Soil Association Organic Standards for Northern Ireland
Food and drink

Version 1.2: published on 25th May 2023
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Introduction
The Soil Association 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 agri-food 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 Soil Association 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 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.

This symbol shows where an extra sourcing requirement applies if you are using an organic product that is not certified to Soil Association standards or is sourced outside of the EU. Standard ‘6.10.1 Products and ingredients certified to other organic standards’ provides further information. If you would like to know what the sourcing requirements are, you can view our annex on Sourcing Organic Ingredients. Our Working Together for Better Sourcing explains webpage the challenges surrounding the sourcing of organic ingredients and how we are working with others to address them.

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.

<table>
<thead>
<tr>
<th>EXAMPLE Standards</th>
<th>EXAMPLE Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>NI SA 6.6.6 Water</strong>&lt;br&gt;Water that you use as an ingredient must be potable (fit for drinking).</td>
<td><strong>You will need to demonstrate that the water you use is potable. Potable water is defined by the EU Drinking Water Directive (98/83/EC). In the UK, this is transposed into The Water Supply (Water Quality) Regulations 2016.</strong>&lt;br&gt;If you are using mains water you can demonstrate that your water is potable by indicating your water supplier on your product specification form. If your water is from a bore hole, demonstrate how you ensure it is potable by retaining copies of your water quality test results.</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>EXAMPLE Standards</th>
<th>EXAMPLE Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>NI SA 5.16.1 Scope</td>
<td>Packaging legislation. The I symbol shows where additional relevant information is provided.</td>
</tr>
<tr>
<td>These standards apply to packaging of products that you introduce into the supply chain.</td>
<td>Keep in mind that you must make sure that your packaging meets all relevant legislation relating to packaging, packaging waste and materials in contact with food. These include, but are not limited to:</td>
</tr>
<tr>
<td>We define packaging as all primary (retail), secondary (grouping, display) and tertiary (transport) materials used for:</td>
<td>1. the European Parliament and Council Directive on Packaging and Packaging Waste (94/62/EC) 2. the European Standard for Compostable Packaging (EN13432) – if you are using compostable or biodegradable packaging.</td>
</tr>
<tr>
<td>• containing</td>
<td>Environmental information claims and symbols on your packaging need to be clear, truthful and accurate. In the UK, you will need to make sure your packaging conforms to Defra’s Green Claims code.</td>
</tr>
<tr>
<td>• protecting</td>
<td></td>
</tr>
<tr>
<td>• preserving</td>
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<tr>
<td>• handling</td>
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<td>• delivery</td>
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<td>• labelling</td>
<td></td>
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<tr>
<td>• marketing, and</td>
<td></td>
</tr>
<tr>
<td>• presentation of your products.</td>
<td></td>
</tr>
<tr>
<td>Note - we include bulk bins but not transport pallets in this definition.</td>
<td>Soil Association higher standards are clearly shown.</td>
</tr>
<tr>
<td>Each Soil Association higher standard has a Why? box to explain its purpose and rationale.</td>
<td>Why?</td>
</tr>
</tbody>
</table>
### SA NI 5.0 General standards for organic food and drink

#### SA NI 5.1 Scope

**Standards** | **Guidance**
--- | ---
#### SA NI 5.1.1 Scope of the standards

1. The standards in this document set out the rules that must apply for all stages of production, preparation, labelling, importing, exporting and distribution in order for products to be labelled and marketed as organic in Northern Ireland and the EU. The organic regulation covers product originating from agriculture, including aquaculture and beekeeping:

   a) live or unprocessed agricultural products, including seeds and other plant reproductive material; (refer to separate standards document for farming, growing and plant reproductive material)

   b) processed agricultural products for use as food;

   c) feed. (Refer to separate feed standards document)

   d) certain other products closely linked to agriculture:
      - Yeasts used as food or feed,
      - maté, sweetcorn, vine leaves, palm hearts, hop shoots, and other similar edible parts of plants and products produced therefrom,
      - sea salt and other salts for food and feed (Salt production standards are under development by the EC)
      - silkworm cocoon suitable for reeling,
      - natural gums and resins,
      - beeswax,
      - essential oils,
      - cork stoppers of natural cork, not agglomerated, and without any binding substances,

Food supplements are covered by the scope of these standards. A food supplement is defined under EC Directive 2002/46/EC as:

‘food supplements’ means foodstuffs the purpose of which is to supplement the normal diet and which are concentrated sources of nutrients or other substances with a nutritional or physiological effect, alone or in combination, marketed in dose form, namely forms such as capsules, pastilles, tablets, pills and other similar forms, sachets of powder, ampoules of liquids, drop dispensing bottles, and other similar forms of liquids and powders designed to be taken in measured small unit quantities;’

Tinctures that are classed as food products are also covered by the scope of these standards.

Medicinal products, and tinctures classed as medicinal products, are not covered by the scope of these standards. Medicinal products must have no indication on their labels that they comply with the Organic Regulations as this regulation relates to food and excludes medicinal products. This means the EU organic logo and certifiers certification code may not be used. If you are unsure as to whether your product is classed as a medicinal product, contact the Medicines and Healthcare Products Regulatory Agency (MHRA) for advice [https://www.gov.uk/guidance/contact-mhra](https://www.gov.uk/guidance/contact-mhra)

If you are unsure whether the activity you are carrying out requires certification, please [contact us](#).

For standards regarding crop production (including wild harvesting), livestock husbandry (including beekeeping), please refer to the Farming and Growing standards on our [website](#).
**SA NI 5.1.2 Products from hunting and fishing of wild animals**

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

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

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- cotton, not carded or combed,
- wool, not carded or combed,
- raw hides and untreated skins,
- plant-based traditional herbal preparation

2. You must ensure you comply with all other relevant EU legislation

*(EC) 2018/848 Art. 2(1) (2) (3) (4) (5)*;

For requirements regarding Aquaculture and Seaweed see [here](#).

For requirements regarding livestock feed, please refer to the Feed Processing standards on our [website](#).

Salt production standards are under development by the EC, until these have been published, we will be unable to certify salt as organic.

The scope of these standards does not include mass catering.
**SA NI 5.2 Objectives and principles**

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

### Standards

<table>
<thead>
<tr>
<th><strong>SA NI 5.2.1 General principles of organic production</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>An organic production system must meet the following principles and objectives:</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>3. To maintain the long-term fertility and biological activity of soils.</td>
</tr>
<tr>
<td>4. To contribute to high animal welfare standards and, in particular, to meeting animals' species-specific behavioural needs;</td>
</tr>
<tr>
<td>5. To respect regional, environmental, climatic and geographic differences and the appropriate practices that have evolved in response to them.</td>
</tr>
<tr>
<td>6. To maximise the use of renewable resources and recycling.</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>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</td>
</tr>
</tbody>
</table>
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. 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.
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) 848/2018 Art. 4; Art. 5
(EC) 848/2018 Annex II Part I 1.9.2
(EC) 848/2018 Art. 24 (5)
SA NI 5.2.2 Specific principles for the processing of organic food
In addition to the overall organic principles set out in standard 5.2.1, the processing of organic food must be based on the following specific principles:

1. The production of organic food from organic agricultural ingredients.
2. The restriction of the use of food additives, of non-organic ingredients with mainly technological and sensory functions and of micronutrients and processing aids, so that they are used to a minimum extent and only in case of essential technological need or for particular nutritional purposes.
3. The exclusion of substances and processing methods that might be misleading regarding the true nature of the product.
4. The processing of food with care, preferably with the use of biological, mechanical and physical methods.
5. The exclusion of food containing, or consisting of, engineered nanomaterials.

(EC) 2018/848 Art. 7

SA NI 5.3 Becoming Soil Association certified
What is this chapter about?
This chapter explains which activities require certification and how you can certify your business to the Soil Association standards.

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>SA NI 5.3.1 Certifying your business</td>
<td>Businesses across the world can become certified to the Soil Association standards. 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 will depend on where you operate.</td>
</tr>
</tbody>
</table>
### Activities that require certification

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

2. Before placing any products on the market as ‘organic’ or as ‘in-conversion your business must be certified to produce, process, package, store, label, import, export, distribute, wholesale, or act as the first consignee for imported products, and any other activities that require the physical or financial ownership of organic or in-conversion products or ingredients.

3. 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 connection with the point of sale, or import such products from a third country or subcontract out such activities to another operator. In other EU countries certification may be required for these activities.

Without adequate certification at each stage of the supply chain, the products may lose their organic status. If you are unsure whether the activity you are carrying out requires certification, please [contact us](#).

‘Placing on the market’ is defined as: ‘the holding of food or feed for the purpose of sale, including offering for sale or any other form of transfer, whether free of charge or not, and the sale, distribution, and other forms of transfer themselves’ Regulation (EC) No 178/2002; Art.8.

You need certification if you manufacture, trade, wholesale, distribute, store, break down, pack, repack, re-label or process organic materials out of sight of the final customer. This includes (this is not an exhaustive list):

- wholesaling and storing products only, both packed and loose
- collecting bulk products from many points, for example milk haulier
- supplying ingredients to others to process for you
- buying and selling organic product - ‘placing on the market’
- food service
- on-farm processing and packing
### SA NI 5.3.3 Organic certificate

1. You are not allowed to sell products with reference to organic or in-conversion without a valid certificate that shows that your activity complies with these organic standards.

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

3. The certificate may be in electronic format.

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.

### Soil Association Certification will issue licensees with the following documentation:

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

If you are a farmer with animals and/or land in conversion, these will be shown as ‘in-conversion’ on your Trading Schedule. Once they have gone through the relevant conversion period they will be shown as ‘organic’ on your Trading Schedule and you can start trading as organic.

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.

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:

- (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;
(f) wine;
(g) other products listed in Annex I to this Regulation or not covered by the previous categories.

(2018/848 Article 35.7)

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 is because both the production and the packing would be classed as category A products (unprocessed).

An egg producer who then processes the eggs into mayonnaise could have certification with different certification bodies as the egg production would fall under category A and the processing under category B.

**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 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
- d) certification is withdrawn.

**Information**

If you are interested in certifying your business, contact Soil Association Certification via:
### SA NI 5.4 Your obligations when certified

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

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SA NI 5.4.1 Description of your activities</strong></td>
<td>To help you meet this requirement we have created an application form that outlines the information we need from you.</td>
</tr>
<tr>
<td>1. Before starting your organic enterprise, you must describe how 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 certification body accordingly.</td>
<td>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.</td>
</tr>
<tr>
<td>2. You must include a full description of your premises, units and activities including: a) facilities used for reception, processing, packaging, labelling and storage of products before and after any processing operations, and b) procedures for the transport of products.</td>
<td>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 currently store organic products and wish to start packing or processing them, if you want to start importing products or if you have an abattoir and you want to start processing burgers and sausages. Depending on what you’re adding or expanding, we will need to update your certificates and you may need an additional inspection or licence.</td>
</tr>
<tr>
<td><strong>SA NI 5.4.2 Subcontracted operations</strong></td>
<td>If you plan to contract out part or all of your operation, please contact the certification team.</td>
</tr>
</tbody>
</table>
If you subcontract 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 5.4.1 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)

SA NI 5.4.3 Declaration
You must sign a declaration stating that you:

- a. have described your organic enterprise and activities as referred to in 5.4.1 accurately
- b. will perform your operations according to organic rules
- c. accept any enforcements in case of non-compliance
- d. inform the buyers of loss of status of your product
- e. accept exchange of information about your operation between different certification bodies or control authorities where 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

This is covered in the contract you sign when you apply for certification with us and the declaration you sign after every inspection.
<p>| | |</p>
<table>
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<tbody>
<tr>
<td>g.</td>
<td>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.</td>
</tr>
<tr>
<td>h.</td>
<td>in the case of withdrawing certification inform the certification body or control authority without delay</td>
</tr>
<tr>
<td>i.</td>
<td>accept that your Certification Body or control authority retains your certification history for a minimum of 5 years</td>
</tr>
<tr>
<td>j.</td>
<td>must inform the certification body of any changes to your activities.</td>
</tr>
</tbody>
</table>

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

**SA NI 5.4.4 Other obligations and statutory requirements**
You must make sure your organic business and operations comply with all statutory regulations in your country, and you must make all declarations and other communications that are necessary for official controls.

(EC) 2018/848 Art.2 (4)(5); Art. 37; Art. 39 (1)(b)

This includes but is not limited to requirements concerning:
- premises
- equipment
- staff facilities
- general hygiene
- protection of food from contamination or deterioration
- animal welfare
- water
- transport
- labour and workers, and
- wildlife conservation and protection.

**SA NI 5.4.5 Employment**
You must not use forced or involuntary labour or child labour that interferes with their education.

*Soil Association higher standard*

Note that this standard is also a requirement of several EU Directives including 94/33/EC Protection of Young People at Work, and 2011/36 Preventing and combating trafficking in human beings and protecting its victims. If you are outside the EU, it may be a requirement of the International Labour Organisation Conventions that have been ratified in your country. If it is not, you must still meet this requirement.
Labour management tools, such as Sedex, can be a useful way of helping to ensure that you meet this standard and identify, mitigate and manage risks in your supply chain.

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 5.4.6 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 sections 5.8 and 5.10 for more information on labelling requirements.

In the UK (including Northern Ireland), products produced or processed in the UK (including Northern Ireland), the Soil Association certifier code is GB-OR-05.

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**SA NI 5.5 Inspections**

What is this chapter about?

This chapter explains the certification and inspection process and details your obligations as a licensee and the obligations of the certification body during the inspection process.

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
</table>
| **SA NI 5.5.1 Inspection visits** | We may carry out additional inspections if:  
- you wish to add a new enterprise to your licence  
- you move to new premises  
- we receive a complaint regarding your business  
- it is necessary to inspect seasonal activity or at different times of year  
- we need to inspect again to make sure you have corrected non-compliances  
- you are selected as part of our additional inspection programme and/or our risk assessment of your operations suggests the need for this. |
| 1. A physical inspection of your organic certified activities must be carried out once per year. You may be subject to additional announced or unannounced inspections based on an assessment of risk.  
   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 on-the-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)**

We may charge you for these additional inspections if 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.

<table>
<thead>
<tr>
<th><strong>SA NI 5.5.2 What happens at the inspection</strong></th>
</tr>
</thead>
</table>
| 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. 39 (d); Art. 38 (6)** |

As part of closing the 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.

<table>
<thead>
<tr>
<th><strong>SA NI 5.5.3 Access to facilities</strong></th>
</tr>
</thead>
</table>
| 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 5.5.4 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)

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

**SA NI 5.6 Non-compliance with the standards**

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

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SA NI 5.6.1 Non-compliances</strong></td>
<td></td>
</tr>
<tr>
<td>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.</td>
<td></td>
</tr>
<tr>
<td>At the end of the visit, your Inspector will leave you an <em>Action Summary Form and Declaration</em> 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. The different grades of sanctions are as follows:</td>
<td></td>
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<tr>
<td>• minor non-compliance</td>
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<tr>
<td>• major non-compliance</td>
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<tr>
<td>• critical non-compliance, or</td>
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<tr>
<td>• manifest infringement.</td>
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<tr>
<td>2. Depending on the severity of the non-compliance Soil Association Certification may suspend or even withdraw</td>
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</tbody>
</table>

your licence. If your licence is suspended or withdrawn you must not trade as organic. 

(EC) 2018/848 Art. 37; Art. 38 (1); Art. 41 (3); Art. 42

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 Officer has received your completed form and agreed that the information you have given is satisfactory they will approve the Action Summary Form and Declaration.

Please note, expiry of the certificate is linked to payment of the annual fee, not your inspection. You will only get new certification documents after approval of your Action Summary Form and Declaration if it was your application inspection or some information stated on the documents has changed. The expiry date remains the same.

We may suspend or terminate 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 falls into three categories: minor, major and critical, and takes into account 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,
### 5.6.2 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 in-conversion 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.


### Suspicions

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.
Art. 41 (1)(2)

SA NI 5.6.3 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:

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.
a) information and documents relating to the supplier (delivery note, invoice, the supplier’s organic certification and the Certificate of Inspection (COI) if relevant)
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 5.6.4 Exceptions
Exceptions to certain production rules will only be allowed when explicitly referenced in these standards. Permission may be granted or confirmed by your certification body or competent authority.

(EC) 2018/848 Art. 40 (4)(b)

SA NI 5.6.5 Appeals and complaints
We appreciate there may be occasions when you wish to make a formal complaint to us. This could be regarding service, standards, policy, another licensee or an unlicensed company. We have formal complaints and appeals procedures which are available on request. You can make a complaint in writing, by email or by telephone.

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

If you wish to appeal a certification decision, please send full details to the certification team.

SA NI 5.7 Record keeping
What is this chapter about?
This chapter details all the records that you will need to keep and have available at your inspection.

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>SA NI 5.7.1 General record keeping</td>
<td>Your records need to be sufficient for us to be able to carry out successful mass balance (input and output) and traceability exercises at your inspection. You will need to be able to demonstrate that you have bought/received sufficient organic material for the quantity you have sold/dispatched.</td>
</tr>
<tr>
<td></td>
<td>You need to have a system to keep track of procedures and records to ensure they are correct, up-to-date and effective.</td>
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<tr>
<td></td>
<td>Your records need to include:</td>
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<tr>
<td></td>
<td>• checked organic status of goods delivered as per standard 5.14.3</td>
</tr>
</tbody>
</table>
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

iii) the nature and quantities of organic products held in storage

d) the nature, quantities, and consignees or buyers (other than final consumers) of any products which have left your unit, premises or storage facility.

3. If you do not store or physically handle organic products, you will still need to keep records of:

a) the nature and quantities of organic products bought and sold

b) the suppliers, and where different, the sellers or the exporters

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

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

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

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

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

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

You need to keep all records for at least shelf-life plus 12 months (or if food can be frozen then the records should be kept for shelf-life plus frozen time plus 12 months), with the exception of Certificates of Inspection which must be kept for 2 years. Please refer to the importing section 6.8 for details.
<table>
<thead>
<tr>
<th><strong>SA NI 5.7.2 Verifying certification documents</strong></th>
<th><strong>Records of verification checks</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. You must verify the certification documents of your suppliers and check that they:</strong></td>
<td>A certification document will be the organic certificate, or in the case of Soil Association Certification licensees this includes the certificate and trading schedule. The name and address on the certificate must match the name and address of your supplier (the company you are purchasing from). When you receive goods, you will also need to make the checks detailed in 5.14.2. Tools such as BioC could be used as a way of doing this.</td>
</tr>
<tr>
<td>a) identify your supplier,</td>
<td><strong>Records of verification checks</strong></td>
</tr>
<tr>
<td>b) cover the type or range of products you are purchasing, and</td>
<td></td>
</tr>
<tr>
<td>c) are valid at the time you are making the purchase.</td>
<td></td>
</tr>
<tr>
<td><strong>2. You must make a record of these checks.</strong></td>
<td></td>
</tr>
<tr>
<td><em>EC 2018/848 Art. 35 (6)</em></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>SA NI 5.7.3 Complaints register</strong></th>
<th><strong>Keeping a record of any complaints you receive encourages transparency. It allows businesses to monitor issues and encourages good practice by ensuring there is a documented system for dealing with complaints.</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>You must keep a complaint register for your business. This must record:</td>
<td></td>
</tr>
</tbody>
</table>
| a) all complaints you make or receive | *
| b) any response to the complaint | |
| c) the action(s) taken. | |
| *EC 2018/848 Art. 2 (4)(5)* | |
| *ISO17065 (4.1.2.2)* | |
### SA NI 5.8 General labelling

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

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
</table>
| **SA NI 5.8.1 Using the term organic**
If you wish to refer to organic in relation to product referred to in standard 5.1.1 anywhere on a label, in advertising materials or commercial documents, you must meet the requirements of these standards. |

Terms listed in annex IV of (EC) 2018/848 (also listed in the guidance to this standard) and their derivatives, this includes terms used in the EU to describe organic products. whether alone or in combination, may be used throughout the European Union and in any language listed.

