

## **Contents**

Introduction	3
Guide to using these standards	4
5.0 General standards for organic food and drink	6
5.1 Scope	6
5.2 Principles	7
5.3 Becoming Soil Association certified	8
5.4 Your obligations when certified	11
5.5 Inspections	14
5.6 Non-compliance with the standards	16
5.7 Record keeping	18
5.8 General labelling	20
5.9 Making claims on your labels	31
5.10 Labelling in specific scenarios	33
5.11 Preserving organic integrity	35
5.12 Cleaning	39
5.13 Pest control	42
5.14 Transport, dispatch and receipt of goods	46
5.15 Storage of products	48
5.16 Packaging	49
6.0 Specific standards for food and drink	54
6.1 General manufacturing	54
6.2 Specific processing requirements	56
6.3 General composition	58
6.4 Additives	61
6.5 Processing aids	66
6.6 Other ingredients	69
6.7 Derogations	76
6.8 Importing	78
6.9 Organic wine	86
6.10 Products and ingredients certified to other organic standards	93

## Introduction

The Soil Association standards put the principles of organic production into practice. These organic standards encompass *EU Regulations* 834/2007, 889/2008 and 1235/2008 (referenced throughout as the EU Organic Regulation). These regulations are the legal basis for the control of organic farming and food processing in Europe and regulate how the word 'organic' can be used.

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 the UK the competent authority is usually Defra or one of its devolved agencies who have delegated some controls to accredited organic certification bodies. 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
- <u>cosmetics</u>

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. 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.

#### **EXAMPLE Standards EXAMPLE Guidance** You will need to demonstrate that the water you use is potable. Potable water 6.6.6 Water is defined by the *EU Drinking Water Directive (98/83/EC)*. In the UK, this is Water that you use as an ingredient must be potable (fit for transposed into The Water Supply (Water Quality) Regulations 2016. drinking). (EC) 889/2008 Art. 27(1e) 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. The relevant part of the EU The R symbol shows which records you need to keep to Organic Regulation is demonstrate that you meet referenced here this standard

## **EXAMPLE Standards**

## 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.

maximise the benefits and avoid the negative impacts of packaging.

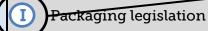
Soil Association higher standard

The production, use and disposal of packaging can have a big impact on the environm

should be packaged in ways that reduce the negative impacts of packaging. This fits w 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

**EXAMPLE** Guidance



The I symbol shows where additional relevant information is provided

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:

- 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.

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*.

Soil Association higher standards are clearly shown.

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

brganic products onment and

# 5.0 General standards for organic food and drink 5.1 Scope

Standards	Guidance
5.1.1 Scope of the standards	If you are unsure whether the activity you are carrying out requires
1. The standards in this document set out the rules that must	certification, please <u>contact us</u> .
apply for all stages of production, preparation and	
distribution in order for products to be labelled and	For standards regarding crop production (including wild harvesting), livestock
marketed as organic. These food and drink organic	husbandry (including beekeeping), please refer to the Farming and Growing
standards cover:	standards on our <u>website</u> .
<ul> <li>a) processing or re-processing and labelling or re- labelling of food, seed and livestock feeds;</li> </ul>	For requirements regarding Aquaculture and Seaweed see here.
b) importing products from outside the EU, including	1 of requirements regularing requirements and ocaweed <u>occ reste.</u>
ensuring equivalence to production within the EU; and	For requirements regarding livestock feed, please refer to the Feed Processing
c) exporting organic products.	standards on our <u>website.</u>
2. You must comply with these organic standards if you are	
involved in activities at any stage in the production,	
processing, preparation and distribution of organic	The scope of these standards does not include catering.
products.	
(EC) 834/2007 Art. 1(1)(2)(3); Art. 8; Art. 28	
(EC) 889/2008 Art. 1(1); Art. 80	
5.1.2 Products from hunting and fishing of wild	
animals  Draducts from the hunting and fishing of wild enimals	
Products from the hunting and fishing of wild animals	
cannot be sold as organic. (EC) 834/2007 Art. 1(2)	
(LC) 037/2007 III. I(Z)	

## **5.2 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	Guidance
5.2.1 General principles of organic production	
1. To produce food of high quality and in sufficient	
quantity by the use of processes that do not harm the	
environment, human health, plant health or animal	
health and welfare.	
2. To work within natural systems and cycles at all levels,	
from the soil to plants and animals.	
3. To maintain the long term fertility and biological activity	
of soils.	
4. To treat livestock ethically, meeting their species-	
specific physiological and behavioural needs.	
5. To respect regional, environmental, climatic and	
geographic differences and the appropriate practices that	
have evolved in response to them.	
6. To maximise the use of renewable resources and	
recycling.	
7. To design and manage organic systems which make the best use of natural resources and ecology to prevent the	
need for external inputs. Where this fails or where	
external inputs are required, the use of external inputs is	
limited to organic, natural or naturally-derived	
substances.	
8. To limit the use of chemically synthesised inputs to	
situations where appropriate alternative management	
practices do not exist, or natural or organic inputs are	
not available, or where alternative inputs would	
contribute to unacceptable environmental impacts.	

- 9. To exclude the use of soluble mineral fertilisers.
- 10. To foster biodiversity and protect sensitive habitats and landscape features.
- 11. To minimise pollution and waste.
- 12. To use preventative and precautionary measures and risk assessment when appropriate.
- 13. To exclude the use of GMOs and products produced from or by GMOs with the exception of veterinary medicinal products.
- 14. To sustainably use products from fisheries.

(EC) 834/2007 Art. 3; Art. 4

## 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.

#### **Standards**

## **5.3.1 Certifying your business**

To become certified to these organic standards you must have a certification contract with an independent, accredited certification body and comply with all relevant organic standards for your organic activity.

(EC) 834/2007 Art. 27(1)(4); Art. 28(1)

#### Guidance

Businesses across the world can become certified to the Soil Association standards. In the UK, Defra is the competent authority and has delegated some control tasks to accredited organic certification bodies. 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.

In the EU, businesses can only become certified to the Soil Association standards if they are already certified to the EU Organic Regulation by another approved certification body in the country their business is registered and operating in. We can only act as the second certifier.

Additionally, Soil Association Certification is accredited by <u>IOAS</u> (International Organic Accreditation Service) and authorised to offer organic certification in specific countries outside the EU for certain types of products. Please contact Soil Association Certification for more details.

## 5.3.2 Activities that require certification

- 1. In the EU all stages of the organic supply chain must hold organic certification.
- Your business must be certified if you produce, process, package, store, label, import or export, include wholesaling, storage and warehousing, acting as the first consignee for imported products and any other activities that require the physical or financial ownership of organic products or ingredients.
- 3. In the UK you do not need certification if you only sell organic products directly to the final consumer or user provided that you do not produce, prepare, store organic products other than in relation to the point of sale or import such products from outside the EU or have not contracted out such activities. In other EU countries certification may be required for these activities.
  (EC) 834/2007 Art. 27(3); Art. 28(1); Art. 28(2)

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 <u>contact us</u>.

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
- food service
- on-farm processing and packing
- importing organic products from outside the EU
- first consignees of organic product from outside the EU, and
- seed and animal feed mills.

This covers all wholesalers, storage premises, including warehouses and distribution centres. It applies to those storing products in bulk, and those storing products that are already packed and labelled for the final consumer. However you do **not** need certification if you sell directly to the end consumer or user, or are a warehouse owned by or operating under contract to retailers or a store attached to a retail operation.

For more information on the certification requirements for importing and exporting please refer to the importing standards (see section 6.8).

## **5.3.3 Organic certificate**

- 1. You are not allowed to sell products with the Soil Association symbol or with reference to organic 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

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.

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.

(EC) 834/2007 Art. 29(1)(3) (EC) 889/2008 Art. 63(1)(d): Art. 68 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.

#### **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 Defra to certify organic food production and processing under the terms of EU Regulation No. 834/2007.

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:

Our website: www.soilassociation.org/certification/get-in-touch

Email: GoOrganic@soilassociation.org

Phone: 0300 330 0100

Post: Soil Association Certification, Spear House, 51 Victoria Street, Bristol, BS1 6AD

## 5.4 Your obligations when certified

## What is this chapter about?

Standards

This chapter explains your responsibilities and obligations when certified to these organic standards.

541	Description	of vour	activities

# 1. Before starting your organic enterprise, you must describe how you will comply with these organic standards. If you make any changes to your activity you must update your certification body accordingly.

- 2. You must include a full description of your premises, units and activities including:
  - 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.

(EC) 889/2008 Art. 63(1); Art. 64; Art. 80

#### Guidance

To help you meet this requirement we have created an application form that outlines the information we need from you.

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.

If you make any significant changes to your activities, you must inform your Certification Officer 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 from outside the EU 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.

## **5.4.2 Contracted operations**

If you contract out your organic activity, in part or whole, to a third party, 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

If you plan to contract out part or all of your operation, please contact your Certification Officer.

c) details of all the practical measures taken to ensure	
and demonstrate full traceability of products.	
(EC) 834/2007 Art. 28(1)	
(EC) 889/2008 Art. 86	
5.4.3 Declaration	This is covered in the contract you sign when you apply for certification with us
You must sign a declaration stating that you:	and the declaration you sign after every inspection.
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 dual certified	
f. accept handing over information about your	
certification history when changing certification body	
or control authority	
g. will inform your certification body or control	
authority immediately of any breaches affecting the	
organic status of your product or organic products	
received from other operators or subcontractors	
h. in the case of withdrawing certification inform the	
certification body or control authority without delay	
i. accept that your Certification Body or control	
authority retains your certification history for a	
minimum of 5 years	
j. must inform the certification body of any changes to	
your activities.	
(EC) 889/2008 Art. 63(2); Art. 64	
5.4.4 Other statutory requirements	This includes but is not limited to requirements concerning:
You must make sure your organic business and operations	• premises
comply with all statutory regulations in your country.	equipment

## (EC) 834/2007 Art. 1(4); Art. 34(2) staff facilities general hygiene protection of food from contamination or deterioration animal welfare water transport labour and workers, and • wildlife conservation and protection. Note that this standard is also a requirement of several EU Directives including **5.4.5 Employment** 94/33/EC Protection of Young People at Work, and 2011/36 Preventing and You must not use forced or involuntary labour or child labour combating trafficking in human beings and protecting its victims. If you are that interferes with their education. outside the EU, it may be a requirement of the International Labour Organisation Soil Association higher standard 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. Why? Organic food which has been produced in a way that compromises the basic rights of people is counter to the principles and expectations of the organic movement and organic consumers. 5.4.6 Certification code Please refer to the labelling sections 5.8 and 5.10 for more information on labelling requirements. 1. Each certification body is issued with a unique certifier code. In the UK the Soil Association Certification's code is GB-ORG-05. 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

(EC) 834/2007 Art. 27(10) (EC) 889/2008 Art. 58

vour behalf.

