



Sainsbury's

Our Requirements for Soy

Our Introduction

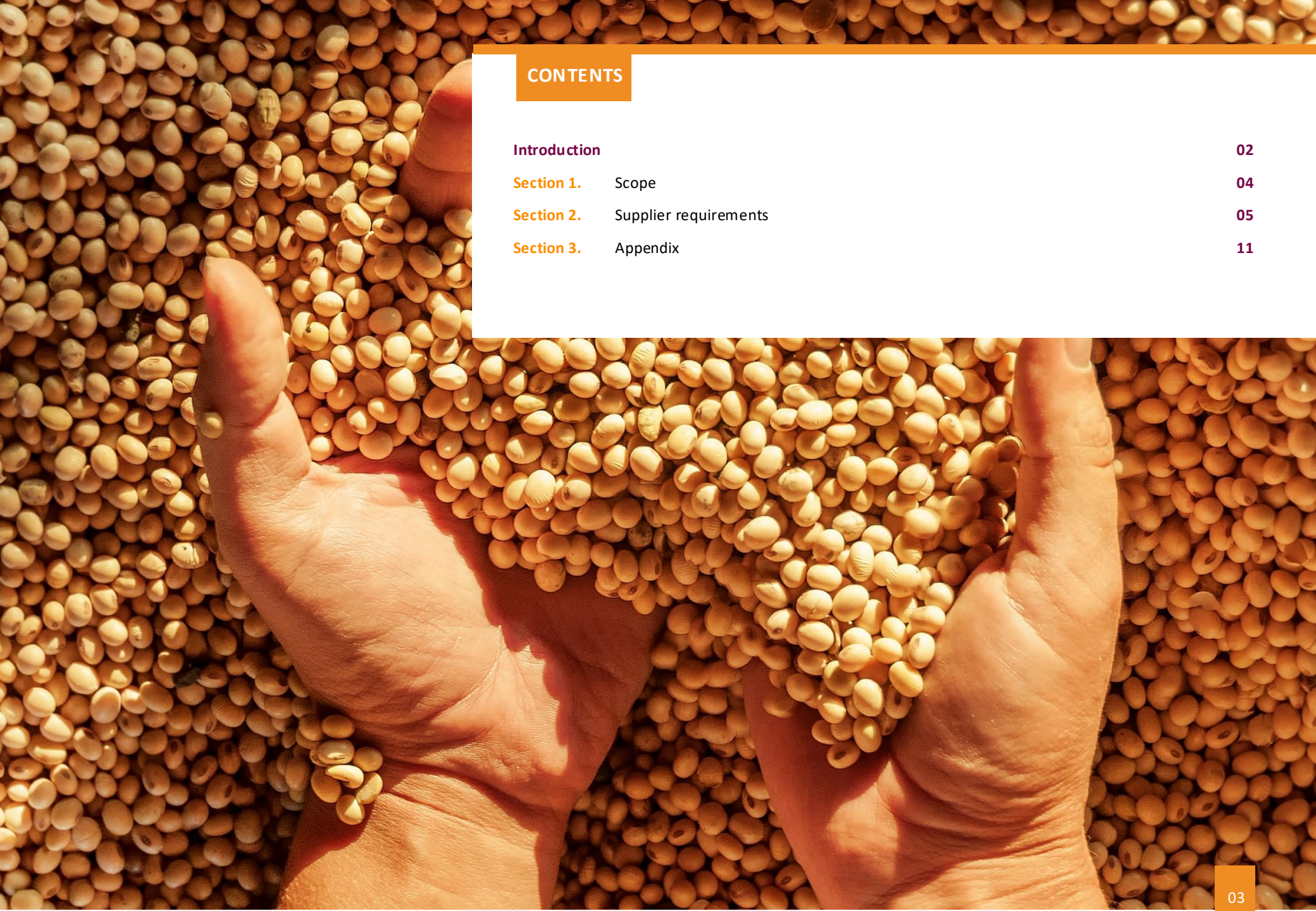
At Sainsbury's we seek to build resilient supply chains by sourcing products ethically and sustainably.

We have committed to achieve 100% Deforestation and Conversion Free (DCF) in our own brand product supply chains, including soy. This document is intended to bring clarity to our suppliers on (i) our requirements relating to the use of soy-based animal feed for our products, (ii) and our asks relating to suppliers' own commitments and efforts to tackle deforestation and ecosystem conversion in their operations. Soy is a globally traded commodity produced in both temperate and tropical regions and serves as a key source of protein and vegetable oils. Soybean meal and soy oils are widely used in animal feed to produce meat and dairy products. With a rising global demand for these products, soy has become one of the world's largest crops, and is a major driver of deforestation.