(EC) 2018/848 Art. 2 (3)  
(EC) 2018/848 Art. 30 (1)(2) |

**Labeling refers to the way in which you identify your products and show their organic status. The labelling standards apply to:**
- retail packaging
- bulk packaging
- the labelling of loose produce for sale in retail outlets
- information on delivery notes or invoices for products that are transported in bulk, such as milk
- marketing materials, and
- web content.

This includes reference to organic not just in the product name or sales description, but also in relation to ingredients of a food or feed product. For example, a cereal bar making organic claims about some of the ingredients may only do so if the cereal bar is certified to the organic regulation.

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

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

If you sell organic products and non-organic products, any use of the word organic, or organic logos (certifier logos such as the SA Symbol, or the EU Organic logo), must be clear and unambiguous as to which products they apply. 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.

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

**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, õkoloogiline.
EL: βιολογικό.
EN: organic.
FR: biologique.
GA: orgánaigh.
HR: ekološki.
IT: biologico.
LV: bioloģisks, ekoloģisks.
LT: ekologiškas.
1. Food products containing 95%–100% organic agricultural ingredients can be labelled as organic provided that:

   a) They meet the composition requirements in standard 6.3.1  
   _EC) 2018/848 Art. 30 (5)(a)_

   b) The labelling includes an indication of which ingredients are organic in the ingredients list.  
   _EC) 2018/848 Art. 30 (5)(b)_ The EU organic logo is used on the labelling of pre-packaged food.  
   _EC) 2018/848 Art. 32 (1)(b)_

   d) When the EU logo is used, an indication of where the ingredients were farmed or grown (see standard 5.8.7).  
   _EC) 2018/848 Art. 32 (2)(EC) 2021/279 (3)_

   e) The code of the certifier who certifies the company

**Guidance is set out below:**

a) Identifying organic ingredients
If any non-organic ingredients are used, make a clear indication on the ingredients panel as to the organic status of each ingredient. This includes water and salt as these are non-organic. This also includes non-organic top notes used in juice from concentrate, which must be identified on the retail label of the juice. Note that a derogation to use non-organic top notes must be obtained as per standard 6.7.1.

For example:
Ingredients: Organic flour (fortified with calcium carbonate, iron, niacin, thiamin), water, organic eggs, organic sunflower seeds, yeast, salt.

that applies the labels (which may or may not be you). This must appear in the same visual field as the EU organic logo if the EU logo is used.

(EC) 2018/848 Art. 32 (1)(a)

(EC) 2021/279 Art.3 (2)

f) A traceability code, such as a batch or date code.

(EC) 2018/848 Annex iii 2.1(d)

g) The EU logo, statement of agricultural origin and code of the certifier must be marked in a conspicuous place in such a way as to be easily visible, clearly legible and indelible.

(EC) 2018/848 Art. 32 (3)

h) Your ingredients list must identify any non-organic ingredients of ingredients, unless exempted – as outlined in the guidance

Soil Association higher standard

The EU sets the rules for the use of the EU leaf logo. Its use is optional on foods imported from outside the EU. It cannot be used on non-food products. See EU logo standard DL a for details.

c) Statement of agricultural origin

See standard ‘declaring ingredient origin’ (5.8.7) for details.

d) Certifier code

Each certification body has its own code, which its operators need to use on pack. The code for Soil Association Certification in the UK is GB-ORG-05. If you are packing and labelling the product yourself, or a Soil Association certified company in the UK is packing or labelling the product on your behalf, this is the code which must be used.

However, if you use another company to apply packaging or labels to your product(s), you need to use the code of their certification body on pack. For example, if you are using a French contract packer certified by Ecocert, use the Ecocert code FR-BIO-01, do not use GB-ORG-05. The certification code of your subcontractor is usually featured on their organic certificate.

If your product is labelled outside the EU and you are not using the EU logo then you do not have to use the certifier’s code, but you must include the name of the certifier.

If you are in any doubt as to what certifier code you should use on your labels please contact the certification team for guidance.

Labels of non-food products, such as textiles and health and beauty care, or medicinal products must not include the code of the certifier. This is because they fall outside the scope of the EU Organic Regulation.

e) Traceability code
Your labelling must include a traceability code. Please refer to the record keeping standard 5.7.1 for details.

f) Identifying non-organic ingredients of ingredients
You must list any non-organic ingredients of ingredients. For compound ingredients you can either list the individual non-organic ingredient in the compound ingredient or use a generic description such as ‘contains a non-organic ingredient’.

If you are using an organic flavouring in a product, you do not need to list the non-organic components of the organic flavouring, provided the non-organic components account for less than 1% of the final product.

**Why?**

The EU Organic Regulation doesn’t require non-organic ingredients of ingredients to be declared on labels. Transparency is important to consumers and can help to drive positive change, so Soil Association standards require any non-organic ingredients of ingredients to be declared on the label.

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<th>Standards</th>
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</tr>
</thead>
<tbody>
<tr>
<td><strong>SA NI 5.8.3 Using the Soil Association symbol</strong></td>
<td>Examples of exceptions where you would not have to use the Soil Association symbol are:</td>
</tr>
<tr>
<td>1. You must use the Soil Association symbol on the packaging of Soil Association certified products which contain 95%-100% organic ingredients, except where there is a good reason for not doing so.</td>
<td>• where the label is so small that it would jeopardise other information required by law</td>
</tr>
<tr>
<td>2. You must <strong>not</strong> use the Soil Association symbol on products containing less than 95% organic ingredients.</td>
<td>• for products which are only sold outside the UK</td>
</tr>
<tr>
<td>3. You must <strong>not</strong> use the Soil Association symbol on in-conversion products.</td>
<td>• where your labelling machine cannot include the symbol and you cannot apply the symbol in another way</td>
</tr>
</tbody>
</table>

*Soil Association higher standard*

For in-conversion products you could use the wording ‘Soil Association approved organic conversion’.
Standards | Guidance for each point is set out below:
---|---
SA NI 5.8.4 Products with less than 95% organic ingredients | 1. Less than 95% organic bulk labels
1. For products where less than 95% of the agricultural ingredients are organic you can only include reference to organic in the ingredients list. In order to do this you must:
   a) indicate which ingredients are organic in the ingredients list.
   b) include the total percentage of organic ingredients in the ingredients list (as a percentage of the agricultural ingredients).
   c) use the same colour, size and style of lettering in the reference to organic and percentage statement as you do as for the non-organic ingredients.
   d) Also comply with standard 6.3.1, 6.3.3 and 6.3.4 (EC) 2018/848 Art. 30(5)
2. For products where the main ingredient is a product of hunting or fishing you may make reference to organic in the sales description and in the list of ingredients provided that you:
   a) indicate which ingredients are organic in the ingredients list
   b) ensure any reference to organic in the sales description is clearly related to the organic ingredients and not the product of hunting or fishing
   c) all other agricultural ingredients are organic
   d) include the total percentage of organic ingredients in the ingredients list (as a percentage of the total

| Guidance | 
|---|---|
| | 

- **Why?**

Use of the Soil Association symbol on products that cannot be called organic could be confusing and has the potential to mislead consumers.

- Standards
  - **SA NI 5.8.4 Products with less than 95% organic ingredients**
    1. For products where less than 95% of the agricultural ingredients are organic you can only include reference to organic in the ingredients list. In order to do this you must:
      a) indicate which ingredients are organic in the ingredients list.
      b) include the total percentage of organic ingredients in the ingredients list (as a percentage of the agricultural ingredients).
      c) use the same colour, size and style of lettering in the reference to organic and percentage statement as you do as for the non-organic ingredients.
      d) Also comply with standard 6.3.1, 6.3.3 and 6.3.4 (EC) 2018/848 Art. 30(5)
  2. For products where the main ingredient is a product of hunting or fishing you may make reference to organic in the sales description and in the list of ingredients provided that you:
      a) indicate which ingredients are organic in the ingredients list
      b) ensure any reference to organic in the sales description is clearly related to the organic ingredients and not the product of hunting or fishing
      c) all other agricultural ingredients are organic
      d) include the total percentage of organic ingredients in the ingredients list (as a percentage of the total

| Guidance | 
|---|---|
| | 

2. **Main ingredient of hunting and fishing**
The 'main ingredient' means it accounts for at least 50% agricultural ingredients or is the characterising ingredient. Added water and salt are not taken into account.

- **Products of hunting and fishing**
  - are considered agricultural ingredients so are included in percentage calculations.
  - For example, Sardines in tomato sauce:
    | Ingredient       | Percentage |
    |------------------|------------|
    | Sardines         | 52%        |
    | Organic tomatoes | 32%        |
    | Organic olive oil| 11%        |
    | Organic lemon    | 5%         |
    | **Organic content** | **48%**  |

  - The label will indicate total organic content of 48%

- The table below provides a summary of the main differences in labelling requirements for products containing more than 95% and less than 95% organic agricultural ingredients, and in-conversion products.
e) In the list of ingredients use the same colour, size and style of lettering in the reference to organic and percentage statement as you do for the non-organic ingredients.

f) The product also complies with standard 6.3.1, 6.3.3 and 6.3.4

*(EC) 2018/848 Art. 30 (5)*

3. You must **not** use the EU logo on products covered under points 1 and 2 above.

*(EC) 2018/848 Art. 33 (1)*

4. The label must include the code number of the certifier who certifies the company that carries out the most recent production, preparation or packing for the product (which may or may not be you).

*(EC) 2018/848 Art. 32 (1)(a)*

5. You must include a traceability code, such as a batch or date code.

*(EC) 221/642 Annex (2.1.1)(d)*

<table>
<thead>
<tr>
<th>%organic agricultural ingredients</th>
<th>References to organic</th>
<th>Soil Association Organic logo</th>
<th>EU Organic logo (optional unless in NI)</th>
<th>Certification code</th>
<th>Statement of agricultural origin</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>More than 95%</strong></td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td><strong>Less than 95%</strong></td>
<td>✓</td>
<td></td>
<td>✓</td>
<td>✓</td>
<td>x</td>
</tr>
</tbody>
</table>

Main ingredient is product of hunting or fishing

In sales description and list of ingredients

You may use the wording ‘product under conversion to organic farming’

You may use the wording ‘Soil Association approved organic conversion’

*In conversion product*
<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SA NI 5.8.5 In-conversion products</strong></td>
<td></td>
</tr>
<tr>
<td>1. To label your product as ‘in-conversion’ or use a similar term, the product must:</td>
<td></td>
</tr>
<tr>
<td>a) have been grown on land that has gone through at least a 12-month conversion period before the crop was harvested, and</td>
<td></td>
</tr>
<tr>
<td>b) contain only one agricultural ingredient, which must be of plant origin, either processed or unprocessed.</td>
<td></td>
</tr>
<tr>
<td>c) meet all of the processed food requirements as detailed in these processed food standards.</td>
<td></td>
</tr>
<tr>
<td>(EC) 2018/848 Art. 16 (1); Art. 10 (4)(b)</td>
<td></td>
</tr>
<tr>
<td>d) ensure any reference to ‘in-conversion’ is not more prominent in colour, size and style of lettering than the sales description of the product.</td>
<td></td>
</tr>
<tr>
<td>e) Include the certifier code in the same visual field as the reference to in-conversion.</td>
<td></td>
</tr>
<tr>
<td>(EC) 2021/279 Art. 3 (1)(a)(b)</td>
<td></td>
</tr>
<tr>
<td>2. You must <strong>not</strong> use the EU logo on in-conversion products.</td>
<td></td>
</tr>
<tr>
<td>(EC) 2018/848 Art. 33 (1)</td>
<td></td>
</tr>
<tr>
<td><strong>SA NI 5.8.6 Using the EU organic logo</strong></td>
<td></td>
</tr>
<tr>
<td>1. You must display the EU logo on labels of pre-packaged organic products produced in Northern Ireland or the EU.</td>
<td></td>
</tr>
<tr>
<td>2. Use of the EU logo is optional on product labelled in a third country.</td>
<td></td>
</tr>
<tr>
<td>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.</td>
<td></td>
</tr>
<tr>
<td>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.</td>
<td></td>
</tr>
<tr>
<td>You can download the EU logo in various formats from here.</td>
<td></td>
</tr>
<tr>
<td>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.</td>
<td></td>
</tr>
</tbody>
</table>
4. Where colour is not possible you may use black & white.

5. The EU organic logo must:
6. appear at least 9mm high and 13.5mm wide, or
7. appear 6mm high for very small packages, and
8. have a proportional height to width ratio of 1:1.5.
9. The EU organic logo may appear:
10. in negative, if the background of your packaging is dark.
11. in the single colour of your packaging if you are only able to print one colour.
12. with an outer line around it to improve how it stands out

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 5.14.2 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.
13. in conjunction with other logos and text referring to organic, providing this does not overlap, obscure or change the logo.

14. The organic production logo of the European Union shall not be used in the labelling, the presentation or the advertising of products originating from mass catering and shall not be used to advertise the mass caterer.

15. The organic production logo may be used for information and educational purposes related to the existence and advertising of the logo itself, provided that such use is not liable to mislead the consumer as regards the organic production of specific products, and provided that the logo is reproduced in accordance with the rules set out in this standard.

(EC) 2018/848 Art. 2 (3); 32 (1)(2)(3) Art. 33 (1)(4)(5)

<table>
<thead>
<tr>
<th><strong>SA NI 5.8.7 Declaring ingredient origin</strong></th>
<th><strong>If the EU logo is used the declaration needs to be in the same visual field as the EU logo.</strong></th>
</tr>
</thead>
</table>
| 1. If 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) below the certifier code, and  
   c) no more prominent than the sales description.  
  2. The word 'Agriculture' may be replaced by 'Aquaculture' where appropriate.  
  (EC) 2018/848 Art. 32(1)(2)  
  (EC) 2021/279 Art.3(3) |                                                                                                                                 |
| 3. You can replace 'EU' or 'non-EU' with a particular country or county and region if all ingredients were farmed or grown there. You do not have to count small amounts of | If the product contains 98% ingredients grown in a particular country, it can be labelled as that specific country. For example, lamb produced in Wales could be labelled as Welsh Agriculture. |
ingredients up to a total of 2% of the agricultural ingredients.

<table>
<thead>
<tr>
<th>Soil Association higher standard</th>
<th>Why?</th>
</tr>
</thead>
<tbody>
<tr>
<td>These standards comply with European Commission organic regulation 2018/848, which has replaced regulations 834/2007 and 889/2008. The Soil Association has identified this standard as an area where the new regulation is less strict, therefore the requirement will be kept at the same level as the previous regulation and marked as a Soil Association higher standard. This standard will undergo a review process in 2023 to determine whether it should be brought into line with 2018/848, or should remain a higher standard.</td>
<td></td>
</tr>
</tbody>
</table>

**SANI 5.8.8 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 5.3. Retailers who are exempt from being certified (standard 5.3.2) may sell Soil Association certified products which include the SA symbol on their labelling and make use of the Soil Association symbol in the marketing of those products provided it is clear and unambiguous as to which products the symbol applies.

You can download the symbol pack directly from our [website](#). We also have the symbol available for use in Welsh and Gaelic.

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.

**Standards**

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>SA NI 5.8.9 Using the Soil Association symbol off-product</td>
<td>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”.</td>
</tr>
</tbody>
</table>
You can download the symbol pack directly from our [website](#). We also have the symbol available for use in Welsh and Gaelic.

**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 5.9 Making claims on your labels**

### What is this chapter about?

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

<table>
<thead>
<tr>
<th>Standards</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SA NI 5.9.1 Using accurate descriptions</strong></td>
</tr>
<tr>
<td>1. References to organic production, as described in standard 5.8.1, 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.</td>
</tr>
<tr>
<td>2. You must not use any terms, including terms used in trademarks, company names and practises, labels or advertising, that could mislead consumers into believing products are organic when they are not.</td>
</tr>
</tbody>
</table>

### Guidance

Your sales description and product name will need to accurately describe your product. You can’t use the word organic, even if it is part of your company trade name, in relation to non-organic products (e.g. on labels). Refer to standard 5.8.1 for further details.

#### Substantiating claims

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

For example:

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

- ‘Organic standards prohibit the use of GM materials’, or
- ‘non-GM’.

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

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

---

*(EC) 2018/848 Art. 30 (2)*
We worked closely with the Advertising Standards Authority to draw up a document of approved advertising claims you can make when selling organic. You can find a copy on our website.

**Labelling must not be misleading**

You need to make sure that the way you label your products is not misleading. For example, if:

- you label your product as ‘organic mint biscuits’, it must contain organic mint.
- your product does not contain organic mint, you can only label it as ‘organic biscuits with mint’.
- you label your product as ‘organic strawberry ice cream’ it needs to contain organic strawberries.
- your product does not contain organic strawberries but uses a natural strawberry flavouring instead, it could only be labelled as ‘organic ice cream with strawberry flavour’.
- your company name includes the word organic; you cannot use it on non-organic products. For example, you could not use the name ‘Brown Farm Organics’ on non-organic products.

You will need to seek guidance from Trading Standards on any other claims you make on your product labels.

If you produce organic and non-organic lines in the same range, you need to make sure that the packaging is sufficiently distinguishable (for example by colour, design or wording) to prevent confusion.

**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 [website](#) for details.

**SA NI 5.9.2 Aquaculture products labelling**

1. You must not label wild-caught aquaculture animals as organic.  
   *(EC) 2018/848 Art. 3 (2)*

2. You must describe organic fish as farmed in the sales description and in any advertising literature.  
   *Soil Association higher standard*

3. For multi-ingredient products containing organic fish, you must refer to the fact they are farmed somewhere on the label.  
   *Soil Association higher standard*

**Why?**

These standards are intended to provide transparency and clarity for consumers about the origin of organic fish. Fish can only be called organic if they have been farmed to organic aquaculture standards. Wild-caught fish can never be described as organic. By requiring labels to specify that organic fish are farmed, consumers are less likely to be confused about how organic fish are produced.

**SA NI 5.10 Labelling in specific scenarios**

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SA NI 5.10.1 Labelling requirements for licensees</strong></td>
<td>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.</td>
</tr>
<tr>
<td>(including retailers, farm shops and farmers’ market stalls) selling direct to consumers</td>
<td></td>
</tr>
<tr>
<td>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.</td>
<td></td>
</tr>
</tbody>
</table>
### Soil Association higher standard

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.

For details on using the Soil Association organic symbol on products, please refer to standard 5.8.8.

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

#### Why?

**SA NI 5.10.2 Stamping eggshells and meat**

You must only use colours in accordance with article 17 of Regulation (EC) No 1333/2008 for stamping meat and eggshells.  

*EC) 2018/848 Annex IV (2.2.2)(c)*

**Egg stamps**

Even if you stamp your eggs with the egg markings, you still need to label the egg boxes in accordance with the general organic labelling standards.

You can find more information on egg marking on the Defra [website](#).

