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Introduction

The EU Organic Regulation standards put the principles of organic production into practice. These organic standards encompass EU Regulations 2018/848 and subsequent implementing and delegated acts (referenced throughout as the EU Organic Regulation). These regulations are the legal basis for the control of organic farming, food processing and organic labelling within the EU, and Northern Ireland.

Northern Ireland has remained in the EU single market and continues to follow EU rules on customs requirements and the regulation of agrifood products, including the EU organic Regulation. If you are in Northern Ireland, for the purpose of the EU organic regulation requirements, you need to apply these standards as if part of the EU. If you bring in products from EU member states you will not need importing on the scope of your organic license, however, if you bring products from the other parts of the UK or non-EU countries you will need to meet the importing requirements.

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

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

Businesses across the world can become certified to the EU equivalent organic standards. A 'competent authority' is authorised by EU Member States to make rulings on organic legislation. In Northern Ireland the competent authority is NICA (Northern Ireland Competent Authority), The certification body that is appointed by the Soil Association to inspect and certify to Soil Association EU Equivalent Organic Standards in the UK is Soil Association Certification. Throughout these standards 'your certification body' refers to Soil Association Certification. For further definitions, please refer to the separate Glossary document on our website.

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

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

Please contact us if you would like more information or visit our website.

Guide to using these standards

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

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

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

What is guidance?

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

EXAMPLE Standards

EXAMPLE Guidance

NI 14.8.1 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 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.

(EC) 2018/848 Art. 39 (1), Annex II Part IV (1.5) (d

- Standards 14.3.1 to 14.3.3 apply to all licensees. More specific record keeping requirements for agricultural operations follow below.
 - Your records need to be mass balance (input and inspection. You will need to be mass balance) The I symbol shows where additional relevant information is provided.

bought/received/produced sulmerent 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.

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

The relevant part of the EU Organic Regulation is referenced here.

EXAMPLE Standards

SA NI 14.1.1 Scope of the standards

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

The production, use and disposal of packaging can have a big impact on the environment should be packaged in ways that reduce the negative impacts of packaging. This fits wi

biodiversity that underpin organic food and farming, and meets consumer expectation

EXAMPLE GEXAMPLE

1

Packaging legislation

Keep in mind that you must legislation relating to package food.

The I symbol shows where additional relevant information is provided.

These include, but are not limited to:

the <u>European Parliament and Council Directive on Packaging and Packaging</u> Waste (94/62/EC)

the <u>European Standard for Compostable Packaging (EN13432)</u> – if you are using compostable or biodegradable packaging.

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

Soil Association higher standards are clearly shown.

Each Soil Association higher standard has a Why? box to explain its purpose and rationale.

rganic products nment and

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 NI 14.0 General	standards for	seaweed	production
SA NI 14.1 Scope			

SA NI 14.1 Scope	
Standards	Guidance

SA NI 14.2 Objectives and principles of organic s	eaweed production
Standards	Guidance
SA NI 14.2.1 General principles of organic production	
Your 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 and contribute to the protection	
of the environment and the climate.	
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, such as natural heritage sites.
- 11. To minimise pollution and waste, substantially contributing to a non-toxic environment.
- 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. Encouraging short distribution channels and local production.
- 15. Encouraging the preservation of rare and native breeds in danger of extinction.
- 16. Contributing to the development and use of plant genetic material adapted to the specific needs and objectives of organic agriculture, including the use of organic heterogeneous material and varieties suitable for organic production.
- 17. Fostering the development of organic plant breeding activities in order to contribute to favourable economic perspectives of the organic sector.
- 18. Ensuring the integrity of organic production at all stages of the production, processing and distribution of food and feed.
- 19. The exclusion from the whole organic food chain of animal cloning, rearing artificially induced polyploid animals, and ionising radiation.

(EC) 2018/848 Art. 4 (EC) 2018/848 Art. 5 (EC) 2018/848 Annex II Part I(1.9.2) (EC) 2018/848 Art. 24(5)

SA NI 14.2.2 Specific principles for aquaculture

In addition to the overall organic principles set out in standard 14.2.1, organic aquaculture production must be based on the following specific principles:

- 1. The continuing health of the aquatic environment and the quality of surrounding aquatic and terrestrial ecosystems
- 2. The minimisation of the use of non-renewable resources and off-farm inputs
- 3. The recycling of wastes and by-products of plant and animal origin as inputs in plant and livestock production
- 4. Taking account of the local or regional ecological balance when taking production decisions
- 5. The use of seeds and animals with a high degree of genetic diversity, disease resistance and longevity
- 6. The maintenance of plant health by preventative measures, such as appropriate crop rotations, mechanical and physical methods and the protection of natural enemies of pests
- 7. Avoiding any endangerment of species of conservation interest that might arise from organic production.

(EC) 2018/848 Art. 6

SA NI 14.3 Becoming Soil Association certifi	ed
Standards	Guidance
SA NI 14.3.1 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) 2018/848 Art. 34(1)	Businesses across the world can become certified to standards that meet the EU Organic Regulation requirements. In NI, NICA is the competent authority, they have delegated some control tasks to accredited organic certification bodies. The certification body that is appointed by the Soil Association to inspect and certify to the standards in the UK is Soil Association Certification. Additionally, Soil Association Certification is accredited by IOAS (International Organic Accreditation Service) and authorised to offer organic certification in specific countries outside the EU for certain types of products. Please contact Soil Association Certification for more details. You must comply with all Applicable laws, and Qualifying Standards, including any conditions detailed in any non-compliances. Please refer to your organic
 SA NI 14.3.2 Activities that require certification In the EU all stages of the organic supply chain must hold organic certification. Your business must be certified if you produce, process, package, store, label, import, export, or distribute organic products. This includes wholesale, storage and warehousing, acting as the first consignee for imported products and any other activities that require the physical or financial ownership of organic or inconversion products or ingredients. 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 or have not contracted out such activities. In other countries certification may be required for these activities. (EC) 2018/848 Art. 34(1)(2)(3) SA NI 14.3.3 Organic certificate	Client contract for more details. Without adequate certification at each stage of the supply chain, the products may lose their organic status. Examples of businesses not requiring certification in the UK include supermarkets and mass caterers serving food e.g. restaurants, cafes, catering companies. If you are unsure whether the activity you are carrying out requires certification please contact us. For more information on the certification requirements for importing and exporting please refer to standard section 6.8 in the food and drink standards. Soil Association Certification will issue licensees with the following
SA INI 14.3.3 OF Galfic Celtificate	documentation:

- You must not make reference to organic, inconversion, or use the Soil Association symbol without a valid certification document that shows that vour 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.
- 4. You are not entitled to obtain a certificate from more than one control body for the same category of products in the same country. This includes at different stages of production, preparation and distribution.

