



PPA Food Law and Consumer Committee Meeting



Chair: Catharine Hall

10 March 2026

PPA Competition Law

- All PPA meetings are to be conducted in accordance with the relevant competition and antitrust laws.
- As a condition of membership, members of PPA acknowledge that membership is subject to the competition law rules and they agree to comply fully with those laws.
- In addition, members are reminded to:
 - not discuss current or future commercial strategy, or disclose or exchange any other commercially sensitive information, in particular specific, non-aggregated information regarding prices including discounts, increases, rebates, and reductions; customers; costs and costs components; conditions of sale; capacities; quantities; turnovers and sales volumes; market shares; confidential technologies and R&D efforts.
 - raise any concerns about competition law compliance during a PPA meeting, or in any further discussion, immediately. In such cases, the discussion/meeting will be paused until a competition lawyer is content it can progress.
 - enable their cameras for the duration of the virtual meeting unless otherwise agreed, to ensure transparency and engagement.
 - ensure any AI-powered notetaking or transcription tools (e.g., Otter.ai, Fireflies) are disabled, as they are strictly prohibited during PPA meetings, unless prior explicit consent has been obtained from all participants. This is to ensure compliance with data protection and privacy regulations, including the UK GDPR and relevant wiretap laws.
- Failure to follow these guidelines may bring with it serious consequences for you as an individual, your companies and PPA. Such consequences include heavy fines and in certain cases, under national laws, the imposition of criminal penalties and sentences.
- The full PPA Competition Law Statement can be found on the [PPA website](#).

Agenda

1) Welcome and anti-trust statement

2) Minutes/action list

- FLC Notes and Action list from 12 November 2025 (FLC 065/26)

3) CAP update on LHF Advertising Restrictions – Andrew Taylor (CAP)

4) Scotland HFSS/LHF promotion and advertising restrictions – Cheryl McNulty and Peter Faassende Heer (Scottish Government)

5) Updates and discussions:

• Nutrition & Health

- England and DA update HFSS promotion restrictions
- 2018 NPM and mandatory reporting of healthy food – 10 Year Health Plan
- NDNS Y12-15 – consumption data TBC
- Other diet and nutrition updates, incl. FDF DHC and NUT updates

• Labelling. Composition and Regulation

- UK/SPS trade agreement
- Allergen labelling updates (UK/EU/Codex)
- Other labelling, composition and regulation updates, incl. FDF FLL updates

Agenda cont.

- **Food Safety**

- UK/EU SPS dynamic alignment – contaminants/PPPs
- Acrylamide, glycoalkaloids and 3-MCPD
- Precision Breeding/New Genomic Techniques
- Other food safety updates

- **Sustainability**

- Packaging update
- Food waste update – No. 10 Roundtable on Food Waste
- Deforestation update

6) **Committee matters**

- Issues of Concern to FLC – Risk Matrix – priorities

7) **AOB**

8) **Next meetings/Close**

Matters arising - FLC 14 November 2025

Action	Status
Secretariat to compile a list of UK/EU regulatory areas that likely affect members in the event of realignment with the EU due to UK/EU SPS agreement (e.g., smoke flavourings, additives, plant protection products, seed potatoes) to be shared with the FSA , following agreement with members.	ONGOING
Secretariat to continue efforts to gather consumption data on members' product categories from the Y12-15 NDNS	COMPLETED (FLC 105/26 and 107/26) – TO BE DISCUSSED
Secretariat to analyse consumption data on members' product categories from the recently published Family Food Statistics FYE 2025 .	COMPLETED (FLC 072/26)
Secretariat to share with members narrowed down list of issues which could most heavily impact their business, our industry and our membership in the next 10 years, in preparation for the upcoming FSA Food System Strategic Assessment Workshop	COMPLETED (FLC 365/25)
Members to provide input on narrowed down list of issues for the upcoming FSA Food System Strategic Assessment Workshop by 13 November	COMPLETED
Members to inform the PPA Secretariat of any concerns regarding the draft FSA Guidance on Clear Food Labelling by 18 November .	ONGOING (FLC 096/26)
Members to inform the PPA Secretariat of issues encountered with regards to the transition to folic acid fortified wheat flour .	ONGOING
Members interested in applying to FLC's vice-chair position to contact the PPA Secretariat.	ONGOING
Secretariat to amend FLC Issues Matrix and circulate to members for approval.	COMPLETED (FLC 372/25)
Secretariat to circulate Doodle poll with proposed dates for the 2026 FLC meetings	COMPLETED (FLC 024/26)

On an ongoing basis, members are invited to submit to the Secretariat any product data held on:

<ul style="list-style-type: none"> • 3-MCPD 	<ul style="list-style-type: none"> • Mycotoxins (aflatoxins, ochratoxin A, patulin, fusarium toxins, fumonisings, deoxynivalenol (DON) and zearalenone (ZEA))
<ul style="list-style-type: none"> • Acrylamide 	<ul style="list-style-type: none"> • Perfluoroalkyl substances (PFAS)
<ul style="list-style-type: none"> • Cadmium 	<ul style="list-style-type: none"> • Pesticides (CIPC)
<ul style="list-style-type: none"> • Nickel 	<ul style="list-style-type: none"> • MOSH/MOAH
<ul style="list-style-type: none"> • Dioxins 	<ul style="list-style-type: none"> • Tropane alkaloids
<ul style="list-style-type: none"> • Glycoalkaloids 	<ul style="list-style-type: none"> • UK import/EU export issues (e.g. composites, HRFNAO)
<ul style="list-style-type: none"> • Hydrocyanic acid (HNC) 	<ul style="list-style-type: none"> • Supply chain shortages (e.g. sunflower oil, lecithins, etc)/substitution issues

CAP update on LHF Advertising Restrictions

Andrew Taylor
Regulatory Policy Executive, CAP

LHF rules and guidance



When an ad is in scope



For an ad to be restricted it must satisfy the following

- 1 An ad must be for an “identifiable” LHF product
- 2 It must “depict” a specific LHF product
- 3 Placed in a restricted medium
- 4 Non- SME advertiser



The “identifiability” test: where it fits in



Whether persons in the UK could reasonably be expected to identify the ad as being for that specific less healthy product

Can an average consumer reasonably be expected to identify the ad as being for a specific LHF?

Holistic, case-by-case assessment



Exemptions

What is not restricted

There are four major exemptions

- 1 Out-of-scope products
- 2 SME advertisers
- 3 Out-of-scope media
- 4 Brand advertising



Brand advertising exemption in detail



- Significant change to policy introduced by 2025 Regulations
- Exempt ads can promote a company, master brand or range of products *provided* they don't depict a specific LHF
 - ✓ No specific less healthy product shown
 - ✓ Uses generic product imagery not uniquely tied to specific LHF
 - ✓ Uses branding techniques not uniquely tied to specific LHF



Reducing risk: 'safe zones'



Non-LHF products

- Direct product promotion
- Use of specific non-LHF to promote a brand or range generally
- Non-LHF in the role of 'generic' imagery



Reducing risk: 'safe zones'



Out of scope media

- Out of scope media: outdoor, radio etc.
- Own socials, organic content
- Own sites & apps



Reducing risk: 'safe zones'



Brand advertising

- Simple logo-based brand awareness
- Product promotion using generic imagery
- Product promotion using non-LHF variant imagery
- CSR without product focus



LHF ads

Where the danger zones lie



Very likely to breach the LHF rules if:



Pack shot of specific LHF product



Imagery or characters directly representative of specific LHF products



Music, colours, logos, or themes that identify specific LHF product



Pay for influencer(s) to post LHF product content



Listings or placements are paid for on delivery platform

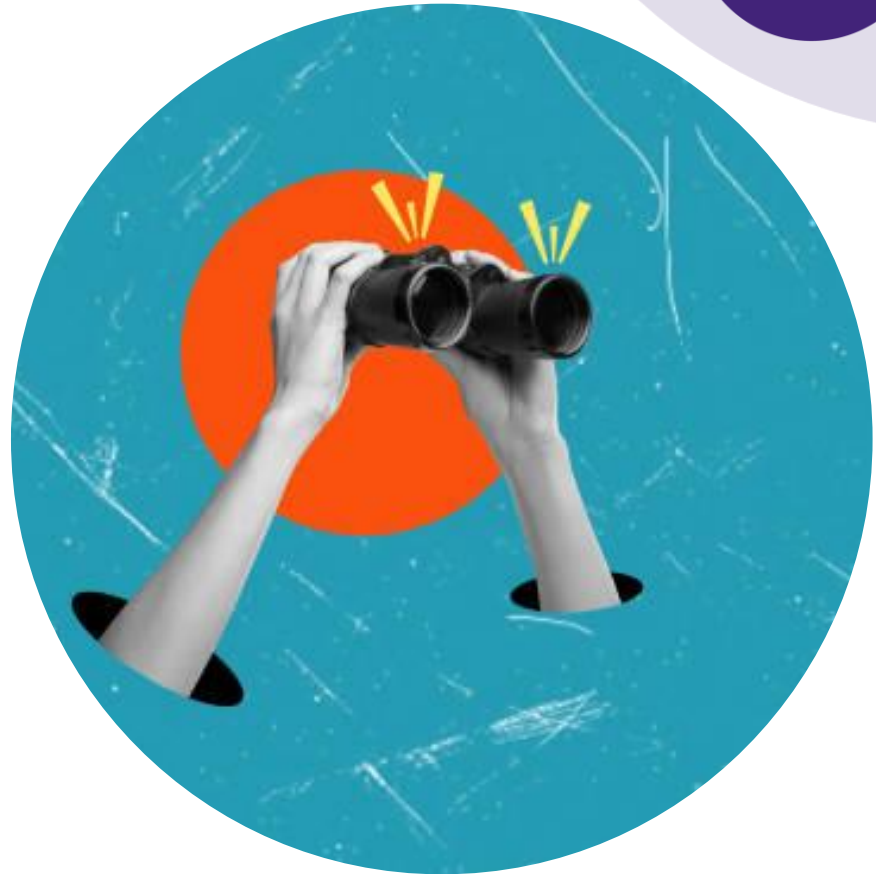


Expectations on advertisers



When we reverse burden of proof, we expect:

- Primary regard to the rules and the guidance
- Advertisers must hold information and evidence
- why an ad is not in scope (e.g. an ad is not identifiable?)



How rulings will develop clarity



The Rules and guidance are tools for compliance.







The rulings will:

- Clarify how the ASA interprets key concepts
- Highlight compliant brand advertising and ads for specific identifiable products
- Practical examples



Get expert pre-publication guidance



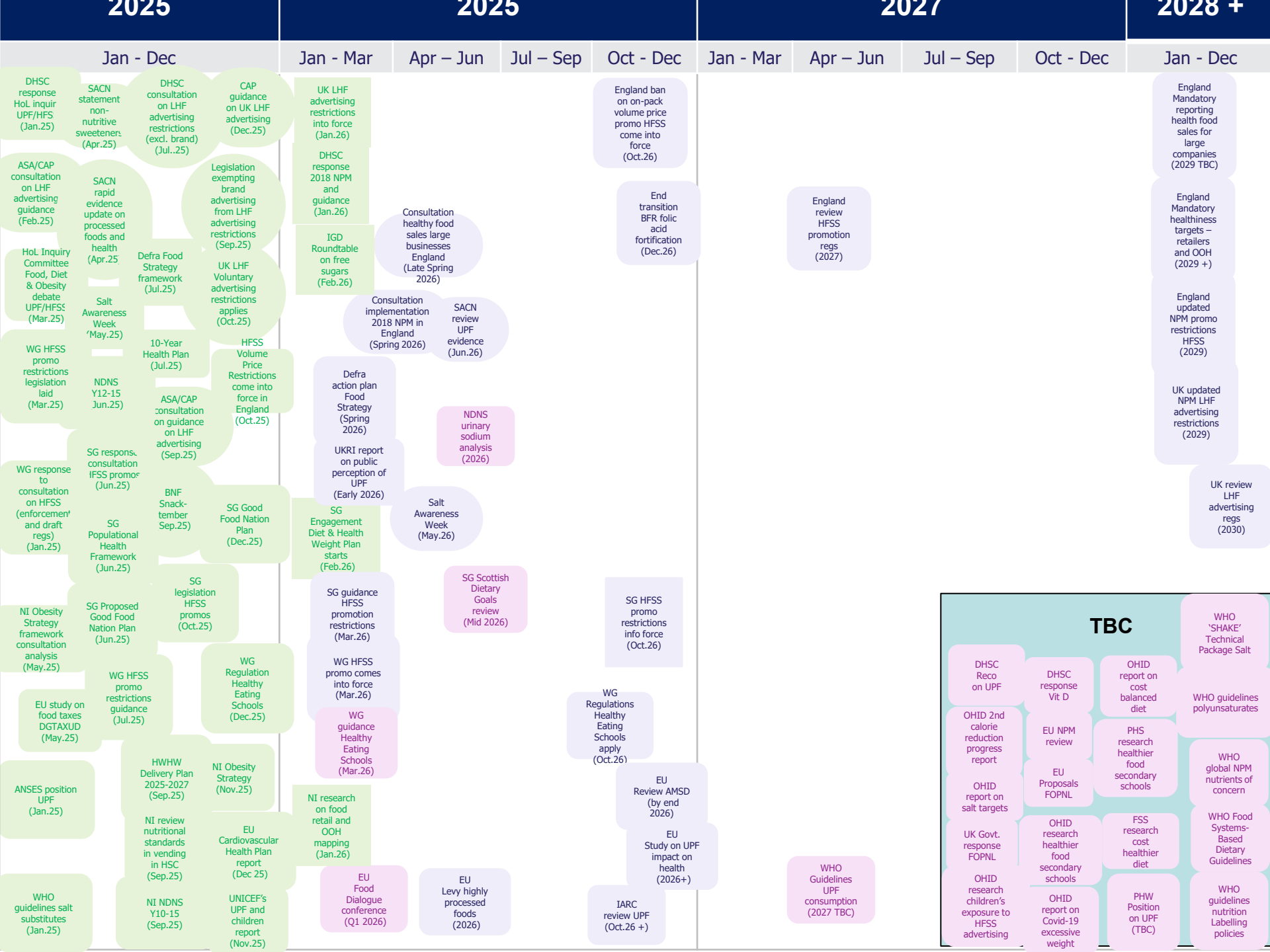
-  CAP Copy Advice for non- broadcast ads
-  Clearcast for TV ads
-  Reduces the risk of breach and regulatory safe check
-  Audit trail
-  Facilitates creative freedom
-  Secondary advice resources



Scotland HFSS/LHF promotion and advertising restrictions

Cheryl McNulty and Peter Faassende Heer
Scottish Government

NUTRITION & HEALTH



UK Diet and Nutrition calendar

Policy areas	Type of legislation	Consultation	Consultation response	Legislation/ guidelines due	Comes into force
England volume/location promotional restrictions HFSS	Secondary legislation under FSA 1990	Main - Apr.19 Enforcement – Feb.21 Delay volume – Jul.23	Main – Dec.20 Enforcement – Jul.21 Delay volume – Sep.23	Dec.21 Delay volume – Sep.23 GUIDANCE: Apr.22	Location: Oct.22 Volume: Oct.25
UK-wide advertising restrictions LHF – 9pm watershed	Secondary legislation under new Health and Social Care Act	Main - Jun.19 Secondary/Enforcement – Dec.22	Main - Jun.21 Secondary/Enforcement – Sep.24 Secondary (brand exemption) – Sep.25	Health & Care Act: Apr. 22 Secondary leg.: Dec.24 DHSC GUIDANCE: Dec.24 Secondary leg (brand advertising): Sep.25	Oct.25 (Voluntary) Jan.26 (Mandatory)
UK-wide LHF advertising restrictions - online		Main – Dec.20 Secondary/Enforcement – Dec.22 Secondary (brand exemption) – Jul.25			
ASA/CAP guidance LHF advertising (UK-wide)	N/A	Dec.23 2 nd round – Feb.25 3 rd round – Oct.25	Oct.24 2 nd round: N/A 3 rd round: Dec.25	Dec.25	Oct.25 (Voluntary – 2023 draft guidance applies) Jan.26 (Mandatory)
FoP nutrition labelling	TBC	Jul-Oct.20	TBC	TBC	TBC
WG Healthy food environment consultation	Secondary legislation under Food Safety Act 1990	Main - Jun.22 Enforcement HFSS restrictions– Jul.24	Main – Jun.23 Secondary/Enforcement – Jan.25 Guidance – Jul.25	Legislation: Mar.25 Guidance: Jul.25	Mar.26
SG HFSS promo restrictions	Secondary legislation under Food Safety Act 1990	Main - July.22 2 nd – Feb.24	Main – May.23 2 nd – Jun.25	Legislation: Oct.25 Guidance: Mar.25	Oct.26
NI Healthy Futures	TBC	Main strategy – Nov.23 Action plan – Dec.24	Main – Late 2024 Action plan – May.25	Nov.25	TBC