## **5.5 Inspections**

## What is this chapter about?

2. You or an appointed representative must sign the

inspection declaration stating that you agree with the

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.

body during the inspection process.				
Standards	Guidance			
<ol> <li>5.5.1 Inspection visits</li> <li>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.</li> <li>If you are a wholesaler dealing only with pre-packaged products you may be subject to a reduced frequency of inspections.</li> <li>You may also be inspected by your competent authority as part of their surveillance of our inspection procedures.</li> </ol>	<ul> <li>We may carry out additional inspections if:</li> <li>you wish to add a new enterprise to your licence</li> <li>you move to new premises</li> <li>we receive a complaint regarding your business</li> <li>it is necessary to inspect seasonal activity or at different times of year</li> <li>we need to inspect again to make sure you have corrected non-compliances</li> <li>you are selected as part of our additional inspection programme and/or our risk assessment of your operations suggests the need for this.</li> <li>We may charge you for these additional inspections if they are needed because of non-compliances.</li> </ul>			
	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.			
<ul><li>5.5.2 What happens at the inspection</li><li>1. At your inspection Soil Association Certification will:</li></ul>	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 <i>Action Summary Form</i> (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

outcomes of the inspection and to undertake necessary corrective actions.  (EC) 889/2008 Art. 63(2); Art. 65(3); Art. 82(3)	you have given is satisfactory, we will approve your corrective actions and issue/reissue your certificate.
5.5.3 Access to facilities	
You must give Soil Association Certification or your control	
authority:	
a) access to all parts of your unit and all premises,	
including any non-organic production units and any	
storage premises for input products which it deems	
necessary in order to certify your organic activities	
<ul> <li>b) access to accounts and relevant supporting documents which it deems necessary in order to</li> </ul>	
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) 899/2009 Art. 63(3); Art. 67(1); Art. 73; Art. 79; Art. 79d	
5.5.4 Sampling	We will take samples if there is a risk that organic standards have not been
You must allow Soil Association Certification to take samples	complied with or to verify that sufficient measures are in place to prevent
which will be analysed for the presence of prohibited	contamination of organic products. Certification bodies are obliged to take
substances and checking compliance to organic standards.	samples from the equivalent of 5% of their licensees per year.
(EC) 889/2008 Art. 65(2)	

## 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.

#### **Standards**

## **5.6.1 Non-compliances**

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

(EC) 834 Art 27(2)(6)(12); Art. 30(1) (EC) 889/2008 Art. 92d

## Guidance

At the end of the visit, your Inspector will leave you an *Action Summary Form* and *Declaration* 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:

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

You are required to complete the *Action Summary Form and Declaration* with the actions you will take to comply with the standards, and return it to us with any other information we request before the deadline given. When your 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.

## **5.6.2 Reporting non-compliances**

- 1. If you consider or suspect that any of your products do not meet organic standards, then you must inform us immediately and either:
  - a) Withdraw any reference to organic in relation to the product.
  - b) Separate or identify the product and only allow it to be further processed or sold as organic once any doubt has been eliminated and this has been agreed with us.

    (EC) 889/2008 Art. 91(1)
- 2. If we have a substantiated suspicion that you intend to place a product on to the market as organic which does not meet organic standards, we will tell you to withhold the product for a set time period whilst we investigate. 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 within the set time period, then you no longer have to withhold the product from sale.

(EC) 889/2008 Art. 91(2)

You must inform your Certification Officer if you have any suspicion that a 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. 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\*.
- 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.

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.

\*Note: If you receive a positive detection, but from the information you have, you believe that the product still meets organic standards, then you do not have to inform us of the detection. You need to have justification as to why you believed it still met organic standards and keep that information on file so that we can check it at inspection if necessary. If you are unsure what action to take, please contact the technical team at sacl.notifications@soilassociation.org.

## **5.6.3 Exceptions**

You may only deviate from the standards when explicitly permitted in these standards. Permission may be granted or confirmed by your certification body.

(EC) 834/2007 Art. 27(7)(b)

## 5.6.4 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.

b) the nature and quantities of organic products

(EC) 889/2008 Art. 92(c)

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

quantities, batch codes and invoices and delivery notes of goods received

If you wish to appeal a certification decision please send full details to your Certification Officer.

## 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.			
Standards	Guidance		
<ul> <li>5.7.1 General record keeping</li> <li>1. You must have a record keeping system in place which allows you to prove the organic status of your products. Your records need to cover all production stages from everything produced or bought in through to all goods sold or dispatched and must allow you to demonstrate the</li> </ul>	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.		
balance between input and output. They must also allow retrospective traceability.	You need to have a system to keep track of procedures and records to ensure they are correct, up-to-date and effective.		
2. You must keep stock and financial records at your unit or premises which make it possible to verify the following information for every product:	R Your records need to include:		
a) the suppliers, sellers or exporters	<ul> <li>checked organic status of goods delivered as per standard 5.14.3</li> </ul>		

delivered, including where relevant:

- i) nature and quantities of all materials bought and the use of such materials
- ii) the composition of compound feed stuffs
- c) the nature and quantities of organic products held in storage
- d) the nature, quantities, and consignees or buyers (other than final consumers) of any products which have left your 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) 889/2008 Art. 26(2)(3)(5)(c); Art. 66(1)(2)

- · 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.
- Make sure that your records meet any other legally required time scales that might be specific to your products.

## **5.7.2 Verifying certification documents**

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

(EC) 834/2007 Art. 29(2)

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.



Records of verification checks

## 5.7.3 Complaints register

You must keep a complaint register for your business. This must record:

- a) all complaints you make or receive
- b) any response to the complaint
- c) the action(s) taken.

(EC) 834/2007 Art. 1(4) ISO17065 (4.1.2.2) 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.

## 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.

**Standards** 

## 5.8.1 Using the term organic If you wish to refer to organic in relation to an agricultural, food or feed product anywhere on a label, in advertising materials or commercial documents, you must meet the requirements of these standards.

(EC) 834/2007 Art. 23(1)

#### Guidance

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

## · marketing materials, and

web content.

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".

## 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*.

## 5.8.2 Products with 95%-100% organic ingredients

1. Food products containing 95%-100% organic agricultural ingredients can be labelled as organic provided that they meet the composition requirements in standard 6.3.1 and the labelling includes the following:

(EC) 834/2007 Art. 23(4)(a)

a) An indication of which ingredients are organic in the ingredients list.

(EC) 834/2007 Art. 23(4)

- b) The EU organic logo on pre-packaged food. *(EC) 834/2007 Art. 25; Art. 24(1)(b)*
- c) When the EU logo is used, an indication of where the ingredients were farmed or grown (see standard 5.8.7).

Guidance for each point 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.

For example:

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

Or, Ingredients: Flour (fortified with calcium carbonate\*, iron\*, niacin\*, thiamin\*), water\*, eggs, sunflower seeds, yeast\*, salt\*. \*Non-organic.

b) Using the EU logo

(EC) 834/2007 Art. 24(1)(c) (EC) 889/2008 Art. 58(2)

d) The code of the certifier who certifies the company that applies the labels (which may or may not be you). This must appear in the same visual field as the EU organic logo.

(EC) 834/2007 Art. 24(1)(a) (EC) 889/2008 Art. 58(1)(d)

- e) A traceability code, such as a batch or date code. (EC) 889/2008 Art. 31(1)(d)
- f) 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) 834/2007 Art. 24(2)

g) 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, even if the product carries the Soil Association symbol. 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 your Certification Officer 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.

g) 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 nonorganic 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.

## Standards Guidance 5.8.3 Using the Soil Association symbol Examples of

- 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.
- 2. You must **not** use the Soil Association symbol on products containing less than 95% organic ingredients.
- 3. You must **not** use the Soil Association symbol on inconversion products.

Soil Association higher standard

Examples of exceptions where you would not have to use the Soil Association symbol are:

- where the label is so small that it would jeopardise other information required by law
- for products which are only sold outside the UK
- where your labelling machine cannot include the symbol and you cannot apply the symbol in another way
- where you are acting as a sub-contractor to a brandholder who is licensed with a different organic certification body and the brandholder doesn't want you to use it, and
- where the symbol has not been used on a brand since July 2008.

For in-conversion products you could use the wording 'Soil Association approved organic conversion'.

## 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** Guidance

## 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.

(EC) 834/2007 Art. 23(4)

- 2. For products where the main ingredient is a product of hunting or fishing and other agricultural ingredients are organic you cannot call the product organic, but you can identify the organic ingredients in the same field visual field as the product description. You must also:
  - 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

Guidance for each point is set out below:

1. Less than 95% organic bulk labels

For bulk products which do not include the ingredient information on the label, indicate the total percentage of organic ingredients on the product label instead.