(EC) 2018/848 Art. 35(1)(2)(4); Art. 39 f) wine;

- 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.

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.

The categories are as follows (2018/848 Article 35.7)

- a) unprocessed plants and plant products, including seeds and other plant reproductive material;
- b) livestock and unprocessed livestock products;
- c) algae and unprocessed aquaculture products;
- d) processed agricultural products, including aquaculture products, for use as food:
- e) feed:
- g) other products listed in Annex I to this Regulation or not covered by the previous categories.

Examples:

An egg producer who also packs eggs, or a grower who also packs the produce could not have certification with 2 different certification bodies. This because both the production and the packing would be classed as category A products (unprocessed).

Contact us if you need to add a new enterprise to your license – refer to standards 12.4.1 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 NICA to certify organic food production and processing under the terms of EU Organic Regulation No. 2018/848.

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

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

- a) licensees change certification bodies
- b) non-compliances are found
- c) organic status of a products is lost, and 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: Spear House, 51 Victoria Street, Bristol, BS1 6AD

SA NI 14.4 Your obligations when certified	
Standards	Guidance
SA NI 14.4.1 Description of your activities 1. Before starting your organic enterprise, you must describe what practical measures you will take to ensure	To help you meet this requirement we have created an application form that outlines the information we need from you.
you will comply with these organic standards and the relevant practical measures to be taken to ensure compliance with this Regulation. If you make any changes to your activity you must update your	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.
certification body accordingly. 2. You must include a full description of your premises, units and activities including: a) a full description of the installations on land and at sea	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
b) facilities used for the receipt of goods, processing, packaging, labelling and storage of seaweed	permitted ingredients and inputs are used for organic production.

- c) procedures used for transporting seaweed
- d) the environmental assessment as outlined in standard 14.7.1
- e) the sustainable management plan as outlined in standard 14.7.2
- f) for wild seaweed a full description and a map of shore and sea collection areas and land areas where post collection activities take place.

(EC) 2018/848 Art.39(1)

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 wish to add land, keep new livestock species or enterprises, or start a box scheme or start to pack or process food or feed. Depending on what changes are made, we might need to update your certificates and you may need an additional inspection or licence.

SA NI 14.4.2 Sub-contracted operations

If you sub-contract out your organic activity, in part or whole, to a third party, they must hold their own organic certification, unless you remain responsible for that organic production and have not transferred that responsibility to the subcontractor, in which case those activities may be covered under the scope of your organic license. The information in 14.4.1 must also include:

- a) a list of the subcontractors, including their activities and the certification body or authority that they are certified by
- b) a written agreement by the subcontractors that their operation will comply with the control measures required as part of organic certification, and
- c) details of all the practical measures taken to ensure and demonstrate full traceability of products.

(EC) 2018/848 Art.34(3)(5)

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

To comply with control measures contractors will be required to supply copies of any records of the work they have carried out for example field records, cleaning records of any storage areas or equipment and details of any separation measures they have in place to prevent contamination.

Sub-contractors premises and facilities may be subject to inspection to comply with control measures. You may need an appropriate agreement or contract with the subcontractor to allow these control measures to take place.

SA NI 14.4.3 Declaration

You must sign a declaration stating that you:

- a) have described your organic enterprise and activities as referred to in 14.4.1 accurately
- b) will perform your operations according to organic rules
- c) accept any enforcements in case of non-compliance

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.

- 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 in the event that subcontractors are subject to controls by different control authorities or control bodies
- f) accept handing over information about your certification history when changing certification body or control authority
- g) will inform your buyer and certification body or control authority immediately in the event that a suspicion of non-compliance has been substantiated, that a suspicion of non-compliance cannot be eliminated, or that non-compliance that affects the integrity of the products in question has been established
- h) in the case of withdrawing certification inform the certification body or control authority without delay
- 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) 2018/848 Art.39(1)(d)(iii)

SA NI 14.4.4 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. If you are outside the EU, it may be a requirement of the International Labour Organisation Conventions that have been ratified in your country. If it is not you must still meet this requirement.

Labour management tools, such as <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 NI 14.4.5 Certification code

- 1. Each certification body is issued with a unique certifier code.
- 2. You must use this code if you are packing and labelling products yourself or if another Soil Association certified business in the UK is packing or labelling the product on your behalf.

Please refer to the labelling section 14.9 for more information on labelling requirements.

In Northern Ireland, products produced or processed in Northern Ireland, the soil Association certifier code is XI-ORG-05.

(EC) 2018/848 Art. 32(5) (EC) 2021/279 Art. 3

SA NI 14.4.6 Transitional measures for stock of products produced in accordance with Regulation (EC) 834/2007

Products produced in accordance with Regulation (EC) No 834/2007 before 1 January 2022 may be placed on the market after that date until stocks are exhausted.

(EC) 2018/848 Art. 60

SA NI 14.5 Inspections

Standards

SA NI 14.5.1 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.
 - a. Where no non-compliances affecting organic integrity have been raised in the last three years and no additional areas of risk have been raised by us you may have a reduced frequency of inspection. The period between two physical onthe-spot inspections shall not exceed 24 months.
 - b. Where a physical inspection does not take place an annual verification of compliance is still required where information and documentation will be requested.
- 2. You may also be inspected by your competent authority as part of their surveillance of our inspection procedures.

(EC) 2018/848 Art.38(2)(3)

SA NI 14.5.2 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) 2018/848 Art. 38(6) (EC) 2018/848 Art. 39(1)(b)(d)

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 noncompliances
- 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.

As part of 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 NI 14.5.3 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) 2018/848 Art.38(1)(b)(c) (EC) 2017/625 Art.15(1)(2)	
SA NI 14.5.4 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) 2018/848 Art.38(4)(c) (EC) 2021/279 Art. 7(c)	
SA NI 14.5.5 Specific requirements for inspecting bivalve mollusc production You must inform your certification body when maximum bivalve biomass production occurs so that inspection visits can take place before or during this period. (EC) 2018/848 Art.9(8)(9)	

SA NI 14.6 Non-compliance with the standards

Standards

SA NI 14.6.1 Non-compliances

- 1. Where you are found not to comply with organic standards Soil Association Certification will issue you with a non-compliance. The level of sanction will be proportionate to the severity and extent of the non-compliance and the risk it poses to the integrity of the organic product. Soil Association Certification will always apply the precautionary principle when making decisions on compliance to organic standards.
- 2. Depending on the severity of the non-compliance Soil Association Certification may suspend or even withdraw your licence. If your licence is suspended or withdrawn you must not trade as organic.

