



## Summary of standards changes

### Organic standards documents updated Friday 31<sup>st</sup> January 2020 – version 18.3

This document summarises the changes made to the Soil Association Organic Standards documents for version 18.3, including a recent amendment to the EU Organic Regulation.

If you have any questions, please contact the Standards Team by emailing [standards@soilassociation.org](mailto:standards@soilassociation.org).

#### Update to the EU Organic Regulation

An amendment to the EU organic regulation\* has been published and comes into effect on Monday 3<sup>rd</sup> February. This relates to import/export from third countries (outside the EU) and clarifies that the certificate of inspection (COI) must be issued by the certification body of the exporter before the consignment leaves the third country of export or origin.

Due to feedback received regarding the difficulty of such a quick turnaround, the European Commission has allowed some of the transport information on the COI to be filled out provisionally at the time of issue. However all information must be completed within 10 days of issuing the COI and, in any case, before endorsement of the COI from the importing authority. This is currently within the guidance of the relevant standard, until a further EU amendment makes it officially part of the standard (6.8.7).

\*New EU regulation 2020/25 amends EC 1235/2008.

#### Consolidated edits to Soil Association Organic Standards

The changes outlined below have been applied to the relevant standards documents which are: **farming & growing and food & drink**. In this document we have not included small edits that have been made to formatting, grammar and spelling. These changes include the recent EU regulation update as well as general edits to the standards guidance. An exemption has also been made to the labelling standard for the identification of non-organic ingredients of ingredients (5.8.2).

Key to text changes: (~~strikethrough~~ = delete; underlined = new wording; normal text = no change)

## Changes to Food and Drink Standards

<p><b>5.8.2 Products with 95%-100% organic ingredients</b></p> <p>1. Food products containing 95%-100% organic agricultural ingredients can be labelled as organic provided that they meet the composition requirements in standard 6.3.1 and the labelling includes the following:</p> <p style="text-align: right;"><i>(EC) 834/2007 Art. 23(4)(a)</i></p> <p>a) An indication of which ingredients are organic in the ingredients list.</p> <p style="text-align: right;"><i>(EC) 834/2007 Art. 23(4)</i></p> <p>b) The EU organic logo on pre-packaged food.</p> <p style="text-align: right;"><i>(EC) 834/2007 Art. 25; Art. 24(1)(b)</i></p> <p>c) When the EU logo is used, an indication of where the ingredients were farmed or grown (see standard 5.8.7).</p> <p style="text-align: right;"><i>(EC) 834/2007 Art. 24(1)(c)</i> <i>(EC) 889/2008 Art. 58(2)</i></p> <p>d) 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.</p> <p style="text-align: right;"><i>(EC) 834/2007 Art. 24(1)(a)</i> <i>(EC) 889/2008 Art. 58(1)(d)</i></p> <p>e) A traceability code, such as a batch or date code.</p> <p style="text-align: right;"><i>(EC) 889/2008 Art. 31(1)(d)</i></p> <p>f) 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</p>	<p>Guidance for each point is set out below:</p> <p>a) Identifying organic ingredients</p> <p>If any non-organic ingredients are used, make a clear indication on the ingredients panel as to the organic status of each ingredient. This includes water and salt as these are non-organic.</p> <p>For example: Ingredients: Organic flour (fortified with calcium carbonate, iron, niacin, thiamin), water, organic eggs, organic sunflower seeds, yeast, salt.</p> <p>Or, Ingredients: Flour (fortified with calcium carbonate*, iron*, niacin*, thiamin*), water*, eggs, sunflower seeds, yeast*, salt*. *Non-organic.</p> <p>b) Using the EU logo</p> <p>The EU sets the rules for the use of the EU leaf logo. Its use is optional on foods imported from outside the EU. It cannot be used on non-food products. See EU logo standard DL a for details.</p> <p>c) Statement of agricultural origin</p> <p>See standard 'declaring ingredient origin' (5.8.7) for details.</p> <p>d) Certifier code</p> <p>Each certification body has its own code, which its operators need to use on pack. The code for Soil Association Certification in the UK is <b>GB-ORG-05</b>. 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 which must be used.</p> <p>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</p>
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<p>indelible. <i>(EC) 834/2007 Art. 24(2)</i></p>	<p>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.</p> <p>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.</p> <p>If you are in any doubt as to what certifier code you should use on your labels please contact your Certification Officer for guidance.</p> <p>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.</p> <p>e) Traceability code Your labelling must include a traceability code. Please refer to the record keeping standard 5.7.1 for details.</p> <p>g) Identifying non-organic ingredients of ingredients You must list any non-organic ingredients of ingredients. For compound ingredients you can either list the individual non-organic ingredient in the compound ingredient, or use a generic description such as 'contains a non-organic ingredient'.</p> <p><u>If you are using an organic flavouring in a product, you do not need to list the non-organic components of the organic flavouring, provided the non-organic components account for less than 1% of the final product.</u></p>
<p>g) Your ingredients list must identify any non-organic ingredients of ingredients, <u>unless exempted – as outlined in the guidance</u> <i>Soil Association higher standard</i></p>	

\*this standard has been updated in the Food and Drink standards and Farming and Growing standards.