2. Main ingredient of hunting and fishing

The 'main ingredient' means it accounts for at least 50% agricultural ingredients. 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:

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.

	ingredients) c) use the same colour, size and style of lettering in the reference to organic and percentage statement as you	% organic agricultural ingredients	References to organic	Soil Association Organic logo	EU Organic logo	Certification code	Statement of agricultural origin
	do for the non-organic ingredients.  (EC) 834/2007 Art. 23(4)(c)  You must <b>not</b> use the EU logo on products containing less than 95% organic ingredients.  (EC) 834/2007 Art. 25(1)  The label must include the code number of the certifier	<b>More</b> than 95%	1	<b>√</b>	✓	<b>√</b>	✓
5.	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) 834/2007 Art. 24(1)(a)  You must include a traceability code, such as a batch or	<b>Less</b> than 95%	Only in ingredient list	×	X	1	×
	date code.  (EC) 889/2008 Art. 31(1)(d)	In- conversion product	You may use the wording 'product under conversion to organic farming'	You may use the wording 'Soil Association approved organic conversion'	X	<b>√</b>	X
St	andards	Guidance					
	<ul> <li>3.5 In-conversion products</li> <li>To label your product as 'in-conversion', the product must:</li> <li>a) have been grown on land that has gone through at least a 12-month conversion period before the crop was harvested, and</li> <li>b) contain only one agricultural ingredient, which must be of plant origin, either processed or unprocessed.  (EC) 834/2007 Art. 19(2)(e); Art. 26(b)</li> </ul>						

(EC) 889/2008 Art. 62(a)(c)

- 2. The label must:
  - a) include the wording 'product under conversion to organic farming', provided it is not more prominent in colour, size and style of lettering than the sales description of the product. The words 'organic farming' must not be more prominent than the words 'product under conversion to'.
  - b) Include the certifier code.

(EC) 889/2008 Art. 62(b)(d)

3. You must **not** use the EU logo on in-conversion products. *(EC) 834/2007 Art. 25(1)* 

## 5.8.6 Using the EU organic logo

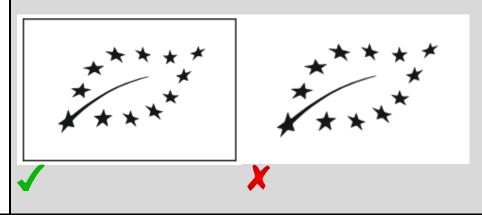
- 1. You must display the EU logo on labels of packaged organic products produced in the EU.
- 2. The EU logo is published for use in green as shown below. The reference for single colour printing is Pantone 376, or if you print using four colour process, 50% cyan, 100% yellow.



The use of the logo is mandatory for all organic pre-packaged food produced within 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.



3. Where colour is not possible you may use black θ white.



- 4. The EU organic logo must:
  - a) appear at least 9mm high and 13.5mm wide, or
  - b) appear 6mm high for very small packages, and
  - c) have a proportional height to width ratio of 1:1.5.
- 5. The EU organic logo may appear:
  - a) in negative, if the background of your packaging is dark.
  - b) in the single colour of your packaging if you are only able to print one colour.
  - c) with an outer line around it to improve how it stands out on coloured backgrounds.
  - d) in conjunction with other logos and text referring to organic, providing this does not overlap, obscure or change the logo.
- 6. You do not have to use the EU organic logo on products imported from countries outside the EU, but if you do, you must also use the declaration of where the ingredients have been farmed and the certifier code. If you do not use the EU logo and code, you must identify your certifier by name.

(EC) 834/2007 Art. 24(1)(b)(c); Art. 25 (EC) 889/2008 Art. 57; Annex XI (1)(2)(3)(4)(5)(6)(7)(8)

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).

## 5.8.7 Declaring ingredient origin

- 1. Where the EU logo is used you need to include a declaration of where the ingredients have been farmed or grown as '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. You can replace 'EU' or 'non-EU' with a particular country if all ingredients were farmed or grown there. You do not have to count small amounts of ingredients up to a total of 2% of the agricultural ingredients.

(EC) 834/2007 Art. 24(1c) (EC) 889/2008 Art. 58(2) The declaration should be placed directly underneath the certifier code and needs to be in the same visual field as the EU <u>logo</u>.

## **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 <u>website</u>. 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 your Certification Officer to find out more.



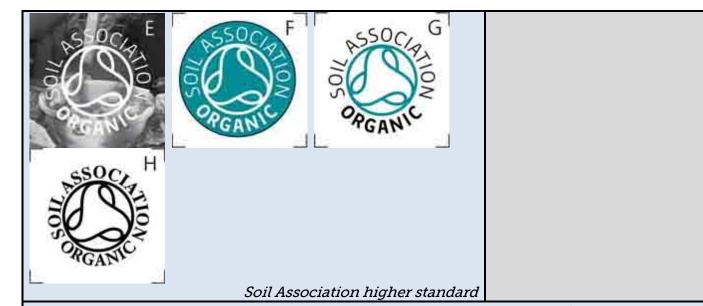




If you wish to use the symbol at a smaller size than 10mm in diameter (for example on very small packaging) or in a colour other than black and white, you must seek permission first.

- 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.



## 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.

Standards	Guidance
5.8.9 Using the Soil Association symbol off-product	You can download the symbol pack directly from our <u>website</u> . We also have the
You may use the symbol on company stationery, promotional	symbol available for use in Welsh and Gaelic.
literature and websites if we certify a range of your products,	
providing it is not misleading to the consumer as to which	
products the symbol applies.	
Soil Association higher standard	
	Why?

The Soil Association symbol should only be used in relation to products or enterprises certified to Soil Association standards to avoid misleading consumers.

## 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.

#### **Standards**

## **5.9.1 Using accurate descriptions**

- 1. The term 'organic' can only be used to describe products (in labels, advertising and commercial documents on products) that meet the requirements of these standards, unless the term is not being used in relation to agricultural products in food or feed, or clearly have no connection to organic production.
- 2. You must not use any terms, including terms used in trademarks, labels or advertising, that could mislead consumers into believing products are organic when they are not.

(EC) 834/2007 Art. 23(2)

#### Guidance

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

## 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'

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 nonorganic 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.

## 5.9.2 Aquaculture products labelling

1. You must not label wild-caught aquaculture animals as organic.

(EC) 834/2007 Art. 1(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.

## 5.10 Labelling in specific scenarios

## Standards

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

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

Soil Association higher standard

#### Guidance

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

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

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

	For details on using the Soil Association organic symbol on products, please refer to standard 5.8.8.
	Why?
This standard helps to avoid misleading consumers by making	it clear which products on sale are organic.
5.10.2 Stamping eggshells and meat	Egg stamps
You must only use colours in accordance with articles 2(8) and 2(9) of directive 94/36/EC for stamping meat and	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.
eggshells.	
(EC) 889/2008 Art. 27(1d)	You can find more information on egg marking on the Defra <u>website</u> .
	Meat stamps
	Please refer to the abattoir standards on our <u>website</u> for full details of meat stamp requirements including details of the records which must be kept.

## **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**

## 5.11.1 Reducing the risk of contamination

You must identify any risk of contamination to your organic products by any unauthorised or prohibited substances and ensure measures are in place to reduce the risk of contamination. When new risks are identified, you must review the measures you have in place and ensure they remain appropriate. The risks identified and the measures in place must be documented.

(EC) 889/2008 Art. 26(1)&(2); Art. 63(1)(c)

#### 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.

#### **5.11.2** Genetic modification

1. Products labelled as consisting of or made from GMOs must never be described as organic.

(EC) 834/2007 Art. 23(3)

- 2. You must **not** use GMOs or products made from or by GMOs or their derivatives. You must be able to demonstrate that any food, feed, processing aids, additives, micro-organisms, plant protection products, fertilisers, soil conditioners, seeds, vegetative propagating materials and animals used in organic production do not contain any GMOs or their derivatives.
- 3. For food and feed products produced in the EU and covered under Directive 2001/18/EC, Regulation (EC)

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.

1829/2003 or Regulation (EC) 1830/2003, 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 produced 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) 834/2007 Art. 9(1)(2)(3) (EC) 889/2008 Art. 69; Annex XIII

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

Soil Association higher standard

Our GMO declaration form explains which additives, processing aids and ingredients are GMO risks. Your Certification Officer 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.

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%.

# 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	Guidance
<ul> <li>5.11.3 Nanoparticles</li> <li>1. Organic products must not contain or consist of engineered nanoparticles.</li> <li>Soil Association higher standard</li> </ul>	<ul> <li>Incidental nanoparticles not prohibited by this standard include:</li> <li>Substances that are incidental by-products of other manufacturing processes (such as milling or homogenisation).</li> <li>Naturally occurring nanoparticles, for example, from volcanic eruptions,</li> </ul>
2. This standard does not apply to incidental nanoparticles.  Soil Association higher standard	in wood smoke or sea spray.  The definition of manufactured nanoparticles reflects the definition of nanomaterials in the Food Information for Consumers regulation 1169/2011.
	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.
	M/hyz?

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

# 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.

#### **Standards**

### **5.12.1 Cleaning measures**

- 1. You must have suitable cleaning measures in place to prevent 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 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) 889/2008 Art. 63(1)(c); Art. 26(4)(a)(b)(5)(e); Art. 35(4)(c)

### Guidance

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.

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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.

### **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.

Standards	Guidance
5.13.1 Preventing contamination by pests and pest	Your procedures must include the measures you have in place to reduce the risk
control products	of contamination by pests. This should include measures to prevent and control
1. You must design and operate your buildings and controls	wild birds, rodents and insects from getting into your buildings such as:
to reduce the risk of contamination by pests.	Flyscreens

You must ensure when implementing preventative measures in organic areas that you take precautionary measures to reduce the risk of contamination of organic products.

(EC) 889/2008 Art. 63(1)(c)

- 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.

# **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) 889/2008 Art. 63(1)(c)

- 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.

### **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;
  - b) use them according to industry best practice;

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

R Records of checks

- c) check rodent glue boards at least once every 12 hours including at weekends and Bank Holidays, as required by the *Pest Management Alliance* code of practice, and
- d) keep a record of each check.

