

FINAL PPA response to Defra call for information on UK-EU Sanitary and Phytosanitary (SPS) Agreement

Introduction

The Potato Processors' Association Ltd (PPA) is the trade association for UK manufacturers of frozen and chilled chips/French fries and potato products, potato crisps, potato-based snack products and dehydrated potatoes. PPA incorporates both the Frozen and Chilled Potato Processors' Association (FCPPA) and the Snack, Nut and Crisp Manufacturers' Association (SNACMA).

Collectively PPA members are the largest customer for GB potatoes, purchasing around 1.47 million tonnes annuallyⁱ and accounting for circa 94% of all potatoes processed into frozen chips and potato products, potato crisps and snacks within the UK.

Over 13,000 people are directly employed by the potato processing sector and other dependent jobs, including those in the farming sector, more than double this total.

The sector also makes a significant contribution to the country's manufacturing base. The value of the UK processed and prepared potatoes market was estimated at more than £2.7 billion (not including food service), and the sliced potato crisps market was estimated to be worth an additional £1.8 billion in 2025ⁱⁱ. Furthermore, the value of the entire savoury snacks sector (which in addition to potato crisps includes cereal, nut, popcorn and meat-based snacks) was estimated to have a combined retail value of £4.05 billion in 2023ⁱⁱⁱ.

Please see below our response to Department for Environment, Food & Rural Affairs (Defra) call for information on UK-EU Sanitary and Phytosanitary (SPS) Agreement. We are grateful for the opportunity to provide information on behalf of our sector at this important stage in the process.

We fully recognise the potential benefits that a UK-EU SPS agreement can and will offer in the long term. However, the extent to which those benefits can be realised in practice will depend heavily on the clarity, timing and workability of the final arrangements. In particular, businesses need urgent clarity on the precise scope of the agreement, any agreed exemptions, the approach to domestic and cross-border enforcement, and the transitional arrangements that will apply. Without this information, businesses cannot prepare with confidence or make informed operational decisions.

Our response highlights the potato sector's main requests and concerns, particularly in relation to agricultural inputs, long production and storage cycles, and the wider risk that products lawfully produced under current UK rules could become non-compliant without adequate transition periods or appropriate derogations. In our view, the central issue is not whether businesses understand the direction of travel, but whether there is still sufficient time to adapt in practice, avoid unnecessary waste and financial loss, and ensure continuity of trade and sales across the supply chain.

Confidentiality

Would you like your response to be confidential?

- No

If you answered Yes to this question, please give your reason(s).

N/A

About you

Please provide your name or surname. If you are representing an organisation, you will be asked its name shortly.

Vanessa Richardson

Please provide your email address

Vanessa.richardson@ppauk.org

What is the name of the organisation you are representing? If you are responding in a personal capacity, please leave this blank and proceed to the next question.

Potato Processors' Association (PPA)

Background Information

Q1.1. Which of the following best describes you?

I am responding on behalf of a business representative organisation (BRO) [Route Go to Q1.7]

Q1.7. If you are responding on behalf of an association or a business representative organisation, how many members do you represent?

- 0-9

Q1.8. Where is your business or organisation registered?

- England

Q1.9a. What agri-food and agri-goods sector(s) apply to you? Please select all that apply.

- a) Agriculture and Horticulture
- d) Food and Drink Manufacturing

Q1.9b Please select all sectors that apply to you.

- Arable and Horticulture
- Fruit or Vegetables and Oils
- Grain and Bakery
- Other food products not elsewhere classified
- Other – please specify [PPA note: Processed potato products and savoury snacks, including nuts and meat snacks]

Q1.10. If you are involved in the supply of agri-food, agri-goods or both, what types of goods do you sell or provide services for? Please select all that apply.

- j) Edible Vegetables and Certain Roots and Tubers
- k) Edible Fruit and Nuts; Peel of Citrus Fruit or Melons
- s) Preparations Of Meat, Of Fish or of Crustaceans, Molluscs or Other Aquatic Invertebrates
- v) Preparations Of Cereals, Flour, Starch or Milk; Pastrycooks' Products
- w) Preparations Of Vegetables, Fruit, Nuts or Other Parts of Plants
- x) Miscellaneous Edible Preparations
- z) Residues and Waste from the Food Industries; prepared Animal Fodder

Operational Impact

This section aims to gather evidence on the potential challenges businesses or organisations may face as a result of SPS alignment, particularly focusing on the transition from current practices to alignment.