**Meat stamps**

Please refer to the abattoir standards on our [website](#) for full details of meat stamp requirements including details of the records which must be kept.
## SA NI 5.11 Preserving organic integrity

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

### Standards

<table>
<thead>
<tr>
<th>SA NI 5.11.1 Reducing the risk of contamination</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. 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:</td>
</tr>
<tr>
<td>(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, including systematic identification of critical procedural steps;</td>
</tr>
<tr>
<td>(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;</td>
</tr>
<tr>
<td>(c) regularly review and adjust such measures;</td>
</tr>
<tr>
<td>(d) document the risks identified and the measures you put in place, and</td>
</tr>
<tr>
<td>(d) comply with other relevant requirements of these standards that ensure the separation of organic, in-conversion and non-organic products.</td>
</tr>
</tbody>
</table>

EC) 2018/848 Article 28 (1); Annex II Part IV (1.2) (1.4)

### Guidance

Examples of risks include:

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

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

#### Risk products
- Chemical or GM contamination from non-organic inputs (e.g. manure, feed, minerals, pesticides, fertilisers).  
- Using risk ingredients – they may be a risk depending on what they are or where they come from. For example, some ingredients like maize and soya from countries like USA, Brazil, Argentina and Canada have a higher risk of being contaminated by GMOs.  
- Residues or contaminants from packaging, such as synthetic coatings for cheese if they contain fungicides or wood that has been treated with preservatives.
Boiler chemicals - If you use boiler chemicals to treat water in boilers be aware that some chemicals are volatile and carry over in the steam and could contaminate organic product. For example, amines are designed to be carried into pipes with the steam to reduce corrosion. These should not be used where steam will be in direct contact with organic product or on product contact surfaces. Some boiler additives do not carry over with the steam, these include: mineral acids (usually phosphoric), polyphosphates, sodium hexametaphosphate, sodium bisulphate, sodium polyacrylate, sodium hydroxide, sulphite oxygen scavengers.

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

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

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

### SA NI 5.11.2 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.

   (EC) 2018/848 Art.30(4)

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.

If you source meat, egg or aquaculture animal products which were farmed outside the UK/EU we will ask for additional information to demonstrate the animal feed meets this Soil Association sourcing requirement.

In the EU, if a product contains GMOs or their derivatives then it must be labelled as such, (as described in 5.11.2.3) so the regulation allows labels to be relied upon as evidence to indicate whether food contains GMOs or their derivatives. This would apply to products such as agricultural crops, like maize and soya, or their derivatives like lecithin or starch. However, Directive 2001/18/EC, Regulation (EC) 1829/2003 and Regulation (EC) 1830/2003 do not extend to the use of ingredients produced by genetically modified micro-organisms. For example,
3. For food and feed products in the EU, Directive 2001/18/EC, Regulation (EC) 1829/2003 or Regulation (EC) 1830/2003 are applicable, and you may rely on labels or any other accompanying documents to confirm that they are non-GM, unless you have other information that the products do not meet the Directive and Regulations listed above.

4. For products that are not food or feed, or products that could be produced by GMOs or for products we are certifying outside the EU, you will need to get confirmation from your suppliers, in the form of a non-GM declaration, that the products supplied have not been produced from or by GMOs.

   **EC 2018/848 Art. 11**

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

   **Soil Association higher standard**

   enzymes and vitamins. This means that it cannot be automatically assumed that a product complies with the specific GMO requirements of the organic regulations. For this reason, we require a completed GMO declaration for all products that may be a GM risk.

   Our GMO declaration form explains which additives, processing aids and ingredients are GMO risks. The certification team can also confirm any other ingredients which are a GMO risk.

   There is a specific form to be used for licensees producing products under a Soil Association Standards license and a separate form to use for licenses producing product under an EU-only licence. This is because the Soil Association has additional requirements in this area, as outlined in 5.11.2.5.

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

   **Please note:** The GMO declaration expires 12 months from the date signed. Supporting information must be dated within 12 months of sending to SA Certification. If older than 12 months, you must check with the supplier that the statement is still valid and provide evidence of this to SA Certification.

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

   Farmers purchasing animal feeds may rely on the information provided on the labels, or accompany documents. Feed used must be certified organic so any checks on GM status will have been done by the feed processors.
As part of due diligence and controlling risks, operators who import/process/trade GM risk organic ingredients may wish to carry out testing for GMOs. For example, soya or maize products. Testing must be to the lowest limit of quantification (0.1%) and not just to 0.9%.

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 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.

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.

Standards

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
</table>
| SA NI 5.11.3 Nanoparticles
Organic food must not contain or consist of engineered nanoparticles. | 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 5.11.4 Nanoparticles in organic products

1. In addition to standard 5.11.3, all other organic products (including feed) within the scope of these standards must not contain engineered nanoparticles.

Soil Association higher standard

2. This standard does not apply to incidental nanoparticles.

Soil Association higher standard

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

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.

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

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

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SA NI 5.12.1 Cleaning measures</strong></td>
<td>Your cleaning procedures must detail how you clean harvesting/handling equipment, storage areas and equipment used for organic production. Explain how you limit the risk of contamination of organic product from microbial contaminants, from cleaning chemicals, non-permitted substances and from non-organic product.</td>
</tr>
<tr>
<td>1. You must have suitable cleaning measures in place to avoid contamination and maintain the integrity of your products throughout production, processing, and storage.</td>
<td>You will need to ensure your staff, or contractors using their own equipment, are trained to carry out effective cleaning to prevent contamination of your organic products.</td>
</tr>
<tr>
<td>2. You must monitor your cleaning measures to make sure they are effective, adjusting measures where appropriate, and keep records to show that you have done this.</td>
<td>Your cleaning procedures need to be clear and need to set out what will be cleaned, how, with what frequency (e.g. daily, weekly, monthly or annually), who is responsible, what chemicals and equipment needs to be used and details of the final rinse of food contact surfaces with potable water (where appropriate).</td>
</tr>
<tr>
<td>3. If you process or store both non-organic and organic at the same site, you must ensure organic processing or storage is only carried out once suitable cleaning of the equipment and/or storage area(s) has been carried out.</td>
<td>Even if you do not produce organic, for example, if you just wholesale or transport, cleaning is still important to minimise the risk of contamination. For example, loading equipment and vehicles need to be cleaned and the risk of contamination minimised.</td>
</tr>
</tbody>
</table>

#### Records of cleaning measures

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

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

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

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

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

QACs are used throughout the supply chain including farms. If you are a farm you should consider all areas where you use QACs, and ensure you have measures in place to prevent contamination of your organic product. This includes harvesting equipment, milking equipment, vats, bulk tanks, meat processing areas, veg packing areas or any other equipment or surfaces that come into contact with your organic product. If you are unsure if your cleaning product contains QACs speak to your cleaning supplier or review the technical data sheet for the product.
If you use alcohol wipes, swabs or sprays, be aware that some may leave a residue after the alcohol has evaporated. Most contain other substances such as surfactants, sanitisers and emollients. These must not be used on product contact surfaces without rinsing them off because they may leave a residue. You may use denatured alcohol (e.g. isopropanol, methanol or ethanol) without rinsing, providing sufficient time is given for the alcohol to evaporate before surfaces come into contact with organic product.

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

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

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

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

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

When you carry out a bleed run or purge of equipment, you need to calculate how much organic product needs to go through the system to remove all residue of non-organic product. This amount needs to be stipulated in your cleaning procedure and you need to record when you do bleed runs along with the quantities of purge material you have used. This figure will be used when carrying out your mass balance calculation (see record keeping standards – 5.7).

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

The European Commission will be releasing detailed rules for cleaning and disinfection of processing and storage facilities in 2024.

---

**SA NI 5.13 Pest control**

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

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SA NI 5.13.1 Preventing contamination by pests and pest control products</strong></td>
<td>Your procedures must include the measures you have in place to reduce the risk of contamination by pests. This should include measures to prevent and control wild birds, rodents and insects from getting into your buildings such as:</td>
</tr>
<tr>
<td>1. You must design and operate your buildings and controls to reduce the risk of contamination by pests.</td>
<td>• Flyscreens</td>
</tr>
</tbody>
</table>
2. You must ensure when implementing preventative measures in organic areas that you take precautionary proportionate and appropriate measures to avoid the risk of contamination of organic products. 

(EC) 2018/848 Art. 28 (1); Annex II Part IV (1.2) (1.4)

- pheromones in traps and dispensers, for monitoring pest levels or as attractants and sexual behaviour disrupters
- effective covers of waste bins
- sealing gaps and entry points.

SA NI 5.13.2 Treating infestations in organic products or areas used for organic products

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

(EC) 2018/848 Art. 28(1)

If you use pest control methods, you will need to keep records of:

- what pests you have found
- what chemicals, methods and equipment you used on them
- who did the treatment, when and which area or equipment was treated, and
- what precautions you took to prevent contamination of organic products.

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

- remove all organic products from the area to be treated
- not put organic products back into the treated area for at least 24 hours after the treatment
- 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. Your pest control contractor can advise you on this.
Rodenticides must only be used in tamper-proof bait stations and in places where there is no risk of contaminating products.

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

You should make your pest control contractor aware that your unit is handling organic products and that you must comply with pest control procedures in section 5.13 of Soil Association standards.

**Control methods on organic products**

Control methods which are appropriate for use on organic products include:
- carbon dioxide or nitrogen
- freezing and heating
- vacuum treatment

**Control methods in organic areas**

Control methods which are appropriate for use in organic areas include, but are not limited to:
- desiccant dusts such as diatomaceous earth and amorphous silica, preferably from naturally occurring sources
- electric flying insect control units, with shatterproof tubes that are positioned and cleaned correctly
- tamper resistant bait stations that contain legally approved pesticides
- sticky boards for insects
- humane electronic rodent repellents such as floor mats

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**SA NI 5.13.3 Using rodent glue boards**

1. You may only use glue boards for rodents as a last resort and you must:
   a) provide evidence to show that other methods of trapping have failed or are not appropriate, before you use the glue boards;

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

**Records of checks**
<p>| | |</p>
<table>
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<tbody>
<tr>
<td>b)</td>
<td>use them according to industry best practice;</td>
</tr>
<tr>
<td>c)</td>
<td>check rodent glue boards at least once every 12 hours including at weekends and Bank Holidays, as required by the <em>Pest Management Alliance</em> code of practice, and</td>
</tr>
<tr>
<td>d)</td>
<td>keep a record of each check.</td>
</tr>
</tbody>
</table>

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**Soil Association higher standard**

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

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

See the [Code of Practice on the Humane Use of Rodent Glue Boards](#) for more information.

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### Why?

In order to protect public health within high-risk environments, the use of rodent glue boards remains an important last option when all other control methods have been considered and deemed ineffective. However, their use does raise serious animal welfare concerns. This standard ensures that glue boards are only used as a last resort and only by persons who have been given adequate training and are competent in the effective and humane use of this technique.
## SA NI 5.14 Transport, dispatch and receipt of goods

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

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
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<tbody>
<tr>
<td><strong>SA NI 5.14.1 Collection of products and transport to preparation units</strong>&lt;br&gt;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 and in-conversion products. Your collection records need to indicate the collection days, hours, collection circuit and the time and date when products were received. <em>(EC) 2018/848 Art.23 (1); Annex III (1)</em></td>
<td>Collection records</td>
</tr>
</tbody>
</table>

| **SA NI 5.14.2 Labelling & transporting products**<br>1. If you send an organic, or in-conversion product to another company, including retailers, wholesalers you must:<br>   a) ensure it is transported in appropriate packaging, containers or vehicles closed in such a way that would prevent alteration, including substitution, of the content without manipulation or damage of the seal.<br>   b) label it clearly, either on the product or on accompanying documentation undeniably linked to it so that the recipient can easily identify:<br>      (i) the product name and its organic status<br>      (ii) the name and address of the operator, and, if different, the seller or owner of the product<br>      (iii) our certification body code,<br>      (iv) product traceability code, such as batch or lot number | For additional requirements for labelling of retail packed products, please refer to section 5.8.<br>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.<br>Labelled packaging helps identify organic products and keeps them sealed which limits the risk of contamination and substitution. However, there are products that need to be transported in loose bulk, for example milk in a tanker or fruit and vegetables in open top boxes. | Records of transportation of loose organic products. |
(v) % organic content of the product (if less than 95%).

The above information may solely be on an accompanying document, provided that document can be undeniably linked with the product packaging, container or vehicular transport. The accompanying document must also include information on the supplier or transporter.

2. You do not need to use closed packaging, containers or vehicles if:
   a) transport takes place directly between two organically certified operators
   b) the transport includes only organic or in-conversion products
   c) products are accompanied by a document containing the information required in point 1 above
   d) both the sending and receiving operators keep records of the transportation.

   (EC) 2018/848 Annex III (2.1 & 2.2)

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

   Soil Association higher standard

**Why?**

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

**SA NI 5.14.3 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 5.14.2 above and packed appropriately so that it cannot be mistaken or mixed up with other products. You must crosscheck that the label on the product

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 (5.7) for details of the information you will need to record.
matches the information on the accompanying documents and provide an account of how you check goods upon receipt.

(EC) 2018/848 Annex III (5)

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 5.15 Storage of products

**What is this chapter about?**

This section details the standards for storing and handling organic products.

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
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<tbody>
<tr>
<td><strong>SA NI 5.15.1 General separation</strong>&lt;br&gt;You must manage your organic storage areas and containers in such a way to;&lt;br&gt;a) ensure identification of lots, and&lt;br&gt;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.&lt;br&gt;(EC) 2018/848 Annex III (7.1)</td>
<td>Demonstrate that your organic products are clearly identified and separated from areas used for other purposes. Examples include, but are not limited to:&lt;br&gt;- identify the room, area, or racking with the word 'organic' to show that it is for storing organic products&lt;br&gt;- identify all organic materials clearly to avoid accidental contamination&lt;br&gt;- have sufficient space or barriers around the organic storage area to stop accidental contamination&lt;br&gt;- only use stores, bins and containers that are made of materials suitable for contact with the food they are to store&lt;br&gt;- dedicate and identify bins and containers as organic&lt;br&gt;- prevent contamination by birds, insects and vermin&lt;br&gt;- clean the stores regularly so that there are no residues which could contaminate organic products or encourage pests.&lt;br&gt;Describe in your procedures how you avoid any mixing or contamination from products or substances not permitted in these standards.&lt;br&gt;Also refer to the ‘preserving organic integrity’ section, for details of contamination, and products and substances we do not allow.</td>
</tr>
</tbody>
</table>
SA NI 5.15.2 Handling and separating organic and non-organic products

1. When you use the same equipment and premises to store and handle both organic, in-conversion and non-organic products you must:
   a) avoid the risk of mixing and exchanging organic or in-conversion products with other products and foodstuffs by clearly identifying and separating them during storage, handling and production, 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 III (7.4); Annex II IV (15)

Also refer to the ‘preserving organic integrity’ (section 5.11) for details of contamination and products and substances we do not allow.

SA NI 5.16 Packaging

Standards

SA NI 5.16.1 Scope

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

We define packaging as all primary (retail), secondary (grouping, display) and tertiary (transport) materials used for:

- containing
- protecting
- preserving
- handling
- storage
- delivery
- labelling
- marketing, and
- presentation of your products.

Guidance

1. 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 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.

Keep in mind that 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 would include, but is not limited to:

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

- Soil Association higher standard

2. the European Standard for Compostable Packaging (EN13432) – if you are using compostable or biodegradable packaging.

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

For further information on what constitutes primary, secondary and tertiary packaging please refer to the Defra definitions of packaging class data.

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.

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
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</table>
| SA NI 5.16.2 Cellulose-based materials
If you use cellulose-based materials, such as corrugate, bleached paper or cardboard, it must be totally chlorine free (TCF) or elemental chlorine free (ECF). Recycled paper must be process chlorine free (PCF).
- Soil Association higher standard | Demonstrate that you have not used these materials, for example by having written confirmation from your supplier. |

**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.

<table>
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<tr>
<th>Standards</th>
<th>Guidance</th>
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</table>
| SA NI 5.16.3 Aluminium foils
You must not use unlacquered aluminium foils to package food which is acidic (with a pH less than or equal to 4.5) or | Demonstrate that you have not used these materials, for example by having written confirmation from your supplier. |
Aluminium has been linked with the onset of Alzheimer's disease and other degenerative mental states. Lacquering the foil prevents the aluminium from reacting with food acids. Producing safe and healthy food is an important principle of organic food processing.

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<th>Standards</th>
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<tr>
<td><strong>SA NI 5.16.4 Plastic materials, coatings, dyes or inks</strong>&lt;br&gt;You must not use plastic materials, coatings, dyes or inks that contain phthalates if they will be in direct contact with foodstuffs.</td>
<td><strong>Why?</strong>&lt;br&gt;Phthalates can have a negative impact on human health, for example they have endocrine disrupting properties.</td>
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</table>

**Standards**

**SA NI 5.16.5 PVC**<br>You must not use polyvinyl chloride (PVC) unless alternative materials are not available or are functionally unsuitable, as listed in the guidance section of this standard.

**Soil Association higher standard**<br>Demonstrate that you have not used these materials, for example by having written confirmation from your supplier.

You must not use vinyl chloride plastics but you may use other chlorinated plastics, such as PVdC.

There are some specific circumstances where we are aware that no suitable alternatives to PVC currently exist yet. These include:

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

The Soil Association’s Packaging Working group will review this list on a regular basis.
You may use metal jar lids, caps and tamper evident seals that contain PVC, however you will need to make your packaging supplier aware that a PVC-free alternative is preferable should it become available.

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

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

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

### Standards

**SA NI 5.16.6 Non-GM packaging**

You must **not** use packaging materials or substances that contain, have been derived from, or manufactured using genetically modified organisms or genetically engineered enzymes, unless alternative materials are functionally unsuitable or not available, as indicated in the guidance section of this standard.

*Soil Association higher standard*

### Guidance

Adequate demonstration of non-GM for packaging materials includes:

- Raw materials made from organic crops
- Non-GMO Project certification
- IP or PCR testing results for the raw materials

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

Only PLA from non-GM sources can be used in the packaging of organic products. This includes teabags. You will need to provide a non-GM declaration to prove the PLA is not produced from or by GM.
There are some cases where it is not possible to trace the source feedstock of packaging materials in order to verify whether or not it is derived from GM, or there are no suitable alternative options which are non-GM. An example of this is lids containing epoxydised soybean oil (ESBO). In cases where there is no functional alternative, we can give you permission to use the packaging. This permission would be subject to annual review and may be revoked should a technological alternative appear on the market in sufficient quantity.

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

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

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

<table>
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<tr>
<th>Standards</th>
<th>Guidance</th>
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<tbody>
<tr>
<td>SA NI 5.16.7 BPA and other bisphenols in food-contact materials&lt;br&gt;You must not intentionally use Bisphenol A (BPA) or other bisphenols in materials that will be in direct contact with foodstuffs.</td>
<td>Bisphenol A (BPA) is a chemical found in some plastics and used in the manufacture of epoxy resins. It is commonly found in the linings of some food and beverage cans. Alternatives to BPA include epoxy-phenolic, modified polyester and acrylic.</td>
</tr>
<tr>
<td><em>Soil Association higher standard</em></td>
<td>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</td>
</tr>
</tbody>
</table>
production. Although you should avoid them where possible, you can still use BPA-NI materials for the time being. We will monitor the situation with BPA-NI materials with a view to totally eradicating BPA from all food contact materials in due course.

Type 7 plastics may be made from BPA. Type 3 plastics (PVC) could also contain BPA, but only in the case of flexible PVC which is prohibited under standard 5.16.5 of these standards.

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

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

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**SA NI 6.0 Specific standards for food and drink**

**SA NI 6.1 General manufacturing**

**What is this chapter about?**
This chapter covers the basic requirements that must be met by all licensees involved in manufacturing organic products.

