

Contents

Introduction	3
Guide to using these standards	4
SA GB 8 General standards for feed processing	6
SA GB 8.1 Scope	6
SA GB 8.2 Principles	6
SA GB 8.3 Becoming Soil Association certified	8
SA GB 8.4 Your obligations when certified	11
SA GB 8.5 Inspections	13
SA GB 8.6 Non-compliance with the standards	15
SA GB 8.7 Record keeping	
SA GB 8.8 General labelling	20
SA GB 8.9 Detailed labelling requirements for feed	
SA GB 8.10 Making claims on your labels	29
SA GB 8.11 Preserving organic integrity	31
SA GB 8.12 Cleaning	34
SA GB 8.13 Pest control	38
SA GB 8.14 Transport, dispatch and receipt of goods	41
SA GB 8.15 Storage of products	44
SA GB 8.16 Packaging	45
SA GB 8.17 General manufacturing	53
SA GB 9 Specific standards for feeding livestock	55
SA GB 9.1 Standard for feeding livestock	55
SA GB 10 Specific standards for feeding aquaculture animals	67
SA GB 10.1 Feeding fish, crustaceans and echinoderms	67
SA GB 10.2 Aquaculture feeds	70

Introduction

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. These regulations were the legal basis for the control of organic farming, food processing and organic labelling within the EU until 31st December 2021, and have been retained in the UK for implementation in Great Britain (GB), as set out in *The Organic Production and Control (Amendment) (EU Exit) Regulations 2019.* They are referenced throughout this document as the GB Organic Regulation. Operators based in Northern Ireland (NI) should use our EU standards which are available on our website.

The Soil Association has higher organic standards than required by the GB 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 GB 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 GB Organic Regulation.

A 'competent authority' is authorised to make rulings on organic legislation. In GB the competent authority is 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 GB 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 GB 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 GB 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 GB 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 EXAMPLE Guidance Keeping a record of any complaints you receive encourages transparency. SA GB 8.7.3 Complaints register It allows businesses to monitor issues and encourages good practice by You must keep a complaint register for your business. This ensuring there is a documented system for dealing with complaints. must record: a) all complaints you make or receive The I symbol shows where b) any response to the complaint additional relevant information is c) the action taken. provided. (EC) 834/2007 Art. 1(4) LSO17065 (4.1.2.2)(EC) 834/2007 Art. 29(2)

The relevant part of the GB organic regulation is referenced here.

SA GB 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 cheek

Soil Association higher standard

Soil Association higher standards are clearly shown.

The use of rodent glue boards is now prohibited in Wales by The Agriculture (Wales) Act 2023. In England, the Glue Trap (Offences) Act 2022 also prohibits the use, unless the glue trap is set by a pest controller granted a license by the Secretary of State as outlined in the legislation.

At the time of publication, the Scottish Parliament had voted to ban the sale of glue traps, but the implementation date had not been announced.

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

Records of checks

Glue boards should not be viewed as a permanent solution to a pest problem.

Certification Office short periods of till will be able to make

The R symbol shows which records you need to keep to demonstrate that you meet this standard.

lly for ntroller equired.

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 <u>Code of Practice on the Humane Use of Rodent Glue Boards</u> 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.

SA GB 8 General standards for feed processing		
SA GB 8.1 Scope		
Standards	Guidance	
 SA GB 8.1.1 Scope of the feed processing standards 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. It does not apply to pet food and feed for fur animals. In GB operators who sell organic products directly to the final consumer or user and who don't produce, prepare, store or import, do not need to be certified. (EC) 834/2007 Art. 1(2)(c); Art. 8 (EC) 889/2008 Art. 59; Art. 87 	In GB 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.	
SA GB 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 Art. 1(2)		

SA	GB	8.2	Pri	inci	n	les
0/ (\cup	0.2			\sim	100

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.

Standards	Guidance
SA GB 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.
- 2. To work within natural systems and cycles at all levels, from the soil to plants and animals.
- 3. To maintain the long-term fertility and biological activity of soils.
- 4. To treat livestock ethically, meeting their species-specific physiological and behavioural needs.
- 5. To respect regional, environmental, climatic and geographic differences and the appropriate practices that have evolved in response to them.
- 6. To maximise the use of renewable resources and recycling.
- 7. 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.
- 8. 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.
- 9. To exclude the use of soluble mineral fertilisers.
- 10. To foster biodiversity and protect sensitive habitats and landscape features.
- 11. To minimise pollution and waste.
- 12. To use preventative and precautionary measures and risk assessment when appropriate.
- 13. To exclude the use of GMOs and products produced from or by GMOs with the exception of veterinary medicinal products.
- 14. To sustainably use products from fisheries.

(EC) 834/2007 Art. 3; Art. 4

SA GB 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.

SA GB 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.

Standards

SA GB 8.3.1 Certifying your business

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.

(EC) 834/2007 Art. 27(1)(4); Art. 28(1)

Guidance

In GB, Defra is the competent authority and it 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.

You must comply with all applicable laws, and Qualifying Standards, including any conditions detailed in any non-compliances. Please refer to your organic client contract for more details.

SA GB 8.3.2 Activities that require certification

- 1. In GB 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 GB 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 **or** have not contracted out such activities. In other countries certification may be required for these activities.

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

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

Examples of businesses not requiring certification in GB 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 <u>contact us</u>.

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

SA GB 8.3.3 Organic certificate

- 1. You must not make reference to organic, in-conversion, or use the Soil Association symbol without valid certification documents that shows that your activity complies with these organic standards.
- 2. Certification documents are issued once Soil Association Certification has inspected your organic activity and they are satisfied that your activity meets organic standards. The certification documents will list all your certified activities and the crops, livestock and/or products you are certified to produce, process, package, store, label, import, export, and/or sell as organic.
- 3. The certification document may be in electronic format. (EC) 834/2007 Art. 29(1)(3) (EC) 889/2008 Art. 63(1)(d); Art. 68

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 'inconversion' 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.

Contact us if you need to add a new enterprise to your license – refer to standard 8.4.1 for details.

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 *The Organic Production and Control (Amendment) (EU Exit) Regulations 2019.*

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 GB 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:

Our website: www.soilassociation.org/certification/get-in-touch/

Email: GoOrganic@soilassociation.org

Phone: 0117 914 2406

Post: Soil Association Certification, Spear House, 51 Victoria Street, Bristol BS1 6AD, UK.

SA GB 8.4 Your obligations when certified

What is this chapter about?

Standards

This chapter explains your responsibilities and obligations when certified to these organic standards.

8.4.1 Description of your activities

- Before starting your organic enterprise, you must describe what practical measures you will take to ensure 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

Guidance

To help you meet this requirement we have created an application form that outlines the information we need from you.

You will need to have documentation that describes what you do. If you have a quality management system already, make sure these points are included within it.

Practical measures include ensuring staff are adequately trained, having written procedures in place for dealing with organic products, an adequate record keeping system, appropriate cleaning and hygiene, separation and identification of organic products, appropriate pest control, procedures to ensure only permitted ingredients and inputs are used for organic production.

If you make any significant changes to your activities, you must inform the Certification Team and make sure any relevant documentation is updated. Important changes are, for example, change of location of an activity, change of ownership, or change of contact person. Another important change is alteration of certified production which means that information previously submitted about the production is no longer correct.