This expansion of soy production has led to the deforestation and habitat conversion of some of the world's most precious places, particularly in South America. These include the savannahs and dry forests that make up the Cerrado. As well as being a rich ecosystem for plants and wildlife, the Cerrado also plays a vital role in the fight against climate through carbon sequestration.

This document is intended for all suppliers who supply Sainsbury's with own brand animal protein products (whole or ingredient) where soy is used as animal feed and soy used as a direct ingredient.





CONTENTS

Introduction	02
Section 1. Scope	04
Section 2. Supplier requirements	05
Section 3. Appendix	11

Scope

Soy is found in different product categories in our business, which can be divided into the five following categories in Table 1.

The focus of our Sustainable Soy Requirements is as follows:

Soy Categories	Scope
1. Direct Soy – Directly purchased and controlled soy including edamame beans and soy milk	In scope
2. Meats – Soy used in feeds for meats such as beef, pork, chicken, duck, fish etc.	In scope
3. Eggs and dairy – Soy used in feeds for dairy and egg animals. Includes milk, yogurt etc.	In scope
4. (A) Meat as ingredient – Soy used in feeds for animals where the meat is an ingredient in a sold product	In scope
4. (B) Dairy/egg ingredients – Soy used in feeds for animals where the milk or eggs are used as an ingredient in a sold product	In scope
5. Soy used to produce soy derivatives used as an ingredient such as lecithin methyl soyate etc.	Out of scope

For list of soy-based animal feed in scope, please see Table 2 in the Appendix



Supplier Requirements

Suppliers are responsible for ensuring that the Sainsbury's supply chain for high-risk soy animal feed complies with Sainsbury's company commitments to sustainable soy meal. This guidance is intended for use by suppliers, including those that purchase directly from producers, as well as downstream companies that purchase raw, processed, or finished products at different stages in the supply chain.

We are asking suppliers to (i) match our commitments to tackle soy-driven deforestation AND (ii) help build better transparency into soy supply chains to ensure our products are deforestation and conversion free (DCF).

Step 1: Matching our commitments to achieve DCF soy supply chains

To tackle soy-driven conversion at scale, we believe there needs to be a collective industry effort to ensure deforestation and conversion free soy supply chains across our sector. Sainsbury's are signatories to the [UK Soy Manifesto](#), which aims to ensure all physical shipments of soy to the UK are deforestation and conversion free. We ask our suppliers commit to:

Your actions

1. Adopt a policy of only using, or buying products that have been fed soy that has not been grown on land that has been deforested or converted since December 2020 (in line with Accountability Framework Initiative)
2. Require your direct suppliers to match and cascade these commitments
3. Monitor and verify your supplier's performance
4. Publicly report on your progress (e.g. on website)

Timeline for action:

- Policy Adoption: September 2022
- Annual Progress Reporting: Starting January 2023



Supplier Requirements - continued

Step 2 – Ensure DCF soy is used for Sainsbury's products

By December 2025, all soy used in our products must be verifiably compliant with our policy by virtue of where it comes from (origin) or by effective monitoring systems (procurement controls). Suppliers should work with their supply chain to build better transparency into soy supply chains to achieve this. Where this is not available, suppliers may use mass balance certification or credits to demonstrate progress towards DCF soy.

1. Origin: Soy verified to be sourced from countries or areas considered at a low risk of deforestation or conversion. This may include areas with regional monitoring systems, such as the Amazon Soy Moratorium or alternatively, from one or more of the Responsible Commodities Facility farms.

The following defines the country level risk analysis for soy animal feed. Any list of sub-national areas deemed low-risk (e.g. Brazilian municipality) should be agreed with the relevant Sainsbury's technical manager.

High Risk Country	Low Risk Country		Unknown Origin (Country or Area)
Brazil Argentina Paraguay Uruguay Bolivia	USA Canada Europe Ukraine	Russia India China Other	High risk assumed

2. Procurement Controls: Soy from supply chains with matching commitments and independent monitoring demonstrating compliant producer landscape practices.