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<thead>
<tr>
<th>Standards</th>
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<tbody>
<tr>
<td><strong>SA NI 6.1.1 Ensuring organic integrity</strong></td>
<td>Your procedures need to cover all the critical processing steps in the manufacture of your products. This includes making sure staff are fully trained for the tasks they carry out and understand the importance of maintaining organic integrity.</td>
</tr>
<tr>
<td>To ensure organic integrity you must:</td>
<td></td>
</tr>
<tr>
<td>1. Have procedures to maintain the organic integrity of your products, from buying raw materials to goods out, and which also ensure that non-organic products are not produced or sold as organic.</td>
<td></td>
</tr>
<tr>
<td>2. Always work to the principles of good manufacturing practice for your sector of the food industry.</td>
<td></td>
</tr>
<tr>
<td><em>(EC) 2018/848 Annex II Part IV (1.1-15)</em></td>
<td>Please also refer to the standards on preserving organic integrity (5.11), cleaning (5.12) and record keeping (5.7) as these are all related to ensuring organic integrity.</td>
</tr>
</tbody>
</table>
There are a number of quality management standards that can provide manufacturing businesses with guidelines for best practice quality control and record keeping, such as ISO 9000, BRC and SALSA. It is not a requirement of organic certification to sign up to any of these schemes, however should you wish to develop your quality management system further, these schemes can provide support and independent auditing.

**SA NI 6.1.2 General production methods**

1. Organic food must be produced with care and preferably with the use of biological, mechanical and physical methods.
2. Use of permitted food additives, non-organic ingredients, micronutrients and processing aids must be kept to a minimum and only used where necessary.
3. Substances and processing methods which could mislead consumers about the true nature of a product must not be used.

   (EC) 2018/848 Art. 7
   (EC) 2020/464 Art. 23

Please also refer to chapters 6.3, 6.4, 6.5 and 6.6 for details of permitted non-organic ingredients, processing aids and additives.

**SA NI 6.1.3 Prohibited techniques**

Techniques must not be used to modify or restore attributes lost during the processing or storage process.

(EC) 2018/848 Annex II Part IV (1.6)
(EC) 2020/464 Art. 23 (1)

You can only use substances, re-constitution techniques, additives and processing aids in ways allowed by the law and by these standards.

**SA NI 6.1.4 Processing organic and non-organic**

If you process organic, in-conversion and non-organic products, either using the same equipment or at the same site, you must:

- a) assess the risk of contamination and mixtures or exchanges, and put in place controls to avoid those risks
- b) process and store organic, in-conversion products separately, in time or space, from non-organic

Also refer to storage (5.15), cleaning (5.12), preserving organic integrity (5.11), and record keeping (5.7) sections.

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

Some businesses may have dedicated organic production days, following a
products
c) ensure that the cleaning of your facilities and
equipment is sufficient to remove residues of non-
organic product before you start processing
d) finish the whole run of organic or in-conversion
products before you start to process non-organic
products
e) keep a record of all organic, in-conversion and non-
organic operations and the quantities processed.
f) guarantee that non-organic products are not placed
on the market with an indication referring to organic
production
g) take the necessary measures to ensure identification
of lots and to avoid mixtures or exchanges between
organic, in-conversion and non-organic products

(\text{EC} 2018/848 \text{Annex II IV (1.1-1.5)})

<table>
<thead>
<tr>
<th>SA NI 6.15 Irradiation</th>
</tr>
</thead>
<tbody>
<tr>
<td>You must \textbf{not} use ionising radiation for the treatment of organic food or feed or for the treatment of raw materials used in organic food or feed.</td>
</tr>
</tbody>
</table>

(\text{EC} 2018/848 Art.9 (4))

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

Ionising radiation occurs at frequencies that are potentially responsible for cell damage. Ionising radiation is defined as: the transfer of energy in the form of particles or electromagnetic waves of a wavelength of 100 nanometers (nm) or less or a frequency of $3 \times 10^{15}$ Hertz or more, capable of producing ions directly or indirectly.

You may use ultra violet radiation (UV light), provided it has a wavelength of 100nm to 400nm for:
- water treatment
- surface sterilisation of products
- to treat mould growth on the surface of dough and baked goods
- to treat fruit and vegetable juice as an alternative to pasteurisation.

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

**SA NI 6.1.6 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*

Processors can manufacture from 1st Jan 2022 using organic ingredients produced under 834/2007.

E.g. organic fruit preparation produced in 2021 used as an ingredient in yogurt after 1st Jan 2022. Seller of the fruit preparation could continue to sell it until stocks are used up. Wheat harvested in 2021 could be used to make flour after 1st January 2022.

However, a manufacturer could not, for example, add a non-organic flavour to their product from 1st Jan 2022 unless the flavour complied with the new flavour requirements in 2018/848. E.g. soft drink produced in Jan 2022 could only add a non-organic flavour which complied with the new flavour requirements in 2018/848.

**SA NI 6.2 Specific processing requirements**

What is this chapter about?
This chapter includes standards relevant to specific products, or product categories. Please check to see if they are relevant to your operation.

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
</table>
| **SA NI 6.2.1 Using ethylene**
You may only use ethylene as a post-harvest plant growth regulator for bananas and potatoes; however, it may also be used on citrus as part of a strategy for the prevention of fruit fly damage. |
| *(EC) 2021/1165 Annex I (4)* | Ethylene can be used in storage for sprout suppression or for ripening of fruits. |
### SA NI 6.2.2 Fruit and vegetable washes
You may wash fruit and vegetables in fresh water or using a fresh produce wash, provided the ingredients used in the wash are listed in the processing aids or additives sections of these standards.

(EC) 2018/848 Annex II Part IV (2.2.1) (2.2.2)(e)  
(EC) 2021/1165 Annex V

See 6.4 for the list of permitted additives and 6.5 for permitted processing aids. List any fruit or vegetable washes you wish to use in your SIPS/MIPS forms. They will need to be approved by us before you use them.

Depending on the ingredients in the washes, we may ask you for additional information, such as a GM declaration from the wash manufacturer.

You will need to demonstrate that the water you use is potable. Potable water is defined by the EU Drinking Water Directive (98/83/EC). In the UK, this is transposed into The Water Supply (Water Quality) Regulations 2016. There are a number of different processes and chemicals that can be used to treat water to bring it to drinking quality, e.g., chlorine, chlorine dioxide and ozone, these are applied to mains water treated by water companies as well as private water sources such as boreholes and springs. This drinking water (potable water), can be used to wash organic product.

Substances such as chlorine, chlorine dioxide and ozone are not permitted for use on organic product (please see the list of permitted additives and processing aids for those which you are allowed to use). Water with enhanced chlorine levels (i.e. above those used to produce drinking water) cannot be used to wash organic product.

In addition to water used to wash produce, any water used during the grading process must be potable.

### SA NI 6.2.3 Wax coatings
You must **not** use wax coatings directly onto fruit and vegetables unless the coatings are certified organic.

(EC) 2021/1165 Annex V

Non-organic wax coatings cannot be used on fruit or vegetables because they are not included in the list of additives allowed in organic food.

If you are using an organic wax on produce, the wax you use needs to be listed on the label for the produce because it counts as an ingredient.

Freshly harvested apples and citrus fruit have their own natural waxy coating that protects them from shrivelling and weight loss. When apples are washed at the packing house to remove dust, about half of the original apple wax will be
| **SA NI 6.2.4 Baking** | Lost. Some apple varieties have naturally higher wax levels, e.g. Royal Gala, Braeburn, Granny Smith and Fiesta. Some bakeries may have separate tins or prover pockets for organic and non-organic products and some may be able to thoroughly clean and rinse the tins and pockets between production runs. If you are not able to do this, you will need to use organic dusting flours for both the non-organic and organic products to avoid contamination of the organic products with non-organic dusting flours. Release agents have to be organic. Please refer to the processing aids chapter – 6.5 – for further details. |
| **SA NI 6.2.5 Restrictions of the use of Ion exchange and adsorption resin techniques** | Ion exchange and adsorption resin techniques are not permitted for any other use. |

- **Baking**
  - If you use the same tins or prover pockets for organic and non-organic products, any dusting flours used must be organic, unless you can demonstrate that the shared equipment is adequately cleaned to remove any non-organic residue.

  **(EC) 2018/848 Annex II Part IV (1.1)**

- **Restrictions of the use of Ion exchange and adsorption resin techniques**
  - Ion exchange and adsorption resin techniques are authorised when used for the preparation of organic raw materials under the following circumstances only:
    - a) for baby food, infant formula, and processed cereal-based food (as referred to in points (a) and (b), respectively, of Article 1(1) of Regulation (EU) No 609/2013), provided that using those techniques is necessary to meet the requirements of that Regulation and acts adopted on the basis of Article 11(1) of that Regulation for the products concerned; or
    - b) for products regulated by Directive 2006/125/EC, provided that using those techniques is necessary to meet the requirements of that Directive.

  **(EC) 2020/464 Art.23 (1) (2) (EC) 2021/1165 Annex V (part a)**
### SA NI 6.3 General composition

**What is this chapter about?**
The standards in this chapter relate to the composition of organic food products. They outline what ingredients, additives and processing aids can and cannot be used in organic products.

Use of the word ‘organic’ in relation to food and farming is controlled by European Union (EU). This means that if you want to describe a product as organic in any way, you need to meet the requirements of the EU regulations, which are outlined in these standards. This applies to all claims you might want to make in relation to food products, including if you do not call a product organic but just want to describe some of the ingredients as organic, organically grown/produced, grown/produced using organic principles etc. It also applies to loose and packaged organic products.

For details about how to label products correctly, including products containing less than 95% organic ingredients, go to section 5.8.

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
</table>
| **SA NI 6.3.1 Composition requirements for all products**  
With the exception of wine where there are separate requirements (see section 6.9), all products, whether organic, or containing organic ingredient(s), must meet the requirements in these standards for:  
a) additives  
b) processing aids  
c) flavourings  
d) water  
e) salt  
f) preparations of micro-organisms and enzymes  
g) colours for stamping meat and eggshells  
h) minerals, trace elements, vitamins, amino acids and other micronutrients etc.  
i) manufacturing and processing techniques.  

*(EC) 2018/848 Art.30 (5); Art.16 (1); Art.24 (2a)*  
*(EC) 2018/848 Annex II Part IV (2.2)* | You will need to complete a Single Ingredient Product Specification form (SIPS) or a Multi Ingredient Product Specification form (MIPS) for each product that you wish to include on your organic licence. If you make changes to the composition of already approved existing products send us updated specifications to reflect these changes. You can download a template of the SIPS and MIPS from [here](#).

If you are producing a less than 95% organic product you will not need to request a derogation from your competent authority for any non-organic agricultural ingredients. However, you may only use additives, processing aids, flavourings, micro-organisms, enzymes, vitamins and minerals etc. that are permitted in these standards. For example, you would not be able to fortify a less than 95% product with added vitamins, unless legally required.

Please refer to standard 5.8.4 for labelling requirements for products with less than 95% organic ingredients. |
| **SA NI 6.3.2 Organic products**  
To label your product as organic (or organically grown or | Please see the example calculation below based on the composition of an organic wholemeal loaf: |

---

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organically produced), it must:

a) contain at least 95% (by weight) of organic agricultural ingredients

b) contain a maximum of 5% (by weight) of natural flavours, additives marked with an asterisk in standard 6.4, and/or non-organic ingredients, but only non-organic ingredients that are covered in these standards

c) only be processed using processing techniques and processing aids allowed in these standards.

(EC) 2018/848 Art.24 (2)(a)(b); Art.30 (5); (EC) 2018/848 Annex II Part IV (2.2.2)(a),(2.2.4)(a)(b); (EC) 2020/464 Art.23 (1)

<table>
<thead>
<tr>
<th>Agricultural ingredient</th>
<th>Non-agricultural ingredients (e.g. water, salt, selected additives)</th>
<th>Weight (g)</th>
<th>Status (organic, non-organic, organic wild harvested)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wholemeal wheat flour</td>
<td></td>
<td>560</td>
<td>Organic</td>
</tr>
<tr>
<td>Yeast</td>
<td></td>
<td>5</td>
<td>Non-organic</td>
</tr>
<tr>
<td>Dried rosemary</td>
<td></td>
<td>20</td>
<td>Organic</td>
</tr>
<tr>
<td>Poppy seeds</td>
<td></td>
<td>20</td>
<td>Organic</td>
</tr>
<tr>
<td>Sunflower oil</td>
<td></td>
<td>20</td>
<td>Organic</td>
</tr>
<tr>
<td>Sea salt</td>
<td></td>
<td>20</td>
<td>Non-organic</td>
</tr>
<tr>
<td>Water</td>
<td></td>
<td>300</td>
<td>Non-organic</td>
</tr>
<tr>
<td><strong>Total weight: (kg)</strong></td>
<td></td>
<td>945</td>
<td></td>
</tr>
</tbody>
</table>

Of the 945g product, 320g is salt and water. We do not include this in the calculation but only factor in the weight of the agricultural ingredients; 625g.

Of this 625g, 5g is non-organic yeast which makes the proportion of the agricultural ingredients in this product 99.2% organic. This loaf can be marketed as organic.

You can use our [online tool](#) to help with this calculation.

If you wish to use any non-organic agricultural ingredients not listed in these standards (refer to standard 6.6.1), then you must apply for a derogation from your competent authority (please see standard 6.7).
<table>
<thead>
<tr>
<th>SA NI 6.3.3 Composition of products</th>
<th>&quot;Composed mainly&quot; means at least 50% agricultural ingredients.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Organic and less than 95% organic food products must be composed mainly of agricultural ingredients. To determine whether a product is compliant, do not include added water and salt in the calculation.</td>
<td>(EC) 848/2018 Art.16(1) (EC) 848/2018 Annex II Part IV (2.1)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SA NI 6.3.4 Using organic and non-organic versions of the same ingredients</th>
<th>This also applies to products made with less than 95% organic ingredients.</th>
</tr>
</thead>
<tbody>
<tr>
<td>You must <strong>not</strong> use organic and non-organic or in-conversion versions of the same ingredient in the same product.</td>
<td>(EC) 2018/848 Art.16(1) (EC) 2018/848 Annex II Part IV (2.1)(b) VII (1.2)</td>
</tr>
</tbody>
</table>
# SA NI 6.4 Additives

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SA NI 6.4.1 Using organic additives</strong>&lt;br&gt;Where additives are available in organic form and in sufficient quantity, you must use them, unless you can provide sufficient justification for not doing so.</td>
<td>If you source products certified to other organic standards, they must meet this Soil Association requirement.</td>
</tr>
</tbody>
</table>

**Soil Association higher standard**

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

### Standards

**SA NI 6.4.2 Permitted additives**

You may only use the additives in the table below in organic foods and according to the specific conditions against them.

Additives marked with an asterisk (*) must be included in the calculation of agricultural ingredients in order to determine the organic percentage of the product overall.

**Why?**

*If you source products manufactured outside of NI or the EU they may only contain additives listed in 9.3 of the Sourcing Organic Ingredients Annex. Check the label and/or technical specification to see if it contains only additives permitted.*

See the glossary for the definition of a food additive.

Some additives are a potential GM risk because they are derived from crops that can be GM or are made using processes that sometimes involve GM. For these additives you will need to provide additional proof that they are non-GM by completing a non-GM declaration form, signed by the additive manufacturer, and providing supporting information. The type of supporting information required will depend on the additive.

If you need to use a non-organic additive or processing aid in your product, please contact the certification team to discuss what will be required.

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*(EC) 2021/1165 Annex V Part A*
<table>
<thead>
<tr>
<th>E no.</th>
<th>Name</th>
<th>Organic foodstuffs to which it may be added</th>
<th>Requires non-GMO declaration form to be completed (unless used in organic form)</th>
<th>Specific conditions and limits</th>
</tr>
</thead>
<tbody>
<tr>
<td>E153</td>
<td>Vegetable carbon</td>
<td>Only in edible cheese rind of ashy goat cheese, Morbier cheese</td>
<td></td>
<td></td>
</tr>
<tr>
<td>E160b (i)</td>
<td>Annatto bixin</td>
<td>Only in Red Leicester, Double Gloucester, Cheddar and Mimolette cheeses</td>
<td></td>
<td></td>
</tr>
<tr>
<td>E160b (ii)</td>
<td>Annatto norbixin*</td>
<td>Only in Red Leicester, Double Gloucester, Cheddar and Mimolette cheeses</td>
<td></td>
<td>Shall not be used for colouring or calcium enrichment of products</td>
</tr>
<tr>
<td>E170</td>
<td>Calcium Carbonate</td>
<td>May be used in any product of plant and animal origin</td>
<td></td>
<td></td>
</tr>
<tr>
<td>E220</td>
<td>Sulphur dioxide</td>
<td>Fruit wines (wines made from fruits other than grapes, including cider and perry) and mead with and without added sugar (see standard 6.4.3. for additional SA standard related to free sulphur dioxide levels).</td>
<td>100 mg/l (Maximum levels available from all sources, expressed as SO2 in mg/l)</td>
<td></td>
</tr>
<tr>
<td>E223</td>
<td>Sodium metabisulphite</td>
<td>Crustaceans². This can be used in EU product only. Prohibited for SA product (see standard 6.4.4 for details).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>E224</td>
<td>Potassium metabisulphite</td>
<td>Fruit wines (wines made from fruits other than grapes, including cider and perry) and mead with and without added sugar):</td>
<td>100 mg/l (Maximum levels available from all sources, expressed as SO 2 in mg/l.</td>
<td></td>
</tr>
<tr>
<td>E250</td>
<td>Sodium nitrite</td>
<td>Meat products</td>
<td></td>
<td>May only be used, if it has been demonstrated to the satisfaction of the competent authority that no technological alternative,</td>
</tr>
<tr>
<td>E no.</td>
<td>Name</td>
<td>Organic foodstuffs to which it may be added</td>
<td>Requires non-GMO declaration form to be completed (unless used in organic form)</td>
<td>Specific conditions and limits</td>
</tr>
<tr>
<td>-------</td>
<td>-----------------------</td>
<td>---------------------------------------------</td>
<td>--------------------------------------------------------------------------------</td>
<td>--------------------------------</td>
</tr>
<tr>
<td>E252</td>
<td>Potassium nitrate</td>
<td>Meat products</td>
<td>May only be used, if it has been demonstrated to the satisfaction of the competent authority that no technological alternative, giving the same guarantees and/or allowing to maintain the specific features of the product, is available. Not in combination with E250. Maximum ingoing amount expressed as NaNO₂: 80 mg/kg, maximum residual amount expressed as NaNO₂: 50 mg/kg</td>
<td></td>
</tr>
<tr>
<td>E270</td>
<td>Lactic acid</td>
<td>Products of plant and animal origin</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>E290</td>
<td>Carbon dioxide</td>
<td>Products of plant and animal origin</td>
<td></td>
<td></td>
</tr>
<tr>
<td>E296</td>
<td>Malic acid</td>
<td>Products of plant origin</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>E300</td>
<td>Ascorbic acid</td>
<td>Products of plant origin, meat products</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>E301</td>
<td>Sodium ascorbate</td>
<td>Meat products</td>
<td>X</td>
<td>May only be used in connection with nitrates and nitrites</td>
</tr>
<tr>
<td>------</td>
<td>----------------</td>
<td>--------------</td>
<td>---</td>
<td>----------------------------------------------------------</td>
</tr>
<tr>
<td>E306</td>
<td>Tocopherol rich extract (Vit E)*</td>
<td>Products of plant and animal origin</td>
<td>X</td>
<td>Anti-oxidant</td>
</tr>
<tr>
<td>E322</td>
<td>Lecithins*</td>
<td>Products of plant origin Milk products</td>
<td>X</td>
<td>Only from organic production</td>
</tr>
<tr>
<td>E325</td>
<td>Sodium lactate</td>
<td>Products of plant origin milk-based and meat products</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>E330</td>
<td>Citric acid</td>
<td>Products of plant and animal origin</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>E331</td>
<td>Sodium citrates</td>
<td>Products of plant and animal origin</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>E333</td>
<td>Calcium citrates</td>
<td>Products of plant origin</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>E334</td>
<td>Tartaric acid (L(+)-)</td>
<td>Products of plant origin Mead</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>E335</td>
<td>Sodium tartrates</td>
<td>Products of plant origin</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>E336</td>
<td>Potassium tartrates</td>
<td>Products of plant origin</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>E341(i)</td>
<td>Monocalcium Phosphate</td>
<td>Self raising flour.</td>
<td></td>
<td>Raising agent</td>
</tr>
<tr>
<td>E392</td>
<td>Extracts of rosemary*</td>
<td>Products of plant and animal origin</td>
<td></td>
<td>Only from organic production</td>
</tr>
<tr>
<td>E400</td>
<td>Alginic acid</td>
<td>Products of plant origin Milk products</td>
<td></td>
<td></td>
</tr>
<tr>
<td>E401</td>
<td>Sodium alginate</td>
<td>Products of plant origin Milk products Sausages based on meat</td>
<td></td>
<td></td>
</tr>
<tr>
<td>E402</td>
<td>Potassium alginate</td>
<td>Products of plant origin Milk-based products</td>
<td></td>
<td></td>
</tr>
<tr>
<td>E406</td>
<td>Agar</td>
<td>Products of plant origin Milk-based products and meat products</td>
<td></td>
<td></td>
</tr>
<tr>
<td>E407</td>
<td>Carrageenan</td>
<td>Products of plant origin Milk-based products</td>
<td></td>
<td></td>
</tr>
<tr>
<td>E410</td>
<td>Locust bean gum*</td>
<td>Products of plant and animal origin</td>
<td></td>
<td>Only from organic</td>
</tr>
<tr>
<td>E412</td>
<td>Guar gum*</td>
<td>Products of plant and animal origin</td>
<td>Only from organic production</td>
<td></td>
</tr>
<tr>
<td>------</td>
<td>-----------</td>
<td>--------------------------------------</td>
<td>-----------------------------</td>
<td></td>
</tr>
<tr>
<td>E414</td>
<td>Arabic gum*</td>
<td>Products of plant and animal origin</td>
<td>only from organic production</td>
<td></td>
</tr>
<tr>
<td>E415</td>
<td>Xanthan gum</td>
<td>Products of plant and animal origin</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>E417</td>
<td>Tara gum powder</td>
<td>Products of plant and animal origin</td>
<td>Thickener Only when derived from organic production.</td>
<td></td>
</tr>
<tr>
<td>E418</td>
<td>Gellan gum</td>
<td>Products of plant and animal origin</td>
<td>High-acyl form only Only when derived from organic production. Applicable as of 1 January 2026</td>
<td></td>
</tr>
<tr>
<td>E422</td>
<td>Glycerol</td>
<td>Plant extracts Flavourings</td>
<td>Only from plant origin Solvent and carrier in plant extracts and flavourings Humectant in gel capsules Surface coating of tablets Only from organic production</td>
<td></td>
</tr>
</tbody>
</table>