(EC) 2018/848 Art. 37 (EC) 2018/848 Art. 38(1) (EC) 2018/848 Art. 41(3)(4) (EC) 2018/848 Art. 42 (EC) 2021/279 Art. 8 (EC) 2021/279 Annex I

Guidance

After your inspection we will draw up an Action Summary Form and Declaration (either at inspection or we will send it to you afterwards). This lists areas that do not comply with the standards and asks how you will correct them.

The different grades of sanctions are as follows:

- minor non-compliance
- major non-compliance
- critical non-compliance, or
- manifest infringement.

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.

The classification of the non-compliances into three categories: minor, major and critical, taking into account at least the following criteria:

• the measure in place to prevent non-compliances.

- the impact on the integrity of the organic or in-conversion status of product
- the ability of the traceability system to locate the affected product(s) in the supply chain;
- previous non-compliances.

SA NI 14.6.2 Reporting non-compliances

If you suspect that a product you have produced, prepared, imported or received from another operator does not meet organic standards you must:

- (a) identify and separate the product concerned
- (b) check whether the suspicion can be substantiated
- (c) not place the product on the market as organic or inconversion and not use it in organic production, unless the suspicion can be eliminated
- (d) where the suspicion has been substantiated or where it cannot be eliminated, immediately inform us and provide us with available information, where appropriate
- (e) fully cooperate with us in verifying and identifying the reasons for the suspected non-compliance.

If we have a substantiated suspicion that you intend to place a product on the market as organic which does not meet organic standards, we will tell you to withhold the product whilst we investigate. We will complete the investigation in a reasonable time period taking into account the complexity of the case and the durability of the product. 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, then you no longer have to withhold the product from sale.

(EC) 2018/848 Art. 27; Art. 41 (1)(2) 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 (please see standard 5.6.3)
- a complaint from a reliable source
- you have not been able to verify the organic status of goods you have received (see section 5.7 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.

You must stop any further sale/use of the product as organic (or in-conversion if applicable) until any doubt over its organic status can be eliminated.

You must inform the certification team if you have substantiated suspicion or where you have not been able to eliminate suspicion that the 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.

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.

If you are unsure what action to take, please contact the technical team at sacl.notifications@soilassociation.org.

SA NI 14.6.3 Actions to be taken in the case of suspicion of the presence of non-permitted products or substances

- 1. If you suspect that a product does not meet these organic standards due to the presence of a substance not authorised for use in organic production, you must:
 - a) identify and separate the product concerned
 - b) check whether the suspicion can be substantiated
 - c) not market the product as organic or in-conversion
 - d) not use the product in organic production
 - e) fully cooperate with Soil Association Certification in identifying and verifying the reasons for the positive residue detection.
- 2. To check whether the suspicion of a positive residue detection can be substantiated you must take account of the following elements:
 - a) where the suspicion concerns an incoming organic or in-conversion product check that the information provided on the label of the product matches the information on the accompanying documents and that the information on the organic certificate provided by the supplier relates to the product purchased
 - b) where there is suspicion that the cause is under the control of your business you must examine any possible cause for the positive residue detection.
- 3. Where the suspicion has been substantiated or where it cannot be eliminated you must immediately inform Soil Association Certification and provide:
 - a) information and documents relating to the supplier (delivery note, invoice, the supplier's organic certification and the Certificate of Inspection (COI) if relevant)

The non-permitted products and substances referred to in this standard can include any product or substance not permitted in these organic standards. Such products and substances not authorised for use in organic production and processing can include but are not limited to:

- active substances used in plant protection products
- pest control products for use in agriculture and storage facilities
- fertilisers soil conditioners and nutrients
- non-organic feed material of plant, algal, animal or yeast origin or as feed material of microbial or mineral origin
- feed additives and processing aids
- food additives and processing aids
- cleaning and disinfection products
- non-organic ingredients not authorised for use in organic products
- processing aids for yeasts and yeast products.

The presence of non-permitted products or substances also includes and may be referred to as residue detections. Suspicion of contamination must be followed by the procedure outlined in this standard.

If you are unsure what action to take, please contact the technical team at sacl.notifications@soilassociation.org.

- b) information relating to the traceability of the product (lot identification or batch number, stock quantity and the quantity of the product already sold)
- c) the laboratory results, from an accredited laboratory when relevant and available
- d) the sampling sheet detailing the time, place and method used to take the sample
- e) any information regarding a previous suspicion or substantiated residue detection for the specific product or substance
- f) any other relevant documentation that will help clarify the case.
- 4. If your product has a positive residue detection for a substance not authorised for use in organic production Soil Association Certification will carry out an investigation to determine:
 - a) if products or substances not authorised in organic production have been used
 - b) if sufficient precautionary measures have been taken
 - c) if sufficient measures following previous requests from certification body have not been taken.

You will be given the opportunity to comment on the investigation and you may be required to take corrective measure to avoid future contamination.

(EC) 2018/848 Art. 28 (2); Art. 29 (1)(2)(3)(4); (EC) 2021/279 Art. 1 (1)(2

SA NI 14.6.4 Exceptions

Exceptions to certain productions rules will only be allowed when explicitly referenced in these standards. Permission must may be granted or confirmed by your certification body or competent authority.

(EC) 2018/848 Art. 22 (EC) 2018/848 Art. 39(1)

(EC) 2018/848 Art. 40(4)(b)	
SA NI 14.6.5 Appeals and complaints	If you have a complaint please send details in writing to
We appreciate there may be occasions when you wish to	cert.complaints@soilassociation.org or telephone Client Services on 0117 987
make a formal complaint to us. This could be regarding	4564.
service, standards, policy, another licensee or an unlicensed	
company. We have formal complaints and appeals	If you wish to appeal a certification decision please send full details to the
procedures which are available on request. You can make a	Certification Team.
complaint in writing, by email or by telephone.	

SA NI 14.7 Planning and managing your organic system

Standards

SA NI 14.7.1 Environmental assessment

If your site produces more than 20 tonnes of organic aquaculture product per year including seaweed, you must draw up an environmental assessment appropriate to the production unit. The assessment must be based on Annex IV to Directive 2011/92/EU which is the Environmental Impact Assessment Directive. It requires you to consider the conditions of the site, its current and future likely effects on the immediate environment. If the unit has already been subject to an equivalent assessment then it can be used for this purpose.

