) The code of the certifier who certifies the company that applies the labels (which may or may not be you). This must appear in the same visual field as the EU organic logo.
      (EC) 834/2007 Art. 24(1a)
      (EC) 889/2008 Art. 58(1d)
   c) A traceability code, such as a batch or date code.
      (EC) 889/2008 Art. 31(1d)
   d) The EU logo, statement of agricultural origin and code of the certifier must be marked in a conspicuous place in such a way as to be easily visible, clearly legible and indelible.
      (EC) 834/2007 Art. 24(2)

Guidance for each point is set out below:

a) Statement of agricultural origin
   See standard ‘Declaring ingredient origin’ (8.8.3) for details.

b) Certifier code
   Each certification body has its own code which its operators need to use on pack. Soil Association Certification’s code in the UK is GB-ORG-05. If you are packing and labelling the product yourself or a Soil Association certified company in the UK is packing or labelling the product on your behalf, this is the code that is to be used.
   
   However, if you use another company to apply packaging or labels to your product(s), you need to use the code of their certification body on pack, even if the product carries the Soil Association symbol. For example, if you are using a French contract packer certified by Ecocert, use the Ecocert code FR-BIO-01, do not use GB-ORG-05. The certification code of your subcontractor is usually featured on their organic certificate.
   
   If your product is labelled outside the EU and you are not using the EU logo then you do not have to use the certifier’s code, but you must include the name of the certifier.
   
   If you are in any doubt as to what certifier code you should use on your labels please do contact your Certification Officer for guidance.
   
   Labels of non-food products, such as textiles and health and beauty care, or medicinal products must not include the code of the certifier. This is because they fall outside the scope of the EU organic regulation.
   
   c) Traceability code
   Your labelling must include a traceability code. Please refer to the record keeping standards (8.7) for details.
8.10 Making claims on your labels

What is this chapter about?
The standards in this section outline the requirements relating to certain labelling claims. As well as meeting the requirements of these standards, you will need to make sure your products meet all statutory labelling legislation.

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>8.10.1 Using accurate descriptions</strong></td>
<td>Your sales description and product name will need to accurately describe your product. You can’t use the word organic, even if it is part of your company trade name, in relation to non-organic products (e.g. on labels).</td>
</tr>
<tr>
<td>1. The term ‘organic’ can only be used to describe products (in labels, advertising and commercial documents on products) that meet the requirements of these standards, unless the term is not being used in relation to agricultural products in food or feed, or clearly have no connection to organic production.</td>
<td><strong>Substantiating claims</strong></td>
</tr>
<tr>
<td>2. You must not use any terms, including terms used in trademarks, labels or advertising, that could mislead consumers into believing products are organic when they are not.</td>
<td>You will need to be able to substantiate any claims that you make on your labels.</td>
</tr>
<tr>
<td>(EC) 834/2007 Art. 23(2)</td>
<td>For example:</td>
</tr>
<tr>
<td></td>
<td>You should not use phrases such as ‘GMO free’ unless you can prove this, if challenged. Instead you could use:</td>
</tr>
<tr>
<td></td>
<td>• ‘organic standards prohibit the use of GM materials’, or</td>
</tr>
<tr>
<td></td>
<td>• ‘non-GM’.</td>
</tr>
<tr>
<td></td>
<td>You should not use phrases such as ‘pesticide free’ unless you can prove this, if challenged. Instead you could use:</td>
</tr>
<tr>
<td></td>
<td>• ‘Less pesticides’, or</td>
</tr>
<tr>
<td></td>
<td>• ‘Organic farming uses virtually no pesticides’, or</td>
</tr>
<tr>
<td></td>
<td>• ‘No system of farming has lower pesticide use’</td>
</tr>
<tr>
<td></td>
<td>We worked closely with the Advertising Standards Authority to draw up a document of approved advertising claims you can make when selling organic. You can find a copy on our website.</td>
</tr>
<tr>
<td></td>
<td><strong>Labelling must not be misleading</strong></td>
</tr>
<tr>
<td></td>
<td>You need to make sure that the way you label your products is not misleading.</td>
</tr>
</tbody>
</table>
8.11 Preserving organic integrity

What is the chapter about?
The standards in this section cover which substances are prohibited and what you need to do to prevent contamination.

<table>
<thead>
<tr>
<th>Standards</th>
</tr>
</thead>
<tbody>
<tr>
<td>8.11.1 Reducing the risk of contamination</td>
</tr>
</tbody>
</table>

You must identify any risk of contamination to your organic products by any unauthorised or prohibited substances and prevent confusion.

Examples of risks include:

- **Environmental**
ensure measures are in place to reduce the risk of contamination. When new risks are identified, you must review the measures you have in place and ensure they remain appropriate. The risks identified and the measures in place must be documented.

(EC) 889/2008 Art. 26(1)&(2); Art. 63(1)(c)

- Contamination from nearby non-organic, or historically treated, processing or storage areas.

**Management**
- Insufficient separation, clean down or procedures when carrying out non-dedicated production including equipment, processing, storage, packaging and transport.
- Cleaning materials insufficiently rinsed off product contact surfaces.
- Ineffective identification of organic and non-organic products at all times.
- Insufficient staff training and ongoing management to ensure procedures are being followed correctly.
- Insufficient pest management.
- Products that may be in contact with crops.

**Risk products**
- Chemical or GM contamination from non-organic inputs (e.g. manure, feed, minerals, pesticides, fertilisers).
- Using risk ingredients – they may be a risk depending on what they are or where they come from. For example, some ingredients like maize and soya from countries like USA, Brazil, Argentina and Canada have a higher risk of being contaminated by GMOs.
- Residues or contaminants from packaging, such as synthetic coatings for cheese if they contain fungicides or wood that has been treated with preservatives.

You must document how you manage organic integrity, for example through your HACCP or quality management system.

Where pesticide residue testing is carried out we recommend it is carried out by a laboratory accredited to the ISO 17025 standard. If possible, the actual test method should also be accredited to ISO 17025 or equivalent.

Staff training is an important way to ensure that risk of contamination is minimised. Ensure that all new staff are adequately trained and that all staff are trained as and when changes are made to the Soil Association organic standards and your own operational procedures.
**8.11.2 Genetic modification**

1. Products labelled as consisting of or made from GMOs must never be described as organic.
   
   *(EC) 834/2007 Art. 23(3)*

2. You must **not** use GMOs or products made from or by GMOs or their derivatives. You must be able to demonstrate that any food, feed, processing aids, additives, micro-organisms, plant protection products, fertilisers, soil conditioners, seeds, vegetative propagating materials and animals used in organic production do not contain any GMOs or their derivatives.

3. For food and feed products in the EU, Directive 2001/18/EC, Regulation (EC) 1829/2003 or Regulation (EC) 1830/2003 are applicable, and you may rely on labels or any other accompanying documents to confirm that they are non-GM, unless you have other information that the products do not meet the Directive and Regulations listed above.

4. For products that are not food or feed, or products that could be produced by GMOs or for products we are certifying outside the EU, you will need to get confirmation from your suppliers, in the form of a non-GM declaration, that the products supplied have not been produced from or by GMOs.
   
   *(EC) 834/2007 Art. 9(1)(2)(3)*

   *(EC) 889/2008 Art. 69; Annex XIII*

5. For Soil Association products and ingredients you will need to provide additional information to demonstrate their non-GM status.

   *Soil Association higher standard*

In the EU, if a product contains GMOs or their derivatives then it must be labelled as such, (as described in 8.11.2.3) so the regulation allows labels to be relied upon as evidence to indicate whether food contains GMOs or their derivatives. This would apply to products such as agricultural crops, like maize and soya, or their derivatives like lecithin or starch. However, Directive 2001/18/EC, Regulation (EC) 1829/2003 and Regulation (EC) 1830/2003 do not extend to the use of ingredients produced by genetically modified micro-organisms. For example, enzymes and vitamins. This means that it cannot be automatically assumed that a product complies with the specific GMO requirements of the organic regulations. For this reason, we require a completed GMO declaration for all products that may be a GM risk.

Our GMO declaration form explains which additives, processing aids and ingredients are GMO risks. Your Certification Officer can also confirm any other ingredients which are a GMO risk.

There is a specific form to be used for licensees producing products under a Soil Association Standards license and a separate form to use for licenses producing product under an EU-only licence. This is because the Soil Association has additional requirements in this area, as outlined in 8.11.2.5.

Please contact us if you need a blank template of the non-GM declaration form for your suppliers to complete.

8.11.2.3 also says, if you have other information that the products do not meet the GM labelling requirements then you cannot rely on the information stated on the label. For example, test results which show GM DNA in the product. If you or a third party tests any of your organic products and gets a positive result, you must inform us of that result as soon as possible.

Farmers purchasing animal feeds may rely on the information provided on the labels, or accompany documents. Feed used must be certified organic so any checks on GM status will have been done by the feed processors.

As part of due diligence and controlling risks, operators who import/process/trade GM risk organic ingredients may wish to carry out testing.
GM ingredients have no place in organic food. In order to provide additional assurance that Soil Association certified products and ingredients do not contain GM, we require suppliers of risk products and ingredients to provide additional verification to prove their non-GM status.

**Why?**

**8.11.3 Nanoparticles**

1. Organic products must **not** contain or consist of engineered nanoparticles.  
   *Soil Association higher standard*

2. This standard does not apply to incidental nanoparticles.  
   *Soil Association higher standard*

Incidental nanoparticles not prohibited by this standard include:
- Substances that are incidental by-products of other manufacturing processes (such as milling or homogenisation).
- Naturally occurring nanoparticles, for example, from volcanic eruptions, in wood smoke or sea spray.

The definition of manufactured nanoparticles reflects the definition of nanomaterials in the Food Information for Consumers regulation 1169/2011.