You must let us know if and when you plan to expand into new areas. For example, if you want to start importing products. **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.

SA GB 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:

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

- 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
- 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

SA GB 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 you sign when you apply for certification with us and the declaration you sign after every inspection.

You must comply with the terms of the contract at all times.

SA GB 8.4.4 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.

Labour management tools, such as <u>Sedex</u>, 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.

SA GB 8.4.5 Certification code

- 1. Each certification body is issued with a unique certifier code.
- 2. You must use **Soil Association Certification's** 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.

(EC) 834/2007 Art. 27(10) (EC) 889/2008 Art. 58 Please refer to the labelling section 8.8 General Labelling and 8.14.2 Labelling and Transporting Products for more information on labelling requirements.

Products certified by Soil Association Certification and produced, packed or processed in GB must use the certifier code GB-ORG-05.

SA GB 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.

Standards

SA GB 8.5.1 Inspection visits

- 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.
- 2. If you are a wholesaler dealing only with pre-packaged products you may be subject to a reduced frequency of inspections.

Guidance

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

3. You may also be inspected by your competent authority as part of their surveillance of our inspection procedures.

(EC) 834/2007 Art. 27(3)(5)

(EC) 889/2009 Art. 65(1)(4); Art. 92c(2)

• you are selected as part of our additional inspection programme and/or our risk assessment of your operations suggests the need for this.

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.

SA GB 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 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.

You must respond with details of the actions you will take to address 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.

SA GB 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	
SA GB 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.
 SA GB 8.5.5 Specific rules for feed processing inspections If you process organic feed you must be subject to a full physical inspection of all your premises. 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. 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 	

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	Guidance
SA GB 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.	

SA GB 8.6 Non-compliance with the 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

You are required to complete the *Action Summary Form and Declaration* 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 the Certification Team has received your completed form and agreed that the information you have given is satisfactory they will approve the *Action Summary Form and Declaration* and renew your licence.

We may suspend or withdraw your licence in the following cases:

- if you are in breach of your contract with us
- if you do not pay your fee within the deadlines
- failure of licensee to return certified sales declaration (CSD)
- we are unable to arrange an inspection
- an inspector is refused access to premises
- an inspector is refused permission to take a sample
- if you do not send the completed *Action Summary Form and Declaration*, or the information we request, within the deadlines
- severe or repeated non-compliance resulting in loss of organic integrity of an operation, product or batch
- a fraudulent activity is reported by an authority.

SA GB 8.6.2 Reporting non-compliances

- 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.

You must inform the Certification Team if you have any suspicion that a product may not meet organic standards and stop any further sale of the product as organic until any doubt over its organic status can be eliminated. Suspicion can originate from a number of sources including (but not exclusively):

- A positive residue detection showing contamination with a substance not permitted in organic production (any detection, at any level, will initially be regarded as suspicion until an investigation has taken place). You must inform us in all positive residue detection cases.
- A complaint from a reliable source.
- You have not been able to verify the organic status of goods you have received (see section 8.7 for further information).
- Not being able to verify valid certification of a product or supplier. For example, if your supplier's certification has been revoked.
- Knowing that an element of the production did not meet organic standards, for example a prohibited substance has accidentally been applied to your crop or a non-organic ingredient has been used by mistake.

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.

An investigation will be carried out to determine if the product has met organic production rules. Once this has been determined you will be informed if the product can be put back on the market as organic or not.

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

SA GB 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)

SA GB 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 procedures which are available on request. You can make a complaint in writing, by email or by telephone.

(EC) 889/2008 Art. 92(c)

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 the Certification Team.

SA GB 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.

\frown	ta					-11-	
× 1	ГЭ	n	\sim	\mathbf{a}	r_{\prime}	\neg	
	-c			c			١.

SA GB 8.7.1 General record keeping

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

Guidance



Standards 8.7.1 – 8.7.3 apply to all licensees. More specific record keeping requirements for feed operations follow below.



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

- sold or dispatched and must allow you to demonstrate the balance between input and output. They must also allow retrospective traceability.
- 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:
 - a) the suppliers, sellers or exporters
 - b) the nature and quantities of organic products delivered, including where relevant:
 - i) nature and quantities of all materials bought and the use of such materials
 - ii) the composition of compound feed stuffs
 - c) the nature and quantities of organic products held in storage
 - d) the nature, quantities, and consignees or buyers (other than final consumers) of any products which have left your unit, premises or storage facility.
- 3. If you do not store or physically handle organic products, you will still need to keep records of:
 - a) the nature and quantities of organic products bought and sold
 - b) the suppliers, and where different, the sellers or the exporters
 - c) the buyers, and where different, the consignees. (EC) 889/2008 Art. 26(1)(2)(3); Art. 31(1)(d); Art. 66(1)(2) (EC) 834/2007 Art. 27(13)

bought/received sufficient organic material for the quantity you have sold/dispatched.

- You need to have a system to keep track of procedures and records to ensure they are correct, up-to-date and effective.
- R 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.

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.
- 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.
SA GB 8.7.2 Verifying certification documents	A certification document will be the organic certificate, or in the case of Soil
1. You must verify the certification documents of your	Association Certification licensees this includes the certificate and trading
suppliers and check that they:	schedule. The name and address on the certificate must match the name and
a) identify your supplier,	address of your supplier (the company you are purchasing from).
b) cover the type or range of products you are	
purchasing, and	The term 'suppliers' also covers businesses supplying a service, e.g. storing organic
c) are valid at the time you are making the purchase.	product.
2. You must make a record of these checks.	
(EC) 834/2007 Art. 29(2)	When you receive goods, you will also need to make the checks detailed in 8.14.3
	Tools such as <u>BioC</u> could be used as a way of doing this.
	Records of verification checks
	Treat de la vermeatien directe
SA GB 8.7.3 Complaints register	Keeping a record of any complaints you receive encourages transparency. It
You must keep a complaint register for your business. This	allows businesses to mornitor issues and encodinges good practice by
must record:	ensuring there is a documented system for dealing with complaints.
a) all complaints you make or receive	
b) any response to the complaint	
c) the action taken.	
(EC) 834/2007 Art. 27(5)(c)	
ISO65 (4.1.2.2)	
SA GB 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	

SA GB 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.

Standards

SA GB 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)

Guidance



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.

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".

If you sell organic products and non-organic products, any use of the word organic, or organic logos (certifier logos such as the SA Symbol, or the EU Organic logo), must be clear and unambiguous as to which products they apply to. Use of references to organic or logos on email footers, invoices, websites should be accompanied by an explanatory wording e.g. "We have a range of organic products, see our product listings for more details", and within the product listing a clear identification of products. For contract manufacturers/packers wording

describing the certified service offered should be included e.g. "We offer certified packing of organic products".

If your company name includes the word organic you may not use this on the labels of non-organic products. e.g. labels of non-organic products sold by 'XXX Organic Farm' could replace their branding with 'XXX Farm'. On websites and marketing materials 'XXX Organic Farm' can be used provide it is clear and unambiguous to buyers which products are organic and which are not.

1

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*.