Soy coming from higher deforestation and conversion risk countries or areas may be verified to be DCF through independent monitoring systems. The independent monitoring system must use satellite/geospatial monitoring to assess the soy has not been grown on land that has been deforested or converted since December 2020. The third-party monitoring provider should provide visibility of independent assessments to Sainsbury's on an agreed basis.



Supplier Requirements - continued

3. Independent certification: suppliers may also use certified soy (segregated) to deliver DCF soy or, if no DCF options are available, Mass Balance as a transitional mechanism.

Soy that is certified to a Mass Balance standard may be used if verified DCF soy is not available. It should be certified to a standard [benchmarked by the European Feed Industry's \(FEFAC\)](#) as achieving the no-conversion criteria, with a cut-off date before 2020, that is delivered in a mass-balance (MB).

Please follow the link above for a list of certifications currently accepted through this benchmark (please note the need for certifications to meet the no-conversion criteria).

Below are the chain of custody models that meet our certification requirements:

Supply Chain Model	DCF?	Definition
Book & Claim	No	A claim is not tied to the physical soy volumes, but instead is traded on a separate online market.
Area mass balance	No	System of regional certificates, where certificates are bought from certified farms in a region where the physical soy originates. Claims are not tied to the physical soy volumes.
Mass balance (Transition)	No – can only be used if DCF soy not available. Will require a 6 monthly review with technical teams.	Soy from one or more certified facilities/sites may be mixed with sources of non-certified soy. An accounting system ensures the volume of certified soy corresponds to the total volume of soy delivered by certified farms.
Segregation	Yes	Soy from one or more certified facilities is kept physically separate from other sources.
Identity Preserved	Yes	Use of segregation and traceability procedures to maintain the identity of specific lots of agricultural or processed products throughout all stages of production, maintenance, transportation, storage and processing.

Certificates: For any volumes of soy used for Sainsbury's products that do not meet the DCF definition above, suppliers should purchase the equivalent certificates from RTRS Regional credits or Cefetra Area Mass Balance credits, and share evidence of this with Sainsbury's.



2026 Supplier Requirements

Since 2022, we have worked through industry groups such as the UK Soy Manifesto to determine a credible pathway towards vDCF that all companies could align around. The consistent transition pathway sought would provide a common request to key suppliers on how verified deforestation-and conversion-free (vDCF*) supply chains could be delivered before 2025 deadline would be reached by UK Soy Manifesto Signatories. Efforts to achieve 100% alignment were ultimately unsuccessful due to continued market uncertainty regarding the price of vDCF soy in the value chain. This is due to a combination of factors including regulatory uncertainty from the EU Deforestation Regulation and UK Forest Risk Commodities regulation and an absence of a vDCF feed standard that can be specified to suppliers and feed mills.

As a result, we developed the below sourcing requirements with other retailers to provide certainty to the market in 2026 given the immediate need to forward buy for January 2026. **Our target is still to source 100% vDCF soy and we expect all suppliers to aim for this.**

Supply Chain Characteristics & Evidence for Retailers

Order of Preference	Classification	Sourcing	Description	Chain of Custody		Assurance		Certification Options				Origin
				Segregation at point of import	Mass Balance after company purchase	3 rd Party Review	Published Outcome	RTRS	Proterra	VISEC	AIC Programme (EUDR)	Import Documents
1	vDCF	Chain of Custody Segregation (2020 cut-off or earlier)	Soy verified DCF at farm-level is kept physically separated from unverified soy from source to UK.	✓		✓	✓	✓	✓			
2		Low Risk Origin	Soy produced outside of South America	✓								✓
3	vDF	EUDR-aligned (e.g. VISEC, AIC)	Soy verified deforestation-free at farm-level is kept physically separated from unverified material	✓		✓	✓			✓	✓	
4	Responsible Buyer	Importer >98% vDCF from high-risk areas	Soy that is sourced from an importer that has a full vDCF purchasing commitment for high-risk soy that is being delivered		✓	✓	✓					✓

All evidence is to be supplied at the point of import (or feedmill in the case of EUDR-aligned to a feed specification). Segregation of supply in the EU / UK is not required.

For any soy bought that does not meet the above specification, suppliers should buy RTRS Regional Credits or Cefetra Area Mass Balance credits, and share evidence of this with Sainsbury's or with 3Keel via the annual reporting process.

2026 approach to Mass Balance

Our approach to mass balance recognises traders have made progress towards monitoring and restricting deforestation and conversion within their supply chains.