Examples of products that we know may contain manufactured nanoparticles and that are commercially available include titanium dioxide and zinc oxide used in health and beauty products. The manufactured nanoparticle versions of these products are transparent.

**Why?**

Nanomaterials may introduce new or heightened risks of toxicity, which are currently little understood. The possible effects of these nanomaterials on the environment, human and animal health are currently unknown. Nanotechnology involves the manipulation of materials and the creation of structures and systems at the scale of atoms and molecules. This can be either through simple physical processes or by specific engineering.

Nanomaterials include:
- nanoparticles and nanoemulsions
- nanostructures including nanocapsules, nanotubes, fullerenes (buckyballs), quantum dots and nanowires.

The properties of nanomaterials can differ significantly from those at larger scales because quantum effects start to occur at the nanoscale. These differences may be in chemical reactivity and biological activity, solubility and mobility, colour and transparency, among others.
These are examples of known and developing uses of nanotechnology:

- food additives, such as for flavouring, enhanced absorption of nutrients or modifying texture
- in health and beauty products, such as in transparent mineral sunscreens and make-up products
- in packaging, including quantum dots for traceability, UV light filters, nanoclays as gas barriers and carbon nanotubes to alter strength-to-weight ratio
- medicinal, such as drug delivery, DNA vaccines and advanced therapies
- environmental, such as soil remediation
- pesticides, such as pesticide delivery in nanoemulsions, and
- textiles, such as stain and water resistant coatings.

### 8.12 Cleaning

**What is this chapter about?**

The standards in this section which cleaning products and measures are permitted for different organic activities in order to minimise the use of chemical substances and risk of contamination.

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>8.12.1 Cleaning measures</strong></td>
<td><strong>Your cleaning procedures must detail how you clean harvesting/handling equipment, storage areas and equipment used for organic production. Explain how you limit the risk of contamination of organic product from microbial contaminants, from cleaning chemicals, non-permitted substances and from non-organic product.</strong></td>
</tr>
<tr>
<td>1. You must have suitable cleaning measures in place to prevent contamination and maintain the integrity of your products throughout production, processing and storage.</td>
<td>You will need to ensure your staff, or contractors using their own equipment, are trained to carry out effective cleaning to prevent contamination of your organic products.</td>
</tr>
<tr>
<td>2. You must monitor your cleaning measures to make sure they are effective and keep records to show that you have done this.</td>
<td>Your cleaning procedures need to be clear and need to set out what will be cleaned, how, with what frequency (e.g. daily, weekly, monthly or annually), who is responsible, what chemicals and equipment needs to be used and details of the final rinse of food contact surfaces with potable water (where appropriate).</td>
</tr>
<tr>
<td>3. If you process or store both non-organic and organic at the same site, you must ensure organic processing or storage is only carried out once suitable cleaning of the equipment and/or storage area(s) has been carried out.</td>
<td>Even if you do not produce organic, for example, if you just wholesale or transport, cleaning is still important to minimise the risk of contamination. For</td>
</tr>
</tbody>
</table>
example, loading equipment and vehicles need to be cleaned and the risk of contamination minimised.

Records of cleaning measures

**Cleaning chemicals**
Detergents, disinfectants, sterilants and sanitisers allowed for use in the food industry may be used for cleaning equipment and storage areas. Residues of these chemicals must be removed from surfaces in contact with organic food so that they do not contaminate organic products.

Sanitizers containing quaternary ammonium compounds or QACs/QUATs, such as Benzalkonium Chloride (BAC) or Didecyl Dimethyl Ammonium Chloride (DDAC) are difficult to remove from surfaces, and if not adequately rinsed will result in residues in the organic product. Brand names include Deosan, Detsan, Foamsan, Quatsan.

If you use these to clean harvesting/handling equipment, storage boxes, dairy equipment or work surfaces, which are in direct contact with organic products, you need to take measures to ensure they are not contaminating your organic product. For example:

- Switch to a cleaning product that does not contain QACs or other substances difficult to rinse and likely to contaminate products that come in contact with them.
- Check whether your rinsing procedures are sufficient by testing food contact surfaces to ensure no residues remain. For example, a cold water rinse may not be sufficient to remove residues.

Please note that QACs can be difficult to detect in some products. For example, if used on dairy equipment, QACs may not appear in milk but may appear in butter that has been made from the milk. This is because the QAC adheres to the fat molecules in the butter.

QACs are used throughout the supply chain including farms. If you are a farm you should consider all areas where you use QACs, and ensure you have measures in place to prevent contamination of your organic product. This
includes harvesting equipment, milking equipment, vats, bulk tanks, meat processing areas, veg packing areas or any other equipment or surfaces that come into contact with your organic product. If you are unsure if your cleaning product contains QACs speak to your cleaning supplier or review the technical data sheet for the product.

If you use alcohol wipes, swabs or sprays, be aware that some may leave a residue after the alcohol has evaporated. Most contain other substances such as surfactants, sanitisers and emollients. These must not be used on product contact surfaces without rinsing them off because they may leave a residue. You may use denatured alcohol (e.g. isopropanol, methanol or ethanol) without rinsing, providing sufficient time is given for the alcohol to evaporate before surfaces come into contact with organic product.

All cleaning chemicals need to be stored safely in closed containers away from food and labelled with the name of the product and safety information.

**Non-dedicated equipment**
Where non-dedicated equipment or storage is used you must be able to demonstrate that the cleaning carried out before it is used for organic products is effective. This may require sampling or swabbing for analysis to demonstrate that the procedures you have in place are effective.

If you process or store non-organic you will need to have a system for checking that cleaning has been undertaken and that it is effective to remove residues of non-organic material and/or previous production. This could involve visual inspection, micro-biological testing, testing to ensure sanitisers have been removed from organic food contact surfaces, adenosine triphosphate (ATP) testing.

**Dry cleaning and cleaning in place (CIP) systems**
Some equipment or surfaces are not suitable for wet cleaning so dry cleaning methods can be used. In these cases, you will still need to demonstrate how you reduce the risk of contamination.
**Bleed runs and purges**

If you process organic product on equipment that you cannot fully clean by taking apart or CIP, you need to use a bleed run or purge to remove residues of non-organic product. Detail in your procedures how you validate that any purge is sufficient to remove residues that may contaminate organic products.

When you carry out a bleed run or purge of equipment, you need to calculate how much organic product needs to go through the system to remove all residue of non-organic product. This amount needs to be stipulated in your cleaning procedure and you need to record when you do bleed runs along with the quantities of purge material you have used. This figure will be used when carrying out your mass balance calculation (see record keeping standards – 8.7).

**Monitoring your cleaning measures**

You will need to have a system for checking that cleaning has been undertaken and that it is effective to remove residues of non-organic material and/or previous production. This could involve visual inspection, micro-biological testing, testing to ensure sanitisers have been removed from organic food contact surfaces, ATP testing.
## 8.13 Pest control

**What is this chapter about?**
The standards in this section detail how pests are controlled in and around facilities where you carry out organic activities. Pest control in organic production and storage areas should prevent birds, rodents, insects or other pests contaminating organic foods or spreading disease. Pest control should aim, in the first instance, to prevent infestation rather than depend on treatments.

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
</table>
| **8.13.1 Preventing contamination by pests and pest control products**   | Your procedures must include the measures you have in place to reduce the risk of contamination by pests. This should include measures to prevent and control wild birds, rodents and insects from getting into your buildings such as:  
  - flyscreen’s  
  - pheromones in traps and dispensers, for monitoring pest levels or as attractants and sexual behaviour disrupters  
  - effective covers of waste bins  
  - sealing gaps and entry points. |
| 1. You must design and operate your buildings and controls to reduce the risk of contamination by pests.  
  2. You must ensure when implementing preventative measures in organic areas that you take precautionary measures to reduce the risk of contamination of organic products. |  

*(EC) 889/2008 Art. 63(1)(c)*

| **8.13.2 Treating infestations in organic products or areas used for organic products** | If you use pest control methods, you will need to keep records of:  
  - what pests you have found  
  - what chemicals, methods and equipment you used on them  
  - who did the treatment, when and which area or equipment was treated, and  
  - what precautions you took to prevent contamination of organic products.  

If you find an infestation in organic products, on sacks or containers, in areas used for handling/storing organic products or in areas not used for organic products, you must only use pest control methods which do not contaminate the organic product.

*(EC) 889/2008 Art. 63(1)(c)*

For example, if you plan to use pyrethrum as a spray or fog to control insects, the following safeguards could be put in place:  
  - before using pyrethrum, remove all organic products from the area to be treated  
  - do not put organic products back into the treated area for at least 24 hours after the treatment  
  - clean all product contact surfaces in the area, (using methods allowed in Soil Association standards), after the treatment and before you process or store organic product there again.
Please note that some products have a long residual activity and must only be used in such a manner that the residues will not contaminate the organic product. For example, if you plan to use products that migrate easily, or have longer residual activity such as synthetic pyrethroids, organophosphorous, carbamate or organochlorine compounds then you must put in place additional safeguards to prevent migration or contamination.

Rodenticides must only be used in tamper-proof bait stations and in places where there is no risk of contaminating products.

If you use pest control treatments in areas not used for organic production or storage, you must still assess the risk of contamination and take appropriate preventative measures.

You should make your pest control contractor aware that your unit is handling organic products and that you must comply with pest control procedures in section 8.13 of Soil Association standards.

### Control methods on organic products

Control methods which are appropriate for use on organic products include:

- carbon dioxide or nitrogen
- freezing and heating
- vacuum treatment

### Control methods in organic areas

Control methods which are appropriate for use in organic areas include, but are not limited to:

- desiccant dusts such as diatomaceous earth and amorphous silica, preferably from naturally occurring sources
- electric flying insect control units, with shatterproof tubes that are positioned and cleaned correctly
- tamper resistant bait stations that contain legally approved pesticides
- sticky boards for insects.