SA GB 8.8.2 Using the EU organic logo

- 1. You must display the EU logo on labels of packaged organic food products produced in Northern Ireland or the EU.
- 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.

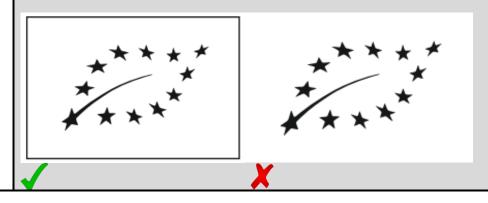


3. Where colour is not possible you may use black and white.

The use of the logo is mandatory for all organic pre-packaged food produced within Northern Ireland or 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.





- 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.
 - d) in conjunction with other logos and text referring to organic, providing this does not overlap, obscure or change the logo.
- 6. You do not have to use the EU organic logo on products produced in GB, but if you do, you must also use the declaration of where the ingredients have been farmed and the certifier code.

(EC) 834/2007 Art. 24(1)(b)(c); Art. 25 (EC) 889/2008 Art. 57; Annex XI (1)(2)(3)(4)(5)(6)(7)(8)

SA GB 8.8.3 Declaring ingredient origin

- 1. You need to include a declaration of where the ingredients have been farmed or grown
- 2. For products produced in GB you must use 'UK Agriculture', 'Non-UK Agriculture' or 'UK/Non-UK Agriculture'
- If the EU logo is used you must also include a declaration

If your product is being packed outside Northern Ireland and 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).

If the EU logo is used the declaration needs to be in the same visual field as the EU logo.

If you are in GB and use the EU organic logo for exports to the EU, you need to include both the GB statement of agriculture ('UK or non-UK Agriculture') and the EU statement of agriculture ('EU or non-EU Agriculture').

in relation to the EU - '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) immediately below the certifier code, and
- c) no more prominent than the sales description.
- 4. You can replace 'UK' or 'Non-UK', 'EU' or 'non-EU' with a particular country if all ingredients were farmed or grown there. In this case only one declaration is required. 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)

If the product contains 98% ingredients grown in a particular constituent nation of the UK, it can be labelled either as that specific country or UK Agriculture. For example, lamb produced in Wales could be labelled either as Welsh Agriculture or UK Agriculture. If you use this, it complies with both the UK and EU requirements.

SA GB 8.8.4 Using the Soil Association symbol on products

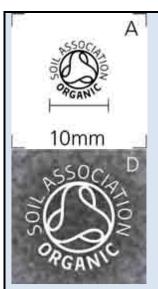
- 1. You can only use the Soil Association symbol on organic products that meet the Soil Association standards.
- 2. You must reproduce the symbol from original artwork and it must appear:
 - a) complete and upright
 - b) in proportion to the product description
 - c) at least 10mm in diameter (example 'A')
 - d) in black or white (examples 'B' and 'C')
 - e) clearly visible
 - f) clear and legible over the whole of a background, for example if used over a photograph (example 'D')
 - g) no less prominent than the EU logo

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 <u>website</u>. We also have the symbol available for use in Welsh and Gaelic.

If you are using a Soil Association certified sub-contractor to label your product they may apply the Soil Association symbol to your packaging. Organic operators certified by other certification bodies can also apply the Soil Association symbol on your packs, but only if there is a Contract Symbol User Agreement in place with them. Please talk to the Certification Team to find out more.



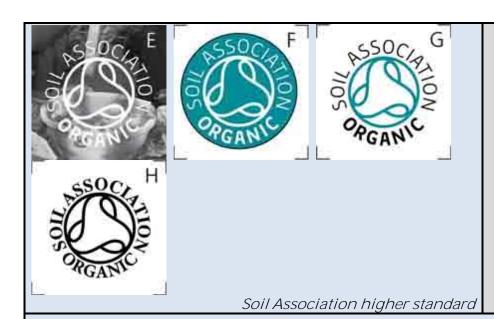




If you wish to use the symbol at a smaller size than 10mm in diameter (for example on very small packaging) or in a colour other than black and white, you must seek permission first.

- 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.



Why?

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.

Standards

SA GB 8.8.5 Using the Soil Association symbol off-product

You may use the symbol on company stationery, promotional literature and websites if we certify a range of your products, providing it is not misleading to buyer as to which products the symbol applies.

Soil Association higher standard

Guidance

You can download the symbol pack directly from our <u>website</u>. We also have the symbol available for use in Welsh and Gaelic.

If you sell SA certified products and also non-SA certified products (including non-organic products), any use of the SA symbol must be clear and unambiguous as to which products it applies to. Use of the symbol on email footers, invoices, websites should be accompanied by an explanatory wording e.g. "We have a range of products which meet the Soil Association standards, see our product listings for more details", and within the product listing a clear identification of products. For contract manufacturers/packers wording describing the certified service offered should be included e.g. "We offer packing of products certified to Soil Association standards".

Why?

The Soil Association symbol should only be used in relation to products or enterprises certified to Soil Association standards to avoid misleading consumers.

SA GB 8.9 Detailed labelling requirements for feed

What is this chapter about?

This section contains the specific requirements for labelling feed.

o tarraar ao		
SA GB 8.9.1	Rules on describing feed	

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:

- a) the processed feed complies with these standards, and
- b) 100% of the ingredients of plant or animal origin are certified organic, and at least 95% of the total dry matter of the product is certified organic agricultural ingredients.
- 2. You must not describe feeds as organic that contain:
 - a) in-conversion ingredients
 - b) permitted non-organic ingredients, and
 - c) more than 5% of total dry matter permitted non-agricultural ingredients.
- 3. You may use the following statement on feeds which meet point 1 a) and point 2:

'may be used in organic production in accordance with Regulations (EC) No 834/2007 and (EC) No 889/2008'.

(EC) 834/2007 Art. 26(a) (EC) 889/2008 Art. 59; Art. 60

Guidance

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.

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.

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

SA GB 8.9.2 Labelling requirements for feed

- 1. The terms 'organic' and 'may be used in organic production' in accordance with Regulations (EC) 834/2008 and (EC) 889/2008 as defined in standards 8.9.1 on feed labels must be:
 - a) separate from the information required for feed labelling by *Article 5 of Council Directive 79/373/EEC* (amending Council Directive 79/373/EEC on the

Link to <u>Council Directive 79/373/EEC</u> (amending Council Directive 79/373/EEC on the marketing of compound feedingstuffs and Council Directive 96/25/EC on the circulation of feed materials).

Link to Council Directive 96/25/EC (on the circulation of feed materials).

- marketing of compound feedingstuffs and *Council Directive 96/25/EC* on the circulation of feed materials) or in *Article 5(1) of Council Directive 96/25/EC* (on the circulation of feed materials)
- 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.

(EC) 834/2007 Art. 26(a) (EC) 889/2008 Art. 61

SA GB 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.

(EC) 834/2007 Art. 26(b)

(EC) 889/2008 Art.62

2. You must **not** use the EU logo on in-conversion products. *(EC)* 834/2007 Art. 25(1)

SA GB 8.9.4 Compulsory indications for labelling feed

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 GB, NI or 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 the Certification Team 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 GB Organic Regulation.

c) Traceability code Your labelling must include a traceability code. Please refer to the record keeping standards (8.7) for details.