Q2. To what extent will alignment to EU SPS rules require changes to your business or organisation's operations (for example, processes, IT systems, labelling, packaging, reformulation of products, contract amendments)?

- Very considerable changes required

Q3. What does your business need to do to be ready for alignment? Tick all that apply.

- Change contracts (for example adapting/amending supply agreements) [PPA note: impact on contracts with growers/suppliers]
- Compliance and regulatory changes (for example, engagement with regulators or approval processes)
- Change labelling and packaging
- Change manufacturing and production (for example, reformulation of products) [PPA note: Some members are having to reformulate products to ensure compliance with EU regulations, e.g. smoke flavourings]
- Other

If answered 'Other' or want to specify in more detail, please use the text box below

Before businesses can prepare properly for alignment, they need clarity on the precise scope of the future SPS agreement, including any agreed exemptions, transition periods, and the expected approach to both domestic and cross-border enforcement. At present, our members are having to plan on the basis of assumptions, given the limited information available. Clear, timely guidance is therefore essential, together with reassurance that appropriate transitional arrangements and/or derogations are being negotiated, to support business continuity and avoid unnecessary food and packaging waste, and potentially significant financial losses.

Q4. Considering your response to Q3, what challenges do you anticipate if any?

Our main concern relates to agricultural inputs. Many of our members process agricultural products that are lawfully produced in the UK, particularly potatoes used to manufacture potato-based products such as chips and crisps. Some of these products depend on agricultural inputs that remain legally permitted in the UK, but are no longer permitted in the EU, or are permitted only under different conditions, for example where lower Maximum Residue Levels (MRLs) apply.

This creates significant practical challenges for our sector. For potatoes grown for processing, and for many other commodities, planting programmes are typically planned more than 18 months in advance, including decisions on active substances needed to ensure legal compliance. In the case of potatoes, the crop-to-production cycle can itself take up to 15 months, from planting through to the use of potatoes placed into

storage and processed between April and July of the following year. Furthermore, processed products may themselves have long shelf lives (up to 18 months). As a result, even where raw materials and finished products were fully compliant with UK law at the point of production, they could become non-compliant if appropriate transitional arrangements are not agreed (please refer to [Figure 1](#) below).

Other than agricultural inputs, our products could also be deemed non-compliant in the EU as a result of recent and future regulatory changes still under discussion (without the UK's involvement), but which could be written into law in the coming months/years, and become applicable in the UK without a suitable transition period. Examples include contaminants and process contaminants, such as acrylamide, glycoalkaloids, 3-MCPD (3-monochloropropane-1,2-diol), mycotoxins, furan, Mineral Oil Saturated Hydrocarbons (MOSH) and Mineral Oil Aromatic Hydrocarbons (MOAH), heavy metals, dioxins and dioxin-like polychlorinated biphenyls (PCBs). The sudden introduction of new Maximum Levels (MLs) for so many contaminants/product combinations puts pressure on businesses of all sizes but will be particularly taxing for SMEs and growers.

Please see our response to Q12 for other areas of concern/uncertainty.

The question of transition periods is therefore critical in determining whether, and how, our members can prepare adequately for the new requirements. If a suitable transition period extending beyond mid-2027 is not secured, there is a real risk that substantial volumes of agricultural produce and finished goods could become food waste, with severe financial consequences for businesses. In summary, the concern is not alignment with EU legislation in principle. Rather, it is the need to address legislation that would already apply at the point of implementation (or soon thereafter, without the benefit of any EU-granted transitional arrangements) and the sector's ability to adapt in a way that avoids unnecessary food waste and financial loss. It is also about ongoing policy developments, which the UK will be forced to implement without being part of the negotiations, as well as guarantees that the UK will have a say in future policy decision-making.