Promotion restrictions (England and DAs)

ENGLAND:



- [Location/placement](#) restrictions in force since **1 October 2022**
- [Volume promotion](#) restrictions in force since **1 October 2025**
- [DHSC implementation guidance](#) last updated 29 September 2023
- [BRC guidance on food categories](#) last updated 4 March 2025

NEXT STEPS:

- Transition period for on-pack volume promos until **30 September 2026**

WALES:



- [The Food \(Promotion and Presentation\) \(Wales\) Regulations 2025](#) published 27 March 2025
- [WG implementation guidance](#) published July 2025
- [Healthy Weight : Healthy Wales Delivery Plan 2025-2027](#) – published 30 September 2025 – potential for further measures, e.g. ban on promotions and advertising in public spaces

NEXT STEPS:

- Regulations come into force **26 March 2026** (no transition for on-pack promotions)

Promotion restrictions (England and DAs)



SCOTLAND:

- [The Food \(Promotion and Placement\) \(Scotland\) Regulations 2025](#) published 31 October 2025

NEXT STEPS:

- SG implementation guidance **exp. March 2026**
- Regulations to come into force **1 October 2026**
- SG Diet and Healthy Weight Plan **exp. H2 2026**
- SG Scottish Dietary Goals review **exp. Autumn 2026**



NORTHERN IRELAND:

- **NEW:** [‘Healthy Futures’ Obesity Strategic Framework](#) published 26 November 2025 (FLC 378/25)
 - Consider powers are in place to reduce the promotion and advertising of HFSS foods - Years 1-2
 - Scope potential to bring forward legislation to restrict promotions on HFSS foods - Years 3-5

NEXT STEPS:

- NI promotion restrictions of HFSS foods **exp. 2028-2030 TBC**
- **NEW:** [Nutritional Standards for food served to staff and visitors across Health and Social Care settings](#) published 25 September 2025 (FLC 016/26)
 - Restrictions on servings of chips and potato products to 3 per week
 - No chips or crisps to be served with sandwiches
 - No salt on chips and potato products
 - 200 kcal calorie cap on savoury snacks and crisps (per pack), incl. vending and private retail settings
 - No HFSS foods in till area – with some exclusions for small settings

NEXT STEPS:

- Further toolkits and guidance on procurement nutrition standards **TBC**

2018 NPM (FLC 047/26)

Summary of differences between models

Table 1 summarises the NPM 2004 to 2005, the NPM 2018 and the modelling that was undertaken as part of the review.

Table 1: summary of the differences between the NPM 2004 to 2005 and the NPM 2018

Nutrients or food components	NPM 2004 to 2005	Modelling undertaken	NPM 2018
Energy	8,950 kJ (2,130 kilocalories (kcal))	Model a range of energy values and removal of the energy component	8,400 kJ (2,000 kcal)
Saturated fat	11% of food energy	Model saturated fat as 11% of food energy based on 8,400 kJ (2,000 kcal)	11% of food energy
Total sugars or free sugars	Total sugars: 21% of food energy	Model total sugars values as % of food energy and free sugars as a % of total dietary energy	Free sugars: 5% total dietary energy
Sodium or salt	Sodium: 2,400mg	Model salt in place of sodium	Salt: 6g
Protein	42g	Model protein in line with adult reference nutrient intakes of 45g	45g
Fruit, vegetables, nuts and seeds (see note)	% in products based on 400g	Model a range of fruit, vegetables and nuts scoring options	% in product based on 400g
Fibre	24g AOAC (18g NSP)	Model a range of fibre values and scoring options	30g AOAC

Note: since the NPM expert group review was completed, the group have made an additional decision to add seeds to the fruit, vegetable and nut component.

- 2018 [consultation response](#) and final [technical guidance](#) published 27 January
- Based on SACN's 2015 report on [Carbohydrates and Health](#) (free sugars max. 5% daily energy intake) and [Eatwell Guide](#)
- Dietary reference values for women aged 19 to 64 years.
- Definition of 'free sugars' excludes all sugars in pureed and powdered starchy carbs (incl. tubers such as potatoes)
- Guidance incl. definition of veg., nuts and seeds definitions
 - Veg. excludes potatoes
- FDF assessing impact of implementation of 2018 NPM on categories to HFSS/LHF promo and advertising restrictions, as well as mandatory reporting

2018 NPM

- **IGD Free Sugars Roundtable 25 February**, incl. DHSC, manufacturers, retailers and OOH
 - Concerns around technical implementation, incl. lack of information in specs, long supply chains, complexities of calculating 'free sugars', contributors of 'free sugars', what constitutes a broken cell/structure, effects of processing, e.g. chopping/cutting, cooking, fermentation
 - Potential alternative proposal– 2018 NPM using total sugars – industry concerns
- **DHSC/Defra Ministerial Roundtable on 4 March**
 - Impact of application of 2018 NPM to promo and advertising restrictions
 - What are businesses doing to adapt?
 - How can the Government support?
- FDF and the AA to follow up with Government.
- **Consultation** on implementation to **HFSS/LHF promo (England) and UK-wide advertising exp. Spring 2026 TBC**



MEMBERS:

- **Concerns about application to products?**
- **Concerns about cost of implementation?**
- **Questions about guidance?**

Mandatory reporting

- Announced as part of 10-Year Health Plan '[Fit for the Future](#)' published 3 July (FLC 205/25)
 - Mandatory reporting of healthier food sales for all large food businesses – **by the end of parliamentary term**
- New DHSC Healthier Food Reporting Cross-Sector Industry WG (FLC 005/26)
- 3 cross-sector industry WG meetings (Nov.25 – Jan.26) (FLC 371/25, FLC 005/26, FLC 027/26, FLC 069/26 and FLC 116/26) looking at:
 - scale and scope
 - metrics and methodology
 - enforcement, compliance and data management
- Priority metrics incl. (building on FDTP):
 - SWA NPM scores (sales in tonnes)
 - % HFSS total volume sales
 - SWA calorie/product
- Exploring potential to complement mandatory with voluntary metrics
- Further industry engagement **exp. Spring 2026.**
- Consultation **exp. Late Spring 2026 TBC**
 - Likely to consider reporting - possibility of further consultations exploring metrics

Mandatory reporting

Member feedback on policy design

Scale and scope

- Strong opposition to geographical breakdowns - reporting should be at UK or UK&I level
- Reporting should apply to all sectors (retail, manufacturers, OOH & delivery platforms)
- Manufacturers should report on branded products only
- Flexible approach - align reporting with existing internal cycles (financial/calendar)

Metrics and methodology

- Less is more - to reduce burden
- SWA NPM as primary metric
- SWA calories/100g works for most (but per product shows progress for some categories)
- Metrics across all sectors to create level playing field
- Mandatory portfolio reporting & optional category reporting
- Flexibility to define categories, rather than prescriptive list
- Reporting separately for food & drink