SA GB 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.

Standards

SA GB 8.10.1 Using accurate descriptions

- 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.
- 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.

(EC) 834/2007 Art. 23(2

Guidance

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). Refer to standard 8.8.1 for further details.



Substantiating claims

You will need to be able to substantiate any claims that you make on your labels.

For example:

You should not use phrases such as 'GMO free' unless you can prove this, if challenged. Instead you could use:

- 'organic standards prohibit the use of GM materials', or
- 'non-GM'.

You should not use phrases such as 'pesticide free' unless you can prove this, if challenged. Instead you could use:

- 'Less pesticides', or
- 'Organic farming uses virtually no pesticides', or
- 'No system of farming has lower pesticide use'

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 <u>website</u>.

Labelling must not be misleading

You need to make sure that the way you label your products is not misleading.

For example if:

- you label your product as 'organic mint biscuits', it must contain organic mint.
- your product does not contain organic mint, you can only label it as 'organic biscuits with mint'.
- you label your product as 'organic strawberry ice cream' it needs to contain organic strawberries.
- your product does not contain organic strawberries but uses a natural strawberry flavouring instead, it could only be labelled as 'organic ice cream with strawberry flavour'.
- your company name includes the word organic, you cannot use it on nonorganic products. For example, you could not use the name 'Brown Farm Organics' on non-organic products.
- If you produce organic and non-organic lines in the same range, you need to make sure that the packaging is sufficiently distinguished (for example by colour, design or wording) to prevent confusion.

Labelling claims

In England, responsibility for food labelling legislation and policy is split across

Defra, the Food Standards Agency (FSA) and the Department of Health (DH).

For Scotland and Wales all domestic standards legislation is the responsibility of the FSA.

Visit this website for details.

SA GB 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.

Standards

SA GB 8.11.1 Reducing the risk of contamination

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

Guidance

Examples of risks include:

Environmental

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

Management

- Insufficient separation, clean down or procedures when carrying out nondedicated 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.
- R

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.

SA GB 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 UK and 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, 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 UK and 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 microorganisms. 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. The Certification Team 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 licence and a separate form to use for licensees producing product certified to the GB Organic Regulation only. 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.

Please note: The GMO declaration expires 12 months from the date signed. Supporting information must be dated within 12 months of sending to SA Certification. If older than 12 months you must check with the supplier that the statement is still valid and provide evidence of this to SA Certification. An updated GMO declaration is not required if you have not re-ordered the product since originally submitting evidence.

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 for GMOs. For example, soya or maize products. Testing should be to 0.1% or lower* and not just to 0.9%.

* Some laboratories can provide testing to a limit of quantification (LOQ) below 0.1%. Please refer to standard 5.6.2 for action to take if you detect GMO's in an organic product, or organic ingredient.

Why?

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.

SA GB 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.

SA GB 8.12 Cleaning

Standards

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.

Guidance

SA GB 8.12.1 Cleaning measures	Your cleaning procedures must detail how you clean harvesting/handling
1. You must have suitable cleaning measures in place to	equipment, storage areas and equipment used for organic production. Explain
prevent contamination and maintain the integrity of your	how you limit the risk of contamination of organic product from microbial
products throughout production, processing and storage.	contaminants, from cleaning chemicals, non-permitted substances and from
	non-organic product.

- 2. You must monitor your cleaning measures to make sure they are effective and keep records to show that you have done this.
- 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.

 (EC) 889/2008 Art. 63(1)(c); Art. 26(2)(b)(3)(e); Art. 35(4)(c)

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.

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).

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 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, by carrying out a final rinse with potable water..

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.

Use of chlorine based and chlorate containing disinfectants, (e.g. sodium hypochlorite, sodium hydroxide/sodium hypochlorite, sodium hydroxide), can lead to residues in organic product. When used on product contact surfaces a potable water rinse must be carried out after use of these cleaning products. There appears to be a higher risk of contamination when used in milk processing and farm dairies. Testing of the raw milk will not usually detect chlorate, but it may be detected in further processed product such as powdered milk. This can be an issue for vulnerable consumers, such as infants and babies, and the legal

maximum residue limits are for set infants and babies at 0.01%. Dairy farms and dairy processors may wish to consider alternatives to chlorine based and chlorate containing disinfectants to reduce the risk of contamination.

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.

SA GB 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.

Standards

SA GB 8.13.1 Preventing contamination by pests and pest control products

- 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)

SA GB 8.13.2 Treating infestations in organic products or areas used for 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. 26(2)

Guidance

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:

- flyscreens
- 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.

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.

For example, if you plan to use pyrethrum as a spray or fog to control insects:

if product is unpackaged, remove all organic products from the area to be treated and do not put organic products back into the treated area for at least 24 hours after the treatment

- if product is in sealed packaging it can remain, but additionally wrap the product with impermeable layer and not remove the wrapping 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
- Provide evidence that these measures were undertaken

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

SA GB 8.13.3 Using rodent glue boards

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

- 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
- humane electronic rodent repellents such as floor mats

The use of rodent glue boards is now prohibited in Wales by The Agriculture (Wales) Act 2023. In England, the Glue Trap (Offences) Act 2022 also prohibits the use, unless the glue trap is set by a pest controller granted a license by the Secretary of State as outlined in the legislation.

At the time of publication, the Scottish Parliament had voted to ban the sale of glue traps, but the implementation date had not been announced.

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



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 <u>Code of Practice on the Humane Use of Rodent Glue Boards</u> 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.

SA GB 8.14 Transport, dispatch and receipt of goods

What is this chapter about?

Standards

This section details all the standards that need to be met for the transport, dispatch and receipt of organic products.

SA GB 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.

Guidance



Collection records

(EC) 889/2008 Art. 30

SA GB 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

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.

- 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
 - 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. For Soil Association certified products which are not prepackaged, (bulk labelling) the label must include either the Soil Association symbol or the words 'Soil Association Organic'. For unpackaged product, (e.g. grain, milk, dispatching unprocessed fruit and vegetables from farm) this information must go on the accompanying paperwork. Refer to standard 5.8.3 for the requirements for use of Soil Association symbol on pre-packaged product (retail packed).

Soil Association higher standard

R

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 the organic or non-organic in separate vans. Or, close the tops of the boxes containing organic to prevent accidental contamination.

Why?

Soil Association certified products have been produced and processed to organic standards that are higher than the GBEU Organic Regulation. Writing 'Soil Association Organic' on the packaging helps to identify products that have met these higher standards.

SA GB 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; Art. 66(1)(2)

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.

R

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.

SA GB 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, inconversion feed and non-organic feed is effectively separated physically
 - 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 nonorganic 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

- Records of cleaning measures
- Records of all transport operations

SA GB 8.15 Storage of products	
What is this chapter about?	
This section details the standards for storing and handling org	
Standards	Guidance
SA GB 8.15.1 General separation You must manage your organic storage areas and containers 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)	 Demonstrate that your organic products are clearly identified and separated from areas used for other purposes. Examples include, but are not limited to: 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.
SA GB 8.15.2 Handling and separating organic and	Also refer to the 'preserving organic integrity' section 8.11, for details of
non-organic products	contamination and products and substances we do not allow.
When you use the same equipment and premises to store and	
handle both organic and non-organic products you must: a) minimise the risk of mixing organic products with other products and foodstuffs by clearly identifying and separating them during the production process, and b) effectively clean equipment and storage areas used to handle or store non-organic products before handling or storing organic products.	
(EC) 889/2008 Art. 35(4); 26 (3)	

SA GB 8.16 Packaging

Standards

SA GB 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.