(EC) 2018/848 Annex II Part III(1.3)

SA NI 14.7.2 Sustainable management

You must provide us with a sustainable management plan drawn up in verifiable coordination with neighbouring operators for aquaculture. The plan must be proportionate to the production unit and include:

- a) The environmental effects of the operation
- b) Details of environmental monitoring
- c) Measures to minimise negative impacts on the surrounding aquatic and terrestrial environment
- d) Where applicable, details of nutrient discharge into the environment per production cycle or per annum
- e) Details of how technical equipment will be surveyed and repaired where necessary
- f) A waste reduction schedule to be put in place at the start of organic production
- g) Defensive and preventative measures taken against predators (in line with national rules and the <u>Habitats Directive 92/43/EEC</u>).

If you produce bivalve molluscs your plan must include a summary of the survey and report required in aquaculture standard 13.13.9.

Guidance

Measure whether your site produces more than 20 tonnes of aquaculture product on a fresh weight basis.

Council Directive 2011/92/EU can be accessed online here

Details of the environmental impact assessment should include descriptions of:

- the production unit, including physical characteristics, construction, production processes, inputs and the period when the unit will be in use
- the aspects of the environment that the production unit will affect, such as aquatic flora and fauna, air, climatic factors, material assets including architectural and archaeological heritage, landscape and the interrelationship between these factors the pollutants emitted by the unit including the elimination of waste measures adopted to prevent, reduce and where possible offset significant adverse effects on the environment.

At inspection we will check this is appropriate to your system. Ensure you review and update your plan annually and include details of neighbouring operations.

Your plan needs to cover:

- Energy and water use; impact on wild species, for example seals and Eider ducks, which are a species of conservation interest
- Risks identified through environmental monitoring and how these will be managed
- How mortalities will be managed; identification and recapture of escapees; measures to minimise waste feed
- The impact of any nutrient and effluent build up on the surrounding aquatic environment and how this is managed. Consider important habitats such as calcified seaweed (maerl) beds
- Procedures to log and maintain all technical equipment
- How site waste is managed to avoid environmental damage, protect animal health and avoid attracting pests. For example using nets and ropes made of durable material that is suitable for re-use
- Identification of potential predators e.g. seals, birds, biofouling organisms, and the steps you take to prevent and deter them in line with national rules and the <u>Habitats Directive</u>.

(EC) 2018/848 Annex II Part III(1.2)(1.7)(3.2.3) SA NI 14.7.3 Renewable energy and recycling You must preferably use renewable energy sources and Record any measures you have in place. recycled materials. Where possible, the use of residual heat should be limited to energy from renewable sources. (EC) 2018/848 Annex II Part III(1.9)

SA NI 14.8 Record keeping	
Standards	Guidance
SA NI 14.8.1 General record keeping1. You must have a record keeping system in place which allows you to prove the organic status of your products.	Standards 14.8.1 to 14.8.3 apply to all licensees. More specific record keeping requirements for seaweed operations follow below.
Your records need to cover all production stages from everything produced or bought in through to all goods sold or dispatched and must allow you to demonstrate the	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
balance between input and output. They must also allow retrospective traceability.2. You must keep stock and financial records at your unit or	bought/received/produced sufficient organic material for the quantity you have sold/dispatched.
premises which make it possible to verify the following information for every product: a) the suppliers, sellers or exporters	You need to have a system to keep track of procedures and records to ensure they are correct, up-to-date and effective.
 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 records need to include: checked organic status of goods delivered as per standard 15.3.3 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
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:	the organic products sale valueannual stock takesany pest control treatments used

- 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) 2018/848 Art. 39 (1)

 (EC) 2018/848 Annex II Part IV(1.5)(d)

• 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. With the exception of Certificates of Inspection which must be kept for 2 years. Please refer to the importing standards in section 6.8 of the food and drink standards for further information.

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

SA NI 14.8.2 Verifying certification documents

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

EC) 2018/848 Art. 35(6)

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

The term 'suppliers' also covers businesses supplying a service, e.g. storing organic product.

When you receive goods, you will also need to make the checks detailed in standard 15.3.3.

R

Records of verification checks

SA NI 14.8.3 Complaints register You must keep a complaint register for your business. This must record: a) all complaints you make or receive b) any response to the complaint c) the action taken. (EC) 2018/848 Art. 2(4)(5); Art 39(1)(a); Art. 46(2)(d)	R	A complaints record encourages transparency. It allows businesses to monitor issues arising and encourages good practice by ensuring there is a documented system for dealing with complaints.
 SA NI 14.8.4 Specific seaweed production records You must keep records in the form of a register which is available at all times on the premises of your holding. These records must provide the following information: a) list of species, date and quantity harvested b) date of application, type and amount of fertiliser used If you collect wild seaweeds the register must also contain: a) the history of harvesting activity for each species in named beds b) harvest estimate (volumes) per season c) sources of possible pollution for harvest beds d) sustainable annual yield for each bed (EC) 2018/848 Art. 39(1)(a) (EC) 2021/1691 Art 34(8) (EC) 2021/1691 Annex I.3(c) 		Plant production records

SA NI 14.9 General labelling

Standards

SA NI 14.9.1 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.

Terms and their derivatives listed in Annex IV, whether alone or in combination (including terms used in the EU to describe organic products – see guidance), may be used throughout the European Union and in any language listed.

(EC) 2018/848 Art. 2 (EC) 2018/848 Art. 30(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
- 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, 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. 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.

<u>Labelling legislation</u>



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.

List of terms for organic (annex IV of (EC) 2018/848)

BG: биологичен.

ES: ecológico, biológico, orgánico.

CS: ekologické, biologické.

DA: økologisk.

DE: ökologisch, biologisch.

ET: mahe, ökoloogiline.

ΕL: βιολογικό.

EN: organic.

FR: biologique.

GA: orgánach.

HR: ekološki.

IT: biologico.

LV: bioloģisks, ekoloģisks.

LT: ekologiškas.

LU: biologesch, ökologesch.

HU: ökológiai.

MT: organiku.

NL: biologisch.

PL: ekologiczne.

PT: biológico.

RO: ecologic.

SK: ekologické, biologické.

SL: ekološki.

FI: luonnonmukainen.

SV: ekoloaisk.

SA NI 14.9.2 Using the EU organic logo

- 1. You must display the EU logo on labels of packaged organic products produced in Northern Ireland or the EU.
- 2. Use of the EU logo is optional on product labelled in a third country.
- 3. 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.



4. 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 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.









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

Products without packaging do not need to display the EU logo (see standard 15.3.2 for details of what you need to include)

Pre-packed products for export only and not for sale on the EU market do not have to use the EU Leaf logo. However, operators must have measures in place to ensure the product cannot be placed on the EU market.

- 5. 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.
- 6. 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.
- 7. The organic production logo of the European Union shall not be used in the labelling, the presentation or the advertising of such products, and shall not be used to advertise the mass caterer.