Soil Association higher standard

Glue boards should not be viewed as a permanent solution to a pest problem. Your Certification Officer 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 <u>Code of Practice on the Humane Use of Rodent Glue Boards</u> for more information.

### Why?

In order to protect public health within high-risk environments, the use of 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.

# 5.14 Transport, dispatch and receipt of goods

### What is this chapter about?

Standards

This section details all the standards that need to be met for the transport, dispatch and receipt of organic products.

Otaliaalas
<b>5.14.1</b> Collection of products and transport to
preparation units

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

6

Guidance

Collection records

(EC) 889/2008 Art. 30

### 5.14.2 Labelling & transporting products

- If you send an organic product to another company, including retailers, wholesalers and other licensees for further processing, packing or re-labelling then you must:
  - a) ensure it is transported in a way that would prevent substitution.
  - b) label it clearly, either on the product or on accompanying documentation undeniably linked to it so that the recipient can easily identify:
    - (i) the product and its organic status
    - (ii) the name and address of the operator, and, if different, the seller or owner of the product
  - c) include your certification code, traceability code and % organic content of the product (if less than 95%). If this information is provided on the accompanying documentation, it must also include information on the supplier and/or transporter.

For additional requirements for labelling of retail packed products, please refer to section 5.8.

If your product is not prepacked for retail, or it goes on for further processing, you can put ingredient information either on the label, or on a document with the product provided it can be clearly linked with the product. For example, grain moved from a dryer to a mill would need to be accompanied by a delivery note with full supplier address, product information (including organic status), batch, haulier and vehicle identification and consignee address.

Labelled packaging helps identify organic products and keeps them sealed which limits the risk of contamination and substitution. However, there are products that need to be transported in loose bulk, for example milk in a tanker or fruit and vegetables in open top boxes.

R

Records of transportation of loose organic products.

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

(EC) 889/2008 Art. 31(1)(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

However you choose to transport your products, you will need to make sure you have minimised the risk of contamination or substitution with non-organic products by using clear labelling and separation. For example, if you are transporting loose fruit and vegetables in open top boxes, consider transporting the organic or non-organic in separate vans. Or, close the tops of the boxes containing organic to prevent accidental contamination.

### 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.

### **5.14.3 Receiving organic products**

When you receive an organic 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 matches the information on the accompanying documents and provide an account of how you check goods upon receipt.

(EC) 889/2008 Art. 33

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.

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.

# **5.15 Storage of products**

# What is this chapter about?

This section details the standards for storing and handling organic products.				
Standards	Guidance			
5.15.1 General separation  You must manage your organic storage areas and containers in such a way to avoid any mixing with or contamination from products or substances that we do not allow in these standards. Your organic storage areas, containers and products must be clearly identifiable at all times.  (EC) 889/2008 Art. 35(1)	Demonstrate that your organic products are clearly identified and separated from areas used for other purposes. Examples include, but are not limited to:  • identify the room, area, or racking with the word 'organic' to show that it is for storing organic products  • identify all organic materials clearly to avoid accidental contamination  • have sufficient space or barriers around the organic storage area to stop			
<ul> <li>5.15.2 Handling and separating organic and nonorganic products</li> <li>1. When you use the same equipment and premises to store and handle both organic and non-organic products you must: <ul> <li>a) minimise the risk of mixing organic products with other products and foodstuffs by clearly identifying and separating them during the production process, and</li> </ul> </li> </ul>	Also refer to the 'preserving organic integrity' (section 5.11) for details of contamination and products and substances we do not allow.			

b) effectively clean equipment and storage areas used to handle or store non-organic products before handling or storing organic products.

(EC) 889/2008 Art. 35(4); 26 (3)

# 5.16 Packaging

# Standards

### 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.

Soil Association higher standard

# Guidance

### Packaging legislation

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 EU such legislation would include, but is not limited to:

- 1. the <u>European Parliament and Council Directive on Packaging and Packaging</u>
  <u>Waste (94/62/EC)</u>
- 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 <u>Defra's Green Claims code</u>.

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

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	
5.16.4 Plastic materials, coatings, dyes or inks	Demonstrate that you have not used these materials, for example by having	
You must <b>not</b> use plastic materials, coatings, dyes or inks that	written confirmation from your supplier.	
contain phthalates if they will be in direct contact with		
foodstuffs.		
Soil Association higher standard		
SycTAZ		

### Why?

Phthalates can have a negative impact on human health, for example they have endocrine disrupting properties.

Standards	Guidance
5.16.5 PVC	Demonstra
You must <b>not</b> use polyvinyl chloride (PVC) unless alternative materials are not available or are functionally unsuitable, as	written con
listed in the guidance section of this standard.  Soil Association higher standard	You may us
	There are so alternatives  • meta  • tamp
	The Soil As basis.

ate that you have not used these materials, for example by having nfirmation from your supplier.

use other chlorinated plastics, such as PVdC.

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

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

ssociation's Packaging Working group will review this list on a regular

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 your Certification Officer. 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.

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**

### 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

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 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.

### **Standards**

# **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

\*This Standard comes in to effect from May 2020

### Guidance

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 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.

In order to allow time for licensees to source and trial alternative materials, this standard will be enforced from May 2020 but licensees should switch to bisphenol-free food contact materials as possible.

# 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.

# **6.0 Specific standards for food and drink**

# **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.

This chapter covers the basic requirements that must be met b	by all licensees involved in manufacturing organic products.			
Standards	Guidance			
<b>6.1.1 Ensuring organic integrity</b>	Your procedures need to cover all the critical processing steps in the			
To ensure organic integrity you must:	manufacture of your products. This includes making sure staff are fully trained			
1. Have procedures to maintain the organic integrity of your	for the tasks they carry out and understand the importance of maintaining			
products, from buying raw materials to goods out, and	organic integrity.			
which also ensure that non-organic products are not				
produced or sold as organic.	Please also refer to the standards on preserving organic integrity (5.11),			
2. Always work to the principles of good manufacturing	cleaning (5.12) and record keeping (5.7) as these are all related to ensuring organic integrity.			
practice for your sector of the food industry.  (EC) 889/2008 Art. 26(1)(2)(3)(4)(c)				
(EC) 889/2008 A11. 20(1)(2)(3)(4)(C)	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.			
6.1.2 General production methods	Please also refer to chapters 6.3, 6.4, 6.5 and 6.6 for details of permitted non-			
1. Organic food must be produced with care and preferably	organic ingredients, processing aids and additives.			
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 834/2007 Art. 6(b)(c)(d); Art. 19(3)

### **6.1.3 Prohibited techniques**

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

(EC) 834/2007 Art. 19(3)

### **6.1.4 Processing organic and non-organic**

If you process organic 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 products separately, in time or space, from non-organic products
- c) ensure that the cleaning of your facilities and equipment is sufficient to remove residues of nonorganic product before you start processing
- d) finish the whole run of organic products before you start to process non-organic products
- e) keep a record of all organic and non-organic operations and the quantities processed.

(EC) 889/2008 Art. 26(5) (EC) 834/2007 Art. 19(1) You can only use substances, re-constitution techniques, additives and processing aids in ways allowed by the law and by these standards.

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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 nonorganic 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 thorough clean down of equipment, whereas others may judge it best to carry out organic processing first thing in the morning followed by non-organic production. The important thing is that you manage risk in a way that is appropriate for your operation.

### 6.1.5 Irradiation

You must **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.

(EC) 834/2007 Art. 10

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  $3 \times 1015$  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.
<ul> <li>The prohibition of ionising radiation does not apply in the case of:</li> <li>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</li> <li>the irradiation of foodstuffs which are prepared for patients requiring sterile diets under medical supervision.</li> </ul>

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.		
Standards	Guidance	
6.2.1 Using ethylene		
You may use ethylene only:		
1. to ripen bananas, kiwis and kakis		
2. to ripen citrus fruit as part of a strategy to prevent fruit		
fly damage		
3. to induce flowering of pineapples		
4. to inhibit sprouting of onions and potatoes.		
(EC) 889/2008 Annex II		

### 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) 889/2008 Art. 27(1)(a)e); Annex VIII

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.

### 6.2.3 Wax coatings

You must **not** use wax coatings directly onto fruit and vegetables unless the coatings are certified organic.

(EC) 889/2008 Annex VIII

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

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6	<i>)</i> 4	K2	kir	200
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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) 889/2008 Art. 26(4a); Art. 63(1c)

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 nonorganic 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.

# **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) law. This means that if you want to describe a product as organic in any way, you need to meet the requirements of the EU organic 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.

Otalidalds	Outdatice
6.3.1 Composition requirements for all products	You will need to co
With the exception of wine where there are separate	or a Multi Ingredie
requirements (see section 6.9), all products, whether organic, or	you wish to include
containing organic ingredient(s), must meet the requirements	composition of alre
in these standards for:	specifications to re

### Guidance

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

- 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 834/2007 Art. 19(1)(2)(b); Art. 23(4)(b)(c) EC 889/2008 Art. 27(1) and MIPS from <u>here</u>.

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.

### **6.3.2 Organic products**

To label your product as organic (or organically grown or organically produced), it must:

- a) contain at least 95% (by weight) of organic agricultural ingredients (including those additives marked with an asterisk in standard 6.4)
- b) contain a maximum of five% (by weight) 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) 834/2007 Art. 19(2)(b)(c); Art. 23(4)(a) (EC) 889/2008 Art. 27 (2)(a)(b) Please see the example calculation below based on the composition of an organic wholemeal loaf:

Agricultural ingredient	Non-agricultural ingredients (e.g. water, salt, selected additives)	Weigh t (g)	Status (organic, non-organic, organic wild harvested)
Wholemeal wheat flour		560	Organic
Yeast		5	Non-organic
Dried rosemary		20	Organic
Poppy seeds		20	Organic
Sunflower oil		20	Organic
	Sea salt	20	Non-organic
	Water	300	Non-organic
Total weight: (kg)		945	

	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 <u>online tool</u> 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).
6.3.3 Composition of products	"Composed mainly" means at least 50% agricultural ingredients.
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.	
(EC) 834/2007 Art. 19(2a)	
6.3.4 Using organic and non-organic versions of the same ingredients	This also applies to products made with less than 95% organic ingredients.
You must <b>not</b> use organic and non-organic versions of the	
same ingredient in the same product.	
(EC) 834/2007 Art. 18(2); Art. 19(2)(d); Art. 20(2)	

### 6.4 Additives

**Standards** 

# 6.4.1 Using organic additives

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. See the Guidance for a list of additives that are currently available as organic.