Soil Association higher standard

Guidance



Packaging legislation

This standard applies to products you process, pack or label, (including on farm), or have contract made for you, (including if **you're a contract**ed symbol user). This standard does not apply if you purchase an already certified product (for example, a wholesaler buying an already certified product). In this case you do not have to supply information on the packaging of that purchased product.

You must make sure your packaging meets all relevant legislation relating to packaging, packaging waste and materials in contact with food. For example, for products sold in the UK and EU such legislation would include, but is not limited to:

- 1. the Defra regulations on extended producer responsibility for packaging products.
- 2. the <u>European Parliament and Council Directive on Packaging and Packaging</u> Waste (94/62/EC)
- 3. the <u>European Standard for Compostable Packaging (EN13432)</u> if you are using compostable packaging.
- 4. applicable legality legislation for cellulose based materials, this means the <u>UK Timber Regulations</u>, in GB, and the <u>EU Deforestation Regulations</u>, in Northern Ireland and the EU.

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 the <u>Defra Green Claims code</u>. For further information on what constitutes primary, secondary and tertiary packaging please refer to the <u>Defra definitions of packaging class data</u>.

These standards do not apply to outer packaging used to deliver the product to consumers via postal/courier service, such as postal bags/envelopes, boxes and other packaging materials used to protect contents.

These standards do not apply to retail bags used by licensed operators, for example, bags for loose fruit and veg used by a retailer or farmers' market.

To ensure that your packaging products are as widely recycled as possible we recommend using the <u>OPRL guidelines on labelling</u> to communicate whether products are recyclable at kerbside across the UK.

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.

SA GB 8.16.2 Chlorine bleached paper or cardboard If you use 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).

Demonstrate that your packaging products have not used chlorine-based processes in manufacture, for example with a packaging specification for all materials used kept on file.

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.

SA GB 8.16.3 Paper, card and wood-pulp packaging products*

Any paper, card and pulp packaging materials from forest ecosystems must be sourced responsibly.

Soil Association higher standard

*This standard comes into effect from September 2025.

Adequate evidence of compliance with this standard is demonstration that packaging products carry certification from Forest Stewardship Council (FSC) or the Programme for the Endorsement of Forest Certification (PEFC).

This can be done with an invoice for the products including a valid chain of custody claim from FSC or PEFC. Licensees can:

- source products which carry source FSC or PEFC certification from suppliers,
- obtain an independent FSC or PEFC chain of custody certificate,

establish <u>FSC</u> or <u>PEFC</u> group certification with other businesses (suitable for small businesses).

See the <u>FSC website</u> and/or the <u>PEFC website</u> for more information on the certification process and to obtain approved materials.

When using recycled paper/card material your packaging must be compliant with the approved certification schemes from PEFC or FSC, for example for FSC these include 'FSC Mix' and 'FSC Recycled' labels, more information on FSC labelling is available here.

This requirement does not apply when paper/card is derived from outside of forest ecosystems, this can include from agricultural wastes and grasses such as miscanthus. Non-timber forest products (e.g. bamboo or cork) are not within the scope of this standard but we recommend FSC/PEFC certification is sought where applicable for these products.

Any packaging purchased from September 2025 must be compliant. Packaging purchased prior to September 2025 may be used until stocks are exhausted.

Why?

Forests are fundamental in responding to the challenges we face, and to ensure a sustainable future. They regulate ecosystems, protect biodiversity, support livelihoods and help stabilise the climate. Paper packaging makes up more than half of the paper and pulp used in Europe, and this is projected to rise as many look to transition away from plastic packaging. Ensuring that products are deforestation-free is a core goal for the organic movement.

SA GB 8.16.4 Plastic materials, coatings, dyes or inks containing phthalates*

You must **not** use plastic materials, coatings, dyes or inks that contain phthalates.

Soil Association higher standard

*The changes to this standard come into effect from September 2025.

Demonstrate that you have not used these materials, for example with a packaging specification for all materials used kept on file.

This restriction applies to all packaging products in scope and is **not** restricted to plastic materials. However, for plastic materials, coatings, dyes, or inks <u>in contact</u> <u>with foodstuffs</u> the restriction applies from September 2025. For those specific products, any packaging purchased from September 2025 must be compliant and packaging purchased prior to September 2025 may be used until stocks are exhausted.

This applies to **all** phthalates, and will **not** be restricted to plastic materials, coats, dyes or inks in direct contact with foodstuffs from September 2025.

To avoid phthalates in packaging materials we recommend:

- a. avoid PVC and use plastics that do not require plasticizers for flexibility, such as polyethylene, e.g., PET, HDPE, and LDPE.
- b. using non-phthalate-based plasticizers which are widely available on the market, see the <u>ChemSec marketplace</u> for more options.
- c. consider whether packaging is necessary or if there are non-plastic alternatives.

Why?

Phthalates are a group of chemicals used as a plasticizer in the manufacture of many plastics, giving flexibility to more brittle materials. Phthalates can have a negative impact on human and environmental health, including endocrine disruption in humans and effects on reproduction in all studied animal groups. They are not chemically bound to the material to which they are added meaning they can continuously leach into food products as a food contact material or into the environment.

SA GB 8.16.5 PVC and other chlorinated plastics* You must **not** use polyvinyl chloride (PVC) or any other chlorinated plastics unless alternative materials are not available or are functionally unsuitable, as listed in the guidance section of this standard.

Soil Association higher standard

*The changes to this standard come into effect from September 2025.

Demonstrate that you have not used these materials, for example with a packaging specification for all materials used kept on file.

This restriction applies to all chlorinated plastics which includes:

- polyvinyl chloride (PVC)
- polyvinylidene chloride (PVdC) (applied from September 2025)
- vinyl chloride

The restriction on PVdC applies from September 2025. For products containing PVdC, any packaging purchased from September 2025 must be compliant and packaging purchased prior to September 2025 may be used until stocks are exhausted

There are some specific circumstances where we are aware that no functional alternatives to PVC currently exist, for example, to have adequate barrier properties to comply with food safety in transport standards requirements.

As a result, you are permitted to use PVC in the following applications:

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

We will keep these exceptions under review on an annual basis as innovation for functional alternatives develops.

Why?

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. Chlorinated plastic materials are very difficult to recycle and can act as a contaminant when added to other plastic recycling systems, rendering output materials unfit for use. Chlorinated plastic materials can also have corrosive effects on recycling machinery.

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.

SA GB 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 or not available, or not possible to verify as indicated in the guidance section of this standard.

Soil Association higher standard

You must seek non-GM sources of packaging materials. This applies to all materials derived from plant-based sources, including:

- polylactic acid (PLA)
- polyhydroxyalkanoates (PHA)
- polybutylene succinate (PBS)
- different starch blends.