### 6.4.1 Using organic additives

Where additives are available in organic form and in sufficient quantity, you must use them, unless you can provide sufficient justification for not doing so. See the Guidance for a list of additives that are currently available as organic.

*Soil Association higher standard*

 If you source products certified to other organic standards they must meet this Soil Association requirement.

The following additives are considered to be available in organic form and in sufficient quantity and quality in most cases:

- locust bean gum
- guar gum
- arabic gum
- [lecithin](#)

There may be circumstances where organic additives are available but they are not suitable for your products. In such cases, you will need to provide sufficient justification for not using them. Sufficient justification will need to include a demonstration of the following:

- alternative organic additives are unsuitable for use in the product(s) in question
- the organic version is not available in sufficient quantity
- the organic version is of a quality that makes it functionally unsuitable for use in your products.


All requests will be reviewed by the Soil Association Certification Committee.

#### Why?

Organic ingredients should always be used where they are available. This helps to grow the market for organic ingredients and by doing so, increases the positive impacts of organic production. Even though the EU organic regulation does not require all additives to be organic, we think that if an additive is available as organic and is of sufficient quality and quantity, it should be used.

### 6.8.7 Certificates of Inspection

1. All organic products imported into the EU must be accompanied by an original endorsed Certificate of Inspection (COI) issued in the third country.
2. The endorsed COI must accompany goods to the premises of first consignee and then must be kept by the importer for at least two years.

 COIs need to be issued and endorsed (signed and stamped in box 14) by the certification body of the exporter and need to be available at the EU port of entry for further endorsement by the member state authority.

#### Electronic Certification of Inspection for the import of organic products into the EU

COIs are sometimes referred to as 'transaction certificates'.

3. The first consignee or importer (where relevant) can make a copy of the COI in order to fulfil the record keeping requirements listed in 6.8.10, provided it is printed or stamped 'COPY' or 'DUPLICATE'.

*(EC) 834/2007 Art. 33*

*(EC) 1235/2008 Art. 13*

The new system of electronic certificate for imports of organic products became compulsory on 20 October 2017. The electronic certificate aims to enhance traceability of imported organic products and reduce potential fraud. It also aims to reduce the administrative burden for operators and authorities, and provides statistical data on organic imports. You can find out more at [https://ec.europa.eu/agriculture/organic/electronic-certificate\\_en](https://ec.europa.eu/agriculture/organic/electronic-certificate_en)

Importers, and exporters in the country of origin, must register for a TRACES NT account. This is the electronic system used by the European Commission to issue and monitor all COIs.

According to the EC organic regulation the certificate of inspection must be issued by the certification body of the exporter before the consignment leaves the country of export. The certification body will carry out the necessary documentary checks before signing box 18. However, Box 13, Box 16 and Box 17 of the COI may be filled in with the provisional information available at the time of issuing the COI. Final transport documents must be included by the certification body within 10 days from the issuance of the COI and, in any case, before endorsement of the COI from the importing authority. So it is important to check that your exporter is aware of this and able to meet this requirement to ensure you do not experience any problems on import.

Control bodies and control authorities will be able to update the information in Boxes 13, 16 and 17 and upload the final transport documents in TRACES after the signature of Box 18 and before the COI is endorsed by the Member State (in Box 20).

In the UK, the Port Health Authority (PHA) is responsible for checking documentation of organic produce at the port of arrival. They have the authority to stop entry of organic product not accompanied by a valid COI and the goods may be held at port or lose their organic status. The PHA checks that the information on the COI matches with the goods being imported and other documents associated with the shipment e.g. the Airway Bill or Bill of Landing. If the information is correct they endorse the COI (they complete box 20 on the form) & the goods are allowed to enter the EU as organic.

If products are imported without the endorsed COI then the competent authority will not allow them to be endorsed retrospectively. If you do not have an endorsed COI for each consignment, the product may lose its organic status.

Whilst the exporter is responsible for getting the COI issued and endorsed by their certification body before the product is exported to the EU, it is the importer's responsibility to ensure that the valid COI is presented at port for each consignment. You need to ensure that each section of the COI is endorsed by the relevant party and that you retain the stamped originals for a minimum of two years. If you or the first consignee make a copy of the COI then it must be marked as 'COPY' or 'DUPLICATE'.