(i) Pectin* (non amidated) Products of plant origin Milk-based products

<table>
<thead>
<tr>
<th>E440</th>
<th>Pectin* (non amidated)</th>
<th>Products of plant origin Milk-based products</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>E464</td>
<td>Hydroxypropyl methyl cellulose</td>
<td>Products of plant and animal origin</td>
<td>Encapsulation material for capsules</td>
</tr>
<tr>
<td>E500</td>
<td>Sodium carbonate</td>
<td>Products of plant and animal origin</td>
<td></td>
</tr>
<tr>
<td>E501</td>
<td>Potassium Carbonates</td>
<td>Products of plant origin</td>
<td></td>
</tr>
<tr>
<td>E503</td>
<td>Ammonium Carbonates</td>
<td>Products of plant origin</td>
<td></td>
</tr>
<tr>
<td>E504</td>
<td>Magnesium carbonates</td>
<td>Products of plant origin</td>
<td></td>
</tr>
<tr>
<td>E509</td>
<td>Calcium chloride</td>
<td>Milk-based products</td>
<td>Milk coagulation</td>
</tr>
<tr>
<td>E516</td>
<td>Calcium sulphate</td>
<td>Products of plant origin</td>
<td>Carrier</td>
</tr>
<tr>
<td>--------</td>
<td>------------------</td>
<td>---------------------------</td>
<td>---------</td>
</tr>
<tr>
<td>E524</td>
<td>Sodium hydroxide</td>
<td>'Laugengebäck'</td>
<td>Surface treatment</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Flavourings</td>
<td>Acidity regulator</td>
</tr>
<tr>
<td>E551</td>
<td>Silicon dioxide gel or colloidal solution</td>
<td>For herbs and spices in dried powdered form Flavourings and propolis</td>
<td>Surface treatment</td>
</tr>
<tr>
<td>E553b</td>
<td>Talc</td>
<td>Sausages based on meat Products of plant origin</td>
<td>Surface treatment</td>
</tr>
<tr>
<td>E901</td>
<td>Beeswax</td>
<td>As a glazing agent for confectionary only Beeswax from organic beekeeping</td>
<td>Glazing agent Only from organic production</td>
</tr>
<tr>
<td>E903</td>
<td>Carnauba wax</td>
<td>Confectionary</td>
<td>Glazing agent</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Citrus fruit</td>
<td>Mitigating method for mandatory extreme cold treatment of fruit as a quarantine measure against harmful organisms (Commission Implementing Directive (EU) 2017/1279) (1) Only from organic production</td>
</tr>
<tr>
<td>E938</td>
<td>Argon</td>
<td>Products of plant and animal origin</td>
<td></td>
</tr>
<tr>
<td>E939</td>
<td>Helium</td>
<td>Products of plant and animal origin</td>
<td></td>
</tr>
<tr>
<td>E941</td>
<td>Nitrogen</td>
<td>Products of plant and animal origin</td>
<td></td>
</tr>
<tr>
<td>E948</td>
<td>Oxygen</td>
<td>Products of plant and animal origin</td>
<td></td>
</tr>
<tr>
<td>E968</td>
<td>Erythritol</td>
<td>Products of plant and animal origin</td>
<td>Only from organic production without using ion exchange technology</td>
</tr>
<tr>
<td>Standards</td>
<td>Guidance</td>
<td></td>
<td></td>
</tr>
<tr>
<td>-----------</td>
<td>----------</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>SA NI 6.4.3 Free sulphur dioxide levels</strong>&lt;br&gt;Free SO₂ for all fruit wines, cider, Perry and mead must not exceed 30 mg/l.</td>
<td>In order to demonstrate compliance, you will need to prove that the free SO₂ level does not exceed this level – this could be by regular testing of products. <strong>Soil Association higher standard</strong>&lt;br&gt;If you source products certified to other organic standards they must meet this Soil Association requirement.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Free SO₂ can cause allergic reactions in people with a sensitivity to sulphur dioxide, especially affecting people with asthma, so should be minimised as much as possible. The amount of free SO₂ allowed in Soil Association products is lower than the amount allowed by the EU organic regulation. This is to help reduce the potential for allergic reactions in people, and to help encourage SO₂ to be used only when strictly necessary.

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SA NI 6.4.4 Sodium metabisulphite</strong>&lt;br&gt;You must <strong>not</strong> use sodium metabisulphite as an additive, including for crustaceans.</td>
<td>If you source products certified to other organic standards they must meet this Soil Association requirement. <strong>Soil Association higher standard</strong>&lt;br&gt;</td>
</tr>
</tbody>
</table>

Sodium metabisulphite is used to prevent microbial spoilage and the appearance of unsightly marking on crustaceans after harvesting. However, sodium metabisulphite can cause allergic reactions in some people so should be avoided.
You may only use the processing aids in the table below. Many have specific conditions against them. You may only use a processing aid in line with the specific condition for its use.

An example of a processing aid is vegetable oil applied to bread tins as a release agent. This has a function during baking to help get the bread out of tin but does not have a function in the final product, although residues may remain.

Conversely vegetable oil added to raisins to prevent them sticking together is not a processing aid as it is designed to have a function in the finished product. It must be declared as an ingredient.

Some processing aids are a potential GM risk because they are derived from crops that can be GM or are made using processes that sometimes involve GM. For these processing aids you will need to provide additional proof that they are non-GM by completing our non-GM declaration form, signed by the processing aid manufacturer, and providing supporting information. The type of supporting information required will depend on the processing aid.

Ethanol, casein and vegetable oil requires a non-GMO declaration form to be completed (unless being used in organic form).

If a processing aid is not listed in the table below then you cannot use it.

### Standards

**SA NI 6.5.1 Permitted processing aids**

You may only use the processing aids in the table below. Many have specific conditions against them. You may only use a processing aid in line with the specific condition for its use.

*EC* 2018/848 Annex II Part IV (2.2.2)  
*EC* 2021/1165 Annex V Part A Section A2

### Guidance

See the glossary for the definition of a processing aid.

An example of a processing aid is vegetable oil applied to bread tins as a release agent. This has a function during baking to help get the bread out of tin but does not have a function in the final product, although residues may remain.

Conversely vegetable oil added to raisins to prevent them sticking together is not a processing aid as it is designed to have a function in the finished product. It must be declared as an ingredient.

Some processing aids are a potential GM risk because they are derived from crops that can be GM or are made using processes that sometimes involve GM. For these processing aids you will need to provide additional proof that they are non-GM by completing our non-GM declaration form, signed by the processing aid manufacturer, and providing supporting information. The type of supporting information required will depend on the processing aid.

Ethanol, casein and vegetable oil requires a non-GMO declaration form to be completed (unless being used in organic form).

If a processing aid is not listed in the table below then you cannot use it.

<table>
<thead>
<tr>
<th>Processing aid name</th>
<th>Only authorised for the processing of the following organic foodstuffs</th>
<th>Specific conditions and limits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Calcium chloride</td>
<td>Products of plant origin</td>
<td>Sausages based on meat</td>
</tr>
<tr>
<td>Calcium carbonate</td>
<td>Products of plant origin</td>
<td>Coagulation agent</td>
</tr>
<tr>
<td>Chemical</td>
<td>Origin</td>
<td>Use</td>
</tr>
<tr>
<td>---------------------</td>
<td>-------------------------------------------</td>
<td>----------------------------------------------------------------------</td>
</tr>
<tr>
<td>Calcium hydroxide</td>
<td>Products of plant origin</td>
<td></td>
</tr>
<tr>
<td>Calcium sulphate</td>
<td>Products of plant origin</td>
<td>Coagulation agent</td>
</tr>
<tr>
<td>Magnesium chloride</td>
<td>Products of plant origin</td>
<td>Coagulation agent</td>
</tr>
<tr>
<td>Potassium carbonate</td>
<td>Grapes</td>
<td>Drying agent</td>
</tr>
<tr>
<td>Sodium carbonate</td>
<td>Products of plant and animal origin</td>
<td></td>
</tr>
<tr>
<td>Lactic acid</td>
<td>Cheese</td>
<td>For the regulation of the pH of the brine bath in cheese production</td>
</tr>
<tr>
<td>L(+)-lactic acid</td>
<td>Plant protein extracts</td>
<td>For the preparation of plant protein extracts</td>
</tr>
<tr>
<td>Citric acid</td>
<td>Products of plant and animal origin</td>
<td></td>
</tr>
<tr>
<td>Sodium hydroxide</td>
<td>Sugar(s); Oil from plant origin excluding</td>
<td></td>
</tr>
<tr>
<td></td>
<td>olive oil; Plant protein extracts</td>
<td></td>
</tr>
<tr>
<td>Sulphuric acid</td>
<td>Gelatine; Sugar(s)</td>
<td></td>
</tr>
<tr>
<td>Hop extract</td>
<td>Sugar</td>
<td>Only for antimicrobial purposes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>From organic production, if available</td>
</tr>
<tr>
<td>Pine rosin extract</td>
<td>Sugar</td>
<td>Only for antimicrobial purposes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>From organic production, if available</td>
</tr>
<tr>
<td>Hydrochloric acid</td>
<td></td>
<td>- Gelatine</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Gouda-, Edam and Maasdammer cheeses, Boerenkaas, Friese and</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Leidse Nagelkaas</td>
</tr>
<tr>
<td>Ammonium hydroxide</td>
<td>Gelatine</td>
<td>Gelatine production in compliance with Regulation (EC) N 853/2004 of</td>
</tr>
<tr>
<td>Hydrogen peroxide</td>
<td>Gelatine</td>
<td>the European Parliament and of the Council</td>
</tr>
<tr>
<td>Carbon dioxide</td>
<td>Products of plant and animal origin</td>
<td>Gelatine production in compliance with Regulation (EC) N 853/2004 of</td>
</tr>
<tr>
<td>Nitrogen</td>
<td>Products of plant and animal origin</td>
<td>the European Parliament and of the Council</td>
</tr>
<tr>
<td>Ethanol</td>
<td>Products of plant and animal origin</td>
<td>Solvent</td>
</tr>
<tr>
<td>Tannic acid</td>
<td>Products of plant origin</td>
<td>Filtration aid</td>
</tr>
<tr>
<td>Egg white albumen</td>
<td>Products of plant origin</td>
<td></td>
</tr>
<tr>
<td>Casein</td>
<td>Products of plant origin</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>----------</td>
<td>--------------------------------------</td>
<td>--------------------------------------</td>
</tr>
<tr>
<td>Gelatin</td>
<td>Products of plant origin</td>
<td></td>
</tr>
<tr>
<td>Isinglass</td>
<td>Products of plant origin</td>
<td></td>
</tr>
<tr>
<td>Vegetable oils</td>
<td>Products of plant and animal origin</td>
<td>Greasing, releasing or anti-foaming agent. Only from organic production</td>
</tr>
<tr>
<td>Silicon dioxide gel or colloidal solution</td>
<td>Products of plant origin</td>
<td></td>
</tr>
<tr>
<td>Activated carbon (CAS-7440-44-0)</td>
<td>Products of plant and animal origin</td>
<td></td>
</tr>
<tr>
<td>Talc</td>
<td>Products of plant origin</td>
<td>In compliance with the specific purity criteria for food additive E553b</td>
</tr>
<tr>
<td>Bentonite</td>
<td>Products of plant origin</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Mead</td>
<td>Sticking agent for mead</td>
</tr>
<tr>
<td>Cellulose</td>
<td>Products of plant origin</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Gelatine</td>
<td></td>
</tr>
<tr>
<td>Diatomaceous earth</td>
<td>Products of plant origin</td>
<td>Gelatine</td>
</tr>
<tr>
<td></td>
<td>Gelatine</td>
<td></td>
</tr>
<tr>
<td>Perlite</td>
<td>Products of plant origin</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Gelatine</td>
<td></td>
</tr>
<tr>
<td>Hazelnut shells</td>
<td>Products of plant origin</td>
<td></td>
</tr>
<tr>
<td>Rice meal</td>
<td>Products of plant origin</td>
<td></td>
</tr>
<tr>
<td>Beeswax</td>
<td>Products of plant origin</td>
<td>Releasing agent. Only from organic production</td>
</tr>
<tr>
<td>Carnauba wax</td>
<td>Products of plant origin</td>
<td>Releasing agent. Only from organic production.</td>
</tr>
<tr>
<td></td>
<td>Fish</td>
<td></td>
</tr>
<tr>
<td>Acetic acid/vinegar</td>
<td>Products of plant origin</td>
<td>Only from organic production. From natural fermentation,</td>
</tr>
<tr>
<td>Thiamin hydrochloride</td>
<td>Fruit wines, including cider, perry and mead</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Fruit wines, including cider, perry and mead</td>
<td></td>
</tr>
<tr>
<td>Diammonium phosphate</td>
<td>Fruit wines, including cider, perry and mead</td>
<td></td>
</tr>
<tr>
<td>Wood fibre</td>
<td>Products from plant and animal origin</td>
<td>The source of timber should be restricted to certified, sustainably harvested wood. Wood used must not contain toxic components (post-harvest</td>
</tr>
</tbody>
</table>

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### SA NI 6.6 Other ingredients

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
</table>
| **SA NI 6.6.1 Non-organic agricultural ingredients** | The following organic fats and oils are widely available and must be used:  
- cocoa (*Theobroma cacao*)  
- coconut (*Cocos nucifera*)  
- olive (*Olea europaea*)  
- sunflower (*Helianthus annuus*)  
- palm (*Elaeis guineensis*)  
- rape (*Brassica napus, rapa*)  
- safflower (*Carthamus tinctorius*)  
- sesame (*Sesamum indicum*)  
- soya (*Glycine max*)  

Please note that whey powder 'hersoula' refers to a particular type of whey protein. Whey powder is available as organic.  
All non-organic sugars and starches and oils require non-GMO declaration form to be completed.  

Please note some of the ingredients listed in the EU regulation are now available in organic form. SA standard 6.6.2 requires organic to be used if organic is available in sufficient quantity and quality. |

- The EU considers that the ingredients below are not available in organic form, so you can use them in non-organic form in your organic products until 31st December 2023:  
  1. Edible fruits, nuts and seeds:  
     - acorns (*Quercus species*)  
     - cola nuts (*Cola acuminata*)  
     - gooseberries (*Ribes uva-crispa*)  
     - passion fruit also known as maracujas (*Passiflora edulis*)  
     - dried raspberries (*Rubus idaeus*)  
     - dried redcurrants (*Ribes rubrum*).  
  2. Edible spices and herbs:  
     - Peruvian pepper (*Schinus molle L.*)  
     - horseradish seeds (*Armoracia rusticana*)  
     - lesser galanga (*Alpina officinarum*)  
     - safflower flowers (*Carthamus tinctorius*)  
     - watercress (*Nasturtium officinale*).  
  3. Algae, including seaweeds, which are allowed as food ingredients.  
  4. Sugars, starches and other products from cereals and tubers:  
     - fructose  
     - rice paper |
3. unleavened bread paper
4. starch from rice and waxy maize (not chemically modified).

Miscellaneous products:
1. pea protein (*Pisum* species)
2. rum, only obtained from cane sugar juice
3. kirsch prepared on the basis of fruits and flavourings as referred to in standard 6.6.4.

Animal products:
1. aquatic organisms, which have not been farmed and which are allowed in non-organic food
2. gelatin
3. whey powder ‘herasoula’
4. casings.

Fats and oils:
The EU considers most fats and oils from plants are available in organic form so must be used as such. See the guidance for details of the fats and oils that are widely available as organic. Fats and oils, whether organic or non-organic, must not be chemically modified.

From January 1st 2024, you can **only** use the following products in non-organic form in your organic products:

1. Alga Arame (*Eisenia Bicyclis*), unprocessed as well as products of first-stage processing directly related to this alga
2. Alga Hijiki (*Hizikia fusiforme*), unprocessed as well as products of first-stage processing directly related to this alga
3. bark of the Pau d’arco tree Handroanthus impetiginosus (‘lapacho’) 
   - only for use in Kombucha and tea mixtures
4. wild fishes and wild aquatic animals, unprocessed as well as products derived therefrom by processes  
   - only from fisheries that have been certified as sustainable under a scheme recognised by the competent authority in line with the principles laid down in Regulation (EU) No 1380/2013, in accordance with point 3.1.3.1 (c) of Part III of Annex II to Regulation (EU) 2018/848 only when not available in organic aquaculture
5. gelatin  
   - from other sources than porcine
6. casings  
   - from natural raw materials of animal origin or from plant origin material
7. milk mineral powder/liquid  
   - only when used for its sensory function to replace wholly or partly sodium chloride

Please note that this new list will undergo a consultation process to determine if the Soil Association will allow the new permitted ingredients.