To mitigate the risk of GM source material in packaging products we recommend you request product specification lists for any compostable or biodegradable packaging products. Biopolymers are often made from natural sugar sources derived from crops such as maize and sugarcane, which are both considered GM risk crops. When sourcing materials it is important to request confirmation from your supplier of the source crop material and whether it is from a country where GM crops are permitted.

Adequate demonstration of non-GM for packaging materials includes:

- Raw materials from certified organic production
- Non-GMO Project certification (more info here)
- IP or PCR testing results for the raw materials

It is not technically possible to verify the non-GM status of certain components at different stages of the packaging manufacturing process. As a result, such components are exempt from the requirements of these standards. The exempt components are:

- glues,
- labels,
- inks and dyes applied to packaging products,

- biodegradable coatings,
- lids containing epoxydised soybean oil (ESBO),
- starch used in paperboard manufacture, and,
- enzymes used in the packaging manufacturing process.

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. Considering the increased global demand for plant-based plastic materials and future projections for growth in the sector, there is a risk that packaging may become a significant driver of GM agriculture.

SA GB 8.16.7 BPA and other bisphenols in food-contact materials

You must not intentionally use Bisphenol A (BPA) or other bisphenols in materials that will be in direct contact with foodstuffs.

Soil Association higher standard

Demonstrate that you have not used BPA or other bisphenols in your food contact materials, for example with a packaging specification for all materials used kept on file.

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.

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.

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.

SA GB 8.16.8 Oxo-degradable Plastics*

You must **not** use oxo-degradable plastics.

Soil Association higher standard

* This standard comes into effect from September 2025

Demonstrate that you have not used these materials, for example with a packaging specification for all materials used kept on file.

Oxo-degradable plastics are not bio-based or compostable plastics; they are conventional plastics with 'pro-degradant' additives that accelerate the fragmentation process. To avoid oxo-degradable packaging products we recommend:

- use of recyclable plastic formats such as LDPE, or,
- use of certified compostable plastics (see 'Packaging Scope' for more guidance)

For more information and evidence on oxo-degradable plastics see this statement from the <u>New Plastics Economy Initiative</u>.

Any packaging purchased from September 2025 must be compliant. Packaging purchased prior to September 2025 may be used until stocks are exhausted.

Why?

Oxo-degradable plastics are considered a 'problematic plastic' owing to their environmental impacts. They contribute to microplastic pollution as they are conventional plastics that fragment by design and are not suited for long-term reuse, recycling at scale or composting. They can undermine recycling systems when captured.

SA GB 8.16.9 Polystyrene*

You must **not** use polystyrene plastics in primary packaging materials.

Soil Association higher standard

*This standard comes into effect from September 2025.

Demonstrate that you have not used these materials, for example with a packaging specification for all materials used kept on file.

This restriction includes all types of polystyrene plastics, these include Expanded Polystyrene (EPS) and Extruded polystyrene (XPS). They are defined as Type 6 plastics (PS) and can be in rigid or film forms as well as the more common expanded foam.

This restriction is limited to primary product packaging, that is packaging contained in a single sales unit to customers. It does not apply to polystyrene used in a business-to-business supply chain where there is greater opportunity for reuse and recycling. For more information on what constitutes primary packaging see <u>Defra definitions of packaging class data</u>.

We will keep the scope of this restriction under review on an annual basis.

Any packaging purchased from September 2025 must be compliant. Packaging purchased prior to September 2025 may be used until stocks are exhausted.

Further government guidance is available here.

Why?

Polystyrene is considered a 'problematic plastic' owing to its negative impact on the environment and human health. Polystyrene is made using the chemical styrene, which has been linked to cancers and nervous-system effects. It is not readily recycled and is persistent in the environment once disposed of. It is a consistent component of marine and coastal litter, breaking up into smaller pieces and releasing toxins, presenting hazards to marine species.

SA GB 8.16.10 PFAS (per-polyfluoroalkyl substances) * You must **not** use per- and polyfluoroalkyl (PFAS) chemical substances in your packaging products.

Soil Association higher standard

*This standard comes into effect from September 2025

Demonstrate that your products have not used PFAS chemicals in their manufacture, for example with a packaging specification for all materials used kept on file, if you use the following materials:

- greaseproof or water-resistant paper packaging (e.g., bread / pastry bags),
- baking paper or cake cases,
- takeaway pizza boxes and card clamshells,
- butter and cheese papers,

There are PFAS-free market ready alternatives to all these applications and/or opportunities to consider reusable or removal options. For alternatives, please review the <u>ChemSec marketplace</u>.

Any packaging purchased from September 2025 must be compliant. Packaging purchased prior to September 2025 may be used until stocks are exhausted.

Why?

PFAS are a group of chemicals known as 'forever chemicals' because they are extremely persistent in the environment. PFAS have been shown to disrupt hormone systems in animals and are classed as endocrine disruptors. Studies have shown links between PFAS exposure and a wide range of human health concerns including cancer, immune system disorders and fertility problems.

SA GB 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.

Standards

SA GB 8.17.1 Ensuring organic integrity

To ensure organic integrity you must:

- 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 Art. 26

Guidance

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 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.

SA GB 8.17.2 Processing organic and non-organic If you process organic and non-organic products, either using the same equipment or at the same site, you must:

- a) assess the risk of contamination and mixtures or exchanges, and put in place controls to avoid those risks
- b) process and store organic products separately, in time or space, from non-organic products
- c) ensure that the cleaning of your facilities and equipment is sufficient to remove residues of non-organic product before you start processing
- d) finish the whole run of organic products before you start to process non-organic products
- e) keep a record of all organic and non-organic operations and the quantities processed.

(EC) 834/2007 Art. 19(1) (EC) 889/2008 Art. 26(5) Also refer to the standard sections on storage (8.15), cleaning (8.12), contamination (8.11) and recordkeeping (8.7).

There are many ways in which you can ensure separation of organic and nonorganic at your facility. As each business is unique it is your responsibility to ensure you have systems and procedures in place that are right for you and your business.

Some businesses may have dedicated organic production days, following a thorough clean down of equipment, whereas others may judge it best to carry out organic processing first thing in the morning followed by non-organic production. The important thing is that you manage risk in a way that is appropriate for your operation.

O A		170	The state of the s
$\leq \Delta$	$(\neg R R$	1 / 3	Irradiation
$\supset \cap$		1. I / . O	птаананон

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 Art. 10

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

lonising 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 1015 Hertz or more, capable of producing ions directly or indirectly.

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 Xrays, 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.

SA GB 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)

SA GB 9 Specific standards for feeding livestock

SA GB 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.

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.		
Standards	Guidance	
SA GB 9.1.1 Meeting the nutritional needs of your livestock 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 the Certification Team. 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.	
SA GB 9.1.2 Force feeding is prohibited 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)		

SA GB 9.1.3 Encouraging anaemia is prohibited

The keeping of livestock in conditions, or on a diet, which may encourage anaemia is prohibited.

(EC) 889/2008 Art. 20(4)

SA GB 9.1.4 Feeding organic and in-conversion feed

- 1. The diet of your organic and converting animals must be based on organic feed composed of feedingstuffs obtained 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

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 harvested. This one year of conversion can include any period recognised retrospectively as per farming and growing standard 2.1.3.

