

Summary of proposed changes to Soil Association packaging standards, 2023:

These proposed changes will apply to Soil Association Great Britain standards and Soil Association Northern Ireland standards. They are listed below with the changes to the existing standards and guidance displayed for reference. We are consulting on all substantive changes to the standards, but not on all changes to the guidance. Note this is not an exhaustive list of our packaging standards, this document only features standards where there are proposed changes to the standards or guidance.

If you have any views or feedback on the proposed changes to guidance, then please contact us standards@soilassociation.org or add your comments under part 12 of the consultation survey <https://soilassociation.typeform.com/packaging>

Key: new wording shown as underlined. Any removed content shown as ~~strikethrough~~

1. Packaging scope

We propose some small updates to the resources signposted in the scope guidance. No substantive changes are proposed to the standard.

Proposed changes:

SA GB 5.16 Packaging	
Standards	Guidance
<p>SA GB 5.16.1 Scope</p> <p>These standards apply to packaging of products that you introduce into the supply chain.</p> <p>We define packaging as all primary (retail), secondary (grouping, display) and tertiary (transport) materials used for:</p> <ul style="list-style-type: none">• containing• protecting• preserving• handling• storage• delivery• labelling• marketing, and	<p>I Packaging legislation</p> <p>This standard applies to products you process, pack or label, (including on farm), or have contract made for you, (including if you're a contracted 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.</p> <p>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. For example, for products sold in the UK and EU such legislation would include, but is not limited to:</p> <ol style="list-style-type: none">1. <u>the Defra regulations on extended producer responsibility for packaging products.</u>2. the <u>European Parliament and Council Directive on Packaging and Packaging Waste</u>

<ul style="list-style-type: none"> • presentation of your products. <p>Note - we include bulk bins but not transport pallets in this definition.</p> <p><i>Soil Association higher standard</i></p>	<p>(94/62/EC)</p> <p>3. the European Standard for Compostable Packaging (EN13432) — if you are using compostable or biodegradable packaging.</p> <p>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.</p> <p>For further information on what constitutes primary, secondary and tertiary packaging please refer to the Defra definitions of packaging class data.</p> <p><u>To ensure that your packaging products are as widely recycled as possible we recommend using the OPRL guidelines on labelling to communicate whether products are recyclable at kerbside across the UK.</u></p>
<p style="text-align: center;">Why?</p> <p>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.</p> <p>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.</p>	

2. Cellulose based materials standard

We propose some rewording of standard to ensure greater clarity of scope as this standard is focused on chlorine bleached paper and cardboard rather than 'cellulose based materials'. No substantive changes are proposed to the standard.

Proposed changes:

Standards	Guidance
<p>SA GB 5.16.2 Cellulose-based materials Chlorine bleached paper or cardboard</p> <p>If you use cellulose-based materials, such as corrugate, bleached paper or cardboard, it must be totally chlorine free (TCF) or elemental</p>	<p>Demonstrate that your packaging products have not used these chlorine-based processes in manufacture, materials, for example by having written confirmation from your supplier.</p>

chlorine free (ECF). Recycled paper must be process chlorine free (PCF). <i>Soil Association higher standard</i>	
<p style="text-align: center;">Why?</p> <p>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.</p>	

3. Aluminium foils standard

We propose to lift the existing restriction on the use of aluminium foils given there is more recent evidence that suggests no causal link between aluminium food contact materials and Alzheimer's disease. Therefore, we propose to remove the standard.

Proposed changes:

Standards	Guidance
<p>SA GB 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 salty (containing more than 2% salt). <i>Soil Association higher standard</i></p>	<p>Demonstrate that you have not used these materials, for example by having written confirmation from your supplier.</p>
<p style="text-align: center;">Why?</p> <p>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.</p>	

4. Plastic materials, coatings, dyes or inks containing phthalates standard

We propose to extend the restriction on the use of phthalates to all packaging not just food-contact materials given there is a risk to human and environmental health associated with the escape of phthalates from the material to which they are added.