Soil Association higher standard

### Guidance



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

The following additives are considered to be available in organic form and in sufficient quantity and quality in most cases:

- locust bean gum
- guar gum
- arabic gum
- lecithin

There may be circumstances where organic additives are available but they are not suitable for your products. In such cases, you will need to provide sufficient justification for not using them. Sufficient justification will need to include a demonstration of the following:

- alternative organic additives are unsuitable for use in the product(s) in question
- the organic version is not available in sufficient quantity
- the organic version is of a quality that makes it functionally unsuitable for use in your products.

All requests will be reviewed by the Soil Association Certification Committee.

### Why?

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.

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

### Guidance

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

(EC) 889/2008 Annex VIII A

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 your Certification Officer to discuss what will be required.

For Soil Association products, you must use organic additives if they are available (see standard 6.4.1).

E no.	Name	Preparation of	Preparation of	Specific conditions
		foodstuffs of plant origin	foodstuffs of animal origin	
E153	Vegetable carbon		X	Only in Ashy goat cheese and Morbier cheese.
E160b	Annatto*, bixin* & norbixin*		X	Only in Red Leicester, Double Gloucester, Cheddar and Mimolette cheeses.
E170	Calcium Carbonate	X	Х	May be used in any product, except for colouring or calcium enrichment.
E220	Sulphur dioxide	X	X (Only for mead)	In fruit wines <sup>3</sup> without added sugar (including cider and perry) or in mead: 100mg <sup>4</sup> (see standard 6.4.3. for additional SA standard related to free sulphur dioxide levels).
E224	Potassium metabisulphite	X	X (Only for mead)	In cider and perry produced with addition of sugars or juice concentrate after fermentation: 100mg/l <sup>4</sup> (see standard 6.4.3. for additional SA standard related to free sulphur dioxide levels).
E223	Sodium metabisulphite		X	Crustaceans <sup>2</sup> . This can be used in EU product only. Prohibited for SA product (see standard 6.4.4 for details).
E250	Sodium nitrite		X	For curing meat only <sup>1</sup> . The ingoing amount expressed as NaNO <sub>2</sub> must not exceed 80mg/kg and the residual amount expressed as NaNO <sub>2</sub> must not exceed 50mg/kg.
E252	Potassium nitrate (saltpetre)		Х	For curing meat only <sup>1</sup> . The ingoing amount expressed as NaNO <sub>3</sub> must not exceed 80mg/kg and the residual amount expressed as NaNO <sub>3</sub> must not exceed 50mg/kg.
E270	Lactic acid	X	X	

E290	Carbon dioxide	Х	Х	
E no.	Name	Preparation of foodstuffs of plant origin	Preparation of foodstuffs of animal origin	Specific conditions
E296	Malic acid	X		
E300	Ascorbic acid	X	Х	For meat products <sup>2</sup> .
E301	Sodium ascorbate		Х	For use with nitrites or nitrates in meat products <sup>2</sup> .
E306	Tocopherol rich extract (Vit E)*	X	Х	As an antioxidant.
E322	Lecithins*	Х	X	For milk products <sup>2</sup> .  Must be organic from January 1st 2022. Until that date, only when derived from organic raw material
E325	Sodium lactate		X	For milk-based and meat products.
E330	Citric acid	X	Х	
E331	Sodium citrates	X	X	
E333	Calcium citrates	Х		
E334	Tartaric acid (L(+)-)	X	X (only for mead)	
E335	Sodium tartrates	X		
E336	Potassium tartrates	Х		
E341 (i)	Monocalcium Phosphate	X		As a raising agent for self-raising flour.
E392	Extracts of rosemary*	Х	Х	Only in organic form.
E400	Alginic acid	X	Х	For milk-based products <sup>2</sup> .
E401	Sodium alginate	X	Х	For milk-based products <sup>2</sup> .
E402	Potassium alginate	X	Х	For milk-based products <sup>2</sup> .
E406	Agar	X	Х	For milk-based and meat products <sup>2</sup> .
E407	Carrageenan	X	Х	For milk-based products <sup>2</sup> .
E410	Locust bean gum*	X	Х	Must be organic from January 1st 2022
E412	Guar gum*	X	Х	Must be organic from January 1st 2022
E414	Arabic gum*	Х	Х	Must be organic from January 1st 2022
E415	Xanthan gum	X	Х	
E417	Tara gum powder	Х	X	As a thickener. Must be organic from January 1 <sup>st</sup> 2022
E418	Gellan gum	X	Х	High-acyl form only.

				Must be organic from January 1st 2022
E no.	Name	Preparation of foodstuffs of plant origin	Preparation of foodstuffs of animal origin	Specific conditions
E422	Glycerol	X		From plant origin. Must be organic from January 1st 2022 For plant extracts, flavourings, humectant in gel capsules and as a surface coating of tablets.
E440 (i)	Pectin* (non amidated)	X	X	For milk-based products <sup>2</sup> .
E464	Hydroxypropyl methyl cellulose	X	X	As an encapsulation material for capsules.
E500	Sodium carbonate	X	X	
E501	Potassium Carbonates	X		
E503	Ammonium Carbonates	X		
E504	Magnesium carbonates	X		
E509	Calcium chloride		X	For milk coagulation.
E516	Calcium sulphate	X		As a carrier.
E524	Sodium hydroxide	Х		Surface treatment of Laugengebäck (a type of traditional German pastry) and regulation of acidity in organic flavourings.
E551	Silicon dioxide gel or colloidal solution	X	X	For herbs and spices in dried powdered form. Flavourings and propolis.
E553b	Talc	X	X	As a coating agent for meat products.
E901	Beeswax	X		As a glazing agent for confectionary only.  Beeswax from organic beekeeping.
E903	Carnauba wax	X		As a glazing agent for confectionary. As a mitigating method for mandatory extreme cold treatment of fruit as a quarantine measure against harmful organisms Must be organic from January 1st 2022. Until that date, only when derived from organic raw material
E938	Argon	X	Х	
E939	Helium	Х	X	
E941	Nitrogen	X	Х	
E948	Oxygen	X	X	
E968	Erythritol	X	X	Only when derived from organic production without using ion

		exchange technology.
37 .		

#### Notes

<sup>1</sup>E250 sodium nitrite and E252 potassium nitrate can 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 maintenance of the specific features of the product, is available.

- <sup>2</sup>The restriction only relates to animal products
- <sup>3</sup> In this context, 'fruit wine' is defined as wine made from fruits other than grapes (including cider and perry).
- <sup>4</sup> Maximum levels available from all sources, expressed as SO<sub>2</sub> in mg/l.

Standards	Guidance			
6.4.3 Free sulphur dioxide levels	In order to demonstrate compliance, you will need to prove that the free SO2 level			
Free SO <sub>2</sub> for all fruit wines, cider, Perry and mead must not	does not exceed this level – this could be by regular testing of products.			
exceed 30 mg/l.				
Soil Association higher standard	If you source products certified to other organic standards they must meet			
	this Soil Association requirement.			
Why?				
ree 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 SO <sub>2</sub> to be used only when strictly necessary.				
Observation of the Control of the Co				

Standards	Guidance
<b>6.4.4 Sodium metabisulphite</b> You must <b>not</b> use sodium metabisulphite as an additive, including for crustaceans.  Soil Association higher standard	If you source products certified to other organic standards they must meet this Soil Association requirement.

### Why?

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.

# **6.5 Processing aids**

# Standards G

### **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) 889/2008 Art. 27(1)(a)(b); Annex VIII B

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.

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

Processing aid name	Preparation of foodstuffs of plant origin	Preparation of foodstuffs of animal origin	Specific conditions
Water	X	X	Drinking water within the meaning of Council Directive 98/83/EC
Calcium chloride	X		Coagulation agent
Calcium carbonate	X		
Calcium hydroxide	X		
Calcium sulphate	X		Coagulation agent
Magnesium chloride (or nigari)	X		Coagulation agent
Potassium carbonate	X		Drying of grapes
Sodium carbonate	X	X	

Processing aid name	Preparation of foodstuffs of plant origin	Preparation of foodstuffs of animal origin	Specific conditions
Lactic acid		X	For the regulation of the pH of the brine bath in cheese production <sup>1</sup>
L(+)lactic acid from fermentation	X		For the preparation of plant protein extracts
Citric acid	X	X	
Sodium hydroxide			Sugar production
	X		Oil production excluding olive oil production
			For the preparation of plant protein extracts
			Gelatine production <sup>1</sup>
Sulphuric acid	X	X	Sugar production <sup>2</sup>
			Only for antimicrobial purposes in production of sugar <sup>2</sup>
Hop extract	X		From organic production, when available
			Only for antimicrobial purposes in production of sugar. <sup>2</sup>
Pine rosin extract	X		From organic production when available
Hydrochloric acid		Х	Gelatine production and for the regulation of the pH of the brine bath in the processing of Gouda, Edam and Maasdammer cheeses, Boerenkaas, Friese and Leidse Nagelkaas
Ammonium hydroxide		Х	Gelatine production
Hydrogen peroxide		Х	Gelatine production
Carbon dioxide	Х	Х	•
Nitrogen	Х	Х	
Ethanol	Х	Х	Solvent
Tannic acid	Х		Filtration aid
Egg white albumen	Х		
Casein	X		
Gelatin	X		
Isinglass	Х		
Vegetable oils	Х	Х	Greasing, releasing or anti-foaming agent. Only when derived from organic production
Silicon dioxide gel or colloidal solution	х		