Enforcement, compliance and management of data

- Proportionate enforcement measures, supporting compliance
- Collaborative approach to enforcement
- Central authority as regulator
- Proactive, consistent and supportive engagement with regulator across all phases
- Headline metric data supported by commentary to be submitted

fdf

Mandatory reporting

Stakeholder positions

Stakeholder	Views (* denotes a differing view to FDF)	Risks
BRC and retailers	<ul style="list-style-type: none"> Broadly supportive, voluntary reporting already underway Consistent metrics and mandatory category reporting for comparability* 	<p>Mandatory category reporting will increase burden. Possible risk that mandatory category reporting could lead to targets for manufacturers in future.</p> <p>Risk of companies being compared / leaderboards etc.</p>
UKH and out-of-home	<ul style="list-style-type: none"> Cautious, complexity of OOH and limitations in available data* Calorie/product metric more suitable for OOH * 	<p>Uneven policy implementation across sectors.</p> <p>Calorie/product metric is unsuitable for manufacturers.</p>
IGD	<ul style="list-style-type: none"> Supportive, create level playing field across sectors Consistent standards and metrics for comparability* Concerns around 2018 NPM (investment, benefit : cost) 	<p>Risk of companies being compared / leaderboards etc.</p>
Nesta	<ul style="list-style-type: none"> Supportive, prerequisite to set targets (proposal based on SWA NPM) Concerns around 2018 NPM delaying reporting Reporting on its own will have no impact (must be in tandem with targets brought in together this parliamentary term)* 	<p>Reporting having to be linked to targets for it to be impactful.</p>
Food Foundation	<ul style="list-style-type: none"> Supportive of mandatory health and sustainability reporting, level playing field across sectors – call out the OOH sector (similar to AoSS) Wider metrics considered beyond healthy sales (F+V, protein) to avoid manipulation of reporting - ‘selling more bottles of water’* Consistent metrics for comparability * 	<p>Proposed metrics are not relevant to all manufacturers, increasing reporting burden.</p> <p>Risk of companies being compared / leaderboards etc.</p>
Henry Fiyin Makinwa	<ul style="list-style-type: none"> Supportive - recommending F+V and fibre to be included 	<p>Proposed metrics are not relevant to all manufacturers, increasing reporting burden.</p>

SOURCE: FDF



MEMBERS: VIEWS?

NDNS Y12-15 & Defra Family Food Statistics

- [OHID National Diet and Nutrition Survey \(NDNS\) for years 12-15 \(2019-2023\)](#) - published June 2025 (FLC 183/25)
- NDNS measures **food consumption and nutrient levels**
- [NDNS Y12-15 PPA analysis:](#)
 - Nutrition (energy, total fat, saturates and sodium) contribution analysis by PPA in October 2025 (FLC 328/25)
 - Consumption (% by age group, by age x pack/portion size, pack/portion size x gender, pack/portion size x age x gender) and days consumed x. quantity in February 2026 (FLC 105/26 and FLC 107/26)
- [Defra Family Food Statistics FYE 2024 \(April 2023-March 2024\)](#) – published November 2025 (FLC 072/26)
 - [Dataset](#)
- Family Food Statistics provides **statistics on food purchases**
- Family Food Statistics PPA analysis – February 2026 (FLC 072/26)

NDNS Y12-15 & Defra Family Food Statistics

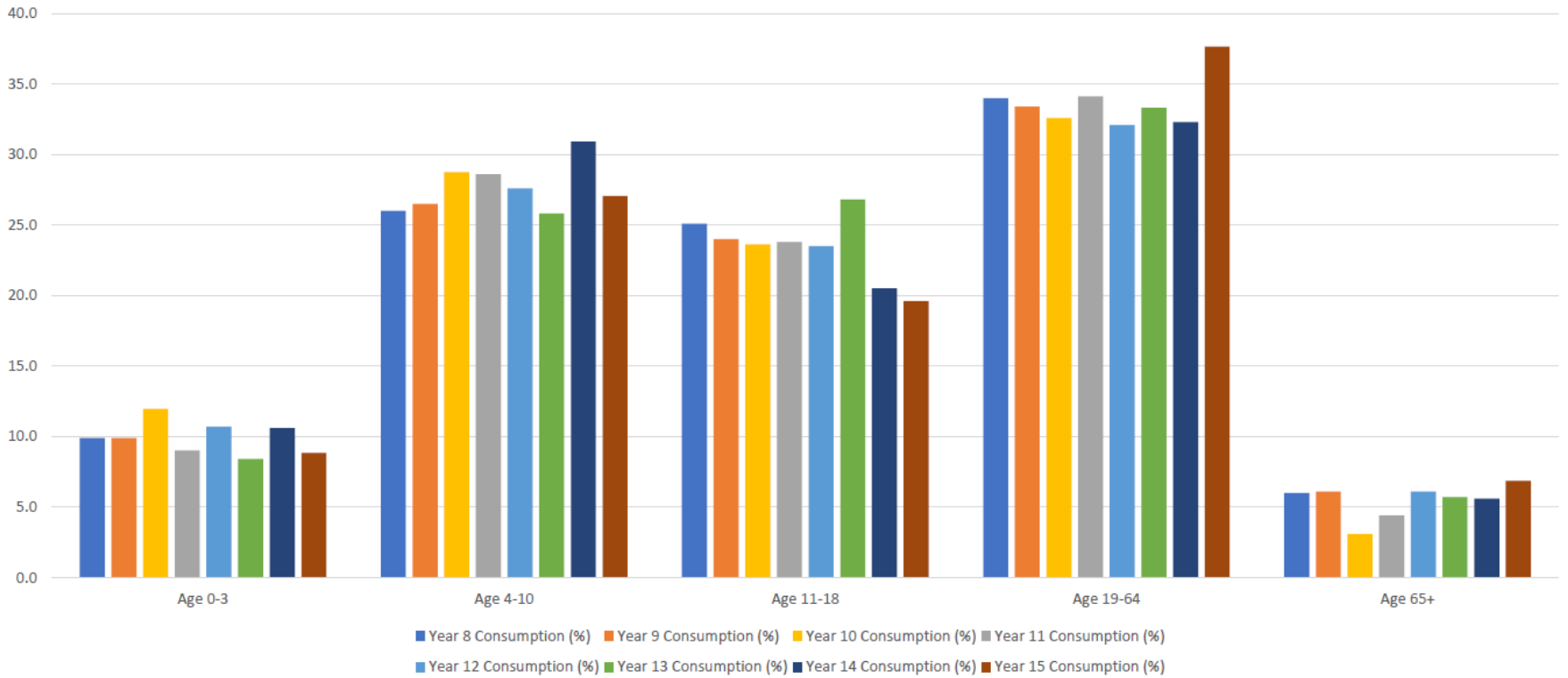
	NDNS (g/day)	Defra Family Food Statistics (g/week)	NDNS (g/day)	NDNS (g/day)	NDNS (g/day)	Defra Family Food Statistics (g/week)
	Crisps & Savoury snacks		Chips & fried potatoes	Potato products*	Potatoes baked, roast or boiled**	Chips & potato products***
Year 12 (2019-2020)	10.55	88.45	17.78	4.32	36.93	191.92
Year 13 (2020-2021)	10.56	96.09	16.87	4.26	29.58	189.26
Year 14 (2021-2022)	9.15	92.66	18.95	3.47	28.49	167.01
Year 15 (2022-2023)	9.48	87.70	22.98	3.57	29.92	176.14
Year 16 (2023-2024)	N/A	86.70	N/A	N/A		160.90

*Incl. waffles, croquettes, crunchies, alphabites, fritters, hash browns, wedges, farls, instant potato, potato flour, fried, grilled, baked and frozen. Excluding chips and fried potatoes

