



Miles Lockwood
Head of Complaints and Investigations
Advertising Standards Authority (ASA)
Castle House
37-45 Paul Street
London EC2A 4LS

15 November 2024

Dear Mr Lockwood

ASA advice regarding regenerative agriculture

We note that you personally have repeatedly stated in public how seriously the Advertising Standards Agency takes greenwashing claims, and that the ASA has issued specific guidance in relation to absolute and/or unsubstantiated claims regarding the comparative environmental benefits or otherwise of different farming systems.

We are therefore writing to draw your attention to the Soil Association's interpretation of the Advertising Standards Authority's recent advice (7 November) regarding marketing and advertising claims in relation to regenerative agriculture and its products.

Science for Sustainable Agriculture is an independent, not-for-profit think-tank, overseen by an advisory board of prominent academics, politicians, farmers and industrialists, whose mission is to promote a more evidence-based public debate about the use of science and technology in agriculture, as well as to call out misinformation and double standards where appropriate.

While sharing the ASA's concern that a lack of consistent definitions, benchmarking and metrics in relation to regenerative agriculture could give rise to potentially misleading or unsubstantiated claims, we trust that the Authority will be equally concerned that the implication drawn from and directly associated with the ASA's advice in media information subsequently issued by the Soil Association (11 November) was that certified organic agriculture is the only independently accredited and "gold standard" form of regenerative agriculture and, therefore, less open to the potential risk of 'greenwashing'.

Given the ASA's previous concerns and specific advice issued in relation to greenwashing claims for those marketing and advertising organic products, we would draw your attention to the following unsubstantiated claims made by the Soil Association for organic farming in its media release of 11 November:

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“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.

“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.

Furthermore, the Food Standards Agency recently issued a report which found that one in four people in the UK are 'food insecure'. This situation is unlikely to be improved by promoting higher-priced organic food over conventional, especially when the evidence base for doing so is so sketchy and open to challenge.

We would therefore urge the Advertising Standards Authority to take the appropriate action to ensure that these absolute and, we would argue, misleading claims by the Soil Association in relation to organic farming are either qualified or withdrawn.

In addition, we would urge the ASA to join Science for Sustainable Agriculture in highlighting to Government 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.

With kind regards

Daniel Pearsall
Co-ordinator
Science for Sustainable Agriculture

(For and on behalf of the Science for Sustainable Agriculture Advisory Board)