

## Soil Association Organic Standards for Northern Ireland Summary of standards changes – document updated 21 March 2024

Key to text changes: (strikethrough = delete; underlined = new wording; normal text = no change)

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## Updates made across all Organic and Soil Association Organic standards

#### 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.

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

Please refer to the labelling sections 5.8 and 5.10 for more information on labelling requirements.

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

#### SA NI 5.8.6 Using the EU organic logo

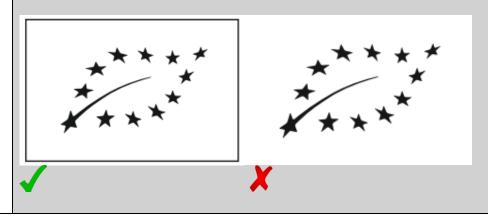
- 1. You must display the EU logo on labels of pre-packaged organic products produced in Northern Ireland or the EU.
- 2. Use of the EU logo is optional on product labelled in a third country.
- 3. The EU logo is published for use in green as shown below. The reference for single colour printing is Pantone 376, or if you print using four colour process, 50% cyan, 100% yellow.



The use of the logo is mandatory for all organic pre-packaged food produced within Northern Ireland or the European Union. The terms of its use are set by the EU and more information can be found online.

You can download the EU logo in various formats from here.

The white EU logo with the black stars is designed to be used on a dark background only. When the EU logo is used it must appear within a box or a black outline.





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 on coloured backgrounds.
- 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,

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.

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



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)

#### 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.
- 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.

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, 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.



#### Soil Association higher standard

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 should be to 0.1% or lower\* and not just to 0.9%.

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

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.

### SA NI 5.12.1 Cleaning measures

- 1. You must have suitable cleaning measures in place to avoid contamination and maintain the integrity of your products throughout production, processing, and storage.
- 2. You must monitor your cleaning measures to make sure they are effective, adjusting measures where appropriate, and keep records to show that you have done this.
- 3. If you process or store both non-organic and organic at the same site, you must ensure organic processing or storage is only carried out once suitable cleaning of the equipment and/or storage area(s) has been carried out.

(EC) 2018/848 Art. 28 (EC) 2018/848 Annex II Part IV (1.2, 1.4, 1.5) (EC) Annex III (7.4)(c)

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.

You will need to ensure your staff, or contractors using their own equipment, are trained to carry out effective cleaning to prevent contamination of your organic products.

Your cleaning procedures need to be clear and need to set out what will be cleaned, how, with what frequency (e.g. daily, weekly, monthly or annually), who is responsible, what chemicals and equipment needs to be used and details of the final rinse of food contact surfaces with potable water (where appropriate).

Even if you do not produce organic, for example, if you just wholesale or transport, cleaning is still important to minimise the risk of contamination. For example, loading equipment and vehicles need to be cleaned and the risk of contamination minimised.

Records of cleaning measures

## Cleaning chemicals

Detergents, disinfectants, sterilants and sanitisers allowed for use in the food industry may be used for cleaning equipment and storage areas. Residues of these chemicals must be removed from surfaces in contact with organic food so that they do not contaminate organic products, by carrying out a final rinse with potable water.



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

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

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

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

QACs are used throughout the supply chain including farms. If you are a farm you should consider all areas where you use QACs, and ensure you have measures in place to prevent contamination of your organic product. This includes harvesting equipment, milking equipment, vats, bulk tanks, meat processing areas, veg packing areas or any other equipment or surfaces that come into contact with your organic product. If you are unsure if your cleaning product contains QACs speak to your cleaning supplier or review the technical data sheet for the product.



If you use alcohol wipes, swabs or sprays, be aware that some may leave a residue after the alcohol has evaporated. Most contain other substances such as surfactants, sanitisers and emollients. These must not be used on product contact surfaces without rinsing them off because they may leave a residue. You may use denatured alcohol (e.g. isopropanol, methanol or ethanol) without rinsing, providing sufficient time is given for the alcohol to evaporate before surfaces come into contact with organic product.

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

Use of chlorine based and chlorate containing disinfectants, (e.g. sodium hypochlorite, sodium hydroxide/sodium hypochlorite, sodium hydroxide), can lead to residues in organic product. When used on product contact surfaces a potable water rinse must be carried out after use of these cleaning products. There appears to be a higher risk of contamination when used in milk processing and farm dairies. Testing of the raw milk will not usually detect chlorate, but it may be detected in further processed product such as powdered milk. This can be an issue for vulnerable consumers, such as infants and babies, and the legal maximum residue limits are for set infants and babies at 0.01%. Dairy farms and dairy processors may wish to consider alternatives to chlorine based and chlorate containing disinfectants to reduce the risk of contamination.