(EU) 2021/1165 Art. 12; Annex V Part B

SA NI 6.6.2 Ingredients which must be organic
If ingredients are available as organic in sufficient quantity and quality, they must be used in organic products.

Soil Association higher standard

Even though the EU allows the products listed in 6.6.1 as non-organic, some of them are widely available in organic form, so must be used as organic in Soil Association certified products.
The EU Organic Regulation allows some specific ingredients to be used as non-organic because they are not thought to be widely available in organic form. However, the EU list of permitted non-organic ingredients is outdated, and some of the items are now available as organic. Where this is the case, licensees must use the organic version. This meets consumer expectations of organic products, helps to grow the market for organic ingredients and by doing so, increases the positive impacts of organic production.

For example, ingredients that the EU say you can use as non-organic, but are widely available as organic so should be used as organic in Soil Association products include:

1. gooseberries (*Ribes uva-crispa*)
2. watercress (*Nasturtium officinale*)
3. spirulina (*Arthrospira platensis*)
4. chlorella

Note that this requirement does not apply to products with less than 95% organic ingredients, as there are different composition and labelling requirements for these products. Please see 6.3.1 and 5.8.4 for more details.

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

### Standards

<table>
<thead>
<tr>
<th><strong>SA NI 6.6.3 Natural casings</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>If you use non-organic casings, such as for sausage skins, these must be of natural and animal origin. <em>Soil Association higher standard</em></td>
</tr>
</tbody>
</table>

### Guidance

Natural origin casings are made from animal intestines.

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

### Why?

The EU Organic Regulation allows all types of non-organic casings (such as collagen) to be used in organic products. The Soil Association standards are higher as they only allow natural casings which are made from animal intestines. This is because natural casings are more in line with consumer expectations and there is potential for them to be certified organic if there was a market demand, unlike other casing-types which use processing aids and techniques that are not allowed under the organic regulation.
### Standards

**SA NI 6.6.4 Natural flavourings**
You can use natural flavouring substances and natural flavouring preparations in organic products but only if:

- **a)** they are natural flavours as defined in regulation (EC) No 1334/2008 that have been labelled as natural flavouring substances or natural flavouring preparations, in accordance with Article 16(2), (3) and (4) of that Regulation
- **b)** they do not contain ingredients made from or by GMOs (EC) 2018/848 Art. 16 (1); Art 11; Annex II Part IV (2.2.2) (b)

### Guidance

Flavourings labelled according to Article 16(4) must be obtained, by at least 95% from the source material referred to.

For example, for a lemon flavour, 95% of the flavour must come from lemons. The remaining 5% could include natural substances that are labelled according to Article 16(3), so for a lemon flavour, the remaining 5% does not have to come from lemons.

Non-organic flavouring must not exceed 5% weight of the organic product. See standard 6.3.2 for how to calculate the percentage of organic ingredients in a product.

**SA NI 6.6.5 Solvents for natural flavourings**
You can use natural flavouring substances and natural flavouring preparations in Soil Association organic products, provided they meet standard 6.6.4. and the following additional requirements:

- **a)** for liquid flavours: water, glycerol, vegetable oil and ethanol are the only carrier solvents used
- **b)** for extraction: water, glycerol, vegetable oil, ethanol and carbon dioxide are the only solvents used.

Soil Association higher standard

### Guidance

For each non-organic natural flavouring you wish to use you will need to submit a GMO and natural flavouring declaration form to the certification team. You can find the form online here. The certification team may also need to see the specification for the flavouring from your supplier.

If you want to use the name of the flavour in the name of the product, you will need to use flavours made from organic ingredients. For example, if you want to label your product as organic strawberry flavour ice cream, then the strawberry flavour must be organic. See the labelling section (5.8) for details of labelling organic products.

Vegetable oils include any plant-derived oil, such as coconut, sunflower and flax.

**Why?**

The EU Organic Regulation allows non-organic flavourings to be used in organic products. Even though these flavourings must be natural, natural flavourings can sometimes be made using carrier and extraction solvents such as fossil fuel-derived hexane and acetone. We think that natural flavourings used in organic products should only be allowed if they have been made using solvents that would be permitted under organic standards (and could potentially be organic), rather than solvents that might be derived from fossil fuels as they could never be organic.

**SA NI 6.6.6 Organic flavourings**

1. For the production of organic flavourings all of the flavouring components and carriers of flavouring

### Guidance

The organic flavouring components must also comply with restrictions on type of flavouring as outlined in standard 6.6.4
components in the flavouring must be organic.  
2. The production of organic flavouring must meet the requirement of these standards.  
3. Only natural flavouring substances and natural flavouring preparations that comply with article 16 (2)(3)(4) of (EC) No 1334/2008 may be used in organic flavours.  

(EC) 2018/848 Art:30 (5)(a)

- Up to 5% non-organic flavourings are also permitted, but must comply with restrictions on type of flavouring as outlined in standard 6.6.4
- Carriers used must be organic. Where organic version is not available up to 5% non-organic carriers may be used, but only if they are listed in section 6.6.1 of these standards.
- Only additives or processing aids listed in section 6.4 and 6.5 of these standards may be used.

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
</table>
| **SA NI 6.6.7 Water**  
Water that you use as an ingredient must be potable (fit for drinking).  
*(EC) 2018/848 Annex II Part IV (2.2.2)* | You will need to demonstrate that the water you use is potable. Potable water is defined by the EU Drinking Water Directive (98/83/EC). In the UK, this is transposed into The Water Supply (Water Quality) Regulations 2016.  
If you are using mains water you can demonstrate that your water is potable by indicating your water supplier on your product specification form. If your water is from a bore hole, you can demonstrate how you ensure it is potable by retaining copies of your water quality test results. |
| **SA NI 6.6.8 Salt**  
You may use salt, either with sodium chloride or potassium chloride as basic components, in organic products.  
*EC) 2018/848 Annex II Part IV (2.2.2)* | Salt is a permitted non-organic ingredient.  
Contact your salt supplier to check whether the salt you are using contains anti-caking agents. |
| **SA NI 6.6.9 Anti-caking agents**  
You may only use salt containing anti-caking agent if it can be clearly justified.  
*Soil Association higher standard* | Additional components in salt, such as anti-caking agents, should only be used where strictly necessary, such as in cases where pure salt would clog-up processing machinery or result in unpalatable products due to uneven salt distribution from salt granules clumping together. Generally, you do not need to use anti-caking agents if the salt grains are in the range 1-3mm. If you are carrying out processing using salt containing anti-caking agents you will need to detail this in your SIPS/MIPS. If you use salt-containing anti caking agents you will need to provide justification to the certification team and retain information relating to it on file for your own records. |
Anti-caking agents in salt are useful and necessary for some products. However, where they are not serving a functional or useful purpose in a product, they should not be used. This is in order to avoid creating products containing ingredients, particularly non-organic ones, which do not need to be there.

### Standards

**SA NI 6.6.10 Yeast**
1. You may use non-organic yeast in your products, however, yeast and yeast products must be calculated as ingredients of agricultural origin.
2. Organic yeast must not be present in organic food or feed together with non-organic yeast.

   \[(EC)\ 2018/848\\ \text{Annex II Part IV (2.2.2 (a)) & 2.2.4);}\ \text{Annex II Part VII (1.2)}\]

### Guidance

In order for the product to be labelled as organic you must not use more than 5% non-organic agricultural ingredients in your product. Non-organic yeast is included within this 5% allowance.

You may use non-organic yeast in organic products, provided we have reviewed the GM information related to the product and we are satisfied it does not contain GM material or has not been made using GM.

You need to include non-organic yeast in the 'agricultural ingredients' section on the product specification form you submit to the certification team.

**SA NI 6.6.11 Micro-organisms and enzymes**

You may use preparations of micro-organisms and enzymes normally used in food processing, but you can only use an enzyme as an additive if it is in the list of permitted additives in standard 6.4.2. Any micro-organisms or enzymes you use must not be made from or by GMOs.

\[(EC)\ 2018/848\ \text{Art, 11; Annex II Part IV (2.2.2 (a))}\]

Micro-organisms should preferably be grown on organic substrates.

Enzymes and micro-organisms may be used as processing aids, e.g., yeast in brewing, rennet for cheese production.

If enzymes are to be used as additives, they must be listed in standard 6.4.2 however, there are currently no enzymes listed for use as additives.
Food additives are legally defined. For general information, the EU publishes a list of food additives approved for use within the EU. If you are unsure whether the enzyme you wish to use is classed as an additive then you can check the list here.

See the glossary for the definition of a food additive.

Some enzymes used as ingredients are not classed as additives, for example, there are some enzymes intended for human consumption for nutritional or digestive purposes. These may be used in organic products if they are normally used in food processing.

For each micro-organism or enzyme you wish to use you will need to complete our non-GM declaration form, signed by the enzyme manufacturer, and providing supporting information as outlined in the non-GM declaration form.

SA NI 6.6.12 Organic yeast

1. To produce organic yeast, you must culture it on an organic substrate. However, if you are unable to obtain organic yeast extract or autolysate, you may add up to 5% non-organic yeast extract or autolysate to the substrate (calculated in dry matter), until 31st December 2024.

2. When producing organic yeast, you may use drinking water, organic or non-organic salt, and preparations of micro-organisms and food enzymes normally used in food processing, however, if the enzymes you wish to use are additives, they can only be used if they are listed as an approved additive in standard 6.4.

3. Organic yeast shall not be present in organic food or feed together with non-organic yeast.

4. The processing aids in the table below are permitted for the production of yeast and yeast products.

When all or part of a cell or tissue breaks down by self-produced enzymes, the product is called autolysate. Whilst you can use up to 5% yeast extract or autolysate, you should only do so if you cannot find it as organic. You need to be able to demonstrate that you have tried to source organic yeast extract or autolysate.

If you use enzymes or other micro-organisms in the process of manufacturing the organic yeast, you should get them from a certified organic source, if that is available. The seed yeast that you use may be non-organic, but it must not contain or be produced using GMOs.

If you are creating your own sourdough starter culture from scratch, use organic flour and potable water to produce it.

If you want to use pre-existing starter cultures then you will need to send us written confirmation that you have not added anything other than flour during its life and that it does not contain any GMOs.

The starter culture will need to be converted to organic as you split, feed and regenerate it. You can do this by adding organic flour each time that it is split and fed, until the non-organic starter proportion is at or below 5%. Keep records to demonstrate that you have done this.

Note - all standards governing food processing and packing apply for producing organic yeast.

At the moment there are no standards for organic salt but the EU Commission plan to develop some.

<table>
<thead>
<tr>
<th>Name</th>
<th>Primary yeast</th>
<th>Yeast confections/formulations</th>
<th>Specific conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Calcium chloride</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Carbon dioxide</td>
<td>X</td>
<td>X</td>
<td>For the regulation of the pH in yeast production</td>
</tr>
<tr>
<td>Citric acid</td>
<td>X</td>
<td></td>
<td>For the regulation of the pH in yeast production</td>
</tr>
<tr>
<td>Lactic acid</td>
<td>X</td>
<td></td>
<td>For the regulation of the pH in yeast production</td>
</tr>
<tr>
<td>Nitrogen</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Oxygen</td>
<td>X</td>
<td>X</td>
<td>For filtering. Only from organic production</td>
</tr>
<tr>
<td>Potato starch</td>
<td>X</td>
<td>X</td>
<td>For the regulation of the pH</td>
</tr>
<tr>
<td>Sodium carbonate</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Vegetable oils</td>
<td>X</td>
<td>X</td>
<td>Greasing, releasing or anti-foaming agent. Only from organic production</td>
</tr>
</tbody>
</table>

**Standards**

**SA NI 6.6.13 Vitamins and minerals**

You may only add vitamins, minerals, amino acids, micro-nutrients and trace elements to organic products provided that:

(a) their use in food for normal consumption is ‘directly legally required’, in the meaning of being directly required by provisions of Union law or provisions of national law

**Guidance**

For example, in the UK, the *Bread and Flour Regulations (1998)* state that iron, thiamine (vitamin B1) and nicotinic acid (vitamin B3) in a carrier of calcium carbonate must be added to flour, except wholemeal flour. This is to replace nutrients lost during the milling process.

Regulation (EU) No 609/2013 Article 1(1) (a & b) relate to infant formula & follow-on formula and processed cereal-based food & baby food;
compatible with Union law, meaning the food cannot be placed at all on the market as food for normal consumption if those minerals, vitamins, amino acids or micronutrients are not added; or
(b) as regards food placed on the market as having particular characteristics or effects in relation to health or nutrition or in relation to needs of specific groups of consumers:
— in products referred to in points (a) and (b) of Article 1(1) of Regulation (EU) No 609/2013 of the European Parliament and of the Council (1) their use is authorised by that Regulation and acts adopted on the basis of Article 11(1) of that Regulation for the products concerned, or

<table>
<thead>
<tr>
<th>SA NI 6.6.14 Oil palm products*</th>
</tr>
</thead>
</table>
| You may use products of the oil palm tree *elaeis guineensis*. However, the oil palm products must hold certification to a standard that is recognised by the Soil Association for verifying the protection of High Conservation Values. This requirement applies to single-ingredient oil palm products you (or your subcontractor) purchase and sell/repack or further process. This includes:
  - Palm oil
  - Palm kernel oil
  - Palm derivatives, such as palm olein, palm stearin or E422 glycerol (palm)/glycerine (palm).

Commission Directive 2006/125/EC is on processed cereal-based foods and baby foods for infants and young children.

of Regulation (EU) No 609/2013 Organic baby foods for infants and young children - specifically organic infant formula, follow-on formula, processed organic cereal-based foods and baby foods - may be fortified by minerals, trace elements, vitamins, amino acids and micronutrients where their use is legally authorised in horizontal legislation.

(a) infant formula and follow-on formula; (b) processed cereal-based food and baby food;

In Europe, other fortification is controlled by the EC Regulation on the Addition of Vitamins, Minerals and Certain Other Substances to Foods (1925/2006/EC).

All vitamins except thiamine require non-GMO declaration form to be completed (unless being used in organic form).

Oil palm products you purchase that are certified to Soil Association standards will already have been verified as meeting this requirement. Oil palm products you purchase that are not certified to Soil Association organic standards will need to hold an additional certification.

Certifications recognised as meeting this requirement include these RSPO standards:
  - RSPO Supply Chain Certification Standard**
  - RSPO Principles & Criteria Certification Standard**
  - RSPO Independent Smallholder Standard**

Certificate validity must be checked on the RSPO website: [https://rspo.org](https://rspo.org)

**Only RSPO product certified to the ‘Identity Preserved’ (IP) or ‘Segregated’ (SG) supply chain models are recognised. If your supplier’s certificate lists IP or SG, but also lists other supply chain models (for example Mass Balance), you will
This requirement does not apply to:
- multi-ingredient products that you (or your subcontractor) purchase, that may contain oil palm ingredients.
- non-organic additives (for example, tocopherol/ E306 tocopherol-rich extract), non-organic flavourings, solvents or processing aids
- Cleaning products you use.

*This requirement comes into effect from July 2023.

**Soil Association higher standard**

need to obtain written confirmation from your supplier that each consignment of product you are buying is certified IP or SG.

Certifications to these standards are also recognised:
- Fair For Life
- Bio Suisse

Purchasing products or ingredients certified to the above sustainability standards will not, of itself, entitle you to make any claims relating to those standards. If you wish to make claims, you will need to contact the bodies above for further information on their requirements.

Some products, such as glycerine or ‘vegetable’ oils, may be derived either from the oil palm or from other plants, such as soybean. Products not derived from the oil palm tree do not need to hold an additional certification. You will be expected to demonstrate this.

If your supplier changes, you will need to update your specification and seek our approval prior to use.

**Why?**

Expansion of agriculture globally has resulted in the destruction of millions of hectares of forests and other natural or important ecosystems to make way for farming, with negative impacts on biodiversity, climate and indigenous peoples. This requirement adds an additional safeguard for high-risk ingredients.

**SA NI 6.6.15 Colouring for decorative eggs**

You will need to apply to your competent authority if you want to use natural colours and natural coating substances for traditional decoration of the shells of boiled eggs sold during the Easter period.

*(EC) 2018/848 Annex II IV (2.2.2) (d)*
<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SA NI 6.7.1 EU derogations</strong>&lt;br&gt;The EU Organic Regulation allows for some derogations to use non-organic agricultural ingredients where they aren’t available on the market in organic form and aren’t already listed in standard 6.6.1. This standard only applies to products containing 95-100% organic agricultural ingredients. In these cases you can apply to your competent authority for a derogation to use the particular ingredients.</td>
<td>If you are having trouble finding an agricultural ingredient in organic form, contact the certification team. We may be able to provide details of companies that will be able to supply you with what you need.</td>
</tr>
<tr>
<td>The competent authority can authorise the use of the non-organic agricultural ingredients for the production of processed organic food in Northern Ireland for a maximum of six months. That authorisation shall apply to all operators in Northern Ireland.</td>
<td>If an ingredient is not available in organic form anywhere in the EU or NI, then you may still be able to use it provided you have successfully applied for a derogation to do so.</td>
</tr>
<tr>
<td>If the ingredient remains unavailable after that six months the competent authority can renew the derogation two times for a maximum of six months each. You must reapply for each renewal to the derogation. Approval may be granted provided that no EU Member State has objected by indicating that the ingredient is available as organic in sufficient quantity.</td>
<td>Derogations can only be granted for agricultural ingredients. Neither certification bodies nor the competent authorities can give derogations to use additives and processing aids which are not listed as permitted in the organic regulation.</td>
</tr>
<tr>
<td>You must keep on file the record of each derogation granted.</td>
<td>If you are producing juice from concentrate and unable to source an organic version of the top note, you can apply for a derogation. If the derogation is issued, the top note must be listed as a non-organic ingredient on the retail label (see standard 5.8.2).</td>
</tr>
<tr>
<td><em>(EC) 2018/848 Art. 7 (a); Art.24 (2b); Art.25</em></td>
<td>If you are producing a less than 95% organic product you will not need to request a derogation from your competent authority for the non-organic ingredients.</td>
</tr>
<tr>
<td><strong>How to apply for a derogation</strong>&lt;br&gt;You will need to complete a NICA non-organic ingredient application form.</td>
<td>Please refer to section 5.8. of these standards for further information on labelling.</td>
</tr>
</tbody>
</table>
Double check your percentage calculations to ensure they are correct and that the total percentage of organic agricultural ingredients will not exceed 5%. Please refer to our web tool for help with calculating maximum percentages. Please note some additives are included in the percentage calculations - refer to standard 6.4.2 for details.

