



**Doc ref: ENV002**

# **Group Soy Sourcing Policy**

**Ingredient and feed**

Issued By:  
Date:  
David Moore  
04/12/2025

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Issue No:  
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# 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.

### 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 some 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.

The Compleat Food Group will work with suppliers to support the transition towards sourcing soy that is verified deforestation and conversion free (vDCF). To deliver this commitment we must 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. Our engagement with our customers and supply base as well as 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, with a cut-off date of 2020. This applies to the soy embedded in the animal products we source and to the soy that is sourced as a raw material or ingredient for both retailer own label and branded products.

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Update: The time-bound element for achieving this commitment has been removed. Compleat will instead look to source vDCF when it is commercially available to do so. The Compleat Food Group will keep an open dialogue with our supply base to understand what level of soy certification is available on the market and ensure that we are progressing up a preferred soy sourcing hierarchy, as outlined by the Retail Soy Group (RSG), in order to achieve our ultimate goal of sourcing vDCF soy. More can be read about this decision in our latest statement.

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 and their latest statement, please respectively visit: <https://uksoymanifesto.uk> & [UKSM progress towards 2025](#)

## Implementation

### Soy as a food ingredient

- All soy used in an own label and branded finished product must be Non-GM.
- 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.
- 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.
- Soy must be sourced from a physically segregated chain of custody that is certified to an approved DCF standard or be verified DCF by a third party as and when it is commercially available to do so. Evidence that soy is from a low-risk origin (North America) is sufficient to meet our policy.
- 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 soy certification 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.

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- If sourcing Organic Soy, this must be sourced from Europe and certified to EU Organic Regulation.
- The feedmills and importers sourcing Soy should be a signatory to the statement of support for the Amazon Soy Moratorium and support the Cerrado Manifesto.
- Soy used in animal feed must be contracted to be sourced from a physically segregated chain of custody that is certified to an approved DCF standard or be verified DCF by a third party as and when it is commercially available to do so. Update: The Retail Soy Group (RSG) has outlined its expectation on how soy-buying livestock producers can transition towards vDCF. These are outlined in the table below.
- Evidence that soy is from a low-risk origin (North America) is sufficient to meet our policy.
- 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 soy certification should be made available to Compleat on request.

vDCF	Sourcing soy from a fully segregated chain of custody
Low-risk origin	Sourcing soy from countries with low deforestation risk, e.g. North America, China, EU
*EUDR-	Sourcing soy that is verified deforestation-free (vDF)
Soft Commodities Forum	Sourcing soy via a forum of Importers who can verify that at least 98% of soy they import into the UK is vDCF = this would allow us to claim that we are responsibly sourcing soy on a mass-balanced basis

RSG: preferred soy sourcing hierarchy towards vDCF

\*pending ratification of regulation

## 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. 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)

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- 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 (vDF) and additional Conversion free module (vDCF). Both are currently in development to be available for soy imported into the UK.

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

## Regulation

We are aware of changing regulatory landscape but remain committed to 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.

## 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 Operating Officer

Date: 04/12/2025

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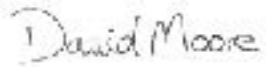
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Date	Update	Signed by	Signature
04/12/2025	Removed time-bound element to achieving our vDCF commitment	David Moore	

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