## Non-dedicated equipment

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



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

Other methods of cleaning than those outlined above may be accepted, you would need to demonstrate how the alternative method would remove residues of non-organic product. You will need to provide this information to the certification team for approval.

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 2026.

## Updates made across all Soil Association Organic Packaging standards

## SA GB 5.16 Packaging

## Standards SA GB 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.

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

#### Guidance



## Packaging legislation

This standard applies to products you process, pack or label, (including on farm), or have contract made for you, (including if you're a 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.

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:

- 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 (94/62/EC).</u>



- Soil Association higher standard 3. the <u>European Standard for Compostable Packaging (EN13432)</u> if you are using compostable or biodegradable packaging.
  - 4. applicable legality legislation for cellulose based materials, this means the UK Timber Regulations, in GB, and the EU Deforestation Regulations, in Northern Ireland and the EU.

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

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

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.

## Why?

The production, use and disposal of packaging can have a big impact on the environment and human health. We believe that organic products should be packaged in ways that reduce the negative impacts of packaging. This fits with the principles of protecting the environment and biodiversity that underpin organic food and farming and meets consumer expectations of organic products.

Packaging serves an important role in preventing food waste by protecting and extending the shelf life of products. It also helps to protect consumers by preventing contamination and substitution of organic products with non-organic alternatives. These packaging standards aim to maximise the benefits and avoid the negative impacts of packaging.



Standards	Guidance
SA GB 5.16.2 Cellulose-based materials Chlorine bleached paper or cardboard  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 your packaging products have not used these-chlorine-based processes in manufacture, for example with a packaging specification for all materials used kept on file. 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.

Standards	Guidance
SA GB 5.16.3 Aluminium foils	Demonstrate that you have not used these materials, for example by having written
You must <b>not</b> use unlacquered aluminium foils to package food which	confirmation from your supplier.
is acidic (with a pH less than or equal to 4.5) or salty (containing more	
than 2% salt).	
Soil Association higher standard	
	Why?
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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.

Standards	Guidance
SA GB 5.16.3 Paper, card and wood-pulp packaging	Adequate evidence of compliance with this standard is demonstration that
	packaging products carry certification from Forest Stewardship Council (FSC) or
Any paper, card and pulp packaging materials from forest	the Programme for the Endorsement of Forest Certification (PEFC).
	This can be done with an invoice for the products including a valid chain of
Soil Association higher standard	custody claim from FSC or PEFC. Licensees can:
	• source products which carry source FSC or PEFC certification from



## \* This standard comes into effect from September 2025

#### suppliers,

- obtain an independent FSC or PEFC chain of custody certificate,
- establish FSC or PEFC group certification with other businesses (suitable for small businesses).

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

This requirement does not apply when paper/card is derived from outside of forest ecosystems, this can include from agricultural wastes and grasses such as miscanthus.

To allow licensees to use up existing stock and source compliant products, this standard will be enforced from September 2025, but licensees should look to source compliant products at the earliest opportunity.

## 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.

Standards	Guidance
SA GB 5.16.4 Plastic materials, coatings, dyes or inks	Demonstrate that you have not used these materials, for example with a
containing phthalates*	packaging specification for all materials used kept on file. by having written
You must <b>not</b> use plastic materials, coatings, dyes or inks	confirmation from your supplier



that contain phthalates. if they will be in direct contact with foodstuffs.

Soil Association higher standard

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

To avoid phthalates in packaging materials we recommend:

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

## Why?

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

#### Standards

SA GB 5.16.5 PVC and other chlorinated plastics\* You must **not** use polyvinyl chloride (PVC) or any other chlorinated plastics unless alternative materials are not available or are functionally unsuitable, as listed in the guidance section of this standard.

Soil Association higher standard

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

#### Guidance

Demonstrate that you have not used these materials, for example with a packaging specification for all materials used kept on file. by having written confirmation from your supplier

This restriction applies to all chlorinated plastics which includes:

- polyvinyl chloride (PVC)
- polyvinylidene chloride (PVdC) (applied from September 2025)
- <u>vinyl chloride</u>

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

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.



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

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

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

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

The Soil Association Packaging Working group will review this list on a regular basis.

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.