** Incl. steamed, microwaved, jacket and roast potato, mashed (with or without fat). Including frozen and canned.

*** Incl. chips and other potato products (frozen or not)

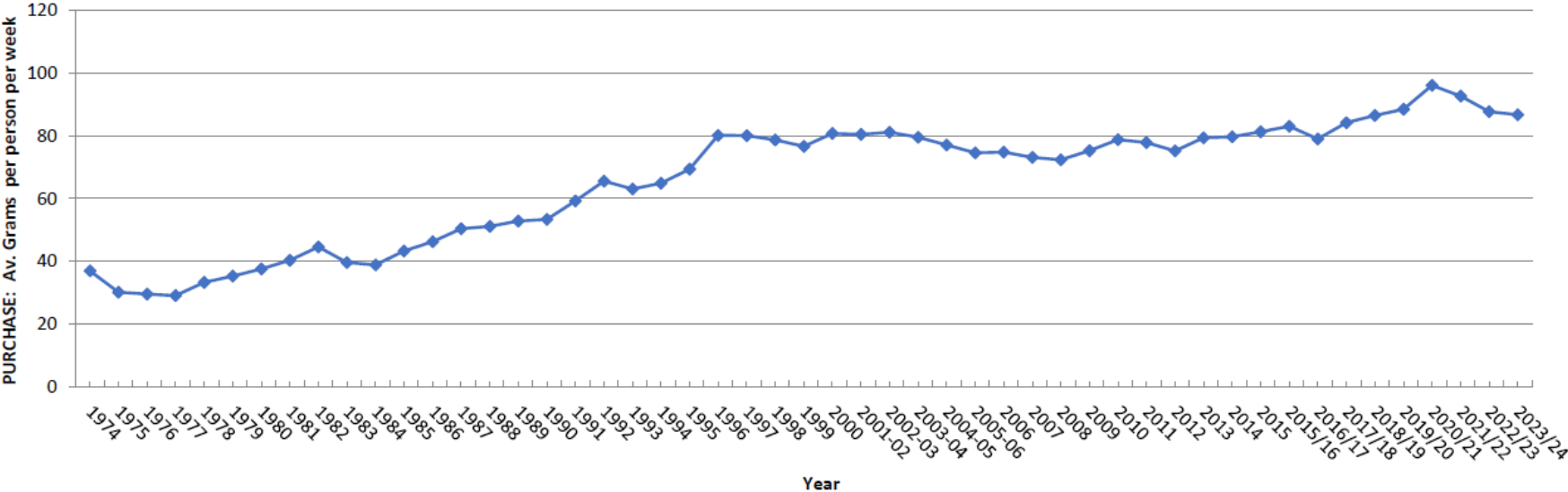
Data from NDNS Rolling Programme Years 8 - 15
 Crisps and Savoury Snacks
 % Consumption by Age Group



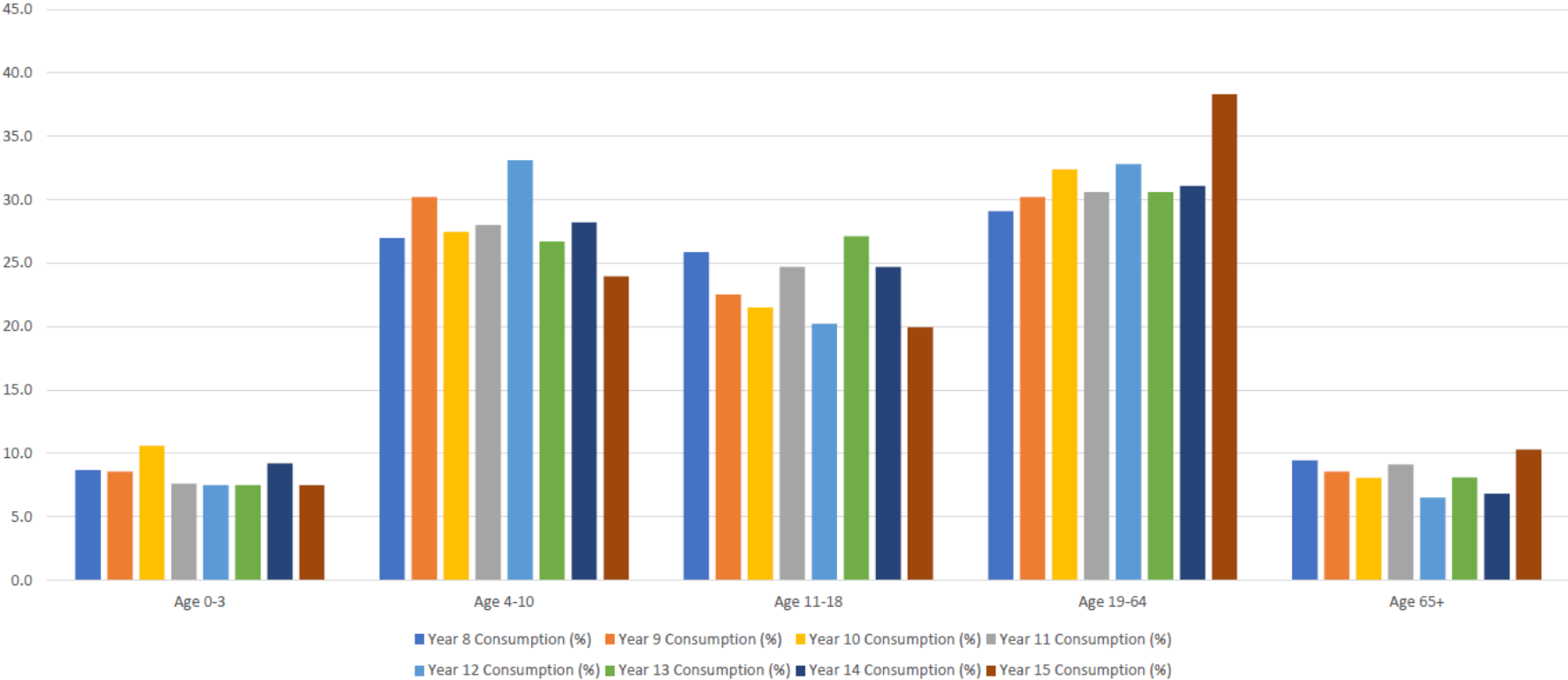
Defra Family Food FYE 2024 – UK Purchases



Total crisps and snacks



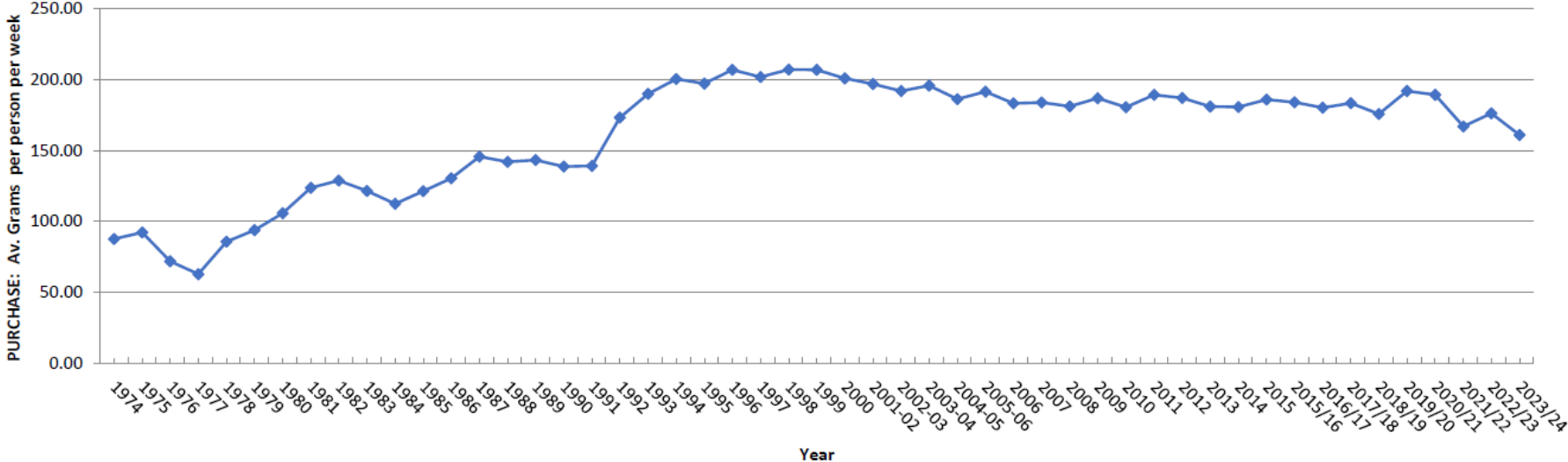
Data from NDNS Rolling Programme Years 8 - 15
 Chips & fried potatoes
 % Consumption by Age Group



Defra Family Food FYE 2024 – UK Purchases



Total (chips and other potato products)



OTHER DIET & NUTRITION

UPF:

- [Lancet Ultra-Processed Foods and Human Health](#) series published 19 November 2025 (FLC 370/25):
 - 3 new papers – no new evidence
 - *Ultra-processed foods and human health: the main thesis and the evidence*
 - *Policies to halt and reverse the rise in ultra-processed food production, marketing, and consumption*
 - *Towards unified global action on ultra-processed foods: understanding commercial determinants, countering corporate power, and mobilising a public health response*
- WHO proposal to add UPFs as form of food addiction – Feb.26
- [FSA Consumer Insights Tracker covering October to December 2025](#) – UPFs 2nd greatest food concern amongst respondents was UPFs (79%) – Dec. 25
- Follow-up SACN review – Jun.26
- UKRI report on public perceptions on UPF – exp. early 2026 TBC
- EU study on consumption of UPF in [Vision for Agriculture and Food](#) (FLC 054/25) – **exp. late 2026/early 2027**
- IARC report on UPF – October 2026 the earliest
- WHO guidelines on UPF – 2027 TBC

PPA position statement on GLP-1 medication (FLC 111/26):

- *"While we recognise the growing use of GLP-1 drugs and accept that they may, over time, influence eating habits for some consumers, we believe it is far too early to support claims that they are the primary driver of declining grocery spend or changes in specific category volumes, and would urge caution in drawing such conclusions. Grocery sales are currently being shaped by a range of wider pressures, including the ongoing cost-of-living squeeze, elevated food and energy prices, persistent inflation and broader economic uncertainty. Taken together, these factors provide a more credible explanation for recent movements in volumes. We believe a more balanced, evidence-based view is required as more robust data becomes available."*



MEMBERS:

- **Any concerns?**

OTHER DIET & NUTRITION

Food Standards Scotland (FSS) Strategy for 2026-2031 (FLC 094/26)

- FSS's statutory purpose: protecting public health re. food safety, diet and food crime risks; supporting consumer interests; and maintaining confidence in Scotland's food system
- Based on 3 priorities:
 - Public health and consumer protection
 - Evolving and reforming the regulatory landscape
 - Providing an effective public service for the people of Scotland
- Refers to future work on UPF building on SACN's evidence base

SG Draft Diet & Healthy Weight (FLC 094/26)

- **Exp. H2 2026** – may be subject to delays due to upcoming elections.
- Commitment as part of [Population Health Framework](#)
- 3 draft outcomes: healthier environment, and children's and adult's healthy diets and weight

SG National Good Food Plan (FLC 014/26)

- Ministers must consider Plan when carrying out functions in secondary legislation
- Based on 6 overarching outcomes and associated indicators – food environment and health, environment, diet and physical and mental health, economy, communities and global trade.
- Scottish Food Commission will oversee the implementation.

OTHER DIET & NUTRITION

EU Cardiovascular Plan 'Safe Hearts Plan' (FLC 410/25) – published 16 December 2025

- Incl. plans for comprehensive food processing assessment system
- Plans for a micro-levy on UPF dropped, although EC to continue exploring options (incl. taxes)
- EC study on health impacts of UPFs based on opinion of SAM and EGE - scoping started Nov.25
- EP to work on non-legislative own-initiative report
- EC plans to review the Audiovisual Media Services Directive to address marketing of UPFs by the end of 2026.

EU discussions on max. levels for vitamins and minerals in food

- Germany request for [EC to prioritise work on MLs](#) – 12 December
- FoodDrinkEurope and other associations - joint-industry statement – re-issued 2 March
- Discussions EC and EUMSs re-started on 5 March – WG on food supplements and on the addition of vitamins and minerals and of certain other substances to food
- EC to continue work on initiative
- Call for evidence – timings TBC

FOOD LABELLING, COMPOSITION & REGULATION



UK/EU SPS Agreement



- [UK-EU joint statement](#), published 17 December 2025
 - Government’s ambition to **conclude agreement by Spring/Summer 2026** – ahead of next EU/UK Summit (July TBC).
- Discussions on exceptions throughout February
 - FDF/Defra/Cabinet Office roundtable on 5 February (FLC 083/26)
- FDF-led sector-specific workshops with Defra last week February- focus on transition and implementation timings (FLC 093/26)
- [EFRA Committee report](#) (FLC 068/26) – Feb.26
- **NEW:** Defra [guidance on SPS agreement published 9 March \(FLC 122/26\)](#)
 - Clarifies businesses affected, areas of scope, digital systems, processes and timescales
 - Applies **to all businesses** (include. SMEs), **even if they do not trade directly with the EU**
 - Potential removal of export health certificates, phytosanitary certificates and some routine SPS checks for GB-EU-NI movements

Official controls across the agrifood system	Marketing standards for specific foods	Feed products and feed hygiene	Plant and forest reproductive material, including seed potatoes
General food law, consumer information and hygiene rules	Food and feed contaminants	Genetically modified organisms	Plant protection products (pesticides) and their maximum residue level
Food additives, flavourings, supplements and novel foods	Food contact materials	Animal health, breeding and welfare	Biocides
Food and feed contaminants	Other food-related measures (including organic rules, mineral waters and irradiation)	Plant health	Veterinary medicines maximum residue limits and antimicrobial resistance



UK/EU SPS Guidance (cont.)



- [List of legislation](#) affected published – incl. “any related EU rules made under the listed legislation”, incl. (not exhaustive):

General Food Law (Reg. 178/2002)	Hygiene Regs. 852/2004 and 853/2004	Contaminants (Reg. 315/93)	Pesticides (Regs. 1107/2009 and 396/2005)
FIC Regulation (Reg. 1169/2011)	Additives, flavourings (incl. smoke flavourings), enzymes and extraction solvents (Regs. 1331/2008, 1332/2008, 1333/2008, 1334/2008 and 2065/2003, Directive 2009/32)	CMO Regulation (Reg. 1308/2013)	Agricultural legislation, incl. seed potatoes (Directives 2002/53, 2002/56)
Nutrition and Health Claims (Reg. 1924/2006)	Fortification (Reg. 1925/2006)	Food Contact Materials (Reg. 1935/2004)	

- Vague on exceptions – still under negotiation, but Government “clear about importance” of animal welfare, public health and new and innovative technologies.
- [Negotiations set to conclude “later this year”](#) – until then rules subject to change
- Government **intent that the agreement will take effect in mid-2027**
- Defra to work with businesses that need longer to adjust to new arrangements
 - Considering targeted (sectoral) transitional arrangements ahead of agreement coming into force
- [Call for information](#) launched – closes 23 April
- Legislation exp. to be introduced to Parliament by mid-2026 and **made into law by the end of 2026.**
- [Detailed guidance](#) (sector-specific and RoW imports) **exp. May 2026**
- Businesses should start preparing – sign up to [Defra alerts](#), [LinkedIn](#) and [Defra’s mailing list](#).

ALLERGY LABELLING

- **Codex**

- [Ad hoc FAO/WHO Expert Consultation on Risk Assessment of Food Allergens](#) recommendations on the RfDs for gluten and cereals (FLC 385/25) – in Dec.25
- 2nd consultation paper on PAL – January (FLC 007/26)
- Codex PAL guidelines for adoption at CCFL49 May 2026 and final adoption of at CAC49 **exp. July 2026**

- **UK**

- [Dec.25 FSA Board paper on UK position on PAL \(FLC 403/25\)](#)
 - FSA Board unanimously agreed benefit of standardisation
 - PAL to be used only when truly necessary.
 - Agreed ED05 provides scientifically sound baseline
 - FSA will begin implementation plans with FSS following adoption of Codex (**exp. July 2026**)
- FSA position on labelling of non-regulated allergens and novel foods (FLC 119/26)
- FDF plans to update guidance on “‘Free –From’ Allergen Claims’ and ‘Gluten Labelling’ – timings TBC

- **EU**

- [EC planned initiative on voluntary provision of PAL \(FLC 078/26\)](#)
 - Public consultation on the draft implementing regulation **exp. Q2-Q3 2027**
 - Targeted consultations beforehand TBC
 - EC adoption **exp. Q4 2027.**
 - EC to request EFSA opinion on or validation of FAO/WHO RfDs
- FoodDrinkEurope position on PAL for mustard and cereal-based products (FLC 015/26)

ALLERGY LABELLING

- **SPAIN**

- [New ES guidance on management of unintended allergens and PAL](#) – Dec.25 (FLC 026/26)
- PAL not to be used when unintended allergen presence is detected but below the ED05
- PAL should be used sparingly, only when residual, unavoidable risk remains above RfDs
- Recommends clear wording, e.g. ‘may contain...’ or ‘not suitable for...’,
 - ‘Not suitable for...’ particularly relevant for wheat RfDs exceeded, but gluten remains <20 ppm
 - *Interprtation:*
 - *The ‘gluten-free’ claim depends solely on the legal limit <20 ppm (Reg. 828/2014).*
 - *Exceeding an RfD (according to ED05) requires PAL, even if the product complies with ‘gluten-free’*
- Only applicable in Spain.