Activated carbon	X		
Processing aid name	Preparation of	Preparation of	Specific conditions
	foodstuffs of	foodstuffs of	
	plant origin	animal origin	
Talc	X		In compliance with the specific purity criteria for food additive E553b
Bentonite	X	X	Sticking agent for mead <sup>1</sup>
Cellulose	X	X	Gelatine production <sup>1</sup>
Diatomaceous earth	Х	X	Gelatine production <sup>1</sup>
Perlite	Х	X	Gelatine production <sup>1</sup>
Hazelnut shells	Х		
Rice meal	X		
Beeswax	Х		Releasing agent. Only when derived from organic beekeeping
			Releasing agent. Must be organic from January 1st 2022. Until that
Carnauba wax	X		date, only when derived from organic raw material.
			Only when derived from organic production. For fish processing only.
Acetic acid/vinegar		X	Fromnatural fermentation, not to be produced by or from GMO
			Only for use in processing fruit wines, including cider, perry and
Thiamin hydrochloride	X	X	mead
•			
			Only for use in processing fruit wines, including cider, perry and
Diammonium phosphate	X	X	mead
			The source of timber should be restricted to certified, sustainably
			harvested wood. Wood used must not contain toxic components
			(post-harvest treatment, naturally occurring toxins or toxins from
Wood fibre	X	X	micro-organisms)

<sup>&</sup>lt;sup>2</sup>The restriction only concerns plant products

# **6.6 Other ingredients**

**Standards** 

# 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:

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
- 2. rice paper
- 3. unleavened bread paper
- 4. starch from rice and waxy maize (not chemically modified).

### Guidance

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.

### 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.

(EC) 889/2008 Art. 28; Annex IX (EC) 834/2007 Art. 19(2)(c)

### 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.

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.			
Why?  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.				
Standards	Guidance			
6.6.3 Natural casings	Natural origin casings are made from animal intestines.			
If you use non-organic casings, such as for sausage skins,	<u></u>			
these must be of natural origin.	If you source products certified to other organic standards they must meet			
Soil Association higher standard				
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	Guidance			
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 <i>(EC)</i> No 1334/2008				
b) they are not made from GMOs				
c) they do not contain anything made from GMOs.				
(EC) 834/2007 Art. 19(2)(b) (EC) 889/2008 Art. 27(1)(c)				

### 6.6.5 Solvents for natural flavours

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

For each non-organic natural flavouring you wish to use you will need to submit a GMO and natural flavouring declaration form to your Certification Officer. You can find the form online <a href="here">here</a>. Your Certification Officer 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.

organic standards (and could potentially be organic), rather than solvents that might be derived from fossil fuels as they could never be organic.			
Standards	Guidance		
6.6.6 Water	You will need to demonstrate that the water you use is potable. Potable water is		
Water that you use as an ingredient must be potable (fit for	defined by the <u>EU Drinking Water Directive (98/83/EC)</u> . In the UK, this is		
drinking).	transposed into <u>The Water Supply (Water Quality) Regulations 2016</u> .		
(EC) 889/2008 Art. 27(1)(e)			
	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.		
6.6.7 Salt	Salt is a permitted non-organic ingredient - as it is a mineral, it can never be		
You may use salt, either with sodium chloride or potassium	produced from organic farming.		
chloride as basic components, in organic products.			
(EC) 889/2008 Art. 27(1)(e)	Contact your salt supplier to check whether the salt you are using contains anti-		
	caking agents.		

#### 6.6.8 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 your Certification Officer and retain information relating to it on file for your own records.

Note: You do not need to provide justification for use in the following product types:

- Hard cheeses: Cheddar/Red Leicester/Double Gloucester/Dunlop (Scotland)/Derby/Cheshire/Lancashire/Caerphilly/Stilton/Blue Vinney
- Butter
- Smoked salmon.

For use in any other products you will need to provide justification to your Certification Officer and retain information relating to it on file for your own records.

# Why?

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**

#### **6.6.9 Yeast**

1. Yeast and yeast products must be calculated as ingredients of agricultural origin.

EC 889/2008 Art. 27(2)(c)

2. Organic yeast must not be present in organic food or feed together with non-organic yeast.

EC 834/2007 Art. 20(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.

#### 6.6.10 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 889/2008 Art. 27(1)(b) EC 834/2007 Art. 9(1)

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

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 <a href="here">here</a>.

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.

# 6.6.11 Organic yeast

- 1. To produce organic yeast, you must culture it on a substrate of at least 95% certified organic origin. 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).
- 2. When producing organic yeast, you may use drinking water, salt, and preparations of micro-organisms and 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.

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.

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

(EC) 889/2008 Art. 27(a)(b); Art. 46a; Annex VIII C

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

(EC) 834/2007 Art. 20(1) 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.

		Organic year	,
Name	Primary yeast	Yeast confections/ formulations	Specific conditions
Calcium chloride	X		
Carbon dioxide	X	X	
Citric acid	Х		For the regulation of the pH in yeast production
Lactic acid	X		For the regulation of the pH in yeast production
Nitrogen	X	X	
Oxygen	Х	Х	
Potato starch	X	X	For filtering. Only when derived from organic production
Sodium carbonate	X	X	For the regulation of the pH
Vegetable oils	X	Х	Greasing, releasing or anti-foaming agent. Only when derived from organic production

#### **Standards**

#### 6.6.12 Vitamins and minerals

You may only add vitamins, minerals, amino acids, micronutrients and trace elements to organic products if the law requires you to.

#### 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.

(EC) 889/2008 Art. 27(1)(f)	
(EC) 834/2007 Art. 19 (2)(b); Art. 21(1)(ii)	The <i>Spreadable Fats (Marketing Standards) (England) Regulations (1999)</i> state
	that vitamin A (retinol) and vitamin D (calciferol) must be added to margarine.
	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.
	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).
6.6.13 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) 889/2008 Art. 27(4)	
(EC) 834/2007 Art. 22(2)(e)	

6.7 Derogations		
Standards	Guidance	
6.7.1 EU derogations  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.  In these cases you can apply to your competent authority for a derogation to use the particular ingredients.	If you are having trouble finding an agricultural ingredient in organic form, contact your Certification Officer. We licence a wide range of products and should be able to provide details of companies that will be able to supply you with what you need.  If an ingredient is not available in organic form anywhere in the EU, then you may still be able to use it provided you have successfully applied for a derogation to do so. This applies to products labelled as organic only.	

This standard only applies to products containing 95-100% organic agricultural ingredients.

(EC) 834/2007 Art. 6(a); Art. 19(2)(c); (EC) 889/2008 Art. 29

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 unless they are covered by this standard.

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.

Please refer to section 5.8. of these standards for further information on labelling.

## How to apply for a derogation

In the UK, you will need to complete an OB9 form which is available from Defra.

Defra normally issues derogations for 12 months then for two further periods of 12 months each. However, Defra may cancel derogations or reduce the time of derogations if enough of the ingredient in organic form becomes available in the EU.

If you are outside of the EU, and we certify you to the EU Organic Regulation, then you need to apply to us for a derogation. Please contact your Certification Officer for details of how you do this.

Please refer to our web tool for help with calculating maximum percentages.

# **6.8 Importing**

# What's this chapter about?

This chapter outlines the requirements that need to be met when importing organic goods from outside the UK.

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Standards	Guidance		
6.8.1 Scope The standards in this section apply to anyone involved in importing 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.  (EC) 889/2008 Art. 81	First consignee means the natural or legal person to whom the imported consignment is delivered and who will receive it for further preparation and/or marketing.		
6.8.2 Importing products from within the EU You do not need to be licensed as an importer to import organic products from within the EU, or the European Economic Area (EEA), provided those products are certified in accordance with the EC organic regulations. However, you will still require certification to trade, wholesale, distribute, store, break down, pack, repack, re-label or process organic product.  (EC) 834/2007 Art. 34(1)	EEA countries are Iceland, Liechtenstein and Norway.  Refer to standard 5.1.1 for details of which activities require certification.		
6.8.3 Soil Association symbol use  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	Please refer to standard 5.8.8 for details of the requirements for using the Soil Association symbol.		

#### 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.

### 6.8.4 Importing products from outside the EU

- If you wish to import products from a third country, (outside the EU or EEA) 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.
- 3. You will also need certification if you wish to export your products.

(EC) 834/2007 Art. 28(1)

**6.8.5 Planning and managing your importing operation** 

Before you can begin importing, you must write a plan with a full description of your premises, units and activities. This must include:

- a) Your name and address
- b) The location of premises where operations related to importing are carried out
- c) The nature of your operations and your products.

(EC) 834/2007 Art. 63(3)

6.8.6 Importing products certified by approved certifiers or from equivalent countries outside the EU

You may import organic products from suppliers, including exporters, certified by a certification body recognised and approved by the EU or a country which has an equivalence agreement with the EU.

(EC) 834/2007 Art. 32; Art. 33 (EC) 1235/2008 Annex III; Annex IV Importer means the natural or legal person within the community who presents a consignment for release for free circulation into the Community, either in person, or through a representative (e.g. a clearing or forwarding agent).

The first consignee also needs to be licenced. First consignee means the natural or legal person to whom the imported consignment is delivered and who will receive it for further preparation and/or marketing.

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 your Certification Officer. 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 from outside the EU or if you have an abattoir and you want to start processing burgers and sausages. Depending on what you are adding or expanding, we will need to update your certificates and you may need an additional inspection or licence.

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

### Recognised third countries

Countries whose national organic standards and control systems are recognised as equivalent to EU organic standards are known as 'recognised third countries'. A list of countries and approved certification bodies operating in each country can be found in <u>Annex III of EU Regulation 1235/2008</u>. These countries are:

- Argentina
- Australia
- Canada
- Chile
- Costa Rica
- India
- Israel
- Japan
- New Zealand
- Switzerland
- Tunisia
- United States of America

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 your Certification Officer so they can let you know about any restrictions.