While we work towards verified DCF soy, we will accept mass balance from companies with procurement controls that demonstrate their purchases are at least 98% vDCF from areas at high risk of deforestation and conversion. Due to mixing of vDCF and non vDCF soy in logistical corridors that are not controlled by the shippers, a mass balance approach will still be required, and **these volumes cannot be claimed as DCF**.

This recognises the progress made from these companies in supporting vDCF soy and allows us to maintain pressure on indirect suppliers to maintain their DCF commitments

We will use data from [the Soft Commodities Forum](#) to identify traders who meet these requirements. Traders submit information on their soy sourcing from Brazil and this is independently verified by third party auditors to ascertain how much soy from direct and indirect sources is vDCF with a 31st December 2020 reference date.



Supplier Requirements - continued

Reporting

Sainsbury's will be verifying progress on the sustainable soy feed requirements and UK Soy Manifesto commitments through our annual reporting process. To support the verification of this reporting to Sainsbury's, the supplier should document the following elements relating to the soy used for Sainsbury's products:

- Total volume of protein supplied
- Total volume of feed used to produce relevant protein, and associated soymeal content per tonne of protein.
- Evidence for DCF status:
 - National and sub-national origin (state or municipality)
 - Evidence of procurement system in place to verify DCF status (e.g., independent satellite monitoring) – when relevant
 - Evidence of soymeal certification status – when relevant
- Name of feed supplier
- Name of first importer of the feed to country of production (trader)

AND

- Progress against each individual UK Soy Manifesto commitment

Sainsbury's has appointed external consultancy 3Keel to collect and verify this information from suppliers on an annual basis. Suppliers will be contacted in November to report on that calendar year's volumes, with a reporting period extending until February of the next calendar year.



Appendix

Our Definitions:

Where relevant, our definitions align with [Accountability Framework Initiative \(Afi\)](#):

- **Deforestation:** The loss of natural forest as a result of (i) conversion to agriculture or other non-forest land use; (ii) conversion to a plantation; or (iii) severe or sustained degradation.
- **Conversion:** Change of a natural ecosystem to another land use or profound change in the natural ecosystem's species composition, structure, or function
- **Cut-off date** – (Related to no-deforestation and no-conversion commitments): The date after which deforestation or conversion renders a given area or production unit non-compliant with no-deforestation or no-conversion commitments.
- **Deforestation and Conversion Free (DCF):** a volume of commodity produced on land that was not subject to conversion or deforestation past a defined cut-off date.
 - Sainsbury's DCF soy commitment cut-off date is 31st December 2020.

Soy: Table 2 - Soy meal types and scope

Soy in animal feed		Scope
Full Fat Soy Hipro-Soy meal Soy bean hulls	Soy oil Soy Expeller Soy bean molasses	In Scope
Soy in food		
Edamame beans Soy milk Soy sauce	Bean curd (Tofu) Soy oil Soy flour	In scope
Lecithin Tocopherols	Glycerides	Out of scope





Our Requirements for Soy Feed

The information in this document may be supported by other Sainsbury’s Documents.
The information outlined in this document is in addition to all applicable UK and EU legislation.

Sainsbury’s suppliers must ensure they meet all legal and regulatory requirements both at the point of manufacture and where the products are sold to the consumer. Whilst this document is intended to help you supply products suitable for the Sainsbury’s brand (i.e. all brands owned by Sainsbury’s), they do not absolve you of your responsibility to understand and comply with all the quality, legal and safety requirements for your products or the products you supply.

For the purpose of this document Sainsbury’s means Sainsbury’s Supermarkets Limited and Argos Limited only. Sainsbury’s Argos is the trading name of both:

- 1)Argos Limited, Registered office: 33 Charterhouse Street, London, EC1M 6HA.. Registered number: 01081551
- 2) Sainsbury’s Supermarket Limited, Registered office: 33 Charterhouse Street, London, EC1M 6HA. and Sainsbury’s Supermarkets (NI) Ltd, Upper Galwally, Belfast, BT8 6FX Registered number: 03261722

Document Reference	Document Owner	Amendment History	Date
ST004 - V1	Hugo Chambers	New Document	April 2022
ST004- V2	Joe James	Change cut off date from January 2020 to December 2020	August 2023
ST004-V3	Sustainability Manager	Head office location changes	June 2025
ST004-V4	Sustainability Manager	Updated sourcing requirements for 2026. Included direct soy.	Sept 2025