If after the derogation is renewed twice the ingredient is still unavailable in organic form in sufficient quality and quantity to meet the needs of operators, the competent authority may submit a dossier to the EC for addition to the list of permitted non-organic agricultural ingredients.
<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SA NI 6.8 Importing</strong></td>
<td><strong>The following definitions are applicable for this chapter:</strong></td>
</tr>
<tr>
<td><strong>What’s this chapter about?</strong></td>
<td>(1) ‘importer’ means a natural or legal person established in the Union and subject to the control system referred to in Regulation (EU) 2018/848, who presents the consignment for release for free circulation in the Union either on its own, or through a representative;</td>
</tr>
<tr>
<td>This chapter outlines the requirements that need to be met when importing organic goods from the EU and EEA.</td>
<td>(2) ‘operator responsible for the consignment’ means, for the purposes of Article 6(4) of Delegated Regulation (EU) 2021/2306 and Commission Delegated Regulation (EU) 2019/2123, either the importer or a natural or legal person established in the Union who presents the consignment at the border control post on behalf of the importer;</td>
</tr>
<tr>
<td><strong>SA NI 6.8.1 Scope</strong></td>
<td>(3) ‘first consignee’ means a natural or legal person established in the Union and subject to the control system referred to in Regulation (EU) 2018/848 to whom the consignment is delivered by the importer after the release for free circulation and who receives it for further preparation and/or marketing;</td>
</tr>
<tr>
<td>The standards in this section apply to anyone involved in importing and exporting organic goods or acting as the first consignee in the import of organic goods. They also apply to anyone carrying out these activities on behalf of someone else.</td>
<td>(4) ‘consignee’ means a natural or legal person established in the Union and subject to the control system referred to in Regulation (EU) 2018/848 to whom the batch obtained from the splitting of a consignment is delivered by the importer after the release for free circulation and who receives it for further preparation and/or marketing;</td>
</tr>
<tr>
<td><strong>(EC) 848/2018 Art.2 (1)</strong></td>
<td>(5) ‘consignment’ means a consignment, as defined in Article 3, point (37)*, of Regulation (EU) 2017/625 of the European Parliament and of the Council(4), of products intended to be placed on the market within the Union as organic products or in-conversion products; however, in case of organic products and in-conversion products exempted from official controls at border control posts in accordance with Commission Delegated Regulation (EU) 2021/2305(5)**, it means a quantity of products under one or more Combined Nomenclature codes, covered by a single</td>
</tr>
</tbody>
</table>
A certificate of inspection, conveyed by the same means of transport and imported from the same third country.

(6) ‘point of release for free circulation’ means a point of release for free circulation where official controls on organic and in-conversion products exempted from official controls at border control posts are carried out in accordance with Delegated Regulation (EU) 2021/2305;

(7) ‘border control post’ means a border control post as defined in Article 3, point (38), of Regulation (EU) 2017/625;

(8) ‘control point’ means a control point other than a border control post as referred to in Article 53(1), point (a), of Regulation (EU) 2017/625;

(9) ‘identity check’ means a visual inspection to verify that the content and the labelling of a consignment, including the marks on animals, seals and means of transport, correspond to the information provided in the official certificates, official attestations and other documents accompanying it;

(10) ‘physical check’ means a check on animals or goods and, as appropriate, checks on packaging, the means of transport, labelling and temperature, the sampling for analysis, testing or diagnosis and any other check necessary to verify compliance with the rules referred to in Article 1(2) of (EU) 2017/625.

**SA NI 6.8.2 Importing products from the EU**

You do not need to be licensed as an importer to bring organic or in-conversion products into Northern Ireland from within the EU, or the European Economic Area (EEA), provided those products are certified in accordance with the EU Organic Regulations. However, you will still require certification to trade, wholesale, distribute, store, break down, pack, repack, re-label or process organic product.

*(EC) 2018/848 Art. 50*

**SA NI 6.8.3 Soil Association symbol use**

EEA countries are Iceland, Liechtenstein and Norway.

Refer to standard 5.1.1 for details of which activities require certification.

Please refer to standard 5.8.8 for details of the requirements for using the Soil Association symbol.
If you wish to use the Soil Association symbol on imported products, whether from the EU or third countries, you will need Soil Association certification in order to do so.

**Soil Association higher standard**

### Why?

The Soil Association symbol is the most recognised organic certification mark in the UK and has gained the trust, respect and confidence of consumers and producers across the globe. The Soil Association symbol demonstrates that an organic food or non-food product meets our higher standards for animal welfare, health, consumer protection and the protection of the natural environment.

### SA NI 6.8.4 Importing products from outside the EU, NI or EEA

1. If you wish to import products from a third country (including from GB), you will need certification in order to do so.
2. If you use a sub-contractor to import on your behalf, they will also need certification. Please refer to standard 5.4.2 for details of subcontractor certification requirements.
3. You will also need certification if you wish to export your products.

*(EC) 2018/848 Art. 34 (1)(3)*

### SA NI 6.8.5 Planning and managing your importing operation

1. Before you can begin importing you must provide, and keep updated as necessary, a full description of your importing enterprise, including details of:
   a) your premises
   b) your importing activities, including the locations where the products you import first enter NI or EU
   c) any other facilities you intend to use for storage of imported products before they are delivered to the first consignee.

   ![Note](Note.png)

   To help you meet this requirement we provide an application form that outlines what information is required. This can be found on our [website](#).

   If you make any significant changes to your activities, you must update your documentation and inform the certification team. 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 currently store organic products and wish to start packing or
d). Any storage site you use must also be subject to the certification system and be inspected by an organic certification body.

2. The first consignee, or consignee, must also provide a full description of their unit which includes details of the facilities used for reception and storage of imported goods.

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

(EC) 2307/2021 Art. 6

processing them depending on what you are adding or expanding, we may need to update your certificates and you may need an additional inspection or licence.

If a consignment leaves port and goes to a distribution hub or warehouse, where the consignment is split and distributed to customers, then that distribution hub/warehouse will require certification as they are acting as first consignee. First consignees must be licensed.

<table>
<thead>
<tr>
<th>SA NI 6.8.6 Importing products from third countries</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. You may import organic products from suppliers, including exporters, certified by a certification body or control authority recognised and approved by the EU or a country which has an equivalence agreement with the EU. Each country/certification body is approved for specific product categories, which means not all product types can be imported. See guidance for further details.</td>
</tr>
<tr>
<td>2. The exporter must be licensed.</td>
</tr>
</tbody>
</table>

(EC) 848/2018; Art. 35 (7); Art. 45 (1); Art. 46 (1); Art. 47; Art. 57 (1)

(EC) 2325/2021 Art. 1; Art. 2; Art. 3; Annex I; Annex II

The EU publish lists of approved countries and certification bodies and also the categories each is approved for.

**Recognised third countries**

These are countries whose national organic standards and control systems are recognised as equivalent to EU organic standards. A list of countries and approved certification bodies operating in each country can be found in [EU 2021/2325](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32021H02325).

These recognitions expire 31st December 2026. The agreements will be renegotiated on the basis of trade agreements.

Countries may also be recognised under [Trade Agreements](https://ec.europa.eu/environment/organic/organic-third-countries_en).

Each country is approved for specific product categories, (see below for details). This means not all product types can be imported, for example wine from Argentina. Before you arrange to import anything from these countries please contact the certification team so they can let you know about any restrictions.

**Categories**

You will see categories referred to organic certificates for companies certified to the EU Organic Regulation. These categories indicate the products which the company is allowed to export to the EU. Below is what each category means:
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;
f) wine;
g) other products listed in Annex I to this Regulation or not covered by the previous categories (See standard 5.1.1 for products this applies to).

**Recognised certification bodies**

These are control bodies whose standards and control system have been recognised as equivalent to EU organic standards. Just like recognised third countries, each certification body is approved for specific product categories. The list of these certification bodies is in (EU) 2021/2325.

These recognitions expire 31st December 2024 by which time all the control bodies must have been recognised by the European Commission (EC) as compliant with and working to 2018/848.

When obtaining certificates from suppliers certified by recognised certification bodies, you will need to check that the documents state that the supplier is certified to the EU Organic Regulation and that they make explicit reference to regulations 2018/848, or 834/2007 and 889/2008 - certificates issued in the EU may continue to refer to 834 & 889 until end of 2022 and certificates issued outside of EU until end of 2024. You will also need to check that the scope of the company’s certification includes export.

The list of approved certifiers occasionally changes. If you are unsure about whether a prospective supplier is certified by an approved certifier, please
SA NI 6.8.7 Certificates of Inspection

1. Issuing of Certificate of Inspection - All organic products listed in standard 5.1.1 imported from a third country (including from Great Britain), must be issued with a Certificate of Inspection (COI) by the certification body of the exporter in the third country. The COI must be issued before the consignment leaves the third country. As the importer, you must ensure you have a COI issued for each consignment.

2. Pre-Notification of arrival - For each consignment, the importer or, where appropriate, the operator responsible for the consignment, must give prior notification of the arrival of the consignment to the border control post (BCP) or the point of release for free circulation. You must complete and submit the relevant part of the COI in TRACES (normally box 20).

3. Partial release of a consignment - If only part of the consignment is released for free circulation, the consignment will be split into different batches before its release. In this case the importer must:
   a) submit an extract of the COI in TRACES for each of the batches.
   b) present a finalised Common Health Entry Document (CHED)

For the import of organic products into NI and the EU, all COIs are issued using an electronic system called TRACES NT. In NI, the EU, and the EEA (Norway, Iceland and Liechtenstein), all importers, and all exporters in the country of origin, must register for a TRACES NT account.

You can find out further information on our webpages [here](#).

In the EU and NI, it is normally the port authorities at the border control post (BCP) who are responsible for checking documentation of organic products at the port of arrival. They have the authority to stop entry of any organic products not issued with a valid COI - and the goods may be held at port or lose their organic status. The BCP checks that the information on the COI corresponds to the goods being imported, and other documents associated with the shipment e.g. the airway bill or bill of lading.

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

Whilst the exporter is responsible for getting the COI issued and endorsed by their certification body before the product is exported, it is the importer's responsibility to ensure that the valid COI is issued on TRACES for each consignment, and the BCP is pre-notified of arrival. Normally you need to give notice of at least one working day before the expected arrival of the consignment.
The BCP will then verify the batches and endorse the COI.

4. Release for free circulation - When consignments are released for free circulation, the importer must report the COI number in the customs declaration. This is in addition to any other notifications required by (EU) 2017/625 Art.56. (3) (a) - Common Health Entry Document (CHED).

A Common Health Entry Document (CHED) is a mandatory document that must be completed on TRACES before arriving at the BCP in the EU. This is acts as prior notification and allows the BCP to carry out security checks when these goods enter the EU market.

A CHED is needed for the following product categories:
- animals,
- products of animal origin,
- products of plant origin,
- feed and food products.

Information on the different types of CHEDs and how to complete them can be accessed on the TRACES website.

In certain cases, the competent authorities of the BCP may accept a period of prior notification of at least four hours before the expected arrival of the consignment – for example, due to transport-related logistical constraints, where it is not possible to give one working day prior notification.

The consignment will be verified by the competent authority at the BCP, or point of release for free circulation, by means of documentary checks. The competent authority may also carry out random identity checks and physical checks. They will make a record of this verification in box 30 of the COI. If satisfied, they will endorse the COI and the consignment can be released for free circulation as organic (or in-conversion, if applicable).

If there are issues with the verification, the following may occur:
- a) the consignment is released for free circulation as non-organic;
- b) the consignment cannot be released for free circulation;
- c) part of the consignment can be released for free circulation with an extract of the certificate of inspection.
We recommend that importers contact their suppliers to ensure they are aware that COIs are required and of their requirements, including that they do not ship products before a COI has been issued by their certification body.

You need to ensure that each section of the COI is endorsed by the relevant party. Port Authorities in NI and the EU may charge for endorsing COIs. Please check with the BCP at your proposed port of arrival for details of their costs.

If you are in NI, Great Britain is regarded as a third country for the duration of the Northern Ireland Protocol. However, for products moving from NI to Great Britain, NI is within the UK and so no COI will be required.

Our [webpage](#) has details of how products are exported from GB to NI.

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### SA NI 6.8.8 Paper Certificates of Inspection and extracts

1. Until 31st October 2022, COIs and extracts of COIs may be issued and/or endorsed on paper after being completed in TRACES.

2. Where a paper copy of the COI is issued it must accompany the goods to the premises of the first consignee or of the consignee.

3. The first consignee must then verify whether the information reported in the COI corresponds to the information completed in TRACES.

If the information relating to the number of packages in box 13 of the COI or in boxes 16 (total gross weight) and 17 (means of transport) of the COI is not completed in the paper COI, or if that information in the paper COI is different from the
information completed in TRACES, the first consignee must take the information in TRACES as the up-to-date version.

4. After verification the first consignee must hand sign the paper COI in box 31 and send that COI to the importer (if different from first consignee).

5. The importer must keep the paper COI for at least two years.

6. **Paper extract of COI** - In case of a paper extract of the COI, the consignee must:
   a) on receiving the batch, hand sign the paper extract in box 13.
   b) keep the paper extract of the COI for at least two years

7. For record keeping the first consignee or, where relevant, the importer may make a copy of the paper COI or extract of the COI. It must be marked ‘COPY’.

8. In the event that TRACES, or one of its functionalities, is continuously unavailable for more than 24 hours, the control authority or control body may issue the COI in paper format with the wording ‘produced during contingency’. Once TRACES, or its functionalities, become available again, the details in the paper COI and accompany documents must be uploaded to TRACES.

   (EC) 2306/2021 Art. 8 (2) (3) (4); Art. 11 (1) (3) (5)
   (EC) 2307/2021 Art. 8

**SA NI 6.8.9 Receiving imported goods**

1. The first consignee must check that imported products:
   a) arrive in appropriate packaging or containers closed in a manner which prevents substitution of the contents

You will also need to keep records relating to other areas of your operation, please refer to the record keeping section (5.7).
b) identify the exporter
c) are marked to identify the lot
d) arrive with a COI
e) that the COI covers the product in the consignment.

2. Once these checks have been made, the first consignee must complete box 31 on the COI.
3. You must keep records to demonstrate these checks have been made.
4. This is in addition to the requirements of standards Section 5.14

(EC) 848/2018 Annex III (6)
(EC) 2306/2021 Annex Part I; Annex Part II
(EC) 2307/2021 Art. 4 (1)(c)

SA NI 6.8.10 Special customs procedures
1. Further preparation of a consignment at port of entry. If a consignment from a third country is assigned to customs warehousing or inward processing, and undergoes packing, or change of packing; or affixing, removal and altering of labels with reference to organic production method, then the facility must be certified organic. Before this packing/repacking/labelling takes place, the BCP must verify the COI for the imported consignment as described in standard 6.8.7. The reference number of the customs declaration - by which the goods have been declared for the customs warehousing or inward processing procedure - shall be indicated by the importer in box 23 of the COI. Once the consignment has been packed/repacked/labelled, the BCP will verify the consignment and endorse the COI.

Under point 1, the operator carrying out the packaging/repacking/labelling is the first consignee, so they must make the checks required in 6.8.8, and complete box 21 of the COI.

Customs warehousing is a procedure whereby non-Union goods may be stored in premises or any other location authorised by the customs authorities and under customs supervision, as referred to in Regulation (EC) 952/2013 Art. 240 (1).

Inward processing is where non-Union goods that are undergoing usual forms of handling intended to preserve them, improve their appearance or marketable quality, or prepare them for distribution of resale, may be used in the customs territory of the Union in one or more processing operations without such goods being subject to certain charges or measures, as referred to in Regulation (EC) 952/2013 Art. 256 (1).

If you are the importer, you must complete the extract of the COI using the details from the original COI and including details of the new batch. You must
2. Splitting a consignment at port of entry.
   If you wish to split a consignment from a third country into different batches at port of entry, before the release into free circulation, this may be done under customs supervision. The consignment must first be verified and the COI endorsed as described in standard 6.8.7. Once the consignment is split, the importer must submit an extract of the COI in TRACES for each of the batches resulting from the splitting. The BCP will then verify the batches and endorse the COI.
   Once the consignment is released for free circulation the importer must report the number of the COI in the customs declaration for release for free circulation.

3. When a consignee receives each batch, they must carry out the checks described in standard 6.8.9 and complete box 13 of the extract of the COI.

4. Certification is required for operations carrying out ‘Further preparation of a consignment at port of entry’ and ‘Splitting a consignment at port of entry’ as described in point 1 and 2 above.

   (EC) 952/2013 Art. 240 (1); Art. 256 (3) (b)
   (EC) 2306/2021 Art. 7
   (EC) 2307/2021 Art. 4

SA NI 6.8.11 Records
1. Importers must keep records of each consignment imported. These must include:
   a) The name and address of the first consignee (if different to the importer)
   b) Any details the control body or authority may reasonably require

   Details of transport arrangements include shipping records (e.g. commercial invoice, packing list, bill of lading/ airway bill, phytosanitary certificate, certificate of origin etc.).

   COIs for your imports issued on TRACES may be accessed via your TRACES account. You can find out further information on using TRACES in our COI Guide on our [webpage](#).
<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
</table>
| **c)** A valid certificate for the supplier of the imported products demonstrating the organic status of the products being imported  
**d)** Certificate of Inspection. |   |
| **2.** You must keep other records as described in Section 5.7 of these standards |   |
| (EC) 848/2018 Art. 34 (5)  
(EC) 2307/2021 Art. 5  
(EC) 771/2021 Art. 1 (4)(b) |   |

**SA NI 6.8.12 High Risk Products**

Each year the European Commission makes a review of imported organic, and in-conversion products. They review the number of major, critical or repetitive non-compliances affecting the integrity of those imports. If they deem particular products originating in particular countries as having a high risk of non-compliance they can require that additional control measures are implemented in those countries, and at the point of import into the EU.

Import controls on entry into the EU (& NI), may take the form of additional documentary checks and sampling of consignments on arrival at the BCP and prior to endorsement of the COI.

(EC) 1698/2021 Art. 8  
(EC) 2306/2021 Art. 4 (2); Art. 6 (2)

**SA NI 6.8.13 Export of Organic Products**

A product may be exported from the EU and NI as an organic product and may bear the organic production logo of the

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Please visit our <a href="#">webpage</a> or contact the certification team for details of any current EU requirements.</td>
<td></td>
</tr>
<tr>
<td>Some countries require consignments to be accompanied by an import certificate. For example, the USA, Canada and South Korea.</td>
<td></td>
</tr>
</tbody>
</table>
European Union, provided that it complies with the EU Organic Regulation.

**(EC) 848/2018 Art. 44 (1)**

Some countries, such as Japan and South Korea, have additional requirements for imports. You can find information [here](#).

If you would like further information on exporting to non-EU countries, contact the processor certification team for details.

### SA NI 6.9 Organic wine

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SA NI 6.9.1 Scope</strong></td>
<td>It is important to read these standards in conjunction with the wine regulations, as they contain detailed requirements for wine making and labelling which must also be met. Amongst other things, the regulations include specific conditions for all the substances you can use for purposes such as regulating pH, encouraging yeast development and stabilisation, etc.</td>
</tr>
<tr>
<td>1. The standards in this section apply to products of the wine sector as referred to in point (l) of Article 1(2) of Regulation (EU) No 1308/2013.</td>
<td></td>
</tr>
<tr>
<td>2. Except where explicitly stated in this chapter you must also comply with:</td>
<td></td>
</tr>
<tr>
<td>a) <strong>EC Regulation 606/2009</strong> (rules for implementing Council Regulation (EC) No 479/2008 for the categories of grapevine products, oenological practices and the applicable restrictions) and</td>
<td>Product of the wine sector listed in EC 1308/2013 Art 1(2) point (l):</td>
</tr>
<tr>
<td>b) <strong>EC Regulation 607/2009</strong> (rules for implementing Council Regulation (EC) No 479/2008 for protected designations of origin and geographical indications, traditional terms, labelling and presentation of certain wine sector products).</td>
<td>• Grape juice (including grape must)</td>
</tr>
<tr>
<td>c) You must comply with the rest of the general production rules laid down in these standards.</td>
<td>• Other grape musts, other than those in fermentation or with fermentation arrested otherwise than by the addition of alcohol</td>
</tr>
<tr>
<td><em>(EC) 2018/848 Annex II Part VI (1.1)(1.2)</em></td>
<td>• Wine of fresh grapes, including fortified wines; grape must other than that of heading 2009, excluding other grape must of subheadings 2204 30 92, 2204 30 94, 2204 30 96 and 2204 30 98</td>
</tr>
<tr>
<td><strong>SA NI 6.9.2 Organic raw materials</strong></td>
<td>• Fresh grapes other than table grapes</td>
</tr>
<tr>
<td>The material you use to make organic wine (e.g. grapes) must be organically grown.</td>
<td>• Wine vinegar</td>
</tr>
<tr>
<td><em>(EC)2018/848 Annex II VI (2.1)</em></td>
<td>• Piquette</td>
</tr>
<tr>
<td></td>
<td>• Wine lees</td>
</tr>
<tr>
<td></td>
<td>• Grape marc</td>
</tr>
<tr>
<td></td>
<td>Organically grown means that all materials must be certified as organic and you must be able to demonstrate this.</td>
</tr>
</tbody>
</table>
SA NI 6.9.3 Additives and processing aids

You may use the products and substances listed in the table below for making products of the wine sector, including during the oenological practices, processes and treatments. Subject to the conditions and restrictions set out in Regulation (EU) No 1308/2013 and Commission Delegated Regulation (EU) 2019/934 and, where applicable, in accordance with national provisions based on Union law.