(EC) 2018/848 Art. 32(1)(2)(3) (EC) 2018/848 Art.33;

For product pre-packed in the EU, or Northern Ireland, but placed on third country markets the use of the EU logo is optional.

(EC) 2018/848 Annex V

SA NI 14.9.3 Declaring ingredient origin

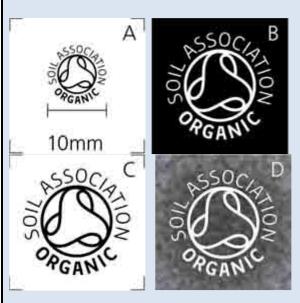
- 1. When the EU logo is used you must also include a declaration in relation to the EU - 'EU agriculture', 'non-EU agriculture', or 'EU/non-EU agriculture'. This must appear:
 - a) in the same visual field as the EU organic logo;
 - b) immediately below the certifier code, and
 - c) no more prominent than the sales description.
- 2. The word 'Agriculture' may be replaced by 'Aquaculture' where appropriate.
- 3. You can replace the words 'UK', or 'Non-UK', 'EU' and '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 5% of the agricultural ingredients.

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

(EC) 2018/848 Art. 32(1)(2) (EC) 2021/279 Art. 3(3)

SA NI 14.9.4 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 14.3. Retailers who are exempt from being certified (standard 14.3.2) 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.

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:



Soil Association higher standard

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 product meets our higher standards for animal welfare, health, consumer protection and the protection of the natural environment.

SA NI 14.9.5 Using the Soil Association symbol offproduct

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 the consumer as to which products the symbol applies.

Soil Association higher standard

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. 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".

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

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 NI 14.10 Making claims on your labels

Standards SA NI 14.10.1 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 which fall under the scope of these standards.
- 2. You must **not** use any terms, including terms used in trademarks, company names and practices, labels or advertising, that could mislead consumers into believing products are organic when they are not.

(EC) 2018/848 Art.30(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 standards 14.8.1 for further details.

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 non-organic 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.

The standards in this section outline the requirements in relation to certain labelling claims. As well as meeting the requirements of these standards, you will need to make sure your products comply with statutory labelling legislation.

Food labelling legislation is harmonised at an EU level. 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, Wales and Northern Ireland all domestic standards legislation is the responsibility of the FSA.

Visit this <u>website</u> for details.

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:

•	'organic agriculture aims to avoid the use of artificial pesticides and
	fertilisers'

- 'organic standards restrict the use of artificial pesticides and fertilisers', or
- 'grown under organic standards which minimise the use of artificial pesticides and fertilisers'.

We worked closely with the Advertising Standards Authority to draw up a document of approved advertising claims you can make when selling organic. If You can find a copy on our <u>website</u>.

SA NI 14.11 Labelling in specific scenarios

SA NI 14.11.1 Labelling requirements for licensees (including retailers, farm shops and farmers' market stalls) selling direct to consumers

You must display your certificate of registration in a way that is clearly visible to your customers. If only some of your products are organic or if your organic supply is sporadic, you also need to provide additional information so that it is clear which products or produce the organic certificate refers to.

Soil Association higher standard

Guidance

In order to make it clear which products your organic certificate relates to, you could also display your trading schedule which lists all the products you are certified to sell. If your organic supply is sporadic, or if the certificate only relates to some items that you are selling, you could add an explanatory note making it clear which products the certificate relates to, and how these are indicated.

Display the certificate in a sensible location in store. For example, if your store is only licensed to cover the loose fruit and vegetables you sell, then put the certificate near the produce.

Online retailers do not have to include their certificate of registration on their website, but they must indicate which products are covered by their Soil Association organic certification. Refer to use of Soil Association symbol in standard 14.5.2.

Why?

Standards

This standard helps to avoid misleading consumers by making it clear which products on sale are organic.

SA NI 14.12 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

Guidance

SA NI 14.12.1 Reducing the risk of contamination In order to avoid contamination with products or substances that are not authorised for use in organic production, you must take the following precautionary measures:

a) put in place and maintain measures that are proportionate and appropriate to identify the risks of contamination of organic production and products with non-authorised products or substances,

You must consider what you do to reduce the risk of contamination at all stages of production, including processing, storage and transport, including how you determine that the measures you have in place are sufficient and how you monitor that they remain effective. You could use details of any sampling and testing that you carry out.

Examples of risks include:

• feed containing non-permitted ingredients

- including systematic identification of critical procedural steps;
- b) put in place and maintain measures that are proportionate and appropriate to avoid risks of contamination of organic production and products with non-authorised products or substances;
- c) regularly review and adjust such measures;
- d) document the risks identified and the measures you put in place, and
- e) comply with other relevant requirements of these standards that ensure the separation of organic, inconversion and non-organic products.

(EC) 2018/848 Art 28(1) (EC) 2018/848 Annex IV(1.2)(1.4)

- other local non-organic sites
- local pollution events e.g. oil spill, sewerage outlets, flooding
- non-permitted cleaning products.

Containers for storage or transport must be of food grade quality.



All procedures must be consistently followed and appropriate records must be maintained to evidence this. Your Inspector will be checking that the procedures you have in place are adequate to reduce the risk of contamination.

Staff training is an important way to ensure that the risk of contamination is minimised. Ensure that all new staff are adequately trained, particularly when changes are made to these organic standards and your own operational procedures.

SA NI 14.12.2 Genetic modification

- 1. If a product contains GMOs, consists of GMOs or is produced from GMOs it must not be labelled or advertised with reference to organic production.
- 2. GMOs, products produced from GMOs, and products produced by GMOs shall not be used in food or feed, or as food, feed, processing aids, plant protection products, fertilisers, soil conditioners, plant reproductive material, micro-organisms or animals in organic production You must be able to demonstrate the above.
- 3. For food and feed products in the EU, Directive 2001/18/EC, Regulation (EC) 1829/2003 or Regulation (EC) 1830/2003 are applicable, and you may rely on labels or any other accompanying documents to confirm that they are non-GM, unless you have other information that the products do not meet the Directive and Regulations listed above.
- 4. For products that are not food or feed, or products that could be produced by GMOs of for products we are certifying outside the EU, you will need to get confirmation from your suppliers, in the form of a non-

In the EU, if a product contains GMOs or their derivatives then it must be labelled as such, (as described in 14.12.3.3) 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.

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

GM declaration, that the products supplied have not been produced from or by GMOs.

(EC) 2018/848 Art. 11

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.

14.12.3.3 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.

The European regulations and directives referred to in the standard only apply to product within the EU market. This means that if we are certifying your business outside the UK/EU, supplier declarations will be required for all GM risk ingredients and feed to confirm the products have not been produced from or by GMOs.