Proposed changes:

Standards	Guidance
SA GB 5.16.4 Plastic materials, coatings, dyes or inks	Demonstrate that you have not used these materials, for example by having written

<p>containing phthalates</p> <p>You must not use plastic materials, coatings, dyes or inks that contain phthalates. if they will be in direct contact with foodstuffs.</p> <p><i>Soil Association higher standard</i></p>	<p>confirmation from your supplier.</p> <p>To avoid phthalates in packaging materials we recommend:</p> <ol style="list-style-type: none"> <u>avoid PVC and use plastics that do not require plasticizers for flexibility, such as polyethylene, e.g., PET, HDPE, and LDPE.</u> <u>using non-phthalate-based plasticizers which are widely available on the market, see the <i>ChemSec marketplace for more options</i></u> <u>reconsider whether packaging is necessary or if there are non-plastic alternatives.</u>
<p>Why?</p> <p><u>Phthalates are a group of chemicals used as a plasticizer in the manufacture of many plastics, giving flexibility to more brittle materials. Phthalates can have a negative impact human and environmental health impacts including endocrine disruption in humans and effects on reproduction in all studied animal groups. They are not chemically bound to the material to which they are added meaning they can continuously leach into food products as a food contact material or into the environment.</u></p>	

5. PVC standard

We propose to extend the restriction on the use of PVC to include all chlorinated plastics. This would mean that any licensee using chlorinated plastics such as PVdC will be required to remove it from use and those using PVC overwraps will be required to find alternatives given there are widely available functional alternatives on the market.

Proposed changes:

Standards	Guidance
<p>SA GB 5.16.5 PVC and other chlorinated plastics</p> <p>You must not use polyvinyl chloride (PVC) <u>or any other chlorinated plastics</u> unless alternative materials are not available or are functionally unsuitable, as listed in the guidance section of this standard.</p> <p><i>Soil Association higher standard</i></p>	<p>Demonstrate that you have not used these materials, for example by having written confirmation from your supplier.</p> <p>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:</p> <ul style="list-style-type: none"> metal jar lids or caps (e.g., for jams, sauces and baby food), and tamper evident seals on jar lids or caps.

	<p>We will review this list exemption on a regular basis, and you will be expected to inform your <u>Certification Officer of your progress to find</u> alternative materials. You may use metal jar lids, caps and tamper evident seals that contain PVC the above listed materials; however, you will need to make your packaging supplier aware that a PVC-free alternative is preferable should it become available.</p> <p>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.</p>
<p style="text-align: center;">Why?</p> <p>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. <u>Chlorinated plastic materials are very difficult to recycle and can act as a contaminant when added to other plastic recycling systems, rendering output materials unfit for use. Chlorinated plastic materials can also have corrosive effects on recycling machinery.</u></p> <p>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.</p>	

6. Non-GM packaging standard

We propose to amend the guidance to tackle the specific verification challenges with demonstrating compliance with this standard.

Guidance will also be updated to include the new plant-based sources of packaging materials that are now on the market.

Proposed changes:

Standards	Guidance
<p>SA GB 5.16.6 Non-GM packaging</p> <p>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</p>	<p>You must seek non-GM sources of packaging materials. This applies to all materials derived from plant-based sources, including:</p> <ul style="list-style-type: none"> - polylactic acid (PLA) - <u>polyhydroxyalkanoates (PHA)</u>

alternative materials are ~~functionally unsuitable or~~ not available, ~~or not possible to verify~~ as indicated in the guidance section of this standard.

Soil Association higher standard

- polybutylene succinate (PBS)
- different starch blends.

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

Adequate demonstration of non-GM for packaging materials includes:

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

~~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 Ass Certification Committee on an annual basis.~~

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

- glues.
- labels.
- inks and dyes applied to packaging products. and
- enzymes used in the packaging manufacturing process. In this event, you will be given up to one year to find a suitable alternative.

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
<p style="text-align: center;">Why?</p> <p>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. <u>Considering the increased global demand for plant-based plastic materials and future projections for growth in the sector, there is a risk that packaging may become a significant driver of GM agriculture.</u></p>	

Proposed new standards:

Below we outline four newly proposed standards and associated guidance for consideration. To give your feedback on these changes please visit our consultation <https://soilassociation.typeform.com/packaging> or for further detailed feedback write to standards@soilassociation.org.