## Why?

The production, use and disposal of PVC are associated with a range of environmental and human health issues. PVC often contains additives which are added to improve flexibility and plasticity, including phthalates. PVC can also contain other toxic substances such as chlorinated paraffins, organic tin compounds and alkyl phenols. Chlorinated plastic materials are very difficult to recycle and can act as a contaminant when added to other plastic recycling systems, rendering output materials unfit for use. Chlorinated plastic materials can also have corrosive effects on recycling machinery.

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

Standards	Guidance
SA GB 5.16.6 Non-GM packaging	You must seek non-GM sources of packaging materials. This applies to all
You must <b>not</b> use packaging materials or substances that	materials derived from plant-based sources, including:
contain, have been derived from, or manufactured using	polylactic acid (PLA)



genetically modified organisms or genetically engineered enzymes, unless 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

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

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

Adequate demonstration of non-GM for packaging materials includes:

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

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

- glues,
- labels,
- inks and dyes applied to packaging products,
- biodegradable coatings,
- lids containing epoxydised soybean oil (ESBO),
- starch used in paperboard manufacture, and,
- enzymes used in the packaging manufacturing process.

This standard also applies to cotton teabag strings. Using organic teabag strings means you automatically meet the requirements of this standard. If your tea bag strings are non-organic you will need to provide details of the country of origin of



the cotton used in them, and/or an IP certificate to prove they are not made with genetically modified cotton.

Polylactic 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 Ass Certification Committee on an annual basis.

## Why?

Genetic modification is counter to the principles and practice of organic food and farming and does not meet consumer expectation of organic products. Whilst most packaging derived from GM materials no longer contain GM DNA, they are still derived from raw materials which have been genetically modified. Considering the increased global demand for plant-based plastic materials and future projections for growth in the sector, there is a risk that packaging may become a significant driver of GM agriculture.

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## SA GB 5.16.7 BPA and other bisphenols in food-contact materials

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

Soil Association higher standard

#### Guidance

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

Bisphenol A (BPA) is a chemical found in some plastics and used in the manufacture of epoxy resins. It is commonly found in the linings of some food and



beverage cans. Alternatives to BPA include epoxy-phenolic, modified polyester and acrylic.

The wording 'intentionally use' refers to the fact that some materials are classified as BPA-NI, where "NI" stands for 'non-intentional'. This classification means that although there is no BPA added as a constituent of a lacquer, BPA may be present in the pipework, raw material packaging, processing equipment etc. and small amounts may be picked up by the finished product during production. Although you should avoid them where possible, you can still use BPA-NI materials for the time being. We will monitor the situation with BPA-NI materials with a view to totally eradicating BPA from all food contact materials in due course.

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

## Why?

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

Standards	Guidance
SA GB 5.16.8 Oxo-degradable Plastics*	Demonstrate that you have not used these materials, for example with a packaging
You must <b>not</b> use oxo-degradable plastics.	specification for all materials used kept on file.
<u>Soil Association higher standard</u>	
* This standard course into offeet from Courtember 2005	Oxo-degradable plastics are not bio-based or compostable plastics; they are conventional plastics with 'pro-degradant' additives that accelerate the
* This standard comes into effect from September 2025	fragmentation process. To avoid oxo-degradable packaging products we
	recommend:
	<ul> <li>use of recyclable plastic formats such as LDPE, or,</li> </ul>
	<ul> <li>use of certified compostable plastics (see 'Packaging Scope' for more</li> </ul>
	guidance)



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

To allow licensees to source compliant products, this standard will be enforced from September 2025, but licensees should look to source compliant products at the earliest opportunity.

#### 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
SA GB 5.16.9 Polystyrene*	Demonstrate that you have not used these materials, for example with a packaging
You must not use polystyrene plastics in primary	specification for all materials used kept on file.
packaging materials.	
<u>Soil Association higher standard</u>	
	Polystyrene (EPS) and Extruded polystyrene (XPS). They are defined as Type 6
* This standard comes into effect from Sentember 2025	plastics (PS) and can be in rigid or film forms as well as the more common expanded foam.
* This standard comes into effect from September 2025	expanded roam.
	This restriction is limited to primary product packaging, that is packaging
	contained in a single sales unit to customers. It does not apply to polystyrene used
	in a business-to-business supply chain where there is greater opportunity for reuse
	and recycling. For more information on what constitutes primary packaging see
	Defra definitions of packaging class data.
	We will keep the scope of this restriction under review on an annual basis.
	The Will Reap the Scope of this restriction affect feview of turn and basis.
	To allow licensees to source compliant products, this standard will be enforced
	from September 2025, but licensees should look to source compliant products at
	the earliest opportunity.
	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 5.16.10 PFAS (Per- and polyfluoroalkyl substances)* You must not use per- and polyfluoroalkyl (PFAS) chemical substances in your packaging products.  Soil Association higher standard  * This standard comes into effect from September 2025	Demonstrate that your products have not used PFAS chemicals in their manufacture, for example with a packaging specification for all materials used kept on file, if you use the following materials:  • greaseproof or water-resistant paper packaging (e.g., bread / pastry bags),  • baking paper or cake cases,  • takeaway pizza boxes and card clamshells,  • butter and cheese papers,
	There are PFAS-free market ready alternatives to all these applications and/or opportunities to consider reusable or removal options. For alternatives, please review the ChemSec marketplace.  To allow licensees to source compliant products, this standard will be enforced from September 2025, but licensees should look to source compliant products at the earliest opportunity.
	Why?