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

Pig and poultry enterprises can use first year in-conversion land after 6 months if the conditions in farming and growing standard 3.1.7 have been met.

R Feed records

SA GB 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



Feed records

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)

SA GB 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.



Feed records

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

SA GB 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)

Guidance

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 <u>FeatherWel website</u>.

When animals are on pasture and able to forage and graze, no additional forage or roughage needs to be provided.



Feed records

Guidance table on daily dry matter intakes (DMI)

Lactating dairy cows		Growing beef cattle, beef suckler c	ows and dairy young stock
Weight (kg):	Daily DMI (kg)	Weight (kg):	Daily DMI @ 2.5% of live weight (kg)
400	14.0	100	2.50

450	15.75	150	3.75
500	17.5	200	5.00
550	19.25	250	6.25
600	21.0	300	7.50
650	22.75	350	8.75
700	24.5	400	10.00
750	26.25	450	11.25
Daily DMI has been calculated as 3.5	5% of live weight	Daily DMI has been calculated as 2.5	5% of live weight
Sheep and goats (all groups)		Pigs	
Weight (kg)	Daily DMI @ 2% of live weight (kg)	Class	Average daily DMI (kg)
10	0.25	Sow + six piglets	4.50
20	0.50	plus each extra piglet	0.40
30	0.75	Gilts	2.60
40	1.00	Weaners at nine weeks	1.00
50	1.25	Weaners at 25 weeks	2.65
60	1.50		
70	1.75		
80	2.00		
Daily DMI has been calculated as 2%	of live weight		
Poultry	Daily DMI (kg)		
Laying chickens	0.118		
Table chickens	0.077		
Turkeys	0.138		
Ducks and geese	0.150		

Standar<u>ds</u>

SA GB 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

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 Defra on this exemption we will update this page.

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 20251.

(EC) 834/2007 Art. 22(2)(b) (EC) 889/2008 Art. 43

SA GB 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.

SA GB 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.

1

Standards

SA GB 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)(f) (EC) 889/2008 Art. 47(c)

Guidance

The Certification Team can submit a request to your competent authority on your behalf. In GB, 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
- 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

SA GB 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

2. The products in the table below may only be used if they are authorised for your intended use in your country.

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

You must be able to justify the use of additional feed products, supplements and substances. For example:

- 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,
- referencing a known species specific nutritional need that cannot be met through feeding organic feed materials
- where a positive welfare outcome will result from the inclusion of the additional feed product in the livestock's ration

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 the Certification Team for more information on using mineral and feed blocks.

Boluses are acceptable if the components are listed in 9.1.13 with the exclusion of the metal ballast.



Records of any feed supplements used

Your livestock management plan should include details of any additional feed products and supplements fed along with the reason for their use.

All products must also be authorised under <u>Regulation (EC) 1831/2003</u>, with the exception of:

- organic feed materials of animal origin
- non-organic feed materials of plant or animal origin, or fermentation (byproducts) from micro-organisms, the cells of which have been inactivated or killed
- feed materials of mineral origin
- products from sustainable fisheries
- non-organic spices, herbs and molasses

Standards

SA GB 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

		(EC) 889/2008 Art. 22; Annex V; Annex VI
Feed Material		
Product or substance)	Conditions of use
Organic feed material	s of animal origin	There are restrictions on what animal by-products you can feed to different animal species. UK guidance is available here
(by-products) from m inactivated or killed: a) Saccharomyces ce b) Saccharomyces ca		 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.
Minerals	To	
Sodium	Sea salt Coarse rock salt Sodium chloride Sodium bicarbonate Sodium carbonate Sodium sulphate	
Potassium	Potassium chloride	7
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 Magnesium chloride	

	Magnesium carbonate	
	Magnesium phosphate	
Preservatives		
Functional Group	Product or substance	Conditions of use
E 200	Sorbic acid	
E 236	Formic acid	
E 237	Sodium formate	
E 260	Acetic acid	
E 270	Lactic acid	
E 280	Propionic acid	
E 330	Citric acid	
Antioxidants		
Functional Group	Product or substance	Conditions of use
1b306(i)	Tocopherol extracts from vegetable oils	
1b306(ii)	Tocopherol-rich extracts from vegetable oils (delta rich)	
Binders and anti-caking ager	nts	
Functional Group	Product or substance	Conditions of use
E412	Guar gum	
E 535	Sodium ferrocyanide	Maximum dose rate of 20 mg/kg NaCl calculated as ferrocyanide anion
E 551b	Colloidal silica	
E 551c	Kieselguhr (diatomaceous earth, purified)	
1m558i	Bentonite	
E 559	Kaolinitic clays, free of asbestos	
E 560	Natural mixtures of steatites and chlorite	
E 561	Vermiculite	
E 562	Sepiolite	
E 566	Natrolite-Phonolite	
1g568	Clinoptilolite of sedimentary origin	

E 599	Perlite	
Silage additives		
ID no.	Product or substance	Conditions of use
1k	Enzymes and micro-organisms	Use restricted to production of silage when weather conditions do
1k237	Sodium formate	not allow for adequate fermentation
1k280	Propionic acid	
1k281	Sodium propionate	
Sensory additives		
ID no.	Product or substance	Conditions of use
2b	Flavouring compounds	Only extracts from agricultural products
	Castanea sativa Mill.: Chestnut extract	
Nutritional additives		
ID no.	Product or substance	Conditions of use
3a	Vitamins and provitamins	 Only if derived from agricultural products, or If synthetic vitamins are used only those identical to vitamins derived from agricultural products may be used for monogastric and aquaculture animals 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 GB this must be approved by Defra.
3a920	Betaine anhydrous	 Only for monogastric animals. Only from natural origin and when available from organic origin. 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.
Trace elements		
ID no. or Functional Group	Product or substance	Conditions of use
E1 Iron		
3b101	<u>Iron(II) carbonate (siderite)</u>	

3b103	Iron(II) sulphate monohydrate	
3b104	Iron(II) sulphate heptahydrate	
3b201	Potassium iodide	
3b202	Calcium iodate, anhydrous	
3b203	Coated granulated calcium iodate anhydrous	
3b301	Cobalt(II) acetate tetrahydrate	
3b302	Cobalt(II) carbonate	
3b303	Cobalt(II) carbonate hydroxide (2:3) monohydrate	
3b304	Coated granulated cobalt(II) carbonate	
3b305	Cobalt(II) sulphate heptahydrate	
3b402	Copper(II) carbonate dihydroxy monohydrate	
3b404	Copper (II) oxide	
3b405	Copper (II) sulphate, pentahydrate	
3b409	Dicopper chloride trihydroxide (TBCC)	
3b502	Maganese (II)oxide	
3b503	manganous sulfate, monohydrate	
3b603	zinc oxide	
3b604	zinc sulphate heptahydrate	
3b605	Zinc sulphate monohydrate	
3b609		

	Zinc chloride hydroxide mono (TBZC)	hydrate	
3b701	Sodium molybdate dihydrate		
3b801	Sodium selenite		
3b810, 3b811, 3b812, 3b813 and 3b817	Selenised yeast inactivated		
Zootechnical additives			
ID no. or Functional Group	Product or substance		Conditions of use
4a, 4b, 4c and 4d	Enzymes and micro-organism category of "Zootechnical addi		
Product or substance			Conditions of use
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		Guidan	ce
SA GB 9.1.14 Use of calcified You must not use calcified seaw when extracted from the sea in Sa	veed, lithothamne or maerl	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 the Certification Team.	