#### 8.13.3 Using rodent glue boards

You may only use glue boards for rodents as a last resort and you must:

Glue boards should only be used as a last resort and you will need permission from your Certification Officer before using them. You will need to let us know what measures you have already tried, such as bait stations and proofing the unit.
<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>a)</strong></td>
<td>provide evidence to show that other methods of trapping have failed or are not appropriate, before you use the glue boards;</td>
</tr>
<tr>
<td><strong>b)</strong></td>
<td>use them according to industry best practice;</td>
</tr>
<tr>
<td><strong>c)</strong></td>
<td>check rodent glue boards at least once every 12 hours including at weekends and Bank Holidays, as required by the Pest Management Alliance code of practice, and</td>
</tr>
<tr>
<td><strong>d)</strong></td>
<td>keep a record of each check.</td>
</tr>
</tbody>
</table>

**Soil Association higher standard**

- **Records of checks**
  - Glue boards should not be viewed as a permanent solution to a pest problem. Certification Officers can give you permission to use glue boards but only for short periods of time to allow you to deal with a pest issue. Your pest controller will be able to make recommendations for how many trappings will be required.
  - This standard applies to the whole licensed unit. However, we recognise that in some cases you may not have ownership or control over the whole site – e.g. if you are renting a room in a storage facility. In these cases you must make all efforts possible to create a dialogue with the building manager and/or the pest control company responsible for the site to ensure that you are consulted prior to use of glue boards, or other pest control measures which could affect your organic status, such as fogging.
  - See the [Code of Practice on the Humane Use of Rodent Glue Boards](#) for more information.

**Why?**

In order to protect public health within high-risk environments, the use of rodent glue boards remains an important last option when all other control methods have been considered and deemed ineffective. However, their use does raise serious animal welfare concerns. This standard ensures that glue boards are only used as a last resort and only by persons who have been given adequate training and are competent in the effective and humane use of this technique.
# 8.14 Transport, dispatch and receipt of goods

## What is this chapter about?
This section details all the standards that need to be met for the transport, dispatch and receipt of organic products.

## Standards

### 8.14.1 Collection of products and transport to preparation units
If you are collecting organic and non-organic products at the same time, you must have measures in place to prevent any possible mixing or exchanges and you must be able to clearly identify the organic products. Your collection records need to indicate the collection days, hours, collection circuit and the time and date when products were received.

(EC) 889/2008 Art. 30

### 8.14.2 Labelling & transporting products

1. If you send an organic product to another company, including retailers, wholesalers and other licensees for further processing, packing or re-labelling then you must:
   a) ensure it is transported in a way that would prevent substitution.
   b) label it clearly, either on the product or on accompanying documentation undeniably linked to it so that the recipient can easily identify:
      i) the product and its organic status
      ii) the name and address of the operator, and, if different, the seller or owner of the product
   c) include your certification code, traceability code and % organic content of the product (if less than 95%). If this information is provided on the accompanying documentation, it must also include information on the supplier and/or transporter.

2. You do not need to use closed packaging, containers or vehicles if:
   a) transportation is between two organically certified operators

For additional requirements for labelling of retail packed products, please refer to section 8.8.

If your product is not prepacked for retail, or it goes on for further processing, you can put ingredient information either on the label, or on a document with the product provided it can be clearly linked with the product. For example, grain moved from a dryer to a mill would need to be accompanied by a delivery note with full supplier address, product information (including organic status), batch, haulier and vehicle identification and consignee address.

Labelled packaging helps identify organic products and keeps them sealed which limits the risk of contamination and substitution. However, there are products that need to be transported in loose bulk, for example milk in a tanker or fruit and vegetables in open top boxes.

Records of transportation of loose organic products.

However you choose to transport your products, you will need to make sure you have minimised the risk of contamination or substitution with non-organic products by using clear labelling and separation. For example, if you are transporting loose fruit and vegetables in open top boxes, consider transporting...
b) products are accompanied by a document containing the information required in point 1b above  
c) both the sending and receiving operators keep records of the transportation.  

(EC) 889/2008 Art. 31(1)(2)

| 3. You must include the words 'Soil Association Organic' or the Soil Association symbol on the packaging of products certified according to Soil Association standards.  
| Soil Association higher standard  

Why?

Soil Association certified products have been produced and processed to organic standards that are higher than the EU organic regulation. Writing ‘Soil Association Organic’ on the packaging helps to identify products that have met these higher standards.

### 8.14.3 Receiving organic products

When you receive an organic product you must check, upon delivery that the product is labelled according to standard 8.14.2 above and packed appropriately so that it cannot be mistaken or mixed up with other products. You must crosscheck that the label on the product matches the information on the accompanying documents and provide an account of how you check goods upon receipt.  

(EC) 889/2008 Art. 33

When receiving goods from other units or operators you need to have a system in place for checking the organic status of the products and have records to show these checks are always made.

- Please see the record keeping standards (8.7) for details of the information you will need to record.

If you cannot be sure about the organic status of a delivery, for example if information is missing or incorrect, you will need to either:

- get written confirmation from the supplier
- send it back
- sell it as non-organic
- use it in non-organic products.

### 8.14.4 Additional rules for transporting feed

1. In addition to standard 8.14.2, when transporting feed you must:
   a) ensure that the transport of organic feed, in-conversion feed and non-organic feed is effectively separated physically

Records of cleaning measures

Records of all transport operations
b) ensure that the transport of finished organic feed is effectively separated physically or in time from the transport of other finished products

c) label it clearly, either on the product or on accompanying documentation undeniably linked to it so that the recipient can easily identify:
   i) the product or a description of the compound feedstuff and its organic status.
   ii) the name and address of the operator, and, if different, the seller or owner of the product.

2. If you use vehicles or containers that have been used to transport non-organic products, you must:

a) ensure they are thoroughly clean before transporting organic products. The cleaning measures used must be appropriate to the risks, and the effectiveness of the measures must be checked before transporting organic products

b) assess and implement measures to ensure that non-organic feed cannot be mistaken or mixed up with organic. Where necessary you may be asked to guarantee this

c) keep documentary records of these transport operations.

3. You must keep records of transport operations, including the quantity of products at the start and of each individual quantity delivered.

(EC) 889/2008 Art. 31(1)(b); Art. 32

8.15 Storage of products

What is this chapter about?
This section details the standards for storing and handling organic products.

<table>
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<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>8.15.1 General separation</td>
<td>Demonstrate that your organic products are clearly identified and separated from areas used for other purposes. Examples include, but are not limited to:</td>
</tr>
</tbody>
</table>
in such a way to avoid any mixing with or contamination from products or substances that we do not allow in these standards. Your organic storage areas, containers and products must be clearly identifiable at all times. 

(EC) 889/2008 Art. 35(1)

- identify the room, area, or racking with the word ‘organic’ to show that it is for storing organic products
- identify all organic materials clearly to avoid accidental contamination
- have sufficient space or barriers around the organic storage area to stop accidental contamination
- only use stores, bins and containers that are made of materials suitable for contact with the food they are to store
- dedicate and identify bins and containers as organic
- prevent contamination by birds, insects and vermin
- clean the stores regularly so that there are no residues which could contaminate organic products or encourage pests.

Describe in your procedures how you avoid any mixing or contamination from products or substances not permitted in these standards.

Also refer to the ‘preserving organic integrity’ section 8.11, for details of contamination, and products and substances we do not allow.

<table>
<thead>
<tr>
<th>8.15.2 Handling and separating organic and non-organic products</th>
</tr>
</thead>
<tbody>
<tr>
<td>When you use the same equipment and premises to store and handle both organic and non-organic products you must:</td>
</tr>
<tr>
<td>a) minimise the risk of mixing organic products with other products and foodstuffs by clearly identifying and separating them during the production process, and</td>
</tr>
<tr>
<td>b) effectively clean equipment and storage areas used to handle or store non-organic products before handling or storing organic products.</td>
</tr>
</tbody>
</table>

(EC) 889/2008 Art. 35(4); 26 (3)

Also refer to the ‘preserving organic integrity’ section 8.11, for details of contamination and products and substances we do not allow.
8.16 Packaging

Standards

8.16.1 Scope
These standards apply to packaging of products that you introduce into the supply chain.

We define packaging as all primary (retail), secondary (grouping, display) and tertiary (transport) materials used for:
- containing
- protecting
- preserving
- handling
- storage
- delivery
- labelling
- marketing, and
- presentation of your products.

Note - we include bulk bins but not transport pallets in this definition.

Guidance

Packaging legislation

Keep in mind that you must make sure that your packaging meets all relevant legislation relating to packaging, packaging waste and materials in contact with food.

For example, for products sold in the EU such legislation would include, but is not limited to:
2. the European Standard for Compostable Packaging (EN13432) – if you are using compostable or biodegradable packaging.

Environmental information claims and symbols on your packaging need to be clear, truthful and accurate. In the UK, you will need to make sure your packaging conforms to Defra’s Green Claims code.

Why?

The production, use and disposal of packaging can have a big impact on the environment and human health. We believe that organic products should be packaged in ways that reduce the negative impacts of packaging. This fits with the principles of protecting the environment and biodiversity that underpin organic food and farming, and meets consumer expectations of organic products.

Packaging serves an important role in preventing food waste by protecting and extending the shelf life of products. It also helps to protect consumers by preventing contamination and substitution of organic products with non-organic alternatives. These packaging standards aim to maximise the benefits and avoid the negative impacts of packaging.

Soil Association higher standard
# Standards

## 8.16.2 Cellulose-based materials
If you use cellulose-based materials, such as corrugate, bleached paper or cardboard, it must be totally chlorine free (TCF) or elemental chlorine free (ECF). Recycled paper must be process chlorine free (PCF).

*Soil Association higher standard*

### Why?
The use of chlorine bleaching has a high environmental impact and its manufacture can result in the release of toxic chemicals such as dioxins and other pollutants.

