



Doc ref: ENV002

Group Soy Sourcing Policy

Ingredient and feed

Issued By:	Authorised By:	Date:	Issue No:
David Moore	Brian Byrne	20/03/2025	3

Contents

Scope..... 3

Aim..... 3

Commitment..... 3

Implementation..... 4

Approved Soy Standards..... 5

Regulation..... 5

Issued By:	Authorised By:	Date:	Issue No:
David Moore	Brian Byrne	20/03/2025	3

Policy

Group Soy Sourcing Policy

Scope

This policy applies to the use of Soy used in retailer Branded, Own Label and Food Service Finished products and Ingredients supplied to The Compleat Food Group.

- Soy as a food ingredient - Soy and food ingredients containing soy
- Soy in animal feed for the production of meat, poultry, dairy and eggs - including soy meal, soy hulls, soy oil.
- Soy derivatives such as soy lecithin, methyl, and soyate are in scope.

Aim

Increasing global demands for meat products and, as a consequence, for animal feed of which soy is a key ingredient, is driving soy production. Soybeans are predominantly produced in North America, South America, Europe, and Asia and are linked to the loss of natural forest from deforestation and conversion which can lead to detrimental impacts on important landscapes such as the Amazon, Cerrado, and the Gran Chaco. As a large purchaser of embedded soy and soy ingredients, it is important for Compleat to safeguard natural forests and the communities that are dependent on them. We do not, however, plan to move away from soy as this is not always possible and there are benefits to remaining engaged with the value chain, such as supporting farmers and using market influence to promote positive change.

Therefore, the aim of this policy is achieving verified deforestation and conversion free (vDCF) soy sourced from any origin.

The Compleat Food Group will work with suppliers to support the sourcing of verified deforestation and conversion free (vDCF) soy by ensuring all soy entering our supply chains is deforestation and conversion free as soon as possible, and by December 2025 at the latest. To deliver this commitment we have agreed action plans with our customers to support our transition from purchasing regional mass balanced credits to sourcing soy from a physically segregated chain of custody up to the point of import into the UK that is certified to a deforestation and conversion free (DCF) standard as benchmarked by the [European Feed Industry \(FEFAC\)](#), or be verified DCF by a third party. Being an active member of the UK Soy Manifesto will help to facilitate the sourcing changes we are committed to in this policy.

Commitment

As a signatory to the UK Soy Manifesto (UKSM), The Compleat Food Group commits to no legal or illegal deforestation and conversion across its primary deforestation-linked commodities by December 2025, with a cut-off date of 2020. This applies to both UK and non-UK direct suppliers of soy embedded in

Issued By:	Authorised By:	Date:	Issue No:
David Moore	Brian Byrne	20/03/2025	3

animal feed and soy as a product or ingredient in both retailer own label and branded products, in line with the UKSM commitment. Evidence that soy is from a low-risk origin (North America) is sufficient to meet our policy.

The cut-off date is based on the Accountability Framework Initiative's (AFI) definition. It means that clearance of natural forest after 2020 renders the affected area, and the commodity produced there, to be non-compliant with our no-deforestation and no-conversion commitments. Deforestation, also defined by AFI is the 'loss of natural forest as a result of land conversion and degradation', while conversion is defined as the 'change of a natural ecosystem to another land use, or a profound change in the natural ecosystem's species composition, structure, or function'.

For more information on UKSM, please visit: <https://uksoymanifesto.uk>

Implementation

Soy as a food ingredient

- All soy used in an own label and branded finished product must be Non-GM.
- Where mass balanced or segregated soy is not currently used, The Compleat Food Group purchases regional mass balanced credits as a minimum in line with the FEFAC sourcing guidelines. From December 2025, all soy supplied to Compleat must be physically segregated and vDCF.
- Where soy is used in a branded line that The Compleat Food Group distribute without any input, this is out of scope of this policy. However, we encourage our peers to make similar commitments in line with the UKSM.
- If sourcing Organic Soy, this must be sourced from Europe and certified to EU Organic Regulation.
- Soy and soy additives should only be used in food as an ingredient for its functionality in delivering optimum product quality. Alternative sustainable options shall be explored during development where appropriate.
- Suppliers must support the annual commodities disclosure and reporting process if requested. You'll need to disclose the volumes supplied and provide evidence to support any certified claims. Evidence of vDCF soy should be made available to Compleat on request.

