

Soil Association Food & Drink Packaging Guide

Contents

Why does the Soil Association have higher standards for packaging?.....	1
When do I need to comply with the packaging standards?	2
When does existing packaging need to comply with the new standards?.....	2
What packaging information do I need to submit?.....	3
What materials are covered by the standards and what supporting evidence is needed?.....	3
Supporting evidence: Paper, card, and wood-pulp packaging	6
Supporting evidence: Non-GM packaging.....	6
• Non-GMO Project certification.....	7
• PCR or IP testing results for the raw materials	7
What if I cannot meet the packaging requirements?	8
Can the Soil Association recommend any compliant packaging suppliers?..	8
Where does the Soil Association stand on recyclability of packaging?	8

Why does the Soil Association have higher standards for packaging?

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 a way that reduces 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.

As baseline GB and EU organic regulations do not contain any restrictions surrounding packaging the Soil Association have introduced higher standards which must be met for products that are certified to the SA higher standard.

Our higher standards aim to minimise the human health and environmental impacts from a range of substances commonly used in the packaging of organic products.

You can view the requirements of the SA higher packaging standards in section 5.16 of the [GB standards](#) or [NI standards](#).

When do I need to comply with the packaging standards?

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

The standards apply to products you process, pack or label, (including on farm), or have contract made for you, (including contracted symbol users).

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. The packaging standards also do not apply where you reuse supplier packaging for direct consumer packaging e.g. a box scheme reusing supplier boxes that organic product was delivered in.

You must submit packaging information if you are certifying your product to the Soil Association higher standard and introduce any primary, secondary, and tertiary packaging into the supply chain.

If you are requesting that your product be listed on a Soil Association standard licence but you buy and sell an already retail packed product and do not introduce any extra packaging into the supply chain, then you do not need to provide packaging information.

When does packaging need to comply with the new standards?

We updated the packaging standard requirements in March 2024. The table below identifies which are new requirements. These come into effect from 1st September 2025.

Please note the following:

- Packaging stock purchased prior to September 2025 may be used until stocks are exhausted.
- All packaging ordered from September 2025 must be compliant with the new standards.

What packaging information do I need to submit?

From September 2025, the packaging for each product submitted for approval to the SA standards must be reviewed for compliance with the updated standards. Please submit:

- A new [Soil Association Packaging Form EFM-1232](#)
- Specification which details the material used for all components, including label material and ink or dye for any printed items
- Supporting evidence as indicated in the table below

We will review the packaging for compliance with the updated standards.

The packaging materials covered by the standards are listed in the table below, with details of any supporting evidence required.

You will also need to keep copies of the approved SA Packaging Form, your packaging specifications, and any supporting information on file to be checked at your inspection. Supporting information must be dated within the last 12 months while the packaging continues to be purchased.

What materials are covered by the standards and what supporting evidence is needed?

To evaluate new packaging, we require a specification which details the material used for all components, including label material and ink or dye for any printed items. This information will enable us to verify the absence of prohibited substances.

In some areas there is further evidence needed to confirm that your packaging complies with the standards. This is indicated in the table below. New or updated standards are indicated with an asterisk.

For further details on each material, refer to the relevant section in the standards.

Packaging material	Standard restrictions	Supporting evidence
Chlorine bleached paper or cardboard Standard 5.16.2 GB SA Standards NI SA standards	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).	If white paper or cardboard are used, the manufacturer's specification must state that it is totally chlorine free (TCF) or elemental chlorine free (ECF), or for recycled paper process chlorine free (PCF), or, you must have a statement from your supplier to confirm this.
*Paper, card, and wood-pulp packaging Standard 5.16.3 GB SA Standards NI SA standards	From September 2025 , (see above for further detail on implementation deadlines) you must be able to demonstrate that any paper, card, and pulp packaging materials sourced from a forest ecosystem carry Forest Stewardship Council (FSC) certification or the Programme for the Endorsement of Forest Certification (PEFC).	Further evidence needed – see here for details
Plastic materials, coatings, dyes or inks containing phthalates Standard 5.16.4 GB SA Standards NI SA standards	You must not use any plastic materials, coatings, dyes or inks that contain phthalates. *This has been expanded to cover all packaging materials, not just those in contact with the food, from September 2025. See above for further detail on implementation deadlines.	If using any plastic material, or any materials that include coatings, dyes or inks, you must have a statement from your supplier confirming that they are free from phthalates. PE, PET, LDPE and HDPE do not require phthalates for plasticity, so if you are using one of these materials no further evidence is required.
PVC and other chlorinated plastics Standard 5.16.5 GB SA Standards NI SA Standards	The use of Polyvinyl chloride (PVC) and any other chlorinated plastics (eg. PVdC*) packaging is not permitted unless your packaging meets the exemptions laid out in standard 5.16.5 GB SA Standards NI SA Standards , where there are no functional alternatives available. *PVdC will no longer be permitted from September 2025. See above for further detail on implementation deadlines.	If using any plastic material, the manufacturer's specification must not identify any of the components as PVC or any other chlorinated plastic.