## 8.16.3 Aluminium foils
You must not use unlaquered aluminium foils to package food which is acidic (with a pH less than or equal to 4.5) or salty (containing more than 2% salt).

*Soil Association higher standard*

### Why?
Aluminium has been linked with the onset of Alzheimer’s disease and other degenerative mental states. Lacquering the foil prevents the aluminium from reacting with food acids. Producing safe and healthy food is an important principle of organic food processing.

## 8.16.4 Plastic materials, coatings, dyes or inks
You must not use plastic materials, coatings, dyes or inks that contain phthalates if they will be in direct contact with foodstuffs.

*Soil Association higher standard*

### Why?
Phthalates can have a negative impact on human health, for example they have endocrine disrupting properties.

## 8.16.5 PVC
You must not use polyvinyl chloride (PVC) unless alternative materials are not available or are functionally unsuitable, as listed in the guidance section of this standard.

### Why?

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
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</thead>
<tbody>
<tr>
<td>8.16.2 Cellulose-based materials</td>
<td>Demonstrate that you have not used these materials, for example by having written confirmation from your supplier.</td>
</tr>
<tr>
<td>8.16.3 Aluminium foils</td>
<td>Demonstrate that you have not used these materials, for example by having written confirmation from your supplier.</td>
</tr>
<tr>
<td>8.16.4 Plastic materials, coatings, dyes or inks</td>
<td>Demonstrate that you have not used these materials, for example by having written confirmation from your supplier.</td>
</tr>
<tr>
<td>8.16.5 PVC</td>
<td>Demonstrate that you have not used these materials, for example by having written confirmation from your supplier. You may use other chlorinated plastics, such as PVdC.</td>
</tr>
</tbody>
</table>
There are some specific circumstances where we are aware that no suitable alternatives to PVC currently exist yet. These include:

- metal jar lids or caps (e.g. for jams, sauces and baby food), and
- tamper evident seals on jar lids or caps.

The Soil Association's Packaging Working Group will review this list on a regular basis.

You may use metal jar lids, caps and tamper evident seals that contain PVC, however you will need to make your packaging supplier aware that a PVC-free alternative is preferable should it become available.

PVC film overwrap may be used where a non-PVC film is unavailable in suitable quantities or is not fit for purpose. If you wish to use a PVC film wrap please contact your Certification Officer. We will need evidence from you and your suppliers that a PVC-free alternative is either not available or not suitable for the purpose you intend. You may continue to use PVC in these cases until a suitable alternative becomes available. Each year we will contact you to see if you have found a suitable PVC-free alternative.

The production, use and disposal of PVC are associated with a range of environmental and human health issues. PVC often contains additives which are added to improve flexibility and plasticity, including phthalates. PVC can also contain other toxic substances such as chlorinated paraffins, organic tin compounds and alkyl phenols.

The environmental hazards of PVC go beyond those associated with other plastics. Some of today's most worrying environmental contaminants are released during the production of PVC or its feedstocks and during the disposal of PVC products.

### Standards

**8.16.6 Non-GM packaging**

You must not use packaging materials or substances that contain, have been derived from, or manufactured using genetically modified organisms or genetically engineered enzymes, unless alternative materials are functionally adequate demonstration of non-GM for packaging materials includes:

- Raw materials made from organic crops
- Non-GMO Project certification
- IP or PCR testing results for the raw materials
unsuitable or not available, as indicated in the guidance section of this standard.

Soil Association higher standard

Polylactic acid (PLA) is sometimes used for compostable or biodegradable packaging. PLA is a biopolymer made from natural sugar sources and many of these sugar sources are high GM risk (such as sugar beet and maize).

Only PLA from non-GM sources can be used in the packaging of organic products. This includes teabags. You will need to provide a non-GM declaration to prove the PLA is not produced from or by GM.

There are some cases where it is not possible to trace the source feedstock of packaging materials in order to verify whether or not it is derived from GM, or there are no suitable alternative options which are non-GM. An example of this is lids containing epoxydisoybean oil (ESBO). In cases where there is no functional alternative, we can give you permission to use the packaging. This permission would be subject to annual review and may be revoked should a technological alternative appear on the market in sufficient quantity.

Any permissions granted will be reviewed by the Soil Association’s Certification Committee on an annual basis.

This standard also applies to cotton teabag strings. Using organic teabag strings means you automatically meet the requirements of this standard. If your tea bag strings are non-organic you will need to provide details of the country of origin of the cotton used in them, and/or an IP certificate to prove they are not made with genetically modified cotton.

Why?

Genetic modification is counter to the principles and practice of organic food and farming and does not meet consumer expectation of organic products. Whilst most packaging derived from GM materials no longer contain GM DNA, they are still derived from raw materials which have been genetically modified.

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
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<tbody>
<tr>
<td>8.16.7 BPA and other bisphenols in food-contact materials*</td>
<td>Bisphenol A (BPA) is a chemical found in some plastics and used in the manufacture of epoxy resins. It is commonly found in the linings of some food and beverage cans. Alternatives to BPA include epoxy-phenolic, modified polyester and acrylic.</td>
</tr>
</tbody>
</table>
You must not intentionally use Bisphenol A (BPA) or other bisphenols in materials that will be in direct contact with foodstuffs.

*This Standard comes in to effect from May 2020

The wording ‘intentionally use’ refers to the fact that some materials are classified as BPA-NI, where "NI" stands for 'non-intentional'. This classification means that although there is no BPA added as a constituent of a lacquer, BPA may be present in the pipework, raw material packaging, processing equipment etc. and small amounts may be picked up by the finished product during production. Although you should avoid them where possible, you can still use BPA-NI materials for the time being. We will monitor the situation with BPA-NI materials with a view to totally eradicating BPA from all food contact materials in due course.

Type 7 plastics may be made from BPA. Type 3 plastics (PVC) could also contain BPA, but only in the case of flexible PVC which is prohibited under [standard ref] of these standards.

Demonstrate that you have not used BPA or other bisphenols in your food contact materials, for example by having written confirmation from your supplier.

In order to allow time for licensees to source and trial alternative materials, this standard will be enforced from May 2020 but licensees should switch to bisphenol-free food contact materials as soon as possible.

**Why?**

Studies have shown that BPA has endocrine disrupting properties and toxic effects on our ability to reproduce. Studies have also raised serious concerns over other bisphenols that are sometimes used as an alternative to BPA, such as BPAF, BPB and BPZ. The toxic effects of Bisphenols are evident even at low concentrations.

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### 8.17 General manufacturing

**What is this chapter about?**

This chapter covers the basic requirements that must be met by all licensees involved in manufacturing organic products.

<table>
<thead>
<tr>
<th>Standards</th>
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<tbody>
<tr>
<td><strong>8.17.1 Ensuring organic integrity</strong></td>
<td></td>
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<tr>
<td>To ensure organic integrity you must:</td>
<td>Your procedures need to cover all the critical processing steps in the manufacture of your products. This includes making sure staff are fully trained for the tasks they carry out and understand the importance of maintaining</td>
</tr>
</tbody>
</table>
a) Have procedures to maintain the organic integrity of your products, from buying raw materials to goods out, and which also ensure that non-organic products are not produced or sold as organic.

b) Always work to the principles of good manufacturing practice for your sector of the feed industry.

\[(EC) 889/2008\text{ Art. 26}(1)(2)(3)(4)(c)\]

organic integrity.

Please also refer to the standards on contamination (8.11), cleaning (8.12) and record keeping (8.7) as these are all related to ensuring organic integrity.

There are a number of quality management standards that can provide manufacturing businesses with guidelines for best practice quality control and record keeping, such as ISO 9000, BRC and SALSA. It is not a requirement of organic certification to sign up to any of these schemes, however should you wish to develop your quality management system further, these schemes can provide support and independent auditing.

<table>
<thead>
<tr>
<th>8.17.2 Processing organic and non-organic</th>
</tr>
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<tbody>
<tr>
<td><strong>If you process organic and non-organic products, either using the same equipment or at the same site, you must:</strong></td>
</tr>
<tr>
<td>a) assess the risk of contamination and mixtures or exchanges, and put in place controls to avoid those risks</td>
</tr>
<tr>
<td>b) process and store organic products separately, in time or space, from non-organic products</td>
</tr>
<tr>
<td>c) ensure that the cleaning of your facilities and equipment is sufficient to remove residues of non-organic product before you start processing</td>
</tr>
<tr>
<td>d) finish the whole run of organic products before you start to process non-organic products</td>
</tr>
<tr>
<td>e) keep a record of all organic and non-organic operations and the quantities processed.</td>
</tr>
</tbody>
</table>

\[(EC) 834/2007\text{ Art. 19}(1)\]
\[(EC) 889/2008\text{ Art. 26}(3)\]

8.17.3 Irradiation

You must **not** use ionising radiation for the treatment of organic food or feed or for the treatment of raw materials used in organic food or feed.

\[(EC) 834/2007\text{ Art. 10}\]

This standard applies to all ingredients used in organic products – including ingredients you buy in and non-organic ingredients.

Ionising radiation occurs at frequencies that are potentially responsible for cell damage. Ionising radiation is defined as: the transfer of energy in the form of particles or electromagnetic waves of a wavelength of 100 nanometers (nm) or less or a frequency of $3 \times 10^{15}$ Hertz or more, capable of producing ions directly
You may use ultra violet radiation (UV light), provided it has a wavelength of 100nm to 400nm for:
- water treatment
- surface sterilisation of products
- to treat mould growth on the surface of dough and baked goods
- to treat fruit and vegetable juice as an alternative to pasteurisation.

The prohibition of ionising radiation does not apply in the case of:
- foodstuffs exposed to ionising radiation generated by measuring or inspection devices, provided that the dose absorbed is not greater than 0.01 Gy for inspection devices which utilise neutrons and 0.5 Gy in other cases, at a maximum radiation energy level of 10 MeV in the case of X-rays, 14 MeV in the case of neutrons and 5 MeV in other cases
- the irradiation of foodstuffs which are prepared for patients requiring sterile diets under medical supervision.