Why?

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.

3	
Standards	Guidance
SA GB 9.1.15 Synthetic amino-acids are prohibited	
You must not use synthetic amino-acids.	
(EC) 834/2007 Art. 14(d)(v)	

SA GB 10 Specific standards for feeding aquaculture animals

SA GB 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.

Standards	Guidance
SA GB 10.1.1 Feeding priorities (all species)	
1. You must feed your aquaculture animals with feed that	
meets the animals' nutritional requirements at the various	
stages of their development.	
2. You must design your feeding regimes to prioritise:	
a) animal health	
b) the production of high quality aquaculture products	
including nutritional composition	
c) low environmental impact.	
(EC) 834/2007 Art. 15d(i)	
(EC) 889/2008 Art. 25(j)	

SA GB 10.1.2 Feeding priorities for carnivorous 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 aquaculture species possible they must be used in order of preference. 1. You must source feed for carnivorous aquaculture animals with the following priorities: For operators in the UK, Defra (the competent authority) has provided additional a) organic feed products of aquaculture origin guidance on the sustainability criteria for whole fish. The Certification Team b) fish meal and fish oil from organic aquaculture can provide you with a copy on request. trimmings c) fish meal and fish oil and ingredients of fish origin derived from trimmings of fish already caught for human consumption in sustainable fisheries d) organic feed materials of plant or animal origin 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 principles laid down in *Regulation (EU) No 1380/2013* of the European Parliament and of the Council. 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) SA GB 10.1.3 Feeding histidine 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. (EC) 889/2008 Art. 25k (5) SA GB 10.1.4 Feeding astaxanthin 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 *Phaffia* yeast. (EC) 889/2008 Art. 25k (4)

SA GB 10.1.5 Feeding freshwater species

- 1. The following species must be fed feed which is naturally available in ponds and lakes:
 - a) carp and associated species in polyculture systems (perch, pike, catfish, coregonids and sturgeon
 - b) Penaeid shrimp and freshwater prawns (*Macrobrachium* spp.)
 - c) tropical freshwater fish milkfish, tilapia and Siamese catfish (*Pangasius* spp.)
- 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.
 - 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.
 - 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. 251; Art. 79b (d)

SA GB 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. 251a

SA GB 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.

organic aquaculture feeds and the conditions of their use.	organic aquaculture feeds and the conditions of their use.			
Standards	Guidance			
SA GB 10.2.1 Permitted feed minerals				
You may use the following feed materials of mineral origin in				
organic aquaculture feeds:				
1. Calcareous marine shells				
Calcium gluconate				
3. Calcium carbonate				
Defluorinated monocalciumphosphate				
5. Defluorinated dicalciumphosphate				
Magnesium oxide (anhydrous magnesia)				
7. Magnesium sulphate				
8. Magnesium chloride				
Magnesium carbonate				
10. Calcium magnesium phosphate				
11. Magnesium phosphate				
12. Monosodium phosphate				
13. Calcium sodium phosphate				
14. Sodium chloride				
15. Sodium bicarbonate				
16. Sodium carbonate				
17. Sodium sulphate				
18. Potassium chloride				
(EC) 834/2007 Art. 15d(iii, iv)				
(EC) 889/2008 Art. 25m (1), Annex V (1)				
SA GB 10.2.2 Calcified seaweed is prohibited	This applies even if feed certified to other organic standards is re-certified to SA			
You must not use calcified seaweed, lithothamne or maerl in	standards.			
feeds for aquaculture livestock.	If you are unclear whether extra sourcing requirements apply, please contact the			
Soil Association higher standard	Certification Team.			

Why?

Calcified seaweed, lithothamne and maerl refer to a group of coralline algae, primarily of the species *Phymatolithon calcateum*, *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

SA GB 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

Sorbic acid	
Formic acid	
Sodium formate	
Acetic acid	
Lactic acid	
Propionic acid	
Citric acid	
•	
Tocopherol extracts from vegetable oils	
Tocopherol-rich extracts from vegetable oils (delta rich)	
	Formic acid Sodium formate Acetic acid Lactic acid Propionic acid Citric acid Tocopherol extracts from vegetable oils Tocopherol-rich extracts from vegetable oils

1c322	Lecithins	Only if derived from organic raw material Use restricted to aquaculture animal feed
Binders, anti-caking agents	and coagulants	
E412	Guar gum	
E 535	Sodium ferrocyanide	Maximum dose rate of 20 mg/kg NaCl calculated as ferrocyanide anion
E 551b	Colloidal silica	
E 551c	Kieselgur (diatomaceous earth, purified)	
1m558i	Bentonite	
E 559	Kaolinitic clays, free of asbestos	
E 560	Natural mixtures of stearites and chlorite	
E 561	Vermiculite	
E 562	Sepiolite	
E 566	Natrolite-Phonolite	
1g568	Clinoptilolite of sedimentary origin, [All species]	
E 599	Perlite	
Sensory additives	•	
2b	Flavouring compounds	Only extracts from agricultural products
	Castanea sativa_Mill.: Chestnut extract	
Nutritional additives	· · · · · · · · · · · · · · · · · · ·	1
3a	Vitamins and provitamins	Derived from agricultural products If derived synthetically, only those identical to vitamins derived from agricultural products may be used for aquaculture animals.

Trace elements			
ID number or Functional Group	Substance	Conditions of use	
E1 Iron			
3b101	Iron(II) carbonate (siderite)		
3b103	Iron(II) sulphate monohydrate		
3b104	Iron(II) sulphate heptahydrate		
3b201	Potassium iodide		
3b202	Calcium iodate, anhydrous		
3b203	Coated granulated calcium iodate anhydrous		
3b301	Cobalt(II) acetate tetrahydrate		
3b302	Cobalt(II) carbonate		
3b303	Cobalt(II) carbonate hydroxide (2:3) monohydrate		
3b304	Coated granulated cobalt(II) carbonate		
3b305	Cobalt(II) sulphate heptahydrate		
3b402	Copper(II) carbonate dihydroxy monohydrate		
3b404	Copper(II) oxide		
3b405	Copper(II) sulphate, pentahydrate		
3b409	Dicopper chloride trihydroxide (TBCC)		
3b502	Manganese (II) oxide		
3b503	manganous sulfate, monohydrate		

3b603	zinc oxide			
3b604	zinc sulphate heptahydrate			
3b605	Zinc sulphate monohydrate			
3b609	Zinc chloride hydroxide monohydrate (TBZC)			
3b701	Sodium molybdate dihydrate			
3b801	Sodium selenite			
3b8.10, 3b8.11, 3b8.12, 3b813 and 3b817	Selenised yeast inactivated			
Zootechnical additives				
4a, 4b, 4c and 4d	Enzymes and micro-organisms in the category of "Zootechnical additives"			
Standards	Guidance			
SA GB 10.2.4 Synthetic amino-acids and gromoters are prohibited You must not use synthetic amino-acids or grow (EC) 834/20				