It is important to note that the wine regulation 606/2009 details further specific conditions and restrictions on using the materials outlined in the table below. You will need to make sure that you also meet these requirements.

Some additives and processing aids are a potential GM risk because they are derived from crops that can be GM or are made using processes that sometimes involve GM. For these additives and processing aids you will need to provide additional proof that they are non-GM by completing a non-GM declaration form, signed by the additive or processing aid manufacturer, and providing supporting information. The type of supporting information required will depend on the additive or processing aid.

Please refer to this guidance document for more information.

<table>
<thead>
<tr>
<th>Product/Substance</th>
<th>ID number</th>
<th>Reference to Annex I to Delegated regulation (EU) 2019/934</th>
<th>Specific conditions and limits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air</td>
<td></td>
<td>Part A, Table 1, points 1 and 8</td>
<td></td>
</tr>
<tr>
<td>Gaseous oxygen</td>
<td>E 948</td>
<td>Part A, Table 1, point 1</td>
<td></td>
</tr>
<tr>
<td></td>
<td>CAS 17778- 80-2</td>
<td>Part A, Table 2, point 8.4</td>
<td></td>
</tr>
<tr>
<td>Nitrogen</td>
<td>E 941</td>
<td>Part A, Table 1, points 4, 7 and 8</td>
<td></td>
</tr>
<tr>
<td></td>
<td>CAS 7727-37-9</td>
<td>Part A, Table 2, point 8.2</td>
<td></td>
</tr>
<tr>
<td>Carbon dioxide</td>
<td>E 290</td>
<td>Part A, Table 1, points 4 and 8</td>
<td></td>
</tr>
<tr>
<td></td>
<td>CAS 124- 38-9</td>
<td>Part A, Table 2, point 8.3</td>
<td></td>
</tr>
<tr>
<td>Argon</td>
<td>E 938</td>
<td>Part A, Table 1, point 4</td>
<td></td>
</tr>
<tr>
<td></td>
<td>CAS 7440-37-1</td>
<td>Part A, Table 2, point 8.1</td>
<td>may not be used for bubbling</td>
</tr>
<tr>
<td>Yeasts, yeast cell walls</td>
<td></td>
<td>Part A, Table 2, point 4.7</td>
<td></td>
</tr>
<tr>
<td>Diammonium hydrogen phosphate</td>
<td>E 342/CAS 7783-28-0</td>
<td>Part A, Table 2, point 4.2</td>
<td></td>
</tr>
<tr>
<td>Thiamine hydrochloride</td>
<td>CAS 67-03-8</td>
<td>Part A, Table 2, point 4.5</td>
<td></td>
</tr>
<tr>
<td>Autolysates of yeast</td>
<td></td>
<td>Part A, Table 2, point 4.6</td>
<td></td>
</tr>
<tr>
<td>Ingredient</td>
<td>E number</td>
<td>CAS number</td>
<td>Reference</td>
</tr>
<tr>
<td>----------------------------------</td>
<td>----------</td>
<td>--------------</td>
<td>-------------------------</td>
</tr>
<tr>
<td>Sulphur dioxide</td>
<td>E 220</td>
<td>CAS 7446-09-5</td>
<td>Part A, Table 2, point 2.1</td>
</tr>
<tr>
<td>Potassium bisulphite</td>
<td>E 228</td>
<td>CAS 7773-03-7</td>
<td>Part A, Table 2, point 2.2</td>
</tr>
<tr>
<td>Potassium metabisulphite</td>
<td></td>
<td></td>
<td>Part A, Table 2, point 2.3</td>
</tr>
<tr>
<td>Charcoal for oenological use</td>
<td></td>
<td></td>
<td>Part A, Table 2, point 3.1</td>
</tr>
<tr>
<td>Edible gelatin</td>
<td></td>
<td>CAS 9000-70-8</td>
<td>Part A, Table 2, point 5.1</td>
</tr>
<tr>
<td>Wheat protein</td>
<td></td>
<td></td>
<td>Part A, Table 2, point 5.2</td>
</tr>
<tr>
<td>Pea protein</td>
<td></td>
<td></td>
<td>Part A, Table 2, point 5.3</td>
</tr>
<tr>
<td>Isinglass</td>
<td></td>
<td></td>
<td>Part A, Table 2, point 5.5</td>
</tr>
<tr>
<td>Egg white albumin</td>
<td></td>
<td>CAS 9006-59-1</td>
<td>Part A, Table 2, point 5.8</td>
</tr>
<tr>
<td>Tannins</td>
<td></td>
<td></td>
<td>Part A, Table 2, point 5.12</td>
</tr>
<tr>
<td>Potato proteins</td>
<td></td>
<td></td>
<td>Part A, Table 2, point 5.4</td>
</tr>
<tr>
<td>Ingredient</td>
<td>CAS Number</td>
<td>Reference</td>
<td>Notes</td>
</tr>
<tr>
<td>------------------------------------------------</td>
<td>--------------------------</td>
<td>----------------------------------------------</td>
<td>----------------------------------------------------------------------</td>
</tr>
<tr>
<td>Yeast protein extracts</td>
<td></td>
<td>Part A, Table 2, point 5.15</td>
<td>available derived from organic raw material if available</td>
</tr>
<tr>
<td>Casein</td>
<td>CAS 9005-43-0</td>
<td>Part A, Table 2, point 5.6</td>
<td>derived from organic raw material if available</td>
</tr>
<tr>
<td>Chitosan derived from <em>Aspergillus niger</em></td>
<td>CAS 9012-76-4</td>
<td>Part A, Table 2, point 5.13</td>
<td>derived from organic raw material if available</td>
</tr>
<tr>
<td>Potassium caseinate</td>
<td>CAS 68131-54-4</td>
<td>Part A, Table 2, point 5.7</td>
<td></td>
</tr>
<tr>
<td>Silicon dioxide</td>
<td>E 551</td>
<td>Part A, Table 2, point 5.10</td>
<td></td>
</tr>
<tr>
<td>Bentonite</td>
<td>E 558</td>
<td>Part A, Table 2, point 5.9</td>
<td></td>
</tr>
<tr>
<td>Pectin lyases</td>
<td>EC 4.2.2.10</td>
<td>Part A, Table 2, point 7.2</td>
<td>only for oenological purposes in clarification</td>
</tr>
<tr>
<td>Pectin methylesterase</td>
<td>EC 3.1.1.11</td>
<td>Part A, Table 2, point 7.3</td>
<td>only for oenological purposes in clarification</td>
</tr>
<tr>
<td>Polygalacturonase</td>
<td>EC 3.2.1.15</td>
<td>Part A, Table 2, point 7.4</td>
<td>only for oenological purposes in clarification</td>
</tr>
<tr>
<td>Hemicellulase</td>
<td>EC 3.2.1.78</td>
<td>Part A, Table 2, point 7.5</td>
<td>only for oenological purposes in clarification</td>
</tr>
<tr>
<td>Cellulase</td>
<td>EC 3.2.1.4</td>
<td>Part A, Table 2, point 7.6</td>
<td>only for oenological purposes in clarification</td>
</tr>
<tr>
<td>Lactic acid</td>
<td>E 270</td>
<td>Part A, Table 2, point 1.3</td>
<td></td>
</tr>
<tr>
<td>Tartaric acid (L(+)-)</td>
<td>E 334</td>
<td>Part A, Table 2, point 1.1</td>
<td></td>
</tr>
<tr>
<td>Calcium carbonate</td>
<td>E 170</td>
<td>Part A, Table 2, point 1.6</td>
<td></td>
</tr>
<tr>
<td>Neutral potassium tartrate</td>
<td>E 336(ii)</td>
<td>Part A, Table 2, point 1.4</td>
<td></td>
</tr>
<tr>
<td>Potassium bicarbonate</td>
<td>CAS 921-53-9</td>
<td>Part A, Table 2, point 1.5</td>
<td></td>
</tr>
<tr>
<td>Aleppo pine resin</td>
<td></td>
<td>Part A, Table 2, point 11</td>
<td></td>
</tr>
<tr>
<td>Lactic bacteria</td>
<td></td>
<td>Part A, Table 2, point 9.</td>
<td></td>
</tr>
<tr>
<td>Product/ Substance</td>
<td>Reference to Annex I to Delegated regulation (EU) 2019/934</td>
<td>Specific conditions and limits</td>
<td></td>
</tr>
<tr>
<td>-----------------------------------------</td>
<td>------------------------------------------------------------</td>
<td>-------------------------------</td>
<td></td>
</tr>
<tr>
<td>L-Ascorbic acid</td>
<td>E 300 Part A, Table 2, point 2.6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nitrogen</td>
<td>E 941 Part A, Table 1, points 4, 7 and 8</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Carbon dioxide</td>
<td>E 290 Part A, Table 1, points 4 and 8</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Carbon dioxide</td>
<td>CAS 7727-37-9 Part A, Table 2, point 8.2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Citric acid</td>
<td>E 330 Part A, Table 2, point 6.3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tannins</td>
<td>Part A, Table 2, point 5.12</td>
<td>derived from organic raw material if available</td>
<td></td>
</tr>
<tr>
<td>Meta-tartaric acid</td>
<td>E 353 Part A, Table 2, point 6.7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gum Arabic</td>
<td>E 414/CAS 9000-01-5 Part A, Table 2, point 6.8</td>
<td>derived from organic raw material if available</td>
<td></td>
</tr>
<tr>
<td>Potassium hydrogen tartrate</td>
<td>E 336(i)/CAS 868-14-4 Part A, Table 2, point 6.1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Copper citrate</td>
<td>CAS 866-82-0 Part A, Table 2, point 10.2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Yeast mannoproteins</td>
<td>Part A, Table 2, point 6.10</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pieces of oak wood</td>
<td>Part A, Table 1, point 1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Potassium alginate</td>
<td>E 402/CAS 9005-36-1 Part A, Table 2, point 5.18</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chitosan derived from <em>Aspergillus niger</em></td>
<td>CAS 9012-76-4 Part A, Table 2, point 5.13</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inactivated yeasts</td>
<td>Part A, Table 2, point 4.8</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Calcium sulphate</td>
<td>E 516 Part A, Table 2, point 1.8</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Standards

**SA NI 6.9.4 Sulphur dioxide levels for Soil Association certified wines**
The sulphur dioxide levels in Soil Association certified wines must not exceed the levels indicated in the table below.  

*Soil Association higher standard*

---

### Guidance

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

Permitted levels of sulphur dioxide in organic ‘other wines’ are given as a range in the table because they depend on the type of wine. For the specific levels, refer to the relevant parts of Annex I B of EC Regulation 606/2009, namely parts A(2 c, d, e), A(3), A(4), A(5) and B. The level of sulphur dioxide permitted in Soil Association organic certified wines must be 30mg/l lower than the levels stated in this annex.

---

### Maximum sulphur dioxide (SO₂) levels

<table>
<thead>
<tr>
<th>Wine with a residual sugar level</th>
<th>Wine with residual sugar level of 2 – 4.9g/l</th>
<th>Wine with sugar level of ≥5g/l</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Red</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>&lt;2 g/l</td>
<td>90 mg/l (25mg/l free SO₂)</td>
<td>100 mg/l (30mg/l free SO₂)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>130 mg/l (50mg/l free SO₂)</td>
</tr>
<tr>
<td><strong>White &amp; rosé</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>&lt;2g/l</td>
<td>100 mg/l (30mg/l free SO₂)</td>
<td>140 mg/l (30mg/l free SO₂)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>160 mg/l (50mg/l free SO₂)</td>
</tr>
<tr>
<td><strong>Sparkling Wine</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>100mg/l (10mg/l free SO₂)</td>
<td></td>
</tr>
<tr>
<td><strong>Other wines as listed in Annex IB of EC Regulation 606/2009</strong></td>
<td>270 - 370 mg/l (50mg/l free SO₂)</td>
<td></td>
</tr>
</tbody>
</table>

---

### Why?

Free SO₂ can cause allergic reactions in people with a sensitivity to sulphur dioxide, especially affecting people with asthma, so should be minimised as much as possible. The amount of free SO₂ allowed in Soil Association products is lower than the amount allowed by the EU Organic Regulation. This is to help reduce the potential for allergic reactions in people, and to help encourage SO₂ to be used only when strictly necessary.
Standards

**SA NI 6.9.5 Sulphur dioxide levels**
Wine must not exceed the sulphur dioxide levels indicated in the table below.
You must keep records to show the amount of sulphur dioxide you have used.


<table>
<thead>
<tr>
<th></th>
<th>Wine with a residual sugar level</th>
<th>Wine with residual sugar level of 2 – 4.9g/l</th>
<th>Wine with sugar level of &gt;5g/l</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Red</strong></td>
<td>100 mg/l</td>
<td>120 mg/l</td>
<td>170 mg/l</td>
</tr>
<tr>
<td><strong>White &amp; rosé</strong></td>
<td>150 mg/l</td>
<td>170 mg/l</td>
<td>220 mg/l</td>
</tr>
<tr>
<td><strong>Sparkling Wine</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Other wines as listed in 2019/934 Part B Annex I</strong></td>
<td>The maximum sulphur dioxide content applied in accordance with Part B of Annex I to Delegated Regulation (EU) 2019/934 shall be reduced by 30 milligrams per litre.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Guidance

**SA NI 6.9.6 Use of sulphur dioxide in exceptional conditions**

1. Your competent authority may authorise the use of higher levels of sulphur dioxide up to the maximum levels outlines in Part B (4) of Annex I of (EC) 2019/934, when sanitary status of organic grapes obliges the winemaker to use more sulphur dioxide than in previous years to obtain a comparable final product.

Please contact the certification team for information on how to make an application.

Records of sulphur dioxide used
### SA NI 6.9.7 Permitted oenological practices

You may use practices, processes and treatments under the following conditions:

- **a)** centrifuging and filtration (with or without an inert filtering agent), in accordance with point 3 of Annex I A to Regulation (EC) No 2019/934, but only with a pore size $\geq 0.2 \mu m$
- **b)** heat treatments, in accordance with point 2 of Annex 1A EC 606/2009, but only up to 75°C

For further conditions and limits of application on the use of centrifuging and filtration, heat treatments, and ion exchange resins, refer to **EC Regulation 2019/934**.

For conditions on using reverse osmosis refer to **EC Regulation 1234/2007 Annex XVa B1(b)**.

---

### SA NI 6.9.8 Prohibited oenological practices

You must **not** use the following processes, practices and treatments:

- **a)** partial concentration through cooling, in accordance with point (c) of Section B.1 of Part I of Annex VIII to Regulation (EU) No 1308/2013
- **b)** partial dealcoholisation of wine, in accordance with point 40 of Annex I A to Regulation (EC) No 606/2009
- **c)** elimination of sulphur dioxide by physical processes, in accordance with point of Annex I A to Regulation (EC) No 606/2009
- **d)** electrodialysis treatment to ensure the tartaric stabilisation of the wine
- **e)** treatment with cation exchangers to ensure the tartaric stabilisation of the wine in accordance with point 13 of Annex I A to Regulation (EC) No 2019/934.

**EC 2018/848 Annex II VI (3.2)**
### SA NI 6.10 Products and ingredients certified to other organic standards

<table>
<thead>
<tr>
<th>Standards</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SA NI 6.10.1 Products and ingredients certified to other organic standards</strong></td>
<td>The annex ‘Sourcing Organic Ingredients’ details the types of product that need to be checked and the Soil Association requirements that apply.</td>
</tr>
<tr>
<td></td>
<td>Organic ingredients that are certified to Soil Association standards already meet the SA's sourcing requirements. You can identify product certified to Soil Association standards from: a certificate with the Soil Association organic symbol; the words 'Soil Association Organic' or the Soil Association symbol on the packaging.</td>
</tr>
<tr>
<td></td>
<td>If the organic ingredient you want to use or import is not certified to Soil Association standards it may need to meet extra requirements detailed in the annex ‘Sourcing Organic Ingredients Annex’.</td>
</tr>
<tr>
<td></td>
<td>To verify compliance with the Soil Association’s requirements, we may require information from organic operators in your supply chain and their certifiers.</td>
</tr>
<tr>
<td></td>
<td><strong>Soil Association higher standard</strong></td>
</tr>
<tr>
<td></td>
<td><strong>On your product specification form you need to indicate your supplier for each organic ingredient and their certifier. For ingredients where SA has extra sourcing requirements (detailed in the Sourcing Organic Ingredients Annex).</strong></td>
</tr>
</tbody>
</table>

**SA NI 6.9.9 Wines produced before 1st August 2010**

For wines produced before 1st August 2010 you can use oenological practices processes and treatments in accordance with standards 6.9.7 and 6.9.8, including the restrictions provided for in Article 80 and Article 83(2) of Regulation (EU) No 1308/2013 in Article 3, Articles 5 to 9 and Articles 11 to 14 of Regulation (EC) No 606/2009, and in the Annexes to those Regulations used before 1 August 2010, shall be permitted.

(EC) 2018/848 Annex II VI (3.1)
<table>
<thead>
<tr>
<th><strong>Annex</strong>, you will need to update your specification if your suppliers change and seek our approval prior to use.</th>
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<tbody>
<tr>
<td>If we have approved meat, egg or aquaculture animal ingredients certified to other organic standards, for your Soil Association standard licence, we will issue you with an ’SA-Accepted Products’ Schedule. This will list the type of organic ingredient, the supplier, and may also state additional criteria you have to meet when using this supply, for example keeping specific records. Organic beef, lamb and goat meat produced and slaughtered in the UK do not need to be listed on this schedule. We will send you an updated copy of this document if any details change, for example if approval is withdrawn or a new supplier is added.</td>
</tr>
<tr>
<td>If you are unclear whether extra sourcing requirements apply, please contact the certification team.</td>
</tr>
</tbody>
</table>

| The Soil Association has higher organic standards than the legal organic minimum. We would like to ensure these higher standards apply across the whole supply chain but realise this is not always practically possible. We want to ensure that it is clear what our logo represents on higher standards of animal welfare, environmental protection and food quality, and for our licensees to be able to communicate this to customers. |
| **Why?** |

<table>
<thead>
<tr>
<th>SA NI 6.10.2 Meat farmed or slaughtered outside the UK/EU</th>
</tr>
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<tr>
<td><strong>Why?</strong></td>
</tr>
<tr>
<td>You will need to provide this information on your product specification form. If the country or countries where the animals are farmed or slaughtered changes, you will need to update your specification and seek our approval prior to use. This also covers product such as offal, blood and meat stock.</td>
</tr>
</tbody>
</table>

| The Soil Association has higher organic standards and sourcing requirements than the legal minimum for organic. This standard allows the verification of those requirements related to livestock products. |
| **Why?** |