Soy in animal feed

- GM Soy is currently permitted in conventional livestock due to a lack of availability of non-GM in the supply chain. However, where possible livestock must be fed non-GM soy. Non-GM soy must be used in Organic livestock.
- The feedmills and importers used to source Soy should be a signatory to the statement of support for the Amazon Soy Moratorium and support the Cerrado Manifesto.
- By December 2025, all soy used in animal feed for retailer own label and branded products must be contracted to be sourced from a physically segregated chain of custody that is certified to an *approved DCF standard or verified DCF by a third party. Approved soy standards are listed at the

Issued By:	Authorised By:	Date:	Issue No:
David Moore	Brian Byrne	20/03/2025	3

bottom of this policy. Evidence that soy is from a low-risk origin (North America) is sufficient to meet our policy.

- If sourcing Organic Soy, this must be sourced from Europe and certified to EU Organic Regulation.
- Soy shall only be used in animal feed for its functionality in delivering optimum livestock nutrition. Alternative DCF options should be explored during development where appropriate.
- Suppliers must support the annual commodities disclosure and reporting process if requested. You'll need to disclose the volumes supplied and provide evidence to support any certified claims. Evidence of vDCF soy should be made available to Compleat on request.
- Road maps have been in place since 2023 and are reviewed on an annual basis with each manufacturing site and/or protein supply chain to show a working timeline for the transition to vDCF soy by December 2025.

Approved Soy Standards

vDCF soy used in own label products must meet a soy standard approved in the retailer code of practice.

Soy used in branded products must be from one of the following *approved soy standards. From

December 2025, only soy certified by a standard that meets vDCF will be compliant.

- Round table on Responsible Soy Association (RTRS) (Segregated – vDCF)
- ProTerra (Segregated – vDCF)
- Organic, low risk origin (vDCF)
- Donau Soy, low risk origin (vDCF)
- USSAP, low risk origin (vDCF)
- Danube or European Soy (in Transition)
- ISCC PLUS Cefetra CRS (in Transition)
- Cargill Triple S (in Transition)
- ADM – The Responsible Soybean standard (in Transition)
- Cefetra Responsible Soy (in Transition)
- AIC Sustainable Commodities Scheme Module 1 (in Development). Alignment with EU Deforestation Regulation and additional Conversion free module (both currently in development, to be available for soy imported into the UK, for certification by the end of 2025).

Please refer to FEFAC Soy Sourcing Guidelines for further information: [StandardsMap](#)

Regulation

We remain aware of changing regulatory landscape and are working with our suppliers and customers to ensure we will be compliant to EU Deforestation Regulation (EUDR) and UK Forest Risk Commodities (UKFRC), and any other applicable legislation once enforced. Where in-scope, materials supplied to Compleat will need to be compliant to meet these regulations.

Products that are in-scope of Annex 1 of EUDR and are placed on sale in EU/Northern Ireland, after the 31/12/2025, are required to have the following:

- 1) A Due Diligence Statement, for the product to be entered on the EU Information Database.
- 2) Evidence that the product is 'deforestation free' as of the 30th of December 2020.

Issued By:	Authorised By:	Date:	Issue No:
David Moore	Brian Byrne	20/03/2025	3

- 3) Evidence that the product has been harvested/produced in accordance with any applicable laws from its Country of Origin, as defined by the EU Commission.

Continued Improvements

- This policy shall be reviewed periodically to ensure that it remains relevant and appropriate to the organisation.
- The Compleat Food Group shall publicly report on progress against this policy via our website on an annual basis and participate in annual reporting for retail and food service: [TCFG UK Soy Manifesto Progress Report-2024.pdf](#)

Signed:



Name: Brian Byrne

Title: Chief Procurement Officer

Date: 22/01/2025

Issued By:	Authorised By:	Date:	Issue No:
David Moore	Brian Byrne	20/03/2025	3