<p>SA GB 5.16.# Paper, card and wood-pulp packaging products</p> <p><u>Any paper, card and pulp packaging materials from forest ecosystems must be sourced responsibly.</u></p> <p style="text-align: right;"><i>Soil Association higher standard</i></p>	<p><u>Adequate evidence of compliance with this standard is demonstration that packaging products carry certification from Forest Stewardship Council (FSC) or the Programme for the Endorsement of Forest Certification (PEFC).</u></p> <p><u>When using recycled paper/card material your packaging must be compliant with the approved certification schemes from PEFC or FSC, for example for FSC these include 'FSC Mix' and 'FSC Recycled' labels.</u></p> <p><u>There are multiple options for licensees to pursue to ensure that their packaging products are supporting responsible forest management, you can:</u></p> <ol style="list-style-type: none"> <u>1. choose certified packaging products from suppliers and demonstrate this with an invoice for the products which includes a valid FSC or PEFC claim.</u> <u>2. obtain chain of custody certification, this can include group certification (suitable for small businesses).</u> <u>3. get a promotional license to make marketing claims about FSC or PEFC labelled packaging products.</u> <p><u>More information on chain of custody certification can be found here.</u></p>
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	<p>This restriction applies to other forest products, which are often termed <u>non-timber forest products</u>. For packaging, these primarily include products such as bamboo, cork and rubber when sourced from a forest ecosystem.</p> <p>This requirement does not apply when paper/card is derived from outside of forest ecosystems, this can include from agricultural wastes and grasses such as miscanthus.</p>
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Why?

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

<p>SA GB 5.16.# Oxo-degradable plastics <u>You must not use oxo-degradable plastics.</u> <i>Soil Association higher standard</i></p>	<p>Demonstrate that you have not used these materials, for example by having written confirmation from your supplier.</p>
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Why?

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

Standards	Guidance
<p>SA GB 5.16.# Polystyrene <u>You must not use polystyrene plastics in primary packaging materials.</u> <i>Soil Association higher standard</i></p>	<p>Demonstrate that you have not used these materials, for example by having written confirmation from your supplier.</p> <p>This restriction includes all types of polystyrene plastics, these include Expanded Polystyrene (EPS) and Extruded polystyrene (XPS). They are defined as Type 6 plastics (PS) and can be in rigid form as well as the more common expanded foam.</p> <p>This restriction is limited to primary product packaging, that is packaging contained in a single sales unit to customers. It does not apply to polystyrene used in a business-to-business supply chain where there is greater opportunity for reuse and recycling. For more information on what constitutes primary packaging see Defra definitions of packaging class data.</p> <p>We will keep this restriction under review on an annual basis.</p>

Why?

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

Standards	Guidance
SA GB 5.16.# PFAS (Per- and poly-fluorinated alkyl substances) <u>You must not use per- and poly-fluorinated alkyl (PFAS) chemical substances in your packaging products.</u> <i>Soil Association higher standard</i>	<u>If you use the following materials:</u> <ul style="list-style-type: none">- <u>greaseproof or water-resistant paper packaging (e.g. bread / pastry bags).</u>- <u>baking paper or cake cases.</u>- <u>takeaway pizza boxes and card clamshells.</u>- <u>butter and cheese papers.</u>- <u>biscuit, sweet, popcorn and chocolate paper packaging.</u> <u>Then you will need to demonstrate that your products have not used PFAS chemicals in their manufacture.</u> <u>There are PFAS-free market ready alternatives to all these applications and/or opportunities to consider reusable or removal options. For alternatives, please review the ChemSec marketplace.</u>
<h3><u>Why?</u></h3> <p><u>PFAS are a group of chemicals known as 'forever chemicals' because they are extremely persistent in the environment. PFAS have been shown to disrupt hormone systems in animals and are classed as endocrine disruptors, studies have shown links between PFAS exposure and a wide range of human health concerns including cancer, immune system disorders and fertility problems.</u></p>	