OTHER LABELLING, COMP. and REGS.

- **GS1 QR codes transition (Sunrise or *Ambition* 2027)**
 - ESA call with GS1 on 21 January (FLC 052/26)
 - 2027 ambition for infra-structure to be in place – retailers to be able to scan codes – not necessarily all products labelled
 - GS1 preparation survey – adoption rates:
 - 45% by 2025
 - 71% by 2026
 - 100% by 2030
 - 2037 – barcodes no longer work
- **BMG/ADAS project**
 - BMG ADAS paper ‘Food Labelling: Costs requirements relative to prospective benefits’ cleared for publication.
 - Publication **exp. end of March.**
- **Vegan/vegetarian/plant-based labelling**
 - PAS 224:2020 on ‘[100% plant-based foods](#)’ – revision **exp. 2026**
 - FSIFG opinion on dairy descriptors for plant-based products will not be published and no change to UK legislation planned:
 - compliance to be assessed on a case-by-case basis by TSOs
 - [Oatly supreme court ruling](#) – CMO Regulation does not allow the use of dairy terms for non-dairy products.
 - Legislation to protect consumers and rules of fair competition.

OTHER LABELLING, COMP. and REGS.

- **Smoke flavourings UK**

- No news on risk assessment due to ongoing SPS negotiations.
- For NI - FSA NI confirmation that (FLC 108/26):
 - Foods placed on the market before end of applicable transition period can continue to be sold until expiry date.
 - Effective 1 July 2026: Products where smoke flavourings are added solely for flavour (e.g. soups, **snacks**, sauces).
 - Effective 1 July 2029: Products where smoke flavourings replace traditional smoking (e.g. cheese, meat, processed fish and fish roe).
 - After transition period, foods containing any of the affected smoke flavouring cannot be placed on EU/NI market.
 - Pre-packed food containing smoke flavourings moving to NI through NIRMS can continue to be placed on the NI market.
 - **FSA NI seeking feedback on impact of EU ban and transition timelines**



MEMBERS:

- **Concerned members to contact PPA**

- **National level regulation – FSA**

- FSA tasked to create proposals on National Level Regulation
- Consistent national approach to food standards and hygiene regulation for large retailers
- Using centralised data and streamlined processes
- Proposals to be put forward to [FSA Board in March](#).

- **New CMA guidance on making green claims across supply chains (FLC 041/26)**

- Published 22 January
- Builds on CMA's '[Green Claims Code](#)'
- Focus on areas of responsibility and offers clarification (e.g. broad or selective claims)

OTHER LABELLING, COMP. and REGS.

- **EU Empowering Consumers for the Green Transition (EmpCo)**
 - EC FAQs document on 4 December 2025 (**FLC 393/25**)
 - Does not address grandfathering clause/transition period issue
 - [Joint statement](#) by 18 organisations urging EC to introduce grandfathering clause/transition period
 - EC (DGJUST) response on 22 January – confirmation of **application from 27 September 2026** but **no retroactive compliance** no products already placed on the market (FLC 053/26)
 - Joint statement signatories workshop with CPC on 27 January and EC meeting 29 January
 - EUMSs support for ‘principles-based’ agreement – EC has no intention to re-open legislation
 - Initial focus would be on online claims, rather than claims on-pack.
 - EC considering pros and cons of changes to the legislation vs. CPC ‘principles-based’ agreement
 - Joint statement signatories to escalate issue to Cabinet of Commissioners and other DGs if no advancement on pragmatic solution.
- **EU recycling labelling/PPWR (FLC 039/26)**
 - Proposals for EU harmonised system under PPWR – EC to adopt implementing act **from 12 August 2026**
 - [JRC study published 13 January:](#)
 - Colour is given priority over purely monochrome designs
 - Text labels are also a preferred solution and should be included by default
 - QR codes are proposed as optional complements, but must be placed in close proximity to label
 - FoodDrinkEurope position in preparation
 - Draft Implementing Act to be developed – Comitology procedure
 - Exp. 4-week public consultation (timings TBC)
 - Other labels Art. 12 DRS symbol, recyclable symbol, recycled content and bio-based content) – Ramboll consultants final report **exp. June 2026**

OTHER LABELLING, COMP. and REGS.

• EU CMO Review

- [EC proposal on CMO Regulation \(Regulation \(EC\) 1308/2013\) Review](#) – Jul.25
- [EP and Council provisional agreement](#) on 5 March (FLC 121/26)
 - Bans 31 meat terms for plant-based products, incl. ‘beef’, ‘chicken’, ‘bacon’, ‘pork’, ‘lamb’, ‘ribs’ and ‘chop’ – ‘steak’ and ‘liver’ also included
 - Final text TBC, but likely to exclude ‘sausage’, ‘burger’ and ‘nuggets’.
 - Explicitly prohibits term ‘meat’ for laboratory-grown or cell-based product
- Needs [endorsement by EP and Council](#)
- Potential for scope to be extended, in the context of [2025 proposal](#)

• EU COOL

- EU AgriFish Council 26 January – AOB discussions led by France (supported by 8 EUMSs)
- Proposal to extend country-specific COOL label to “as many products as possible” (instead of ‘EU’/‘Non-EU’)
- EC noted complexities of this work and work already underway by specific sectors, e.g. CMO Regulation.

• EU Enzyme labelling

- Union list still **exp. 2028**
- Still under consideration by EC.
 - Will consult with SANTE E2 Unit and legal service – timings TBC

• EU Official Controls Regulations

- [Implementing Regulation \(EU\) 2026/194](#) into force **18 February** (FLC 092/26)
 - 13th Review of [Regulation \(EU\) 2019/1793](#)

OTHER LABELLING, COMP. and REGS.

- **CODEX CCFL49 – 11-15 May 2026**
 - Annex to GSLPF (CXS 1-1985): Guidelines on the use of PAL (Step 7)
 - Amendment to GSLPF (CXS 1-1985): Provisions relevant to joint presentation and multipack formats (Step 4)
 - Guidelines on application of food labelling provisions in emergencies (Step 4)
- **Codex Food labelling in emergencies**
 - 3rd consultation paper – closes on 17 April
 - FoodDrinkEurope initial proposals, incl. extending scope to imported food, work to be done by national authorities to support businesses, and alignment on timeframes of easements with stakeholders.
- **CCFA56 – 13-17 April 2026**
 - NCCC meeting 18 March
 - PPA to take part
 - PPA proposal to survey members on additives used, to better support members



MEMBERS:

- **Please send lists of additives used in products to PPA**

FOOD SAFETY

Precision Breeding (UK)

CUPGRA event:

- Precision Breeding for the UK Potato Group - Exploring Opportunities and Challenges (Monday 16 March - 10:00 am to 3.00 pm).

CUPGRA / Sainsbury's laboratory project:

- Previous work with GB Potatoes has shown that target traits (blight resistance, Potato Virus Y [PVY], low-reducing sugars / bruising control) express well with no obvious yield penalties.
- Discussion with 'ACRE' indicates that blight and virus resistance originates for sources that are sexually compatible with cultivated potatoes, and these would therefore be classed as 'cisgenic' and should be Precision Breeding Act compliant.
- However, the low-reducing sugars / bruising control construct used would not be compliant.
- The Sainsbury Laboratory has developed a new cisgenic construct combining 3 blight resistance genes with resistance to PVY and Potato Leaf Roll Virus (PLRV) and transformed Maris Piper and Charlotte varieties to give 'Piper Plus 3.0'.
- Trials will take place this year at NIAB Farm, Cambridge.

New Genomic Techniques (EU) (1)

Status of New Genomic Techniques (NGT) regulation:

Political agreement

- 3 December 2025 trilogue settled core political issues of the file.
- Council, EP and EC reached a provisional agreement.