Q5. From the point at which you start to make changes, what is the minimum lead time that your business or organisation will need to comply with SPS alignment? Changes to lead-in times may refer to contracts, staff training impacts, supply chain and logistic changes etc, for example.

- >25 months

From an agricultural inputs perspective, a minimum transition period of three years would be required. However, given the complexity of the wider supply chain, transitional arrangements should be incrementally introduced over a five-year period.

Q6. Which types of operational changes will it take your business or organisation longest to prepare for?

- Compliance and regulatory
- Labelling and packaging

If you answered 'Other' to this question, please specify briefly.

N/A

Q7. What support would your business or organisation need to implement the changes necessary to comply with SPS alignment?

Please see our response to Q3. Our members need clarity on the requirements, clear guidance and fully appropriate transitional arrangements, especially for agricultural inputs.

We also require confirmation that, whenever possible, businesses should be able to act early (i.e. ensure compliance with EU regulations ahead of time, even when that does not comply with UK requirements). This should be supported by pragmatic enforcement to allow businesses to utilise planned re-originations ahead of the final agreement coming into force.

Business Awareness and Readiness

We are aiming to conclude negotiations and have legislative arrangements in place no later than 2027 and for the new arrangements to start taking effect in mid-2027. To support our preparation, communications and engagement, it is helpful for us to understand how aware businesses are of the SPS Agreement, its aims and the anticipated opportunities and challenges.

Q8. Before this Call for Information, had you heard of the SPS agreement?

- Yes

Q9. If so, where did you first hear about the SPS agreement?

- Government communications
- Industry body
- Media

If you answered 'Other' to this question, please briefly specify.

N/A

Q10a. Have you attended any forums or received any official communications from the Government regarding the SPS agreement?

- Yes

We have been invited to attend some government events, however, this engagement has been ad hoc, inconsistent and insufficient, given the significance and extent of the proposed SPS agreement for our sector. We are concerned by the limited level of meaningful stakeholder engagement throughout the process. While we have been willing to provide information and constructive input, communication has not been reciprocal, and we do not consider that our sector has been adequately included in key discussions.

From our perspective, there remain more questions than answers at this stage, which is concerning given the proposed implementation timeframe. We share information with our members as it becomes available. However, much of the engagement appears to be taking place through the larger trade associations, which seem to be more closely involved in the discussions with government. That is a concern in itself, and is particularly troubling for smaller businesses that are not members of any trade association.

Q10b. If you have, how useful did you find them?

- Moderately useful

Q10c. Would you like to sign up for government alerts?

- Already signed up

[If answered yes to Q10c] Please provide an email address

N/A

Q11. Under the deal, businesses will be expected to follow EU rules. How confident are you of what these EU rules on specific areas related to SPS are and what they will mean for your business or sector?

- Unconfident

If you answered Unconfident or Very unconfident to this question, please give your reason(s) and provide further information here.

Although we are well informed and reasonably confident in our understanding of relevant EU regulatory developments affecting our sector (and which will affect our sector in the future), our concern is not whether we understand the rules, but whether there is still sufficient time to comply with them in practice. In some areas, this is no longer simply a matter of tight or challenging timelines. If changes were to apply from mid-2027, it would already be physically too late for some businesses to adjust, particularly in relation to pesticides legislation, because key decisions on planting programmes, inputs and production cycles are made well in advance and cannot be revisited retrospectively.

Q12. Are there any specific areas where clarity for your business or organisation is lacking?

Yes. Significant clarity is still lacking on when compliance with relevant EU legislation would be required, and on any agreed exemptions, transition periods, and domestic and cross-border enforcement practices. Without this information, businesses cannot prepare with confidence or make informed operational decisions.