### 8.17.4 Specific processing rules for feed

1. Production of processed organic feed must be kept separate in time or space from production of processed non-organic feed.
2. Organic feed materials or in-conversion feed materials must not be used in combination with the same non-organic feed materials in the composition of feeds.
3. Any feed materials used or processed in organic production must not have been processed with the aid of chemically synthesised solvents.
4. Substances and techniques that reconstitute properties that are lost in the processing and storage of organic feed, that correct the results of negligence in the processing or that otherwise may be misleading as to the true nature of these products must **not** be used.

*(EC) 834/2007 Art. 18; Art. 20(2)*
9 Specific standards for feeding livestock

9.1 Standard for feeding livestock

What is this chapter about?
The following standards are taken out of the Soil Association farming and growing standards. It includes how the nutritional needs of organic animals must be met, the allowances for first year conversion and in-conversion feed and which additives and minerals are permitted in organic feeds and the conditions of their use. We have included this chapter for your information as it may help inform your activities. Please note that Standard 9.1.14 ‘Use of calcified seaweed is prohibited’ applies even if feed certified to other organic standards is re-certified to SA standards.

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
</table>
| **9.1.1 Meeting the nutritional needs of your livestock**<br>You must feed your livestock organic feed that meets their nutritional needs at all stages of their development.  
(EC) 834/2007 Art. 14(1)(d)(ii) | Routine monitoring of your animals is necessary to check that their nutritional demands are being met at each stage of the production cycle. You can use a range of measures to assess the nutritional status of your animals, for example, body condition, cleanliness and diarrhoea, skin and coat condition, body weight and mortality (for lambs). If you would like more information and support on monitoring the welfare of your animals see our Advisory Support pages or contact Producer Support or your Certification Officer.  
Young mammals must be fed sufficient colostrum and milk and only weaned when they are taking in sufficient quantities of solid food.  
The welfare of your animals will be assessed at inspection and your inspector will use the welfare outcomes measures described above to determine whether you are meeting this standard. |
| **9.1.2 Force feeding is prohibited**<br>You must not force feed your livestock. Fattening practices are allowed only if they are reversible at any stage of the rearing process.  
(EC) 889/2008 Art. 20(5) |                                                                                                                                               |
| **9.1.3 Encouraging anaemia is prohibited**<br>The keeping of livestock in conditions, or on a diet, which may encourage anaemia is prohibited.  
(EC) 889/2008 Art. 20(4) |                                                                                                                                               |
| **9.1.4 Feeding organic and in-conversion feed**<br>1. The diet of your organic and converting animals must be based on organic feed composed of feedingstuffs obtained | In conversion feed (as defined in farming and growing standard 2.1.5a) is feed grown on land that had completed one year of conversion before the crop was |
primarily from your holding or from other organic holdings in the same region.

2. You may feed or graze your organic or converting livestock:
   a) up to 100% in-conversion feed from your own holding and no more than 30% in-conversion feed, forage or grazing from another holding.
   b) up to 20% of the total average amount of feed can be first year conversion perennial forage crops and protein crops, only if they are produced from your own holding. The land you wish to use in this way must not have been part of any organic holding in the last five years.

3. When both in-conversion feed and first year conversion feed are being used, the total combined percentage used must not exceed the percentages in point a).

4. These percentages must be based on the annual dry matter intake of feedstuffs of plant origin.

   (EC) 834/2007 Art. 5(k); Art. 14(1)(d)(i)(ii)
   (EC) 889/2008 Art. 21

Since 100% in-conversion from your own holding is currently permitted under point 2. a), point 3. is effectively redundant.

9.1.5 Feeding herbivores

1. Rearing systems for herbivores must be based on maximum use of grazing pasturage according to the availability of pastures in the different periods of the year. You must ensure for your herbivore species that:
   a) at least 60% of their daily diet on a dry matter basis consists of fresh or dried fodder, roughage or silage, except during the period each year when the animals are under transhumance, and
   b) at least 60% of their total diet comes from your own holding, or if this is not possible, feed produced in cooperation with other organic farms in the same region.

   (EC) 889/2008 Art. 19(1); Art. 20(2)
9.1.6 Reducing the amount of forage is prohibited

For herbivore species, at least 60% of their daily diet on a dry matter basis must consist of fresh or dried fodder, roughage or silage. This must not be reduced below 60%, even during the first few months of lactation.

*Soil Association higher standard*

**Why?**

Roughage and forage is a critical part of a ruminant’s diet and function. Low forage diets can have serious welfare and health implications. They are often associated with breeding strategies that produce very high-yielding dairy cows. Producing large quantities of milk can exceed the capacity of the animal’s digestive system to process sufficient nutrients without a detrimental effect on overall health and wellbeing. This approach to feeding and breeding can lead to systems of dairy production in which cows experience excessive hunger, loss of body condition and increased risk of infertility.

**Standards**

**Guidance**

9.1.7 Feeding pigs and poultry

1. For your pigs and poultry, you must ensure that:
   a) roughage, fresh or dried fodder or silage is added to their daily ration.
   b) at least 20% of their total diet comes from your own holding. Where this is not possible, you may use feed produced in the same region in cooperation with other organic farms or feed business operators.

*(EC) 889/2008 Art. 19(2); Art. 20(3)*

Roughage, fresh and dried fodder must be fed at all stages of production. When rearing poultry you can feed hay or alfalfa in hay nets. For more ideas on how to enrich chicken’s diets with roughage see the [FeatherWel website](#). When animals are on pasture and able to forage and graze, no additional forage or roughage needs to be provided.

**Guidance table on daily dry matter intakes (DMI)**

<table>
<thead>
<tr>
<th>Lactating dairy cows</th>
<th>Growing beef cattle, beef suckler cows and dairy young stock</th>
</tr>
</thead>
<tbody>
<tr>
<td>Weight (kg):</td>
<td>Daily DMI (kg)</td>
</tr>
<tr>
<td>400</td>
<td>14.0</td>
</tr>
<tr>
<td>450</td>
<td>15.75</td>
</tr>
<tr>
<td>500</td>
<td>17.5</td>
</tr>
<tr>
<td>550</td>
<td>19.25</td>
</tr>
<tr>
<td>600</td>
<td>21.0</td>
</tr>
<tr>
<td>650</td>
<td>22.75</td>
</tr>
<tr>
<td>700</td>
<td>24.5</td>
</tr>
<tr>
<td>750</td>
<td>26.25</td>
</tr>
</tbody>
</table>
Daily DMI has been calculated as 3.5% of live weight | Daily DMI has been calculated as 2.5% of live weight

<table>
<thead>
<tr>
<th>Sheep and goats (all groups)</th>
<th>Pigs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Weight (kg)</td>
<td>Daily DMI @ 2% of live weight (kg)</td>
</tr>
<tr>
<td>10</td>
<td>0.25</td>
</tr>
<tr>
<td>20</td>
<td>0.50</td>
</tr>
<tr>
<td>30</td>
<td>0.75</td>
</tr>
<tr>
<td>40</td>
<td>1.00</td>
</tr>
<tr>
<td>50</td>
<td>1.25</td>
</tr>
<tr>
<td>60</td>
<td>1.50</td>
</tr>
<tr>
<td>70</td>
<td>1.75</td>
</tr>
<tr>
<td>80</td>
<td>2.00</td>
</tr>
</tbody>
</table>

Daily DMI has been calculated as 2% of live weight

<table>
<thead>
<tr>
<th>Poultry</th>
<th>Daily DMI (kg)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Laying chickens</td>
<td>0.118</td>
</tr>
<tr>
<td>Table chickens</td>
<td>0.077</td>
</tr>
<tr>
<td>Turkeys</td>
<td>0.138</td>
</tr>
<tr>
<td>Ducks and geese</td>
<td>0.150</td>
</tr>
</tbody>
</table>

### Standards

**9.1.8 Use of non-organic protein for pigs and poultry**

1. If you cannot source 100% organic feeds that meet the nutritional needs of your animals, you may feed pigs and poultry up to 5% non-organic protein feed.
2. This percentage must be calculated on an annual dry matter basis.
3. At your inspection you must have records to demonstrate that you are unable to source an appropriate 100% organic or in-conversion ration and that you have not fed more than 5% non-organic protein feed.
4. This exemption will be in place until 31st December 2020.

*(EC) 834/2007 Art. 22(2)(b)*

*(EC) 889/2008 Art. 43*

### Guidance

If you are using a feed that is certified as suitable for organic production and it contains some non-organic ingredients, the feed mill will already have demonstrated that organic ingredients are not available. If you are mixing or blending your own feeds then you must demonstrate that suitable organic ingredients are not available.

Feed records

Once we hear from the EU Commission on this exemption we will update this page.
9.1.9 Feeding young mammals

1. Young mammals must be fed natural, organic milk, preferably maternal milk, for a minimum period of:
   a) 12 weeks for calves
   b) 45 days for lambs and kids
   c) 40 days for piglets.

( EC) 834/2007 Art. 14(1)(d)(vi)
( EC) 889/2008 Art. 20(1)

Maternal milk is milk from the mother; natural milk is from the glands of a mammal. Natural milk can come from other species provided that it meets the nutritional and health needs of the species you are feeding it to. Milk powder is considered as natural milk as long as it only contains milk powder.

Milk containing vegetable oil and milk replacers is not considered as natural milk and therefore must be regarded as a concentrate for feed calculations during the minimum periods set out in this standard.

You should have a plan in place to provide an organic source of colostrum. In an emergency you may feed non-organic milk replacer to young mammals until they are 72 hours old. However, if you feed them non-organic milk replacer for any longer they will lose their organic status.

9.1.10 Feeding of waste milk to calves is restricted

You must not feed your calves milk taken from dairy cows during the statutory withdrawal period for antibiotic treatments.