Non-GM packaging Standard 5.16.6 GB SA Standards NI SA standards	If you are using packaging materials derived from plant-based sources you must provide evidence that these have not been derived from or manufactured using genetically modified organisms.	Further evidence needed – see here for details
BPA and other bisphenols in food-contact materials Standard 5.16.7 GB SA Standards NI SA standards	You must not intentionally use BPA or other bisphenols in your food contact materials.	If using a can or tin, the manufacturer's specification must state that the lining is BPA-free, or BPA-NI, or you must have a statement from your supplier to confirm this.
*Oxo-degradable plastics Standard 5.16.8 GB SA Standards NI SA standards	From September 2025 you must not use oxo-degradable plastics. See above for further detail on implementation deadlines.	If using any plastic material, the manufacturer's specification must not describe it as oxo-degradable, or any of the following terms: oxo-biodegradable, photo/thermo-degradable, oxo-fragmentable or pro-oxidant additive containing plastics.
*Polystyrene Standard 5.16.9 GB SA Standards NI SA standards	From September 2025 you must not use polystyrene in primary packaging materials. See above for further detail on implementation deadlines.	If using any plastic material, the manufacturer's specification must not identify any of the primary packaging components as polystyrene. Expanded polystyrene is one material to be aware of, pots used for packaging dairy can also be a risk. Polystyrene can be identified by the recycling code 6.
*PFAS (Per- and polyfluoroalkyl substances) Standard 5.16.10 GB SA Standards NI SA standards	From September 2025 you must not use per- and polyfluoroalkyl (PFAS) chemical substances in your packaging products. See guidance in the Standards for a list of materials at risk of containing PFAS. See above for further detail on implementation deadlines.	If you are using any of the following materials you must have a statement from your supplier to confirm that they are PFAS-free: 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.

Supporting evidence: Paper, card, and wood-pulp packaging

From **September 2025** you must be able to demonstrate that your supplier of any paper, card, and pulp packaging materials sourced from a forest ecosystem carry Forest Stewardship Council (FSC) certification or the Programme for the Endorsement of Forest Certification (PEFC).

To evidence this you must submit your supplier's FSC or PEFC certificate. If you are purchasing from an agent or printer, they must also have FSC or PEFC certification.

Once your packaging is approved you must ensure that the invoices for paper, card and wood-pulp products you purchase include a valid chain of custody claim from FSC or PEFC. The supplier's invoice/delivery note should make clear which products the FSC certification applies to.

The chain of custody claims that FSC allow are:
FSC 100%; FSC Mix X%; FSC Recycled X%; FSC Mixed Credit; FSC Recycled Credit.

The chain of custody claims that PEFC allow are:
X% PEFC certified; PEFC controlled sources; 100% PEFC Origin

Options for certification are:

- Source products which carry FSC or PEFC source certification from suppliers,
- obtain an independent FSC or PEFC chain of custody certificate,
- establish [FSC](#) or [PEFC](#) group certification with other businesses (suitable for small businesses).

If you are using recycled paper/card you must demonstrate it is compliant with the approved certification schemes from PEFC or FSC, for example for FSC these include 'FSC Mix' and 'FSC Recycled' labels.

For further details refer to standard 5.16.3 [GB SA Standards](#) [NI SA standards](#)

Supporting evidence: Non-GM packaging

Packaging materials made from plant-based sources present a risk of being derived from or manufactured using genetically modified organisms, for example compostable or biodegradable biopolymers are often made from natural sugar sources derived from GM risk crops such as sugar cane and maize. This applies to all materials derived from plant-based sources, including:

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

If you are using packaging materials derived from non-organic plant-based sources*, and your supplier has Non-GMO Project certification covering the packaging, or PCR or IP testing for the raw materials, please provide this information. If you do not have this information, follow the steps below.

*Some plant-based packaging components are exempt from this standard as it is not technically possible to verify their non-GM status.

For the list of exemptions please refer to standard 5.16.6 [GB standards](#) [NI Standards](#)

Step 1: Ask your supplier what the source crop is for your packaging material and submit their response to us.



Step 2: We will review whether the source crop is a high GM-risk. If the crop is high-risk, you will need to ask your supplier what country the crop was produced in and submit their response to us.



Step 3: This will be reviewed by us and if the source crop and country present a high GM risk you will be asked to provide additional evidence to confirm the crop's non-GM status.



Adequate evidence includes:

- **Non-GMO Project certification**

We accept packaging certified to the Non-GMO Project Standard. You can view more details on the standard [here](#). Adequate evidence would be a valid Non-GMO Project certificate for the packaging you are using.

- **PCR or IP testing results for the raw materials**

You can request a PCR or IP testing certificate for the high GM risk crop from your supplier. To be accepted by SA the certificate must be dated in the last 12 months.

PCR Testing

PCR Testing provides DNA analysis of crops to confirm there has been no adulteration with GM materials. Testing can be done to different levels of precision. To meet SA standards the precision testing level must be 0.1%.

IP Testing

IP certification provides non-GM verification throughout the supply chain. There are a range of IP certifiers. You can request the IP certification from your supplier.

Please note you must keep this supporting evidence on file to be checked at your inspection. It must be dated in the last 12 months to be valid, so please request new evidence on an annual basis.

For further details refer to standard 5.16.6 [GB SA Standards](#) [NI SA standards](#)

What if I cannot meet the packaging requirements?

In this case, the Soil Association symbol must not be used on the pack. However, we can certify the product to the GB baseline standards, (or EU regulation for NI operators), which do not include any standards around packaging.

Can the Soil Association recommend any compliant packaging suppliers?

We do not currently hold a database of verified packaging products, but this is a resource we are working to develop.

Where does the Soil Association stand on recyclability of packaging?

We encourage businesses to use simpler, more sustainable and more recyclable packaging, where packaging is necessary. You can read [our packaging priorities here](#).

Our standards are designed to have longevity and in the packaging sector whether something is considered 'recyclable' or 'non-recyclable' is quite dynamic. These terms are dependent on regulation (which differs across the nations of the UK) and local authority application of them.

As well as this, whether something is recyclable or not depends on the market for recycled materials which is constantly changing and dependent upon the value of a given product, supply of that material etc. For example, polystyrene is widely recycled in many countries across the EU, however given that the end product has such a low value there are no recycling facilities at scale in the UK.