#### Categories

You will often see categories referred to on the organic certificates of companies from outside the EU. These categories indicate the products which the company is allowed to export to the EU. Below is what each category means:

- A: Unprocessed plant products
- B: Live animals or unprocessed animal products (includes honey)
- C: Aquaculture products and seaweeds
- D: Processed agricultural products for use as food
- E: Processed agricultural products for use as animal feed
- F: Seeds and propagating material

#### Recognised certification bodies

Control bodies whose standards and control system have been recognised as equivalent to EU organic standards are known as 'recognised certification bodies'. Just like recognised third countries, each certification body is approved

for specific product categories. The list of these certification bodies is in *Annex* IV of EU Regulation 1235/2008.

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 regulation and that they make explicit reference to regulations 834/2007 and 889/2008. 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 contact your Certification Officer and forward them a copy of your supplier's organic certificate.

#### Compliant certification bodies

Control body whose standards have been recognised by the EU as compliant. Meaning it follows all aspects of the EU regulation.

There are currently no countries recognised as compliant to EU organic regulations.

### **6.8.7 Certificates of Inspection**

- 1. All organic products imported into the EU must be accompanied by an original endorsed Certificate of Inspection (COI) issued in the third country.
- 2. The endorsed COI must accompany goods to the premises of first consignee and then must be kept by the importer for at least two years.
- 3. The first consignee or importer (where relevant) can make a copy of the COI in order to fulfil the record keeping requirements listed in 6.8.10, provided it is printed or stamped 'COPY' or 'DUPLICATE'.

(R) the certification body of the exporter and need to be available at the EU port of entry for further endorsement by the member state authority.

COIs need to be issued and endorsed (signed and stamped in box 14) by

### Electronic Certification of Inspection for the import of organic products into the EU

COIs are sometimes referred to as 'transaction certificates'.

The new system of electronic certificate for imports of organic products became compulsory on 20 October 2017. The electronic certificate aims to enhance traceability of imported organic products and reduce potential fraud. It also aims to reduce the administrative burden for operators and authorities, and provides (EC) 834/2007 Art. 33 statistical data on organic imports. You can find out more at (EC) 1235/2008 Art. 13 https://ec.europa.eu/agriculture/organic/electronic-certificate\_en

Importers, and exporters in the country of origin, must register for a TRACES NT account. This is the electronic system used by the European Commission to issue and monitor all COIs.

According to the EC organic regulation the certificate of inspection must be issued by the certification body of the exporter before the consignment leaves the country of export. The certification body will carry out the necessary documentary checks before signing box 18. However, Box 13, Box 16 and Box 17 of the COI may be filled in with the provisional information available at the time of issuing the COI. Final transport documents must be included by the certification body within 10 days from the issuance of the COI and, in any case, before endorsement of the COI from the importing authority. So it is important to check that your exporter is aware of this and able to meet this requirement to ensure you do not experience any problems on import.

Control bodies and control authorities will be able to update the information in Boxes 13, 16 and 17 and upload the final transport documents in TRACES after the signature of Box 18 and before the COI is endorsed by the Member State (in Box 20).

In the UK, the Port Health Authority (PHA) is responsible for checking documentation of organic produce at the port of arrival. They have the authority to stop entry of organic product not accompanied by a valid COI and the goods may be held at port or lose their organic status. The PHA checks that the information on the COI matches with the goods being imported and other documents associated with the shipment e.g. the Airway Bill or Bill of Landing. If the information is correct they endorse the COI (they complete box 20 on the form) & the goods are allowed to enter the EU as organic.

If products are imported without the endorsed COI then 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 to the EU, it is the importer's responsibility to ensure that the valid COI is presented at port for each consignment. You need to ensure that each section of the COI is endorsed by the relevant party and that you retain the stamped originals for a minimum of two years. If you or the first consignee make a copy of the COI then it must be marked as 'COPY' or 'DUPLICATE'.

Any products without original COIs may lose organic status.

UK Port Health Authorities charge for endorsing COIs. Please check with the PHA at your proposed port of arrival for details of their costs. Some certification bodies also charge their licensees for issuing COIs, however the Soil Association does not charge for this service.

First consignee means the natural or legal person to whom the imported consignment is delivered who will receive it for further preparation and/or marketing.

#### 6.8.8 Receiving imported goods

- 1. The first consignee must check that imported products:
  - a) arrive in appropriate packaging or containers which prevent substitution
  - 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 21 on the COI.
- 3. You must keep records to demonstrate these checks have been made.

(EC) 889/2008 Art. 31; Art. 33; Art. 34; Art. 66(2) (EC) 1235/2008 Art. 13(9)



You will also need to keep records relating to other areas of your operation, please refer to the record keeping section (5.7).

### **6.8.9 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, (in the form of a system of suspension as provided for in *Council Regulation (EEC) No 2913/92 (3))* and undergoes some form of preparation, such as packing, repacking, or labelling as organic, then the facility must be certified organic. Before this packing/repacking/labelling takes place the COI for the imported consignment must be endorsed as described in standard 6.8.7. Once the consignment has been packed/repacked/labelled the endorsed COI must accompany the consignment and be further verified by the member states authority (in the UK this is the Port Health Authority) before they allow the consignment to be released.
- 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, under a suspensive customs procedure, (as described in *Council Regulation (EEC) No 2913/92)*, the COI for the imported consignment must first be endorsed as described in standard 6.8.7. Once the consignment is split, an extract of the COI must be given to the member states authority, (in the UK this is the Port Health Authority), for each batch, so they can endorse it. The original extract must then accompany each batch to the consignee of the batch.
- The original importer, indicated in box 11 on the original COI, must keep a copy of each endorsed extract of the COI together with the original. These copies of the endorsed extracts must be printed or stamped 'COPY' or 'DUPLICATE'.

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.

A copy of the extract from the Certificate of Inspection can be found <u>here</u>.

The extract of the COI is completed by the operator using the details from the original COI and including details of the new batch. The operator completes one for each new batch. The port authority then checks the details and completes box 13 on the extract form.

If a consignment leaves port and goes to for example, 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

- 4. When a consignee receives each batch, they must carry out the checks described in standard 6.8.8 and complete box 13 of the original extract of the COI. They must keep the original for at least 2 years.
- 5. 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) 1235/2008 Art. 14

### **6.8.10 Control arrangements**

- 1. You must provide 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 the EU
  - c) any other facilities you intend to use for storage of imported products before they are delivered to the first consignee (which may or may not be you).
- 2. Any storage site you use must also be subject to the certification system and be inspected by an organic certification body.
- 3. The first 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) 889/200 Art. 82(1)(2)

To help you meet this requirement we provide an application form that outlines what information is required.

If you are the importer, but the product is delivered into storage, or direct (R) to your customer, then they are classed as the first consignee and so will need to make the checks required in 6.8.8 and complete box 22 of the eCOI. The completed original of the COI must then be returned to you for vour records.

#### **6.8.11 Records**

1. Stock and financial records of the importer and first consignee must be kept separately, unless the importer is also the first consignee.

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

2. Details of transport arrangements from the exporter to the first consignee and from the first consignee to further consignees within the EU must be maintained.

(EC) 889/2008 Art. 83

- 3. Importers must keep records of each consignment imported into the EU. 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
  - c) A valid certificate demonstrating the organic status of the products being imported
  - d) Certificate of Inspection.

(EC) 834/2007 Art. 32

(EC) 889/2008 Art. 84; Art. 67(2)

4. If requested, the importer should forward the information in point 3 to the control body or control authority of the first consignee.

(EC) 889/2008 Art. 84

5. Importers must be able to provide copies of the organic inspection reports of any other units or premises they use for importing.

(EC) 889/2008 Art. 85

If the storage facility for your organic products is licensed with another certification body, then you will need to be able to provide a copy of the inspection report for that operation.

(R)

See details in the standard.

# 6.9 Organic wine Standards

## 6.9.1 Scope

- 1. The standards in this section apply to wine made from grapes.
- 2. Except where explicitly stated in this chapter you must also comply with:

#### Guidance



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

a) EC Regulation 606/2009 (rules for implementing Council Regulation (EC) No 479/2008 for the categories of grapevine products, oenological practices and the applicable restrictions) and b) EC Regulation 607/2009 (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).  (EC) 889/2008 Art 29(b)  6.9.2 Organic raw materials  The material you use to make organic wine (e.g. grapes) must be organically grown.  (EC) 889/2008 Art 29(c)(1)  6.9.3 Additives and processing aids  You may use the products and substances listed in the table below for making wine. You must cross reference this with EC Regulation 1234/2007 and the specific conditions and limits of application listed in Annex I A of EC Regulation 606/2009.  (EC) 889/2008 Art. 29(c)(12)  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 Ghor these additives and processing aid amunfacturer, and providing supporting information. The type of supporting information required will depend on the additive or processing aid.  Product/ Substance  Oenological practice  Oenological practice  For aeration or oxygenation  Caseous oxygen  Perlite  Centrifuging & filtration  To use only as inert filtering agents.				
The material you use to make organic wine (e.g. grapes) must be organically grown.  (EC) 889/2008 Art. 29(c)(1)  6.9.3 Additives and processing aids You may use the products and substances listed in the table below for making wine. You must cross reference this with EC Regulation 1234/2007 and the specific conditions and limits of application listed in Annex I A of EC Regulation 606/2009.  (EC) 889/2008 Art. 29(c)(2)(3); Annex VIIIa (EC) 606/2009 Annex Ia  (	Council Regulation (EC) No 479/2008 for the categories of grapevine products, oenological practices and the applicable restrictions) and b) EC Regulation 607/2009 (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).			
You may use the products and substances listed in the table below for making wine. You must cross reference this with EC Regulation 1234/2007 and the specific conditions and limits of application listed in Annex I A of EC Regulation 606/2009.  (EC) 889/2008 Art. 29(c)(2)(3); Annex VIIIa (EC) 606/2009 Annex Ia  (EC) 606/2009 Annex II  (EC) 6	The material you use to make organic wine (e.g. grapes) must be organically grown.			
Product/ Substance Oenological practice Specific conditions and restrictions within the limits and conditions set out in Regulation (EC) 1234/2007 and Regulation (EC) 606/2009  Air Gaseous oxygen  For aeration or oxygenation	6.9.3 Additives and processing aids You may use the products and substances listed in the table below for making wine. You must cross reference this with EC Regulation 1234/2007 and the specific conditions and limits of application listed in Annex I A of EC Regulation 606/2009.  (EC) 889/2008 Art. 29(c)(2)(3); Annex VIIIa		Some a derived someti to provide provide require	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.  Idditives and processing aids are a potential GM risk because they are a from crops that can be GM or are made using processes that mes involve GM. For these additives and processing aids you will need ide additional proof that they are non-GM by completing a non-GM tion form, signed by the additive or processing aid manufacturer, and any supporting information. The type of supporting information of will depend on the additive or processing aid.
Gaseous oxygen	Product/ Substance	Oenological practice		Specific conditions and restrictions within the limits and conditions
Perlite Centrifuging & filtration To use only as inert filtering agents.		For aeration or oxygenation		
	Perlite	Centrifuging & filtration	L	To use only as inert filtering agents.