Soil Association higher standard

You may feed colostrum, but you should use stored colostrum where available, in preference to colostrum taken from cows during the statutory withdrawal period for antibiotic treatments.

Why?

Milk produced by cows that have been treated with antibiotics may contain antimicrobial residues. During the withdrawal period for antibiotic treatments, milk has to be withdrawn from the human food chain and this waste milk is often fed to calves. This approach to feeding waste milk promotes the development of antibiotic resistance bacteria in calves.

Standards

9.1.11 Catastrophic circumstances

1. Your competent authority may authorise on a temporary basis the use of non-organic feed under catastrophic circumstances when forage is lost or when restrictions are imposed, in particular as a result of:
   a) exceptional weather conditions
   b) infectious disease outbreaks
   c) contamination with toxic substances
   d) fire.

2. Upon approval by the competent authority you must keep documentary evidence of the use of this exception.

( EC) 834/2007 Art. 22(2)(t)

In the UK, your Certification Officer can submit a request to your competent authority on your behalf. In the UK, Defra (the competent authority) will require the following information to consider your request:

- The agricultural parish(es) in which your farm is located
- The quantity of forage you usually make and the scale of your current shortage
- The reason/s for the forage shortage (if it is due to bad weather please provide details such as a report from the Met Office)
- Ways in which you have tried to overcome the shortage - e.g. organic forage purchased, new land rented, stock numbers reduced
- Evidence to show that you have tried and failed to source organic forage, including the area in which you have been searching and for how long

Guidance
(EC) 889/2008 Art. 47(c)

- Details of your livestock numbers, the organic diet fed to each group of animals and how long the shortage is forecasted to last
- Details of the groups of stock to be fed non-organic forage and how many are in each group, e.g. dry cows, young stock, in-lactation animals
- Details of the period of time that you wish to feed non-organic forage. Please note derogations can be given for a maximum of 3 months at a time. If towards the end of the permitted period you need the permission to be extended, you will need to submit a new request
- For dairy cows, Defra (the competent authority in the UK) will also need confirmation that you have contacted your milk buyer and the details of their response

If the derogation request is due of the quality of the diet, Defra will also require information to show the nutritional value of the current diet and details as to why it is unsatisfactory.

Records of the use of this exception

9.1.12 Use of additional products and substances in feed and feed supplements

1. You may only use the products and substances in standard 9.1.13 below if they are necessary to maintain animal health, welfare and vitality and to contribute to an appropriate diet which fulfils the physiological and behavioural needs of your animals, or if it is impossible to produce or preserve feed without them. Their use is subject to the specific conditions in the table.

   (EC) 834/2007 Art. 14(d)(ii)(iv); Art. 16(2)(e)
   (EC) 889/2008 Art. 22

You must be able to justify the use of additional feed products and substances. For example show:
- by forage or soil analysis that your home grown feeds are deficient, or
- with blood or tissue analysis, or details of previously identified deficiencies in your stock.

The products you use should target the nutritional needs as closely as possible and must be used in compliance with the conditions set in the table below.

Mineral licks must be free from additives and ingredients not permitted in these standards. Contact your Certification Officer for more information on using mineral and feed blocks.

Records of any feed supplements used

All products must also be authorised under Regulation (EC) 1831/2003.
### Standards

#### 9.1.13 Products and substances permitted for use in livestock feed

**(EC) 834/2007 Art. 16(1)(c)(d)**

**(EC) 889/2008 Art. 22; Annex V; Annex VI**

<table>
<thead>
<tr>
<th>Feed Material</th>
<th>Conditions of use</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Organic feed materials of animal origin</strong></td>
<td>• There are restrictions on what animal by-products you can feed to different animal species. UK guidance is available <a href="#">here</a>.</td>
</tr>
</tbody>
</table>
| **Non-organic feed materials of plant or animal origin, or fermentation (by-products) from micro-organisms, the cells of which have been inactivated or killed:**  
  a) Saccharomyces cerevisiae  
  b) Saccharomyces carlsbergensis | • must be produced or prepared without chemical solvents; and  
  • only used as part of the non-organic feed allowance in compliance with standards 9.1.8 and 9.1.11. |

<table>
<thead>
<tr>
<th>Minerals</th>
<th></th>
</tr>
</thead>
</table>
| **Sodium** | Sea salt  
  Coarse rock salt  
  Sodium chloride  
  Sodium bicarbonate  
  Sodium carbonate  
  Sodium sulphate |
| **Potassium** | Potassium chloride |
| **Calcium** | Calcareous marine shells  
  Calcium gluconate  
  Calcium carbonate |
| **Phosphorus** | Defluorinated monocalciumphosphate  
  Defluorinated dicalciumphosphate  
  Monosodium phosphate  
  Calcium magnesium phosphate  
  Calcium sodium phosphate  
  Monosodium phosphate |
| **Magnesium** | Magnesium oxide (anhydrous magnesia)  
  Magnesium sulphate |
<table>
<thead>
<tr>
<th>Functional Group</th>
<th>Product or substance</th>
<th>Conditions of use</th>
</tr>
</thead>
<tbody>
<tr>
<td>Magnesium chloride</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Magnesium carbonate</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Magnesium phosphate</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Preservatives**

<table>
<thead>
<tr>
<th>Functional Group</th>
<th>Product or substance</th>
<th>Conditions of use</th>
</tr>
</thead>
<tbody>
<tr>
<td>E 200</td>
<td>Sorbic acid</td>
<td></td>
</tr>
<tr>
<td>E 236</td>
<td>Formic acid</td>
<td></td>
</tr>
<tr>
<td>E 237</td>
<td>Sodium formate</td>
<td></td>
</tr>
<tr>
<td>E 260</td>
<td>Acetic acid</td>
<td></td>
</tr>
<tr>
<td>E 270</td>
<td>Lactic acid</td>
<td></td>
</tr>
<tr>
<td>E 280</td>
<td>Propionic acid</td>
<td></td>
</tr>
<tr>
<td>E 330</td>
<td>Citric acid</td>
<td></td>
</tr>
</tbody>
</table>

**Antioxidants**

<table>
<thead>
<tr>
<th>Functional Group</th>
<th>Product or substance</th>
<th>Conditions of use</th>
</tr>
</thead>
<tbody>
<tr>
<td>1b306(i)</td>
<td>Tocopherol extracts from vegetable oils</td>
<td></td>
</tr>
<tr>
<td>1b306(ii)</td>
<td>Tocopherol-rich extracts from vegetable oils (delta rich)</td>
<td></td>
</tr>
</tbody>
</table>

**Binders and anti-caking agents**

<table>
<thead>
<tr>
<th>Functional Group</th>
<th>Product or substance</th>
<th>Conditions of use</th>
</tr>
</thead>
<tbody>
<tr>
<td>E412</td>
<td>Guar gum</td>
<td></td>
</tr>
<tr>
<td>E 535</td>
<td>Sodium ferrocyanide</td>
<td></td>
</tr>
<tr>
<td>E 551b</td>
<td>Colloidal silica</td>
<td></td>
</tr>
<tr>
<td>E 551c</td>
<td>Kieselguhr (diatomaceous earth, purified)</td>
<td></td>
</tr>
<tr>
<td>1m558i</td>
<td>Bentonite</td>
<td></td>
</tr>
<tr>
<td>E 559</td>
<td>Kaolinitic clays, free of asbestos</td>
<td></td>
</tr>
<tr>
<td>E 560</td>
<td>Natural mixtures of stearites and chlorite</td>
<td></td>
</tr>
<tr>
<td>E 561</td>
<td>Vermiculite</td>
<td></td>
</tr>
<tr>
<td>E 562</td>
<td>Sepiolite</td>
<td></td>
</tr>
</tbody>
</table>

- Maximum dose rate of 20 mg/kg NaCl calculated as ferrocyanide anion
<table>
<thead>
<tr>
<th>ID no.</th>
<th>Product or substance</th>
<th>Conditions of use</th>
</tr>
</thead>
<tbody>
<tr>
<td>1k</td>
<td>Enzymes and micro-organisms</td>
<td>• Use restricted to production of silage when weather conditions do not allow for adequate fermentation</td>
</tr>
<tr>
<td>2b</td>
<td>Flavouring compounds</td>
<td>• Only extracts from agricultural products</td>
</tr>
<tr>
<td></td>
<td><em>Castanea sativa</em> Mill.: Chestnut extract</td>
<td></td>
</tr>
<tr>
<td>3a</td>
<td>Vitamins and provitamins</td>
<td>• Only if derived from agricultural products, or</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• If synthetic vitamins are used only those identical to vitamins derived from agricultural products may be used for monogastric and aquaculture animals</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Only synthetic vitamins A, D and E if identical to vitamins derived from agricultural products may be used for ruminants. Their use is subject to approval by the Member State. If you want to make use of this provision, you must justify why you need to use these vitamins. In the UK this must be approved by Defra.</td>
</tr>
<tr>
<td>3a920</td>
<td>Betaine anhydrous</td>
<td>• Only for monogastric animals.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Only from natural origin and when available from organic origin.</td>
</tr>
</tbody>
</table>

