

# Soil Association Food & Drink Packaging Guide

## Contents

Why does the Soil Association have higher standards for packaging?.....	1
When do I need to comply with the packaging standards?.....	2
When does existing packaging need to comply with the new standards?.....	2
What packaging information do I need to submit? .....	2
What materials are covered by the standards and what supporting evidence is needed?.....	3
Supporting evidence: Paper, card, and wood-pulp packaging .....	5
Supporting evidence: Non-GM packaging.....	5
• Non-GMO Project certification.....	6
• PCR or IP testing results for the raw materials .....	6
What if I cannot meet the packaging requirements? .....	7
Can the Soil Association recommend any compliant packaging suppliers? ..	7
Where does the Soil Association stand on recyclability of packaging?.....	7

## Why does the Soil Association have higher standards for packaging?

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

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

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

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

## **When do I need to comply with the packaging standards?**

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

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

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

This standard does not apply if you purchase an already certified product (for example, a wholesaler buying an already certified product). In this case you do not have to supply information on the packaging of that purchased product. The packaging standards also do not apply where you reuse supplier packaging for direct consumer packaging e.g. a box scheme reusing supplier boxes that organic product was delivered in.

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

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

## **What packaging information do I need to submit?**

You will be required to submit a packaging specification when you are using any new packaging material that has not been previously approved. \* The packaging specification will need to detail all the component materials used in the packaging.

Additionally, each time you submit a product for approval, you will be required to complete the packaging checklist on our Single ingredient product specification (SIPS) or Multi ingredient product specification (MIPS) form.

Depending on the packaging materials used you may also be required to submit supporting information to show that the packaging meets the Soil Association standards.

The packaging materials covered by the standards are detailed in the table below, with links to any supporting evidence required.

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

## When does packaging need to comply with the new standards?

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

Non-compliant packaging stock may not be used to package product from 1st September 2025.

Product placed in non-compliant packaging before 1st September 2025 may be sold until stocks are exhausted.

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

You can view the materials covered by the packaging standards in the table below along with details of the restrictions and when supporting evidence is required. New or updated standards are indicated with an asterisk.

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

Packaging material	Standard restrictions	Supporting evidence
<b>Chlorine bleached paper or cardboard</b> Standard 5.16.2 <a href="#">GB SA Standards</a> <a href="#">NI SA standards</a>	If you use cellulose-based materials, such as corrugate, bleached paper or cardboard, it must be totally chlorine free (TCF) or elemental chlorine free (ECF). Recycled paper must be process chlorine free (PCF).	
<b>*Paper, card, and wood-pulp packaging</b> Standard 5.16.3 <a href="#">GB SA Standards</a> <a href="#">NI SA standards</a>	From <b>September 2025</b> you must be able to demonstrate that any paper, card, and pulp packaging materials sourced from a forest ecosystem carry Forest Stewardship Council (FSC) certification or the Programme for the Endorsement of Forest Certification (PEFC).	Yes – see <a href="#">here</a> for details
<b>Plastic materials, coatings, dyes or inks containing phthalates</b>	You must not use any plastic materials, coatings, dyes or inks that contain phthalates.	

<p>Standard 5.16.4 <a href="#">GB SA Standards</a> <a href="#">NI SA standards</a></p>	<p>*This has been expanded to cover all packaging materials, not just those in contact with the food, from September 2025.</p>	
<p><b>PVC and other chlorinated plastics</b></p> <p>Standard 5.16.5 <a href="#">GB SA Standards</a> <a href="#">NI SA Standards</a></p>	<p>The use of Polyvinyl chloride (PVC) and any other chlorinated plastics (eg. PVdC*) packaging is not permitted unless your packaging meets the exemptions laid out in standard 5.16.5 <a href="#">GB SA Standards NI SA Standards</a>, where there are no functional alternatives available.</p> <p>*PVdC will no longer be permitted from September 2025.</p>	
<p><b>Non-GM packaging</b></p> <p>Standard 5.16.6 <a href="#">GB SA Standards</a> <a href="#">NI SA standards</a></p>	<p>If you are using packaging materials derived from plant-based sources you must provide evidence that these have not been derived from or manufactured using genetically modified organisms.</p>	<p>Yes – see <a href="#">here</a> for details</p>
<p><b>BPA and other bisphenols in food-contact materials</b></p> <p>Standard 5.16.7 <a href="#">GB SA Standards</a> <a href="#">NI SA standards</a></p>	<p>You must not intentionally use BPA or other bisphenols in your food contact materials.</p>	
<p><b>*Oxo-degradable plastics</b></p> <p>Standard 5.16.8 <a href="#">GB SA Standards</a> <a href="#">NI SA standards</a></p>	<p>From September 2025 you must not use oxo-degradable plastics.</p>	
<p><b>*Polystyrene</b></p> <p>Standard 5.16.9 <a href="#">GB SA Standards</a> <a href="#">NI SA standards</a></p>	<p>From September 2025 you must not use polystyrene in <a href="#">primary packaging</a> materials.</p>	
<p><b>*PFAS (Per- and polyfluoroalkyl substances)</b></p> <p>Standard 5.16.10 <a href="#">GB SA Standards</a> <a href="#">NI SA standards</a></p>	<p>From September 2025 you must not use per- and polyfluoroalkyl (PFAS) chemical substances in your packaging products. See guidance in the Standards for a list of materials at risk of containing PFAS.</p>	

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

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

This can be evidenced with an invoice from your supplier for the products including a valid chain of custody claim from [FSC](#) or [PEFC](#). You can:

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

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

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

## Supporting evidence: Non-GM packaging

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

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

If you are using packaging materials derived from non-organic plant-based sources\*, you must follow these steps:

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

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

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

**Adequate evidence includes:**

- **Non-GMO Project certification**

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

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

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

**PCR Testing**

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

**IP Testing**

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

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

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

\*Some plant-based packaging components are exempt from this standard as it is not technically possible to verify their non-GM status. For the list of exemptions please refer to standard 5.16.6 [GB standards NI Standards](#)

## **What if I cannot meet the packaging requirements?**

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

## **Can the Soil Association recommend any compliant packaging suppliers?**

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

## **Where does the Soil Association stand on recyclability of packaging?**

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

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

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