



## Soya Policy

### **Summary**

Premier Foods understands the link between soy production and deforestation and conversion of forests and other natural ecosystems. This degradation of land contributes to climate change and human rights abuses. Therefore, we are committed to the goal of using only soy that has been grown without deforestation and habitat conversion across the whole soy supply chain by 2030.

Premier Foods is a member of the Round Table for Responsible Soy (RTRS) and the UK Roundtable on Sustainable Soy. Through these we can play our role in promoting zero deforestation and conversion and respecting the rights, customs, and culture of different communities and indigenous populations around the globe.

Currently all soy directly and indirectly sourced by Premier Foods is covered through sustainable certification models.

As part of our Roadmap to achieving our 2030 goal we understand the importance of tracing our upstream supply chain and verifying its deforestation and conversion free (DCF) status.

As part of Premier Foods ongoing work through our Enriching Life Plan we will continue to review this policy to ensure ongoing alignment with our stakeholder needs.

### **Policy Detail**

Premier Foods is committed to creating great food which our consumers love – food that is tasty, easy to prepare and reliable with a meaningful heritage, which resonates in the UK and our markets around the world. As one of Britain’s largest branded food producers, we supply a wide range of retail, wholesale, foodservice, and other customers with some of Britain’s best loved brands. We aim to ensure that we continually deliver value and quality across all our products.

Premier Foods directly procures soya flour and other soya derived ingredients for use in some of our food products. Additionally, the supply chains for many animal origin ingredients we use include ‘indirect’ use of soya as an animal feed ingredient.

We believe that soya should be produced in an economically, socially, and environmentally responsible manner.

We are committed to the goal of using only soya (direct and indirect) that has been grown without deforestation and is habitat conversion free across the whole soy supply chain by 2030.

Premier Foods is a member of the Round Table for Responsible Soy (RTRS) and the UK Roundtable on Sustainable Soy. Through this we can play our role in promoting zero deforestation and respecting the rights, customs, and culture of different communities and indigenous populations around the globe.

Currently all soya directly sourced directly and indirectly by Premier Foods is covered through certification, either mass balance or credits. BM TRADA, the leading independent certification body, has certified our products’ sites as having RTRS/Proterra approved traceability systems

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Date of Approval	Oct 23	Policy Originator:	Sarah Adams/Clare Hazel		

capable of guaranteeing the direct use of soy from sustainable sources. All our sites that handle soya flour are certified to the RTRS/Proterra sustainable soy standard.

Of the soya we buy indirectly, the vast majority is used within animal feed and therefore sourced indirectly via our dairy, egg, meat, stocks, flavorings, and seasonings supply chains. These are complex supply chains and currently we are not able to trace the country of origin. However Premier Foods recognizes the scale of this issue beyond our own supply chains, therefore, through RTRS credits we support farmers in high-risk countries. Currently the volume of soy indirectly sourced by Premier Foods is covered through certified sustainable RTRS credits. The following link explains how the investment in credits supports sustainable soy.

<https://www.premierfoods.co.uk/CorporateSite/media/documents/sustainability/behaviour%20policies/Soy-Management-Through-RTRS-Certified-Credits-without-farmer-details.pdf>

On our journey to ensure 100% of the soy we buy meets our 2030 commitments, we are working with our suppliers to ensure we have complete transparency on how the soy within these indirect supply chains is cultivated.

Manufacturing sites producing for retailers under their own brands will in addition ensure full compliance with their policies on this issue.

## **Regulations**

Regulations are in place that cover:

### **a) Allergen Labelling of soybeans and their products in foods:**

Allergen labelling is controlled by Regulation (EU) No 1169/2011 on the provision of food information to consumers (the "FIC"). This regulation (at Article 21) requires that the presence of 14 foods and their derivatives known to commonly cause serious allergic or intolerance reactions be clearly labelled on the packaging of pre-packed food products. They must be clearly indicated in the ingredient list with a clear reference to the name of the allergen which must be emphasised through use of a typeset that clearly distinguishes it from the rest of the ingredient declaration. Soybeans and their products are included in the list of 14 foods which require this labelling.

### **b) Labelling of GM soya used in food and animal feed:**

The current legislation covering genetically modified organisms (GMOs) came into force in April 2004. There are two separate regulations, Regulation (EC) No 1829/2003 on genetically modified food and feed and the details affecting traceability and Regulation (EC) No 1831/2003 on labelling of GMOs and traceability of foods and feeds produced from GMOs. These provisions require that, from April 18<sup>th</sup>, 2004, product labelling specifies those foods or ingredients that contain GMOs and those produced from GMOs, even if no GMO material is present in the final product. Any intentional use of GM ingredients at any level must be labelled. However, Regulation (EC) No 1829/2003 provides for a threshold for the adventitious or accidental presence of GM material in non-GMO food or feed sources, below which labelling is not required. The threshold is set at 0.9% and only applies to GMOs that are authorized for use in the UK and the EU. Foods from animals that have been fed GM soya do not require GM labelling under this legislation.

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