**Guidance**

There is a risk of production from GM beet and you must be able to demonstrate that betaine anhydrous is not from a GM source as per standard 1.11.2.
<table>
<thead>
<tr>
<th>Code</th>
<th>Chemical Formula</th>
</tr>
</thead>
<tbody>
<tr>
<td>3b101</td>
<td>Iron(II) carbonate (siderite)</td>
</tr>
<tr>
<td>3b103</td>
<td>Iron(II) sulphate monohydrate</td>
</tr>
<tr>
<td>3b104</td>
<td>Iron(II) sulphate heptahydrate</td>
</tr>
<tr>
<td>3b201</td>
<td>Potassium iodide</td>
</tr>
<tr>
<td>3b202</td>
<td>Calcium iodate, anhydrous</td>
</tr>
<tr>
<td>3b203</td>
<td>Coated granulated calcium iodate anhydrous</td>
</tr>
<tr>
<td>3b301</td>
<td>Cobalt(II) acetate tetrahydrate</td>
</tr>
<tr>
<td>3b302</td>
<td>Cobalt(II) carbonate</td>
</tr>
<tr>
<td>3b303</td>
<td>Cobalt(II) carbonate hydroxide (2:3) monohydrate</td>
</tr>
<tr>
<td>3b304</td>
<td>Coated granulated cobalt(II) carbonate</td>
</tr>
<tr>
<td>3b305</td>
<td>Cobalt(II) sulphate heptahydrate</td>
</tr>
<tr>
<td>3b402</td>
<td>Copper(II) carbonate dihydroxy monohydrate</td>
</tr>
<tr>
<td>3b404</td>
<td>Copper (II) oxide</td>
</tr>
<tr>
<td>3b405</td>
<td>Copper (II) sulphate, pentahydrate</td>
</tr>
<tr>
<td>3b409</td>
<td>Dicopper chloride trihydroxide (TBCC)</td>
</tr>
<tr>
<td>3b502</td>
<td>Maganes(II) oxide</td>
</tr>
<tr>
<td>3b503</td>
<td>Manganese sulfate, monohydrate</td>
</tr>
<tr>
<td>3b603</td>
<td>Zinc oxide</td>
</tr>
<tr>
<td>3b604</td>
<td>Zinc sulphate heptahydrate</td>
</tr>
<tr>
<td>ID no. or Functional Group</td>
<td>Product or substance</td>
</tr>
<tr>
<td>---------------------------</td>
<td>----------------------</td>
</tr>
<tr>
<td>3b605</td>
<td>Zinc sulphate monohydrate</td>
</tr>
<tr>
<td>3b609</td>
<td>Zinc chloride hydroxide monohydrate (TBZC)</td>
</tr>
<tr>
<td>3b701</td>
<td>Sodium molybdate dihydrate</td>
</tr>
<tr>
<td>3b801</td>
<td>Sodium selenite</td>
</tr>
<tr>
<td>3b8.10, 3b8.11, 3b8.12, 3b813 and 3b817</td>
<td>Selenised yeast inactivated</td>
</tr>
</tbody>
</table>

**Zootechnical additives**

<table>
<thead>
<tr>
<th>ID no. or Functional Group</th>
<th>Product or substance</th>
<th>Conditions of use</th>
</tr>
</thead>
<tbody>
<tr>
<td>4a, 4b, 4c and 4d</td>
<td>Enzymes and micro-organisms in the category of “Zootechnical additives”</td>
<td></td>
</tr>
</tbody>
</table>

**Product or substance**

- **Products from sustainable fisheries,**
  - only when they are produced without chemical solvents
  - their use is restricted to non-herbivores
  - the use of fish protein hydrolysate is restricted solely to young animals

  **Guidance**
  - The source must be independently certified as sustainable, such as by the Marine Stewardship Council.

- **Non-organic spices, herbs and molasses provided that:**
  - only when organic is not available
  - must be produced or prepared without chemical solvents, and
  - use is limited to 1% of the feed ration of a given species calculated as a percentage of the dry matter of feed from agricultural origin

  **Guidance**
  - If you use non-organic spices, herbs or molasses you must demonstrate that the organic form is not available.

**Standards**

<table>
<thead>
<tr>
<th>9.1.14 Use of calcified seaweed is prohibited</th>
</tr>
</thead>
<tbody>
<tr>
<td>You must not use calcified seaweed, lithothamne or maerl when extracted from the sea in livestock feeds.</td>
</tr>
</tbody>
</table>

**Guidance**

- This applies even if feed certified to other organic standards is re-certified to SA standards.
- If you are unclear whether extra sourcing requirements apply, please contact your certification officer.
Calcified seaweed, lithothamne and maerl refer to a group of coralline, primarily of the species *Phymatolithon calcateum* and *Lithothamnion corallioides*. Calcified seaweed beds are relatively scarce and are important habitats which hold impressive levels of biodiversity, harboring 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. We therefore prohibit the use of calcified seaweed when extracted from the sea in Soil Association organic standards.

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
</table>
| **9.1.15 Synthetic amino-acids are prohibited**<br>You must not use synthetic amino-acids.  
*(EC) 834/2007 Art. 14(d)(v)* |
# 10 Specific standards for feeding aquaculture animals

## 10.1 Feeding fish, crustaceans and echinoderms

### What is this chapter about?

The following standards are taken out of the Soil Association aquaculture standards. It includes how the nutritional needs of organic aquaculture must be met and the different rules on feeding carnivorous and freshwater species. We have included this chapter for your information as it may help inform your activities. Please note that Standard 10.2.2 ‘**Use of calcified seaweed is prohibited**’ applies even if feed certified to other organic standards is re-certified to SA standards.

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>10.1.1 Feeding priorities (all species)</strong></td>
<td></td>
</tr>
<tr>
<td>1. You must feed your aquaculture animals with feed that meets the animals’ nutritional requirements at the various stages of their development.</td>
<td></td>
</tr>
<tr>
<td>2. You must design your feeding regimes to prioritise:</td>
<td></td>
</tr>
<tr>
<td>a) animal health</td>
<td></td>
</tr>
<tr>
<td>b) the production of high quality aquaculture products including nutritional composition</td>
<td></td>
</tr>
<tr>
<td>c) low environmental impact.</td>
<td></td>
</tr>
<tr>
<td><em>(EC) 834/2007 Art. 15d(i)</em> <em>(EC) 889/2008 Art. 25(j)</em></td>
<td></td>
</tr>
<tr>
<td><strong>10.1.2 Feeding priorities for carnivorous aquaculture species</strong></td>
<td>You can choose from the above sources of feed in order to meet the animals’ nutritional requirements at the various stages of their development, but where possible they must be used in order of preference.</td>
</tr>
<tr>
<td>1. You must source feed for carnivorous aquaculture animals with the following priorities:</td>
<td>For operators in the UK, Defra (the competent authority) has provided additional guidance on the sustainability criteria for whole fish. Your Certification Officer can provide you with a copy on request.</td>
</tr>
<tr>
<td>a) organic feed products of aquaculture origin</td>
<td></td>
</tr>
<tr>
<td>b) fish meal and fish oil from organic aquaculture trimmings</td>
<td></td>
</tr>
<tr>
<td>c) fish meal and fish oil and ingredients of fish origin derived from trimmings of fish already caught for human consumption in sustainable fisheries</td>
<td></td>
</tr>
<tr>
<td>d) organic feed materials of plant or animal origin</td>
<td></td>
</tr>
<tr>
<td>e) feed products derived from whole fish caught in fisheries certified as sustainable under a scheme recognised by the competent authority in line with the</td>
<td></td>
</tr>
</tbody>
</table>

2. The feed ration may comprise a maximum of 60% organic plant products.

   *(EC) 834/2007 Art. 15d(ii)  
   (EC) 889/2008 Art. 25k(1)(2)(3); Art. 79b (d)*

<table>
<thead>
<tr>
<th>10.1.3 Feeding histidine</th>
</tr>
</thead>
<tbody>
<tr>
<td>When the feed sources allowed in these standards do not provide sufficient amounts of histidine to prevent cataracts and to meet the dietary needs of salmonid fish you may feed histidine sources produced through fermentation.</td>
</tr>
</tbody>
</table>

   *(EC) 889/2008 Art. 25k (5)*

<table>
<thead>
<tr>
<th>10.1.4 Feeding astaxanthin</th>
</tr>
</thead>
<tbody>
<tr>
<td>You may feed salmon and trout astaxanthin derived primarily from organic sources such as organic crustacean shells, within the limit of their physiological needs. If organic sources are not available you may use natural sources of astaxanthin such as <em>Phaffia</em> yeast.</td>
</tr>
</tbody>
</table>

   *(EC) 889/2008 Art. 25k (4)*

<table>
<thead>
<tr>
<th>10.1.5 Feeding freshwater species</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. The following species must be fed feed which is naturally available in ponds and lakes:</td>
</tr>
<tr>
<td>a) carp and associated species in polyculture systems (perch, pike, catfish, coregonids and sturgeon)</td>
</tr>
<tr>
<td>b) Penaeid shrimp and freshwater prawns (<em>Macrobrachium</em> spp.)</td>
</tr>
<tr>
<td>c) tropical freshwater fish – milkfish, tilapia and Siamese catfish (<em>Pangasius</em> spp.)</td>
</tr>
<tr>
<td>2. When natural feed is not available in sufficient quantity, you may feed seaweed or organic feed of plant origin, preferably grown on the holding.</td>
</tr>
<tr>
<td>a) Where you are supplementary feeding Penaeid shrimp in this way, you may feed a maximum of 25% fishmeal and 10% fish oil derived from sustainable fisheries.</td>
</tr>
</tbody>
</table>
b) You may also supplement the diets of Penaeid shrimp with organic cholesterol. Where organic cholesterol is not available, you may use non-organic cholesterol derived from wool, shellfish or other sources.

c) When you are supplementary feeding Siamese catfish (*Pangasium* spp.) in this way you may include a maximum of 10% fishmeal or fish oil derived from sustainable fisheries.

(EC) 834/2007 Art. 15d(ii)
(EC) 889/2008 Art. 25l, Art.79b (d)

### 10.1.6 Permitted feed for juveniles

In the larval rearing of organic juveniles, non-organic phytoplankton and zooplankton may be used as feed.

(EC) 889/2008 Art. 25la

### 10.2 Aquaculture feeds

**What is this chapter about?**

The following standards are taken out of the Soil Association aquaculture standards which details which additives and minerals are permitted in organic aquaculture feeds and the conditions of their use.