Our main concern is agricultural inputs, particularly pesticides and contaminants (see our response to Q4), but important questions also remain in the following areas:

- **Labelling requirements** – There is uncertainty around how any labelling changes would take effect in practice, including around the name and address of the Food Business Operator (FBO) on pack, and whether the UK front-of-pack traffic light nutrition labelling system would remain permissible. Further clarification is also required on the application of origin labelling requirements under any future alignment arrangements. In particular, there is uncertainty as to whether terms such as ‘Origin: non-UK’ or ‘UK(NI)/UK’ would continue to be permitted where EU legislation prescribes terminology such as ‘EU’ and ‘non-EU’.
- **Flour fortification** – Further consideration is needed of the interaction between dynamic alignment and the UK’s domestic flour fortification policy. In light of the significant steps already taken by industry to implement folic acid fortification in 2025/26, greater certainty is needed on the long-term approach, together with appropriate mechanisms to ensure the continued acceptance of UK fortified flour. In addition, future EU changes to MLs of vitamins and minerals could affect the continued compliance of UK flour placed on the market, including non-wholemeal wheat flour subject to statutory fortification requirements in the UK.
- **Approved establishment requirements** – Uncertainty remains regarding the application of approved establishment requirements to composite products containing products of animal origin (POAO). As the UK and the EU currently maintain separate approved establishment lists, it is unclear whether establishments approved for export to the UK would also require separate approval for EU purposes. Clarification is also needed on the treatment of shelf-stable composite products containing dairy, where the current UK and EU regimes differ.
- **Market authorisations for regulated products** – Further detail is required on how alignment would operate in relation to regulated product categories, including food additives, flavourings (incl. smoke flavourings) and novel foods. In particular, clarification is needed on whether the UK would retain any policy flexibility in these areas, including to support innovation and the adoption of new technologies.
- **Organic legislation** – Greater clarity is needed on the implications for organic products, including labelling requirements, the recognition of control bodies, and the treatment of triangular trade involving the EU and the UK. In particular, clarification is required on the extent to which organic products imported from the EU into the UK could subsequently be re-exported to the EU without undergoing further processing.
- **Policy areas outside scope** – The future GB policy approach in areas that may fall outside the scope of alignment has yet to be formally confirmed. This includes, for example, the EU Packaging and Packaging Waste Regulation (PPWR) and the EU Deforestation Regulation (EUDR), where greater certainty would be beneficial. The PPWR has implications for recyclability and recycling labels, which the industry needs to be aware of now in order to plan for future implementation.

- **Additional UK requirements** – Clarification is needed as to whether the UK intends to retain stricter national requirements already in force alongside any move towards alignment with EU rules, e.g. High Risk Foods Not Of Animal Origin (HRFNAO). It is also unclear how broader Official Controls will apply in the UK (arising from Regulation (EU) 2017/625), and whether requirements pertaining to official laboratories will also be reviewed.

Q13a. Has your business considered making any preparations for future change that may be needed under the SPS agreement?

- Unsure [PPA note: Some members report having started discussions with supply chain].

Q13b. If this applies to you, when do you intend to start preparations?

- Unsure [PPA note: Members state that it depends on level of certainty of scope and specific timings].

Q14a. How do you want to receive important updates from government?

- Webinars and teach-ins
- Industry wide forums
- Newsletters
- Online portal or dashboard
- Roadshows

If you answered 'Other' to this question, please specify briefly'.

N/A

Q14b. How frequently would you like to receive updates and information from us?

- Other

If you answered 'Other' to this question please specify briefly in the text box below.

As a trade association, we must be kept informed as developments take place.

Q14c. How do you want to get in touch with us about readiness preparation?

- Email or mailbox
- Regular online engagement, for example working groups
- Online forum or portal
- In person, for example Roadshows

If you answered 'Other' to this question, please specify briefly.

N/A

Q15. What specific forms of communication support would help your business or organisation with readiness?

- Guidance documents
- Training sessions
- Practical advice
- Dedicated helpline
- Industry forums
- Other

If you answered 'Other' to this question, please specify briefly.

A direct contact for trade associations to obtain information as needed to advise members, email and telephone.

Benefits and Costs

This section aims to collect greater detail on where the benefits, costs or financial impacts of SPS alignment arise. Your input enables understanding and planning to improve implementation. **Please note that this information will be anonymised for analysis purposes.** As a reminder, it is our intent for the new SPS arrangements to start taking effect in mid-2027, as noted in the recent announcement. This is the date that you should use when considering the steps required to align and the associated implications for your business or organisation. Please answer all questions on that basis – this will help us plan for a successful transition.