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

Soil Association higher standard

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 NI 14.12.3 Nanoparticles

1. Organic products must **not** contain or consist of engineered nanoparticles.

(EC) 2018/848 Art. 7(e); Art. 3(63)

The definition of engineered nanomaterial, as stated in (EC) 2015/2283 is as follows:

'engineered nanomaterial' means any intentionally produced material that has one or more dimensions of the order of 100 nm or less or that is composed of discrete functional parts, either internally or at the surface, many of which have one or more dimensions of the order of 100 nm or less, including structures,

	agglomerates or aggregates, which may have a size above the order of 100 nm but retain properties that are characteristic of the nanoscale. Properties that are characteristic of the nanoscale include: (i) those related to the large specific surface area of the materials considered; and/or (ii) specific physico-chemical properties that are different from those of the non-nanoform of the same material. 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.
 SA NI 14.12.4 Nanoparticles in organic products In addition to standard 1.11.3, all other organic products (including feed) within the scope of these standards must not contain engineered nanoparticles. This standard does not apply to incidental nanoparticles. Soil Association higher standard 	Why?

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 NI 14.13 General rules on cleaning

Standards

SA NI 14.13.1 Cleaning measures

- You must have suitable cleaning measures in place to avoid contamination and maintain the integrity of your products throughout production, processing and storage.
- 2. You must monitor your cleaning measures to make sure they are effective, adjusting measure where appropriate, 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) 2018/848 Art.28 (EC) 2018/848 Annex II Part IV(1.2)(1.4)(1.5) (EC) 2018/848 Annex III 4(c)

Guidance

For cleaning chemicals permitted in aquaculture facilities please refer to 15.1.4.

You must be able to demonstrate your cleaning procedures, with details of how you clean harvesting/handling equipment, storage areas and equipment used for organic production. Explain how you limit the risk of contamination of organic product from microbial contaminants, from cleaning chemicals, non-permitted substances and from non-organic product.

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).

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.

A list of products for cleaning and disinfection substances and products will be made available in 2026.

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, ATP testing.

SA NI 15.0 Specific standards for organic seaweed

SA NI 15.1 Specific rules on antifouling measures and cleaning of aquaculture equipment and facilities				
Standards	Guidance			
SA NI 15.1.1 Bio-fouling You must remove bio-fouling organisms only by physical means and, where appropriate, return them to the sea at a distance from the farm. (EC) 2018/848 Annex II Part III	You need to be able to demonstrate how you manage the removal of bio-fouling organisms.			
 SA NI 15.1.2 Cleaning equipment You must only clean equipment and facilities by physical or mechanical measures. Where this is not satisfactory, only the substances in standard 15.1.4 may be used. Storing any non-permitted input product on the organic production unit is prohibited. This includes, but is not exclusive to non-permitted fertilisers, cleaning and disinfection products and anti-fouling substances. (EC) 2018/848 Annex II Part III; Annex III (EC) 2018/848 Annex III(7)(2) 				
SA NI 15.1.3 Cleaning and disinfecting You must properly clean and disinfect the holding systems, equipment and utensils on the production unit. You may only use products allowed in these standards. (EC) 2018/848 Annex II Part III; Annex III(7)(4)(c)	At inspection we may ask you to demonstrate how you clean and disinfect the holding systems using the products allowed, for example frequency of cleaning.			
SA NI 15.1.4 Products for cleaning and disinfection and biocide for aquaculture animals and seaweed production You may only use products which contain the following active substances, for cleaning and disinfection of equipment and facilities in the absence of: 1. ozone 2. sodium hypochlorite 3. calcium hypochlorite	Your cleaning procedures must document what techniques and products you use.			

- 4. calcium hydroxide
- 5. calcium oxide
- 6. caustic soda***
- 7. alcohol
- 8. copper sulphate: only until 31 December 2015
- 9. potassium permanganate***
- 10. tea seed cake made of natural camelia seed only for shrimp production***
- 11. mixtures of potassium peroxomonosulphate and sodium chloride producing hypochlorous acid.

You may use only products which contain the following active substances, for cleaning and disinfection of equipment and facilities in the presence and absence of aquaculture animals **:

- 1. limestone (calcium carbonate) for pH control
- 2. dolomite for pH correction (use restricted to shrimp production)
- 3. sodium chloride
- 4. hydrogen peroxide
- 5. sodium percarbonate***
- 6. organic acids (acetic acid, lactic acid, citric acid)
- 7. humic acid***
- 8. peroxyacetic acids***
- 9. peracetic and peroctanoic acid
- 10. iodophores (only in the presence of eggs).

The use of these substances must comply with relevant EU and national provisions as referred to in *Article 16(1) of Regulation (EC) No 834/2007*, and in particular with *Regulation (EU) No 528/2012* and *Directive 2001/82/EC* of the European Parliament and of the Council.

(EC) 2021/1165 Annex IV

(*) Regulation (EU) No 528/2012 of the European Parliament and of the Council of 22 May 2012 concerning the making available on the market and use of biocidal products (OJ L 167, 27.6.2012, p. 1)

(**) Directive 2001/82/EC of the European Parliament and of the Council of	
6 November 2001 on the Community code relating to veterinary medicinal	
product (OJ L 311, 28.11.2001, P. 1).	
(***) must not be used as a biocide	

SA NI 15.2 Pest control	
Standards	Guidance
 SA NI 15.2.1 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 proportionate and appropriate measures to avoid the risk of contamination of organic products. (EC) 2018/848 Art. 28(1) (EC) 2018/848 Annex II Part IV(1.5.1.7) 	
SA NI 15.2.2 Treating infestations in organic products or areas used for organic products	If you use pest control methods, you will need to keep records of:
If you find 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) 2018/848 Art.28(1)	 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 not put organic products back into the treated area for at least

24 hours after the treatment

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

- you will 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, organo-phosphorous, carbamate or organo-chlorine compounds then you must describe the additional safeguards you will put in place to prevent migration or contamination.

Rodenticides must be used only 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 15.2 of Soil Association standards.

Control methods on organic products

Control methods which are appropriate for use on organic products include, but are not limited to:

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

Control methods in organic areas

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

• desiccant dusts such as diatomaceous earth and amorphous silica, preferably from naturally occurring sources

• electric flying insect control units, with shatterproof tubes that are positioned and cleaned correctly

- tamper resistant bait stations that contain legally approved pesticides
- sticky boards for insects
- humane electronic rodent repellents such as floor mats

SA NI 15.2.3 Using glue boards

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

Soil Association higher standard

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

Glue boards should not be viewed as a permanent solution to a pest problem. The Certification Team is able to give permission to use glue boards but only for short periods of time to allow you to deal with the 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 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 NI 15.3 Transport, dispatch and receipt of goods

SA NI 15.3.1 Collection of products and transport to preparation units

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

(EC) 20128/848 Art.23(1); Annex III(1)

Guidance



Collection records.