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>10.2.1 Permitted feed minerals</strong></td>
<td></td>
</tr>
<tr>
<td>You may use the following feed materials of mineral origin in organic aquaculture feeds:</td>
<td></td>
</tr>
<tr>
<td>1. Calcareous marine shells</td>
<td></td>
</tr>
<tr>
<td>2. Calcium gluconate</td>
<td></td>
</tr>
<tr>
<td>3. Calcium carbonate</td>
<td></td>
</tr>
<tr>
<td>4. Defluorinated monocalciumphosphate</td>
<td></td>
</tr>
<tr>
<td>5. Defluorinated dicalciumphosphate</td>
<td></td>
</tr>
<tr>
<td>6. Magnesium oxide (anhydrous magnesia)</td>
<td></td>
</tr>
<tr>
<td>7. Magnesium sulphate</td>
<td></td>
</tr>
<tr>
<td>8. Magnesium chloride</td>
<td></td>
</tr>
<tr>
<td>9. Magnesium carbonate</td>
<td></td>
</tr>
<tr>
<td>10. Calcium magnesium phosphate</td>
<td></td>
</tr>
<tr>
<td>11. Magnesium phosphate</td>
<td></td>
</tr>
<tr>
<td>12. Monosodium phosphate</td>
<td></td>
</tr>
<tr>
<td>13. Calcium sodium phosphate</td>
<td></td>
</tr>
<tr>
<td>14. Sodium chloride</td>
<td></td>
</tr>
<tr>
<td>15. Sodium bicarbonate</td>
<td></td>
</tr>
<tr>
<td>16. Sodium carbonate</td>
<td></td>
</tr>
<tr>
<td>17. Sodium sulphate</td>
<td></td>
</tr>
<tr>
<td>18. Potassium chloride</td>
<td></td>
</tr>
</tbody>
</table>

*EC* 834/2007 Art. 15d(iii, iv)  
*EC* 889/2008 Art. 25m (1), Annex V (1)

### 10.2.2 Calcified seaweed is prohibited

You must **not** use calcified seaweed, lithothamne or maerl in feeds for aquaculture livestock.  

*Soil Association higher standard*

This applies even if feed certified to other organic standards is re-certified to SA standards.  
If you are unclear whether extra sourcing requirements apply, please contact your certification officer.

**Why?**

Calcified seaweed, lithothamne and maerl refer to a group of coralline algae, primarily of the species *Phymatolithon calcareaeum*, *Lithothamnion glaciale* 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.
### Standards

#### 10.2.3 Permitted feed additives

You may use the following feed additives or products in animal nutrition and processing aids:

*(EC) 834/2007 Art. 15d (iii, iv)*

*(EC) 889/2008 Art. 25m (2), Annex VI*

<table>
<thead>
<tr>
<th>ID number or Functional Group</th>
<th>Substance</th>
<th>Description/conditions for use</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Preservatives</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>E200</td>
<td>Sorbic acid</td>
<td></td>
</tr>
<tr>
<td>E 236</td>
<td>Formic acid</td>
<td></td>
</tr>
<tr>
<td>E 237</td>
<td>Sodium formate</td>
<td></td>
</tr>
<tr>
<td>E 260</td>
<td>Acetic acid</td>
<td></td>
</tr>
<tr>
<td>E 270</td>
<td>Lactic acid</td>
<td></td>
</tr>
<tr>
<td>E 280</td>
<td>Propionic acid</td>
<td></td>
</tr>
<tr>
<td>E 330</td>
<td>Citric acid</td>
<td></td>
</tr>
<tr>
<td><strong>Antioxidants</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1bE306(i)</td>
<td>Tocopherol extracts from vegetable oils</td>
<td></td>
</tr>
<tr>
<td>1bE306(ii)</td>
<td>Tocopherol-rich extracts from vegetable oils (delta rich)</td>
<td></td>
</tr>
<tr>
<td><strong>Emulsifying and stabilising agents, thickeners and gelling agents</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1c322</td>
<td>Lecithins</td>
<td>Only if derived from organic raw material Use restricted to aquaculture animal feed</td>
</tr>
<tr>
<td><strong>Binders, anti-caking agents and coagulants</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>E412</td>
<td>Guar gum</td>
<td></td>
</tr>
<tr>
<td>E 535</td>
<td>Sodium ferrocyanide</td>
<td>Maximum dose rate of 20 mg/kg NaCl calculated as ferrocyanide anion</td>
</tr>
<tr>
<td>ID number or Functional Group</td>
<td>Substance</td>
<td>Conditions of use</td>
</tr>
<tr>
<td>------------------------------</td>
<td>-----------------------------------------------------</td>
<td>----------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>E51b</td>
<td>Colloidal silica</td>
<td></td>
</tr>
<tr>
<td>E51c</td>
<td>Kieselgur (diatomaceous earth, purified)</td>
<td></td>
</tr>
<tr>
<td>1m558i</td>
<td>Bentonite</td>
<td></td>
</tr>
<tr>
<td>E59</td>
<td>Kaolinitic clays, free of asbestos</td>
<td></td>
</tr>
<tr>
<td>E60</td>
<td>Natural mixtures of stearites and chlorite</td>
<td></td>
</tr>
<tr>
<td>E61</td>
<td>Vermiculite</td>
<td></td>
</tr>
<tr>
<td>E62</td>
<td>Sepiolite</td>
<td></td>
</tr>
<tr>
<td>E66</td>
<td>Natrolite-Phonolite</td>
<td></td>
</tr>
<tr>
<td>1g568</td>
<td>Clinoptilolite of sedimentary origin, [All species]</td>
<td></td>
</tr>
<tr>
<td>E599</td>
<td>Perlite</td>
<td></td>
</tr>
<tr>
<td><strong>Sensory additives</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2b</td>
<td>Flavouring compounds</td>
<td>Only extracts from agricultural products</td>
</tr>
<tr>
<td></td>
<td></td>
<td><em>(Castanea sativa</em> Mill.: Chestnut extract)</td>
</tr>
<tr>
<td><strong>Nutritional additives</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3a</td>
<td>Vitamins and provitamins</td>
<td>Derived from agricultural products</td>
</tr>
<tr>
<td></td>
<td></td>
<td>If derived synthetically, only those identical to vitamins derived from agricultural products may be used for aquaculture animals.</td>
</tr>
<tr>
<td><strong>Trace elements</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ID number or Functional Group</td>
<td>Substance</td>
<td>Conditions of use</td>
</tr>
<tr>
<td>E1 Iron</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3b101</td>
<td>Iron(II) carbonate (siderite)</td>
<td></td>
</tr>
<tr>
<td>3b103</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Code</td>
<td>Description</td>
<td></td>
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<tr>
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</tr>
<tr>
<td>3b104</td>
<td>Iron(II) sulphate monohydrate</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Iron(II) sulphate heptahydrate</td>
<td></td>
</tr>
<tr>
<td>3b201</td>
<td>Potassium iodide</td>
<td></td>
</tr>
<tr>
<td>3b202</td>
<td>Calcium iodate, anhydrous</td>
<td></td>
</tr>
<tr>
<td>3b203</td>
<td>Coated granulated calcium iodate anhydrous</td>
<td></td>
</tr>
<tr>
<td>3b301</td>
<td>Cobalt(II) acetate tetrahydrate</td>
<td></td>
</tr>
<tr>
<td>3b302</td>
<td>Cobalt(II) carbonate</td>
<td></td>
</tr>
<tr>
<td>3b303</td>
<td>Cobalt(II) carbonate hydroxide (2:3) monohydrate</td>
<td></td>
</tr>
<tr>
<td>3b304</td>
<td>Coated granulated cobalt(II) carbonate</td>
<td></td>
</tr>
<tr>
<td>3b305</td>
<td>Cobalt(II) sulphate heptahydrate</td>
<td></td>
</tr>
<tr>
<td>3b402</td>
<td>Copper(II) carbonate dihydroxy monohydrate</td>
<td></td>
</tr>
<tr>
<td>3b404</td>
<td>Copper(II) oxide</td>
<td></td>
</tr>
<tr>
<td>3b405</td>
<td>Copper(II) sulphate, pentahydrate</td>
<td></td>
</tr>
<tr>
<td>3b409</td>
<td>Dicopper chloride trihydroxide (TBCC)</td>
<td></td>
</tr>
<tr>
<td>3b502</td>
<td>Manganese (II) oxide</td>
<td></td>
</tr>
<tr>
<td>3b503</td>
<td>Manganous sulfate, monohydrate</td>
<td></td>
</tr>
<tr>
<td>3b603</td>
<td>Zinc oxide</td>
<td></td>
</tr>
<tr>
<td>3b604</td>
<td>Zinc sulphate heptahydrate</td>
<td></td>
</tr>
<tr>
<td>3b605</td>
<td>Zinc sulphate monohydrate</td>
<td></td>
</tr>
<tr>
<td>3b609</td>
<td>Zinc chloride hydroxide monohydrate (TBZC)</td>
<td></td>
</tr>
<tr>
<td>Code</td>
<td>Description</td>
<td></td>
</tr>
<tr>
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<td>-----------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>3b701</td>
<td>Sodium molybdate dihydrate</td>
<td></td>
</tr>
<tr>
<td>3b801</td>
<td>Sodium selenite</td>
<td></td>
</tr>
<tr>
<td>3b8.10, 3b8.11, 3b8.12, 3b8.13 and 3b8.17</td>
<td>Selenised yeast inactivated</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Zootechnical additives</strong></td>
<td></td>
</tr>
<tr>
<td>4a, 4b, 4c and 4d</td>
<td>Enzymes and micro-organisms in the category of “Zootechnical additives”</td>
<td></td>
</tr>
</tbody>
</table>

**Standards**

**10.2.4 Synthetic amino-acids and growth promoters are prohibited**

You must not use synthetic amino-acids or growth promoters

*(EC) 834/2007 Art. 15(d)(iv)*