<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>



# Update(s) made to Organic Food and Drink and Soil Association Organic Food and Drinks standards

#### SA NI 6.6.1 Non-organic agricultural ingredients

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 31 December 2023):

#### Edible fruits, nuts and seeds:

- 1. acorns (Quercus species)
- 2. cola nuts (Cola acuminata)
- 3. gooseberries (Ribes uva-crispa)
- 4. passion fruit also known as maracujas (*Passiflora* edulis)
- 5.—dried raspberries (Rubus idaeus)
- 6. dried redcurrants (Ribes rubrum).

#### Edible spices and herbs:

- 1. Peruvian pepper (Schinus molle L.)
- 2.—horseradish seeds (Armoracia rusticana)
- 3.—lesser galanga (Alpina officinarum)
- 4. safflower flowers (Carthamus tinctorius)
- 5. watercress (Nasturtium officinale).

Algae, including seaweeds, which are allowed as food ingredients.

Sugars, starches and other products from cereals and tubers:

1—fructose

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.



- 2. 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 1<sup>st</sup> 2024, you can **only** use the following products in non-organic form in your organic products:

 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

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



## Update(s) made to Organic Feed and Soil Association Organic Feed standards

## SA NI 9.1.8 Use of non-organic protein for pigs and poultry

- 1. Where the competent authority has confirmed organic protein feed is not available in sufficient quantity, for pigs up to 35kg and young poultry, you may feed up to 5% non-organic protein feed.
- 2. This percentage must be calculated per period of 12 months on the dry matter of feed of agricultural origin.
- 3. At your inspection you must have records to demonstrate that you have not fed more than 5% non-organic protein feed.
- 4. This exemption will be in place until 23 February 2025.

(EC) 2018/848 Annex II Part II (1.9.3) (1.9.4)

If you are using a feed that is certified as suitable for organic production and it contains some non-organic ingredients, the feed mill will already have demonstrated that organic ingredients are not available. If you are mixing or blending your own feeds then you must demonstrate that suitable organic ingredients are not available.



Feed records

Once we hear from the EU Commission on this exemption we will update this page.



## Update(s) made to Sourcing Organic Ingredients Annex

# 5.4 Number of birds permitted in each house

Linked to SA GB 3.12.2 & SA NI 3.12.2

The number of birds in a poultry house must not exceed:

- 32000 for laying hens, unless the poultry production is certified to a scheme the Soil
   Association recognises for independent welfare outcome assessment: in which case the number of birds in a house may reach, but not exceed, 3000 birds.
- ii. or 1000 for other poultry species.

Guidance: Organic poultry production in GB meets the sourcing requirement for laying hens.

Different requirements apply for some specialist egg ingredients, see endnoteError! Bookmark not defined..

**Reason**: Flock size is limited to help ensure consistently high levels of animal welfare.

The Soil Association recognises the following scheme's independent welfare outcome assessment for laying birds: RSPCA Assured.

The Soil Association has developed rigorous welfare outcome assessments for farm animals. These assessments are now part of all Soil Association and RSPCA Assured farm assessments for laying hens. They provide an additional safeguard to ensure that measures in place at the farm result in good animal welfare. Further information is available on the Assurewel website.

## Addition(s) made to the Standards Glossary

Poultry house

a fixed or mobile building for accommodating flocks of poultry, which includes all surfaces covered by roofs, including a veranda. The house may be subdivided into separate compartments, each accommodating a single flock, these must be separated by solid partitions; each flock must have access to separate air space, ventilation, feed, water and outside range area.

Ends