SA NI 15.3.2 Labelling & transporting products

- 1. If you send an organic or in-conversion product to another company, including retailers, wholesalers and other licensees for further processing, packing or relabelling then you must:
 - a) ensure it is transported in a way that would prevent alteration, including substitution, of the content cannot be achieved without manipulation or damage of the seal.
 - b) label it clearly with,:

Standards

- (i) the product name and its organic status
- (ii) the name and address of the operator, and, if different, the seller or owner of the product
- (iii) certification body code
- (iv) product traceability code, such as batch or lot number
- (v) % organic content of the product (if less than 95%)
- 2. If this information is provided on the accompanying documentation, it must also include information on the supplier and/or transporter.
- 3. You do not need to use closed packaging, containers or vehicles if:

For additional requirements for labelling of retail packed products, please refer to chapters 14.9 and 14.10.

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 on a tanker or fruit and vegetables in open top boxes.



Records of transportation of loose organic products.

However you choose to transport your products, you will need to make sure you have minimised the risk of contamination or substitution with non-organic products 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.

- a) transport takes place directly between two organically certified operators
- b) the transport only includes organic or in-conversion products
- c) products are accompanied by a document containing the information required in point 1b above
- d) both the sending and receiving operators keep records of the transportation.

(EC) 2018/848 Annex III(2.1)(2.2) (EC) 2018/848 Annex III (EC) 2021/642 Art 23.2(a)

4. 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

Why?

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

SA NI 15.3.3 Receiving organic products

When you receive an organic or in-conversion product you must check, upon delivery that the product is labelled according to standard 15.3.2 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) 2018/848 Annex III Part V(5)

When receiving goods from other units or operators you need to have a system in place for checking the organic status of the products and have records to show these checks are always made. Please see the record keeping standards (chapter 14.3) 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 NI 15.4 Storage of products				
Standards	Guidance			
SA NI 15.4.1 General separation You must manage your organic storage areas and containers in such a way to a) ensure identification of lots and b) 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) 2018/848 Annex III(7.1)	 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. Also refer to the 'preserving organic integrity' section, for details of contamination, and products and substances we do not allow. 			
SA NI 15.4.2 Handling and separating organic and	Also refer to the 'preserving organic integrity' section (chapter 14.3), 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) avoid the risk of mixing and exchanging organic and in-conversion 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 and in-conversion products. (EC) 2018/848 Annex II Part IV(1.5); Annex III(7.4) 				
SA NI 15.4.3 Storing unauthorised inputs on organic units is prohibited	Storing any non-permitted input product on the organic production unit is prohibited. This includes, but is not exclusive to non-permitted fertilisers,			
units is prombited	cleaning and disinfection products and anti-fouling substances.			

The storage of inputs in organic plant, seaweed, livestock and aquaculture production units, which are not permitted under these standards is prohibited.

(EC) 2018/848 Annex III(7.2)

SA NI 15.5 Packaging

Standards SA NI 15.5.1 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 EU such legislation includes, but is not

limited to:

- 1. the <u>Defra regulation on extended producer responsibility</u> 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 NI 15.5.2 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).

Soil Association higher standard

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

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 NI 15.5.3 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

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:

*This standard comes into effect from September 2025.

- 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 NI 15.5.4 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</u> <u>contact 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.

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 NI 15.5.5 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 is 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 NI 15.5.6 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 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 (GM) 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 NI 15.5.7 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 15.5.5 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 NI 15.5.8 Oxo-degradable Plastics*

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

Soil Association higher standard

*The 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 NI 15.5.9 Polystyrene*

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

Soil Association higher standard

*The 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 Defra definitions of packaging class data.

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 NI 15.5.10 PFAS (Per- and polyfluoroalkyl substances) *

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

Soil Association higher standard

*The 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 ChemSec marketplace.

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

Whv?

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.

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species within it.

Standards Guidance SA NI 15.6.1 Site suitability for farming and collection When you start your aquaculture operation, or when you add new sites, we will require details of the assessments you have made. Demonstrate that the of wild seaweed water quality meets this standard. Your production units and/or collection areas must be sited in locations: Defra, the competent authority in the UK, will provide further guidance. We 1. that are suitable from a health point of view and are of high expect it to reflect the criteria below: ecological status as defined by Directive 2000/60/EC, or are • Water quality assessment could be based on the Bathing Water Directive of equivalent quality to areas that meet the criteria for Class which is available from the **Environment Agency website**. A or Class B areas as defined in Article 18(8) of Regulation • This should include details of neighbouring operations and an assessment (EU) 2017/625 (laying down specific rules for the controls of the contamination risk these pose and how this will be minimised. on animal products for human consumption) Where there is no data available you should use other methods to assess your 2. are free from contamination by substances not permitted water quality. This should be based on risks and may require analysis in organic production depending on the nature of those risks. Water testing may be required. 3. are free from pollution or pollutants that would affect the organic integrity of the product. 4. where the cultivation or collection of seaweed does not affect the stability of the natural ecosystem or existing

(EC) 2018/848 Annex II Part III

SA NI 15.7 Seaweed production				
Standards	Guidance			
SA NI 15.7.1 Organic and non-organic production Organic and non-organic production units must be adequately separated based on: 1. the natural situation 2. separate water distribution systems 3. distance 4. tidal flow 5. upstream and downstream location of the organic production unit. (EC) 2018/848 Annex II Part III(1.2)				
SA NI 15.7.2 Seaweed harvesting biomass estimate For seaweed harvesting sites, you must conduct a one-off biomass estimate at the start of production. (EC) 2018/848 Annex II Part III (2.4.1)	Show how you have estimated your biomass and justify how the methodology that you use is appropriate for your environment.			
 SA NI 15.7.3 Sustainable harvesting of wild seaweed You must harvest wild seaweed without significant impact on the aquatic environment. You must put in place measures that ensure seaweed regeneration, taking into account: harvesting technique minimum sizes minimum ages reproductive cycles or size of remaining seaweed. You must keep records that demonstrate: the history of harvesting activity for each species in named beds that the seaweed harvested is wild seaweed and that it is harvested according to these standards that where you harvest seaweed from a shared or common harvest area, the total harvest complies with these standards. Your records of harvest estimates and sources of potential 	You must be able to demonstrate how you manage and monitor the sustainability of your operation. You need to provide a map of the harvest area and keep records of the species you harvest.			