Endorsement of the EP underway

- The ENVI Committee approved the compromise text on 28 January 2026.
- File is advancing toward final plenary adoption.
- Plenary vote is the next formal and procedural step, no reopening on the substance.
- Planned for March/April.

Endorsement by the Council

- COREPER endorsed the text at end of 2025
- Awaiting formal Council adoption

Next steps

- Formal adoption by the co-legislators
- Publication in the Official Journal expected in 2026
- Application date foreseen to be two years after entry into force of the text

New Genomic Techniques (EU) (2)

Two-tier system

NGT-1 plants	NGT-2 plants
<ul style="list-style-type: none">• Equivalent to conventional breeding• Exempt from GMO legislation requirements• No labelling for food/feed, only for seeds and PRM• Subject to verification	<ul style="list-style-type: none">• When complex modifications• Fully under GMO legislative framework for authorisation, traceability and labelling

Key compromises

- Exclusion list created for NGT-1 plants, especially for herbicide tolerant traits.
- No full patent ban, which a key contention point.

SUSTAINABILITY

Packaging update UK (1)

Packaging Extended Producer Responsibility (pEPR) scheme

- Defra has updated its guidance on registering and paying fees under the pEPR scheme, removing references to provisional charges and confirming 2026 fee figures.
- Also updates the published fee amounts and clarify the administrative requirements for obligated producers.

PackUK

- Has recently confirmed that disposal fees for Year 1 of the pEPR scheme will remain as set out in producers' October 2025 Notices of Liability.
- A funding shortfall caused by revised packaging data submissions will be covered by the UK Government on a one-off basis.

Welsh Government

- Consultation on proposed amendments to the pEPR scheme to include 'on-the-go' packaging waste placed in public bins or littered in Wales.
- Seeks views on how producer fees should be structured to account for street-binned and littered packaging waste. Consultation closes on 24 April.

Packaging update UK (2)

Producer Responsibility Organisation (PRO) for UK packaging

- FDF (along with INCPEN) is leading an industry-backed initiative to establish a new PRO for UK packaging (Provisionally UK Packaging PRO Ltd”.
- PPA wrote in support of the application.
- Karen Graley, acting Head of pEPR Producer Responsibility Organisation, was appointed in late 2025.
- FDF/INCPEN now awaiting feedback from government (outcome expected ‘imminently’).
- Application was supported by nine of the ten largest packaging producers in UK.

Packaging update EU

Implementation of Packaging and Packaging Waste Regulation (PPWR)

a. Restrictions on single-use packaging formats (Art. 25 & Annex V)

- **Ongoing work:** Commission to clarify scope of banned single-use plastic (SUP) formats by delegated acts and guidance; definitions of "grouped" vs "sales" packaging and handling exemptions still pending.
- The Commission is not currently working on Annex V Row 1 — *single use plastic grouped packaging*.
- Instead focusing on Row III — *single use plastic packaging*, and IV — *single-use plastic packaging for condiments, preserves, sauces, coffee creamer, sugar, and seasoning* in HORECA sector of the Annex.
- **Uncertainties:** Ambiguity around what qualifies as 'necessary for handling' or as 'grouped packaging' - may affect many food formats.
- In addition, the Commission has launched a **Call for Evidence** as part of the evaluation of Directive (EU) 2019/904 on single-use plastics (until 17 March).
- The evaluation could have a direct implications for cumulative regulatory burden in interaction with the PPWR.

No. 10 Food Waste Roundtable

- Food Waste RoundTable held 29 January 2026.
- Chaired by PM's 'Head of Partnerships' (Tim Kiddell).
- Attendees included FDF, WRAP, IGD, BRC, NFU, FareShare/Felix Project, Olio, Too Good To Go, The Trussell Trust, Company Shop, Zest (AI), The National Lottery, DEFRA, DESNZ, No.10 Policy Units and the Coronation Food Project.
- PM reported to have a strong personal interest in this agenda, as does the King (*via the Coronation Food Project).
- Four strands (sub-groups to be convened):
 - Halving avoidable household waste (71% of edible food waste coming from households);
 - Quadrupling redistribution where surplus cannot be avoided;
 - Technology and data;
 - Funding (The National Lottery Community Fund will convene within this strand).
- Aligns with the WRAP Food and Drink Pact and the upcoming Defra Circular Economy Growth Plan (understood to be in final stages of approval and will be published 'soon': will include interventions to prevent and food waste).
- **ADDITIONAL:** FareShare has also asked PPA whether our members have any capability/capacity to turn excess potato into mash. Provided some possible leads.

Deforestation

EU Deforestation Regulations (EUDR)

- [Regulation \(EU\) 2025/2650](#) amending [Regulation \(EU\) 2023/1115](#) published 23 December 2025 (FLC 112/26)
- Delays application of EUDR by 12 months, to apply from:
 - **30 December 2026** for **large- and medium-sized** businesses
 - **30 June 2027** for **micro- and small-sized** enterprises
- Changes incl.:
 - Due diligence focussed on first market operators
 - Reduced obligations for downstream actors
 - Simplified requirements for micro and small operators from low-risk countries
 - Simplification review by 30 April 2026 (with potential further simplifications). General review postponed until 30 June 2030.
- Outstanding issues incl.: implementation in NI, duplication risks for re-imported goods, downstream operator obligations, IT system capacity, and traceability requirements for low-risk countries and smallholders.

UK Forest Risk Commodities Regulations

- UK considering aligning with EU requirements (FLC 112/26)
- Defra update (January):

“We recognise the urgency of taking action to ensure that UK consumption of forest risk commodities is not driving deforestation and will set out our approach to addressing UK consumption of forest risk commodities in due course. We are working across government to agree the most effective way to reduce the impact of the UK’s consumption of forest risk commodities on deforestation. We are aware of businesses’ need for certainty on this in Northern Ireland. We will communicate the relevant arrangements at the earliest possible opportunity and entirely understand the urgency of this.”

COMMITTEE MATTERS

Committee Matters

FLC vice-chair position still vacant



Members: If you would like to help steer the work of the FLC Committee, please contact the PPA Secretariat!



Risk Matrix

Food Issues Risk Matrix (November 2025)

Decreasing impact on business

Risk Analysis	Current Issue Actions in hand Dynamic situation	Future Issue Plans in preparation	Managed issue Controlled/monitored Could reoccur Outstanding actions
Big Company Impact Cost Reputation Media	Acrylamide 3-MCPD/Glycidyl-Esters HFSS/LHF Advertising/Promotions restrictions Portion Size/Calories UK Devolved regulatory divergence Packaging waste/Taxation/EPR Ultra-Processed Foods Consultation on implementation 2018 NPM UK/EU SPS Agreement	Food taxation FOPNL developments Salt/Sodium reduction (2024 targets) Mandatory reporting of healthy food sales by large businesses	
Moderate Impact Cost Material availability Working practice	CIPC tMRL monitoring Environment Act (implementation)/EU Farm to Fork Strategy Food waste Allergens (precautionary labels) Bread and Flour Regulations implementation Wales Obesity Strategy (Healthy Weight: Healthy Wales) NI Obesity Strategy (Healthy Futures)	Eco-labelling EU Deforestation UK Deforestation GB Smoke flavourings review Precision Breeding implementation England Food Strategy EU Smoked Ingredients UK Smoked Ingredients Scotland Obesity Strategy EU EmpCo Directive	EU Smoke flavourings NIRMS/'Not for EU' labelling
Small Impact Cost Materials Change	EU Flavourings reviews Sugars (popcorn) EU MOAH/MOSH	UK Recycling labelling EU PFAS Plant-based/vegan/vegetarian/meat definitions Glycoalkaloids Furans	

New issue

Changed priority

Identified as a potential high-profile media issue

AOB

Dates of next 2026 meetings

- **In-person:** 30 June – 10:30am start (FDF, London)
- **Online:** 11 November– 1pm start



Members: Suggestion of guest speakers for next meeting?

Potential GUEST SPEAKERS:

- *FSA on contaminants*
- *FSA on regulated product reforms*
- *OHID/DHSC*
- *SG on diet policy*
- *WG on diet policy*
- *Trading Standards/enforcement updates*
- *OHID on reformulation or policy*
- *FDF general*
- *BRC general*

Thank you



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