Q16. Which of the following present a benefit or opportunity for your business or organisation arising from alignment with EU SPS rules?

- Increased exports
- Increased imports
- Reduced costs of imports
- Reduced compliance costs (for example, fewer checks, simplified certification)
- Improved market access
- Greater supply chain flexibility
- Operational efficiencies
- Other

If you answered 'Other' or 'None of the above' to this question, please specify briefly.

It is difficult to assess whether 'increased access to data systems', 'enhanced product competitiveness', 'improved consumer confidence', 'opportunities for innovation' and, especially 'better predictability and stability in trade rules' offer benefits or opportunities, without knowing how the relationship between the UK and EU agencies will work and how the UK will be able to influence EU legislation.

Q17. What are the estimated benefits or cost savings for your business or organisation arising from alignment with EU SPS rules?

Please provide an estimate using the matrix and briefly describe where these benefits or cost savings arise, for example staff training, certifications in the open text box below.

	£0-10k	£11-50k	£51-200k	£201k-£1m	>£1m - £5m	>£5m-10m	>10m	Estimate (where known)	Description of costs
One off cost savings									
Ongoing cost savings									
Not applicable									
Don't know	x	x	x	x	x	x	x	x	x

Please provide an estimate of costs (where known) and provide a description of the costs (such as where these benefits or cost savings arise, for example staff training, certifications) in the text box below.

N/A

Q18. Following SPS alignment, when do you expect to see benefits, if any, for your business or organisation?

- 0-3 months [PPA note: Some members report resource benefits to be available immediately, e.g. if private attestations no longer required]
- 4-6 months [PPA note: Some members report potential new listings opportunities longer term].

Q19. Are there any financial costs you anticipate incurring as a result of SPS alignment?

- One-off compliance costs
- Ongoing operational costs
- Staff training costs
- IT upgrades costs
- Certification costs
- Other

If you answered 'Other' to this question, please specify briefly.

If the agreement is implemented by mid-2027 without adequate transitional arrangements or appropriate exceptions for agricultural inputs, we anticipate potentially significant financial costs associated with the disposal of agricultural produce and finished products that could become non-compliant, particularly as a result of pesticides- and/or contaminants-related requirements.

Q20. If Q19 applies to you, please set out the expected costs to the best of your ability.

Please provide an estimate using the matrix and briefly describe where these benefits or cost savings arise, for example, staff training, certifications, contractual arrangements etc, in the open text box below.

	£0-10k	£11-50k	£51-200k	£201k-£1m	>£1m - £5m	>£5m-10m	>10m	Estimate (where known)	Description of costs
One off cost savings									
Ongoing cost savings									
Not applicable									
Don't know	x	x	x	x	x	x	x	x	x

Please provide an estimate of expected costs (where known) and provide a description of the costs (such as where these benefits or cost savings arise, for example, staff training, certifications, contractual arrangements etc, in the open text box below.

Members have struggled to quantify impact on costs/revenue at this stage. However, considering the factors previously outlined (see our responses to Q4 and Q12), alignment with EU regulations without a suitable transition period could place the entire potato sector at risk:

Volume of harvested production in 2024: 5.137 million tonnes^{iv}.

Value of potatoes in 2024: approx. £1.5 billion^{iv}.

Specifically for our sector (i.e. potato crisps and frozen chips), these figures equate to:

Potato crisps: £1.8 billionⁱⁱ.

Frozen chips: £842 million^v.

Q21. How might your costs go up or revenue go down if there is, for example, no lead time, 6 months lead time or a 12-month lead time?

Please complete the matrix and then use the text box below to briefly explain how the costs and reduction in revenue would impact your business or organisation, if applicable.

	Increase in cost	Reduction in revenue	Don't know
No lead time	x	x	
6 months lead time	x	x	
12 months lead time	x	x	
Not applicable			

PPA note: See our response to Q20. A 12-month transition period would be insufficient to mitigate the risk of products becoming non-compliant and ultimately going to waste (see our response to Q4 in relation to agricultural inputs/contaminants and to Q5 on the industry's needs in relation to transitional arrangements).