	pollution must provide evidence that you are managing	
	the harvesting areas sustainably with no long term impact.	
5.	Where you are harvesting from a shared documentary	
	evidence produced by the relevant authority designated	
	by the Member State concerned shall be available showing	
	that the total collection complies with this Regulation.	
	(EC) 2018/848 Annex II Part III(2.2.1)(b)(2.4.2)(2.4.3)(2.4.4)	
S	A NI 15.7.4 Seaweed cultivation	
1.	Sustainable practices must be used in all stages of	
	production, from collection of juvenile seaweed to	
	harvesting.	
2.	Seaweed cultivation at sea must only utilise nutrients	
	naturally occurring in the environment or from organic	
	aquaculture.	
3.	Where seaweed is cultivated in coastal areas, these must	
	meet the criteria for Class A or Class B areas as defined in	
	Annex II of Regulation (EC) No. 854/2004 (laying down	
	specific rules for the controls on animal products for	
4	human consumption)	
4	Where seaweed is cultivated on land using external	
	nutrient sources, the outflowing water must have the same or lower nutrient levels than the inflowing water.	
	You may only use nutrients of plant or mineral origin as	
	listed in Annex I.	
5	You must ensure that the culture density or operational	
	intensity does not exceed the amount which can be grown	
	without negative effects on the environment.	
6	Where possible, you must re-use or recycle ropes and	
	other equipment used for growing seaweed.	
7.	Seaweed cultivation should preferably form part of a	
	polyculture system.	
8	You must record the culture density or operational	Records of culture density or operational intensity.
	intensity.	
	(EC) 2018/848 Annex II Part III(2.2.2)(c)	
	(EC) 2018/848 Annex II Part III(2.3.1)(2.3.3)(2.3.4)	

 SA NI 15.7.5 Cultivated seaweed conversion period The conversion period for a seaweed harvesting site shall be six months. The conversion period for a seaweed cultivation unit shall be the longer of six months or one full production cycle. (EC) 2018/848 Annex II Part III(2.1.1)(2.1.2) 	
SA NI 15.7.6 Ensuring genetic diversity in indoor culture stock To ensure that a wide gene-pool is maintained, the collection of juvenile seaweed in the wild should take place on a regular basis to maintain and increase the diversity of indoor culture stock. (EC) 2018/848 Annex II Part III(2.2.2)(b)	

SA NI Annex I – fertilisers and nutrients

The following substances can be used in seaweed cultivation on land using external nutrient sources in line with standard 15.7.4.

Name - Compound	Description, compositional requirements, conditions for use	Soil Association
products of products		additional conditions
containing only materials		
Mushroom culture wastes	This must be initially made from products permitted in this table.	
Composted or fermented	Composts obtained from mixtures of vegetable matter which has been	
mixture of vegetable matter	submitted to composting or to anaerobic fermentation for biogas production.	
Products and by-products of	Examples: oilseed cake meal, cocoa husks, malt culms	
plant origin for fertilisers		
Hydrolysed proteins of plant		
origin		
Seaweeds and seaweed	As far as directly obtained by:	You must not use
products	(i) physical processes including dehydration, freezing and grinding	calcified seaweed,
	(ii) extraction with water or aqueous acid and/or alkaline solution	lithothamne or maerl if
	(iii) fermentation	extracted from the sea.
Sawdust and wood chips,	Wood not chemically treated after felling	
composted bark and wood ash		
Soft ground rock phosphate	Product as specified in point 7 of Annex 1 A.2 of <i>Regulation (EC) No</i>	
	<u>2003/2003</u> .	
	The cadmium content must be less than or equal to 90 mg/kg of P ₂ O ₅	
Aluminium-calcium	Product as specified in point 6 of Annex I A.2. of <u>Regulation (EC) No 2003/2003</u> .	
phosphate	The cadmium content must be less than or equal to 90 mg/kg of P ₂ O ₅ .	
	Use only allowed where the soil pH is greater than 7.5.	
Basic slag	Products as specified in point 1 of Annex I A.2 of <u>Regulation (EC) No</u>	
	2003/2003.	
Crude potassium salt or kainit	Products as specified in point 1 of Annex I A.3 of <u>Regulation (EC) No</u> 2003/2003.	
Potassium sulphate, possibly	Product obtained from crude potassium salt by a physical extraction process,	
containing magnesium salt	containing possibly also magnesium salts.	
Stillage and stillage extract	Ammonium stillage excluded.	

Calcium carbonate	Only of natural origin, for example chalk, marl, ground limestone, Breton ameliorant, phosphate chalk.	
Mallygayygata		
Mollusc waste	Only from sustainable fisheries, as defined in Article 4 (1) (7) of <u>Regulation</u>	
	(EU) No 1380/2013 or organic aquaculture	
Egg shells	Must not be of factory farming origin.	
Magnesium and calcium	Only of natural origin	
carbonate	e.g. magnesian chalk, ground magnesium, limestone	
Magnesium sulphate (kieserite)	Only of natural origin	
Calcium sulphate (gypsum)	Only of natural origin	
	Products as specified in point 1 of Annex I D of <i>Regulation (EC) No 2003/2003.</i>	
Industrial lime	Only as a by-product of sugar production from sugar beet or sugar cane, or	
	vacuum salt production from brine found in mountains.	
Elemental sulphur	Products as specified in Annex I D.3 of <i>Regulation (EC) No 2003/2003</i> .	
Trace elements	Only the inorganic micronutrients listed in Annex I, part E of <i>Regulation (EC)</i>	
	<u>No 2003/2003.</u>	
Sodium chloride		Only sea and rock salt.
Sodium Nitrate	Only for algae production on land in closed systems	
Stone meal and clays	For example, ground basalt, bentonite, perlite and vermiculite.	
Leonardite (Raw organic	Only if obtained as a by-product of mining activities.	
sediment rich in humic acids)		
Organic rich sediment from	Only organic sediments that are by-products of fresh water body management	
fresh water bodies formed	or extracted from former freshwater areas.	
under exclusion of oxygen (e.g.	When applicable, extraction should be done in a way to cause minimal impact	
sapropel)	on the aquatic system.	
	Only sediments derived from sources free from contaminations of pesticides,	
	persistent organic pollutants and petrol like substances.	
	Maximum concentrations in mg/kg of dry matter must not exceed:	
	cadmium: 0,7; copper: 70; nickel: 25; lead: 45; zinc: 200; mercury: 0,4;	
	chromium (total): 70; chromium (VI): not detectable	
Xylite	Only if obtained as a by-product of mining activities (e.g. by-product of brown	
	coal mining).	