Cellulose		
Diatomaceous earth		
Nitrogen	To create an inert atmosphere	
Carbon dioxide	and to handle the product	
Argon	shielded from the air	
Yeasts, yeast cell walls	Use	Individual strains organically sourced if available.
Diammonium phosphate	Use	
Thiamine hydrochloride		
Autolysates of yeast		
Sulphur dioxide	Use	See standards 6.9.4, 6.9.5 and 6.9.6 for permitted levels.
Potassium bisulphite or potassium		
metabisulphite		
Charcoal for oenological use	Use	
Product/ Substance	Oenological practice	Specific conditions and restrictions within the limits and conditions
T171		set out in Regulation (EC) 1234/2007 and Regulation (EC) 606/2009
Edible gelatin	Clarification	From organic raw material if available.
Plant proteins from wheat or peas		
Isinglass		
Egg white albumin		
Tannins		
Potato proteins		
Yeast protein extracts		
Casein	Clarification	
Chitosan derived from Aspergillus niger		
Potassium caseinate		
Silicon dioxide		
Bentonite		
Pectolytic enzymes		
Lactic acid	Acidification	
L(+)Tartaric acid		
L(+)Tartaric acid	Deacidification	
Calcium carbonate		

Neutral potassium tartrate			
Potassium bicarbonate			
Aleppo pine resin	Addition		
Lactic bacteria	Use		
L-Ascorbic acid	Addition		
Nitrogen	Bubbling		
Carbon dioxide	Addition		
Citric acid	Wine stabilization		
Tannins	Addition		From organic raw material if available.
Meta-tartaric acid	Addition		For partially fermented wines for direct human consumption as such, and the products defined in paragraphs 1, 3, 4, 5, 6, 7, 8, 9, 15 and 16 of Annex IV of <i>EC Regulation 479/2008</i> . No more than 100mg/l.
Product/ Substance	Oenological practice		Specific conditions and restrictions within the limits and conditions set out in Regulation (EC) 1234/2007 and Regulation (EC) 606/2009
Acacia gum (gum Arabic)	Use		From organic raw material if available.
Potassium bitartrate	Use		
Cupric citrate	Use		
Yeast mannoproteins	Use		
Oak chips	Use		
Potassium alginate	Use		
Chitosan derived from Aspergillus niger	Use		
Calcium sulphate	Treatment in accordance with Annex III A (2)(b) to <i>EC</i> Regulation 606/2009		Only for 'vino generoso' or 'vino generoso de licor'.
Standards		Guida	ince
6.9.4 Sulphur dioxide levels for Soil Associate			you source products certified to other organic standards they must neet this Soil Association requirement.
The sulphur dioxide levels in Soil Association certified wines must not exceed the levels indicated in the table below.  Soil Association higher standard		range	tted levels of sulphur dioxide in organic 'other wines' are given as a 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 (SO <sub>2</sub> ) lev	<i>r</i> els			
	Wine with a residual sugar level < 2 g/l	Wine with residual sugar level of 2 – 4.9g/l	Wine with sugar level of ≥5g/l	
Red	90 mg/l (25mg/l free SO <sub>2</sub> )	100 mg/l (30mg/l free SO <sub>2</sub> )	130 mg/l (50mg/l free SO <sub>2</sub> )	
White & rosé	100 mg/l (30mg/l free SO <sub>2</sub> )	140 mg/l (30mg/l free SO <sub>2</sub> )	160 mg/l (50mg/l free SO <sub>2</sub> )	
Sparkling Wine	100mg/l (10mg/l free SO <sub>2</sub> )			
Other wines as listed in Annex IB of EC Regulation 606/2009	270-370 mg/l (50mg/l free SO <sub>2</sub> )			
Why? Free $SO_2$ 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 $SO_2$ 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 $SO_2$ to be used only when strictly necessary.				
Standards		Guidance		
<b>6.9.5 Sulphur dioxide levels</b> Wine must not exceed the sulphur dioxide levels indicated in the table below.		These are the permitted sulphur dioxide levels for wines certified to the EU Organic Regulation only. Wines carrying the Soil Association symbol must meet the requirements of standard 6.9.4.		
	(EC) 889/2008 Annex VIIIa			

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.

Maximum sulphur dioxide (SO <sub>2</sub> ) le	Wine with a residual sugar level < 2g/l	Wine with residual sugar level of 2 – 4.9g/l	Wine with sugar level of ≥5g/l	
Red	100 mg/l	120 mg/l	170 mg/l	
White & rosé	150 mg/l	170 mg/l	220 mg/l	
Sparkling Wine	205	155mg/l for quality sparkling wind Smg/l for all other categories of sparkli		
Other wines as listed in Annex IB of <i>EC Regulation 606/2009</i>	270-370 mg/l (see guidance)			
Standards		Guidance		
<ol> <li>6.9.6 Use of sulphur dioxide in exceptional conditions</li> <li>You can apply to your certification body to use higher levels of sulphur dioxide up to the maximum levels outlined in Annex I B of EC Regulation 606/2009. However, you can only do so if exceptional climatic conditions of a given harvest year lead to severe bacterial or fungal attacks which deteriorate the sanitary status of organic grapes in a specific geographical area which means that more sulphur dioxide than previous years is needed in order to obtain a comparable product.</li> <li>You must keep records to show the amount of sulphur dioxide you have used.</li> </ol>		Records of sulphur dioxide used		
6.9.7 Permitted oenological practices  You may use:  a) centrifuging and filtration (with or without an inert filtering agent), but only with a pore size ≥0.2µm		or further conditions and limits of appl tration, heat treatments, and ion exchange of the second of		

b) heat treatments, but only up to 70°C c) ion exchange resins d) reverse osmosis.  (EC) 889/2008 Art. 29d(3)(4)	For conditions on using reverse osmosis refer to <i>EC Regulation 1234/2007 Annex XVa B1(b).</i>
<ul> <li>6.9.8 Prohibited oenological practices</li> <li>You must not use the following processes, practices and treatments: <ul> <li>a) partial concentration through cooling</li> <li>b) partial dealcoholisation of wine</li> <li>c) elimination of sulphur dioxide by physical processes</li> <li>d) electrodialysis treatment or treatment with cation exchangers to ensure the tartaric stabilisation of the wine.</li> <li>(EC) 889/2008 Art. 29d(2)</li> </ul> </li> </ul>	
6.9.9 Wines produced before 1st August 2010 For wines produced before 1st August 2010 you can use oenological practices processes and treatments as outlined in EC Regulation 1234/2007 Articles 120c and 120d, and EC Regulation 606/2009 Articles 3,5,9 and 10-14 and their Annexes.  (EC) 889/2008 Art. 29d(1)	Please refer to specific labelling requirements for these wines as outlined in 6.9.10.
<ul> <li>6.9.10 Labelling of wines produced before 1st August 2012</li> <li>Stocks of wines produced up until 31st July 2012 can be sold until stocks are exhausted provided they meet the following labelling conditions: <ul> <li>a) Wine produced up until 31st July 2012 must be labelled as 'wine made from organic grapes' unless it complies with point b.</li> <li>b) The EU organic logo can only be used if the process to make the wine was compliant with the current wine standards outlined in this chapter and there are records to demonstrate this which include the quantities of wine in litres, per wine category and per year. These records must</li> </ul> </li> </ul>	

- be kept for at least five years after the wine is placed on the market.
- c) If you do not have the records outlined in point b but can demonstrate that the wine meets the general standards for processing organic food and drink, then the wine may be labelled as 'wine made from organic grapes' but cannot be labelled as 'organic wine' and cannot bear the EU organic logo.

(EC) 889/2008 Art.95(10)(a)

# 6.10.1 Products and ingredients certified to other organic standards

**Standards** 

You may use products and ingredients that are certified to other organic standards, however some will have to be checked to verify that they meet Soil Association extra requirements so that the Soil Association logo can be used. These extra requirements may relate to any stage of the supply chain, including the primary production on farms. You must seek approval before using an ingredient/product where extra sourcing requirements apply.

Soil Association higher standard

#### Guidance

The annex 'Sourcing Organic Ingredients' <u>here</u> details the types of product that need to be checked and the Soil Association requirements that apply.

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.

If the organic ingredient you want to use is not certified to Soil Association standards it may need to meet extra requirements detailed in the annex 'Sourcing Organic Ingredients' <a href="here.">here.</a>

To verify compliance with the-Soil Association's requirements, we may require information from organic operators in your supply chain and their certifiers.

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, you will need to update your specification if your

suppliers of ingredients change and seek our approval prior to use. We may also require you to keep additional records, depending on the sources you use.

If you are unclear whether extra sourcing requirements apply, please contact your certification officer

# Why?

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.