Labelling Guidelines for UK organic food and feed products from 1st January 2021

This document provides Soil Association Certification’s licensees with labelling rules for GB and EU (including Northern Ireland) markets as a result of the end of the transition period on 1st January 2021. It does not include organic labelling rules which will not change such as the list of ingredients – for these rules refer to the Soil Association Food & Drink standards.

For any labelling that is non-compliant, placed on the UK market from 1st January 2021, Defra have confirmed there will be a grace period for technically non-compliant labelling, (e.g. certification codes, agricultural statements, EU Logo), up to September 2022. This is to allow time to use up existing labels and for labelling amendments to take place.

The EU (and NI) will continue to accept products from GB with existing labelling provided the products were placed on the market, either in the EU or GB, prior to 31st Dec 2020. The definition of ‘placing on the market’ includes written or verbal agreement for the transfer of ownership or possession, or an offer of sale to supply a product for distribution, consumption or use in the UK or the EU. This relates to an existing and individually identifiable good, after manufacturing has taken place.

All certification codes refer to Soil Association Certification. If your product is packed by a company certified by another certifier you will need to consult them about the correct code.

We can provide feedback on draft labelling amendments. If you’d like to send draft amended labels, please use our Brexit label submissions form.

The information provided relates to organic requirements only. It is your responsibility to ensure your labels comply with any other legal requirements for products exported to EU. You can find details here.

This guide covers:

- **Products placed on GB market**
- **Products placed on EU or NI market**
- **Dual labelling for products out of scope of UK-EU Trade Agreement**
- **Products packed in Northern Ireland**
- **Products exported to non-EU markets**
- **Scope of the UK-EU Trade Agreement**
1. Products placed on GB market (England, Wales Scotland):
   - packed by a Soil Association Certification licensee,
   - certified to the EU regulations 834/2007 & 889/2008 (as retained in GB),
   - Certification code GB-ORG-05
   - UK statement of agricultural origin, (on organic pre-packed product only), one of:
     - UK agriculture
     - Non-UK agriculture
     - UK and non-UK agriculture
     - or the name of an individual country if more than 98% of the ingredients are grown there
   - SA logo (where certified to SA standards)
   - EU organic logo optional
   - If the EU is logo used:
     - EU agriculture, non EU agriculture, or EU/non EU agriculture, is required in addition to the UK agriculture statement (or if the name of an individual country is used, only one statement of agriculture is required).

Although there is no requirement for where the UK agriculture statement appears, it is recommended it is in the same visual field as the certification code. If used the EU agriculture statement must appear below the certification code.

**NB:** products sold in GB which have been packed in the EU or other third countries, and certified and labelled according to the EU organic regulation, do not need to additionally meet these rules (i.e. the UK agriculture statement is not required in addition to an EU agriculture statement). Where the product is for sale only in GB the use of the EU organic logo is optional.

For example, a product certified to the EU organic regulations (as retained in GB) and Soil Association standards may use one of:

<table>
<thead>
<tr>
<th>GB-ORG-05</th>
<th>GB-ORG-05</th>
<th>GB-ORG-05</th>
</tr>
</thead>
<tbody>
<tr>
<td>UK agriculture</td>
<td>Non UK agriculture</td>
<td>UK/non UK agriculture</td>
</tr>
</tbody>
</table>

Or if the EU logo is used:

<table>
<thead>
<tr>
<th>GB-ORG-05</th>
<th>GB-ORG-05</th>
<th>GB-ORG-05</th>
</tr>
</thead>
<tbody>
<tr>
<td>UK agriculture</td>
<td>EU agriculture</td>
<td>EU/non EU agriculture</td>
</tr>
<tr>
<td>Non UK agriculture</td>
<td></td>
<td>UK/Non UK agriculture</td>
</tr>
</tbody>
</table>

2. Products placed on EU or NI market

Products covered under the scope of the UK-EU Trade Agreement ([see section 6](#)) may be labelled as described under section 1 above.
Products being exported to EU or NI not covered under the scope of the UK-EU Trade Agreement*, if packed and/or labelled by the exporter can be certified to the Soil Association EU equivalent standards (EC regulation 1235/2008 annex IV):

- Certification code GB-BIO-142
- SA logo (where certified to SA standards)
- EU logo optional >95% of the agricultural ingredients are organic
- Statement of agriculture required when EU logo used
  - EU agriculture
  - Non-EU agriculture
  - EU & non-EU agriculture (or the name of an individual country if more than 98% of the ingredients are grown there)

The above would also be applied to exports to EEA countries.

For example, a product certified to EU equivalent standards and Soil Association standards:

If the products being exported are not being packed and/or labelled by the exporter, the product labels themselves do not require amendment (can be labelled as per section 1) however the exporter will need to:

- Create a new lot code for the consignment
- Label the outer packaging (e.g. outer case labels, pallet labels) with the new lot number and GB-BIO-142
- Refer to the new lot number in the export document.

For more details about what you will need to do please refer to our ‘Guide for exporting out of scope products.’

3. Dual labelling for products out of scope of UK-EU Trade Agreement (see section 6)

For products out of scope of the trade agreement intended to be placed both on the GB market and the EU market (including NI), Defra have indicated that a label can contain both sets of labelling requirements i.e. GB-ORG-05 and UK/non UK agriculture; and GB-BIO-142 (and EU/non-EU agriculture if EU logo used).

For these products if you wish to have one label to cover both markets you must ensure that:

- the positioning of the codes in relation to the EU organic logo is clear.
- GB-BIO-142 must appear in the same visual field as the EU logo with the EU statement of agriculture directly below the certification code.
- GB-ORG-05 must be clearly linked to the UK agricultural statement.
For example, a product grown in the EU and prepared but not processed in the UK:

Note: GB-ORG-05 and the UK required statement of agriculture does not have to appear next to EU logo and associated certification code and statement of EU agriculture.

4. Products packed in Northern Ireland

Businesses in NI will continue to be certified to the EU organic regulation, there will be no changes. You can continue to use GB-ORG-05, the EU logo and access the UK and EU market. However, if ingredients for your product are produced within GB, you will need to change the statement of agriculture to reflect non-EU origin.

If the product consists of >98% agricultural ingredients from any individual country, EU agriculture or non EU agriculture can be replaced with the name of that country.

5. Products exported to non EU markets

The label must meet the requirements of that market, check with your customer and their certification body. Some markets may have additional or different requirements (e.g. South Korea will not accept the EU logo for products packed in GB).

6. Scope of the UK-EU Trade Agreement.

The trade agreement covers products which are grown/produced or processed in the UK, or imported into GB and processed. Product imported into GB and not further processed, (e.g. packed or labelled), is not covered by the EU-UK trade agreement. To enable export of product outside of the scope of agreement SA Certification has been recognised by the EC under annex IV of regulation 1235/2008 and has been issued the code GB-BIO-142 for these activities. Further details of the trade agreement can be found here.