Supply Chain and Regional Impacts

This section seeks to gather insights on how SPS alignment might influence supply chain operations and whether there could be region-specific effects.

Q22a. Do you anticipate SPS alignment will affect your supply chain operations?

Supply chain operations may effect changes to contracts, updating internal systems and process, staff training etc, for example.

- Yes

Q22b. If this applies to you, which part of your supply chain do you expect to be affected?

- Sourcing of raw materials
- Transportation and logistics
- Border clearance and checks
- Storage
- Distribution to retailers
- Supplier compliance
- Contract changes

If you answered 'Other' to this question, please specify briefly.

N/A

Q23a. Do you anticipate SPS alignment to have region-specific impacts on your business or sector?

- Unsure

Q23b. If this applies to you, which regions do you expect to be the most affected?

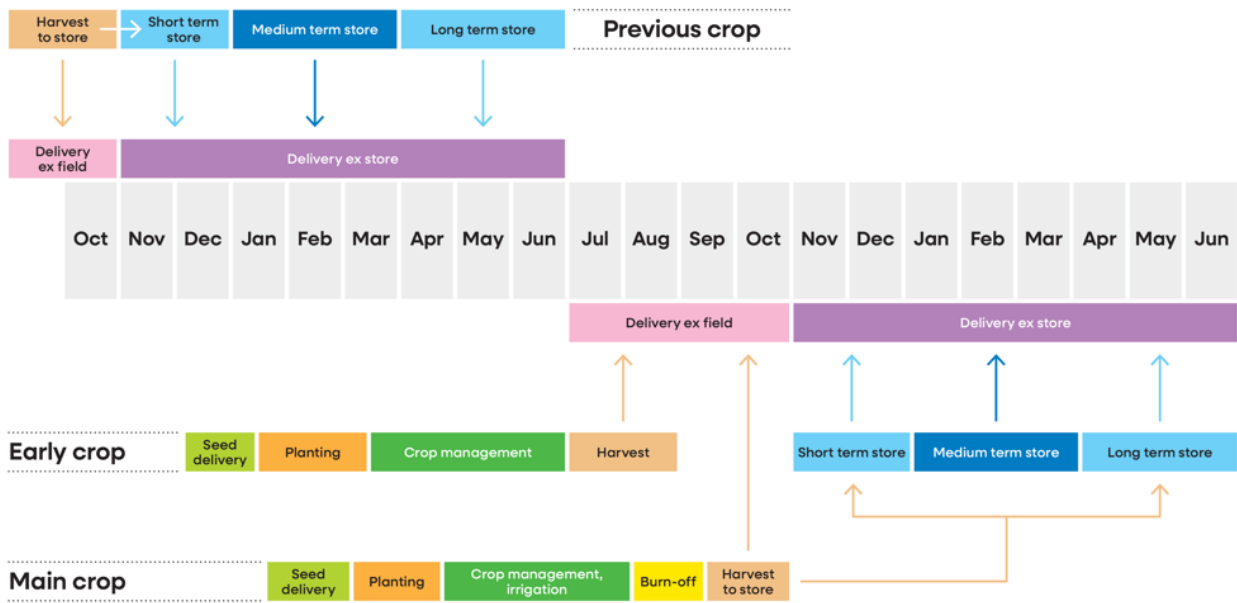
N/A

Q24. [If answered Yes to If this applies to you, what level of impact do you anticipate these regional effects will have on your business or organisation? (No impact – Major impact)]

- Not applicable

ANNEX

Figure 1: PPA UK Potato Crop Diagram



ⁱ Source: PPA own data, collected from members annually. Latest data May 2022. Covers period 1/06/21 -31/05/22.
ⁱⁱ Source: Kantar 52 w/e 6 September 2025.
ⁱⁱⁱ Source: Nielsen 52 w/e 20 May 2023.
^{iv} Source: Gov.uk: [UK Potato crops are in Agriculture in the United Kingdom 2024](#)
^v Source: Nielsen Discover 52 w/e 14 September 2025.