Any products without original COIs may lose organic status.

UK Port Health Authorities charge for endorsing COIs. Please check with the PHA at your proposed port of arrival for details of their costs. Some certification bodies also charge their licensees for issuing COIs, however the Soil Association does not charge for this service.

First consignee means the natural or legal person to whom the imported consignment is delivered who will receive it for further preparation and/or marketing.

Changes to Farming and Growing Standards

**2.6.3. Permitted pesticides and plant protection products**

All substances listed in this table must comply at least with the conditions for use as specified in the Annex of Commission Implementing Regulation (EU) No 540/2011. More restrictive conditions for use for organic production are specified in the second column of the table.

(EC) 834/2007 Art. 16(1)(a)

(EC) 889/2008 Annex II

Name of product	Description, compositional requirements, conditions for use	Soil Association additional conditions
<b>Substances of plant or animal origin</b>		
Allium sativum (Garlic extract)		
Azadirachtin extracted from <i>Azadirachta indica</i> (Neem tree)		
Beeswax	Only as pruning agent/wound protectant	
COS-OGA		
Hydrolysed proteins excluding gelatine		
Laminarin	Kelp must be either grown organically according to standard 15.7.4 (Art. 6d) or harvested in a sustainable way according to standard 15.7.3 (Art. 6c) of the Soil Association seaweed standards.	
Maltodextrin		
Pheromones	Only in traps and dispensers	
Plant oils	All uses authorised, except herbicide.	
Pyrethrins	Only from plant origin	
Quassia extracted from <i>Quassia amara</i>	Only as an insecticide, repellent	
Repellents by smell of animal or plant origin/sheep fat	Only on non-edible parts of the crop and where crop material is not ingested by sheep or goats	
<i>Salix</i> spp. Cortex (aka willow bark extract)		
<b>Basic substances</b>		
<b>Basic substances based on food</b>	Only those basic substances within the meaning of Article 23(1) of <i>Regulation (EC) No 1107/2009</i> that are covered by the definition of 'foodstuff' in Article 2 of <i>Regulation (EC) No 178/2002</i> and have plant or animal origin.	

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	<p>Substances not to be used as herbicides, but only for the control of pests and diseases.</p> <p>Basic substances are substances which are useful in plant protection, but are not predominantly used for this purpose. Many of them have traditionally been used in organic farming and include numerous foodstuffs of plant or animal origin.</p> <p>Substances that fall under this category are:</p> <ul style="list-style-type: none"> <li>• Lecithins</li> <li>• Sucrose</li> <li>• Fructose</li> <li>• Vinegar</li> <li>• Whey</li> <li>• Equisetum arvense L.</li> <li>• Chitosan hydrochloride (Obtained from sustainable fisheries or organic aquaculture)</li> </ul> <p><b>Contact your Certification Officer for more information</b></p>	
<b>Micro-organisms or substances produced by or derived from micro-organisms</b>		
Micro-organisms	Not from GMO origin	
Spinosad		Not from GMO origin
Cerevisane		Not from GMO origin
<b>Other substances</b>		
Aluminium silicate (Kaolin)		
Calcium hydroxide	Fungicide, only in fruit trees, including nurseries, to control <i>Nectria galligena</i>	
Carbon dioxide		
<p>Copper compounds in the form of:</p> <ul style="list-style-type: none"> <li>• copper hydroxide</li> <li>• copper oxychloride</li> </ul>	<p><b>Guidance</b></p> <p><u>In compliance with PPP legislation you may use a maximum of 4kg/ha in any one year provided that over 7 years you do not exceed 28kg/ha.</u></p>	



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<ul style="list-style-type: none"> <li>• copper oxide</li> <li>• Bordeaux mixture</li> <li>• tribasic copper sulphate</li> </ul>		
Diammonium phosphate	Only as attractant in traps	
Ethylene		
Fatty acids	All uses authorised, except herbicide	
Ferric phosphate (iron (III) orthophosphate)	Preparations to be surface-spread between cultivated plants.	
Hydrogen peroxide		
Kieselgur (diatomaceous earth)		
Lime sulphur (calcium polysulphide)		
Paraffin oil		
Potassium and sodium hydrogen carbonate (aka potassium/sodium bicarbonate)		
Pyrethroids (only deltamethrin or lambdacyhalothrin)	Only in traps with specific attractants; only against <i>Bactrocera oleae</i> and <i>Ceratitis capitata</i> Wied	
Quartz sand		
Sodium chloride	All uses authorised, except herbicide	Only sea and rock salt
Sulphur		