25 November 2024

Think-tank reports Soil Association 'greenwashing' claims to advertising watchdog

Pro-innovation think-tank Science for Sustainable Agriculture (SSA) has written to the Advertising Standards Agency's head of complaints and investigations, Miles Lockwood, calling on the ASA to investigate potentially misleading claims made by the Soil Association in relation to organic farming and regenerative agriculture.

On 7 November, the Advertising Standards Agency (ASA) issued new advice warning that the lack of consistent definitions and metrics in relation to regenerative agriculture could give rise to potentially misleading and/or unsubstantiated marketing and advertising claims.

Four days later, the Soil Association issued a press statement welcoming the ASA's advice, and claiming that certified organic agriculture was the only independently accredited, "gold standard" form of regenerative agriculture and, therefore, less open to the potential risk of 'greenwashing'.

Ironically, however, the Soil Association's own statement contains clear examples of the kind of greenwashing claims the ASA was warning about.

In view of the advertising watchdog's previous advice on the potential for misleading claims among those marketing and advertising organic products, the SSA letter challenges claims made in the Soil Association's media release of 11 November as follows:

> **""reassurance of the highest animal welfare standards"**
> There is no unequivocal, substantiated evidence for this absolute statement and in a previous case the ASA has concluded that evidence submitted in support of a similar claim failed to show that, in all cases, organically farmed animals experienced better conditions than non-organically farmed animals. A recent peer-reviewed study published in *Nature Food (Bartlett, H., Zanella, M., Kaori, B. et al. Trade-offs in the externalities of pig production are not inevitable. Nat Food **5**, 312–322 (2024))* concluded that in relation to pig production, woodland systems offered better welfare outcomes than organic.
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> **"free from pesticides and fossil-fuel based fertilisers"**
> This statement is potentially misleading in two ways. Firstly, it does not specify 'synthetic' pesticides, simply claiming that organic farming is 'free from pesticides' when clearly organic standards permit a wide range of

manufactured pesticides to be used in crop production. A list of more than 20 pesticides approved for use in organic farming is available on the Pesticide Action Network UK website.

Secondly, given the organic sector's emphasis on its 'holistic' approach to farming and food production, we would draw your attention to the widespread use by organic growers of 'emergency' derogations to plant non-organic seed. For some crop types, seed industry estimates put the use of non-organic seed at up to 90% of total seed use (*see Fresh approach needed to secure UK organic seed supply, SSA, May 2024*).

We have not carried out any validated consumer research on this issue (perhaps we should?), but we would be reasonably confident that consumers paying a substantial premium for certified organic products would not be aware of this loophole. If, for example, organic shoppers were asked if they would expect organic carrots to have been produced from non-organic seed grown using the same synthetic pesticides and artificial fertilisers prohibited under organic standards (and vigorously campaigned against by the organic lobby) we strongly suspect the answer would be no, and that they would expect such 'semi-organic' products to be labelled as such. We would welcome the ASA's views on this.

Similar 'emergency derogations' are in place throughout the organic sector's 'legally binding standards and practices', for example to permit the use of non-organic feedstuffs, to import manure from non-organic farms, and to use non-organic poults up to 14 weeks of age in organic egg production systems.

"organic farms on average have 30% more biodiversity"
Again, there are two aspects to this potentially misleading statement. Firstly, peer-reviewed evidence can equally be cited which has not found such levels of biodiversity benefit associated with organic farms. For example, Benton *et al* in the *Journal of Applied Ecology* (*Food production vs. biodiversity: comparing organic and conventional agriculture, January 2013*), in the largest UK-specific comparison organic vs. conventional crop production, questioned whether *"relatively modest biodiversity gains can be justified by the substantial reductions in food production. Indeed, the relatively low yields of organic farms may result in larger areas of land being brought into agricultural production (locally or elsewhere), at a biodiversity cost much greater than the on-farm benefit of organic practice."*

This context is absolutely critical in relation to biodiversity-related claims. In a 10-year international study published in the journal *Nature*, Balmford *et al (The environmental costs and benefits of high-yield farming, September 2018),* concluded that the most effective way to keep pace with increasing human demands for food while protecting habitats and preventing further biodiversity loss is through high-tech, high-yield production on land that is already farmed, so avoiding the need to bring more land into production. Since a 2021 meta-analysis by Galvarez *et al* in the journal *Agronomy and Soil Science* (*Comparing Productivity of Organic and Conventional Farming Systems: A Quantitative Review*, January 2021) identified a productivity gap between organic and conventional of between 29% to 44% depending on the type of crops included in the rotation, claims that organic farming is better for biodiversity are simply not supported by the evidence."

Members of the Science for Sustainable Agriculture advisory board have therefore urged the Advertising Standards Agency to take the appropriate action to ensure that

these absolute and misleading claims by the Soil Association in relation to organic farming are either qualified or withdrawn.

In addition, SSA has encouraged the ASA to highlight the importance of developing consistent, science-based sustainability metrics which will enable claims made in relation to the environmental and other impacts of different farming systems to be properly assessed and validated.

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Notes
A copy of the SSA letter addressed to the Advertising Standards Agency's head of complaints and investigations, Miles Lockwood, is available here.

Science for Sustainable Agriculture (SSA) is a new policy and communications platform, offering a focal point for information, comment and debate around modern, sustainable agriculture and food production. Supported by an independent advisory group of political, scientific and industry leaders from a range of sectors and backgrounds, SSA's aim is to promote a conversation rooted in scientific evidence, rather than ideology. Science for Sustainable Agriculture provides a platform for like-minded individuals and organisations to champion and explain the vital role of science and technology in safeguarding our food supply, tackling climate change and protecting the natural environment, as well as to expose, comment on and challenge unscientific positions or policy decisions in relation to sustainable agriculture.

Further information about Science for Sustainable Agriculture is available here.

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