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**PPA Food Law and Consumer (FLC) Committee
Minutes of the meeting 28 July 2021 (14:00-16:45),
Teleconference**

Participants

Catharine Hall	KP Snacks (Chair)
Andrew Curtis	PPA (Secretariat)
Vanessa Richardson	PPA (Secretariat)
Emma Aldridge	Pipers
Gillian Black	Mackie's
Greg Foster	McCain
Philip Gray	Tayto
Jyoty Modha	PepsiCo
Charlotte Pick	McCain
Federica Tritschler	Lamb Weston

Guest speakers

Lindsey Manion	DHSC
Stephanie Shields	DHSC
Brittney MacKinlay	DHSC
Milly Walpole	DCMS
Amy Glass	FDF

Apologies

1) Welcome and anti-trust guidance

Members were asked to note the PPA anti-trust statement as practiced in meetings and to reply to the email previously sent accordingly.

2) Invited Guest Speakers: Lindsey Manion, Stephanie Shields, Brittney MacKinlay (DHSC) and Milly Walpole (DCMS)

The DHSC and DCMS team joined the meeting. Lindsey Mannion (LM), Head of Healthy Weight Policy within DHSC, introduced herself and the supporting team, noting the presence of Milly Walpole, Senior Policy Advisor – Advertising, Media and Creative Industries, from the Department for Digital, Culture, Media & Sport (DCMS), as one of the items in the agenda was the newly announced HFSS advertising ban on TV and online, which is a joint DHSC/DCMS policy area.

LM started by providing a summary of the Government response to the consultation on HFSS advertising restrictions, including policy objectives, published at the end of June. LM also provided information on the upcoming changes, which will introduce simultaneously, at the end of 2022, a 9pm TV watershed and a restriction of all paid-for online advertising for identifiable 'less healthy' food and drink products.

Government will use powers in the Health and Care Bill to legislate for these changes and food categories in scope will be taken forward in secondary legislation. Products in scope will be those belonging to categories specifically identified in the forthcoming secondary legislation which fail (foods scoring ≥ 4 points) the 2004-5 Ofcom Nutritional Profiling Model (NPM). Draft secondary legislation and an enforcement consultation are expected soon. Guidance on advertising restrictions will then follow. DHSC will share with PPA a draft version of the guidance once that is available.

Online advertising restrictions will only apply to paid-for advertising and therefore owned media is out of scope. Other exemptions apply, such as for SMEs (with up to 249 employees), brand advertising (with no identifiable HFSS products in the adverts), online audio, other forms of broadcast (e.g. radio, outdoor, print, cinema) and online B2B and transactional content.

On the HFSS promotional restrictions, LM also provided a summary of the Government response and draft legislative text published on 21 July. The main change in policy is the delay of application of the restrictions, which will now apply from Oct.22 (instead of Apr.22).

LM explained that the restrictions will apply to volume price restrictions such as 'buy-one-get-one-free' or '3 for 2' offers of 'less healthy' food and drink, as well as placement (location) restrictions of 'less healthy' food and drink at store entrances, checkouts and aisle ends, and their online equivalents (i.e. entry pages, landing pages and shopping baskets).

The rules will be applicable to businesses with ≥ 50 employees, with an exemption on location restrictions for businesses with an internal store size of $< 2,000$ sq. ft.

To verify products in scope of the promotional restrictions, the same 2-stage approach to advertising restrictions will apply (i.e. products in categories in scope followed by NPM score). The categories in scope are outlined in draft legislation published but further examples will be included in the upcoming guidance.

DHSC agreed to provide PPA with a copy of the draft guidance, which is expected in the next few weeks. ML said that the guidance will also provide clarity on where the provisions on advertising and online promotions seem to overlap. LM also explained that retailers would be responsible for compliance, and that for the out-of-home sector, only restrictions on free drink refills would apply.

Following the presentation, we opened the floor to questions from members and clarity was asked on the overlap between the two policies (advertising and online promotions). LM's response was that part of it comes from the policy objectives and therefore the aim of promotional restrictions online is for it to mirror the in-store equivalent of areas where shoppers are encouraged to purchase more, e.g. end of aisle displays, to ensure a level playing field with retailers that operate mainly online versus those who have physical stores, whereas the objective of the advertising restrictions is to stop adverts that actively push products to children. ML also said that they are aware that the industry needs more detail on the differences between the two policies and this information will be provided in the upcoming guidance.

Another question was asked about brand advertising and the fact that no changes would be made to the current ASA (Advertising Standards Authority) rules, and whether that would be codified in secondary legislation or guidance, as no mention of it appears in the Health and Care Bill, and the legislation will link with the ASA. In response, LM stated that the reason brand advertising is not mentioned in the legislation is because no changes in this respect will be made, and therefore there is no need to refer to it in legislation.

In terms of enforcement of advertising restrictions, DHSC's expectation is that the ASA will play a role as the front line regulator, pointing out that Ofcom was appointed as the regulatory authority and that it is up to them to appoint a front line regulator, mirroring the same framework for advertising restrictions. Stephanie Shields (SS) also pointed out that the current ASA requirements in terms of child-specific programming/content is more restrictive than the new policy as it applies to all products, rather than just the categories in scope of the upcoming restrictions, and DHSC does not expect this legislation to supersede the current restrictions, but instead will run in parallel to provide a higher level of protection on children-specific content. SS also stated that as they expect the ASA to serve as the front-line regulator, they will work with them on the related guidance.

As a follow up to the question, a member asked if it is a fair assumption that, as the guidance is unlikely to be released until at least end of the year/next year, industry should continue to follow ASA rules in terms of brand advertising. In response, LM stated that it is not DHSC's intention to change brand advertising rules, but the rules are written in primary legislation. Due to the Parliamentary process, these may be subject to further amendments outside the Government's control.

The Secretariat then asked a question as to whether we can expect a consultation on enforcement of the advertising restrictions. DHSC confirmed this will take place once the text with the secondary legislation is

published and that will have to happen before the guidance is issued, in case further changes to the wording of the legislation are required that could have an impact on the guidance.

Another question was asked about checkout areas on the online space, and that it appears that a supplier to an online supermarket is unable to promote their product at the checkout whereas the retailer could advertise its product at the checkout as it would qualify as own media and therefore not be paid-for advertisement. The member who asked this said that the question did not need to be addressed straight away but needed to be considered in the upcoming guidance. LM thanked the member for the input and said they would make sure this is covered in the guidance.

The Chair asked a final question was asked about the meaning of 'identifiable HFSS' with regards to advertising. LM answered that this will also be covered in the guidance, but explained that it comes down to whether the NPM score for the product in question can be calculated. If the regulator is unable to sufficiently identify the product to be able to work out the NPM score, then the product is not 'identifiable'. The Secretariat added that it is essential to understand the meaning of 'identifiable HFSS' as, from the explanation provided, liability will depend on whether a product is identifiable or not. DHSC also made a note of this request/concern.

As no more questions were asked, the Secretariat thanked DHSC and DCMS for joining the meeting reminding them to send PPA a copy of the draft guidance and to keep PPA informed on next steps. LM also thanked PPA and members for the time and said the team is available to answer any further questions.

ACTION: *DHSC team to share with Secretariat copies of the draft guidance on promotional restrictions and advertising restrictions as they become available, to be shared with members.*

[POST MEETING NOTE: DHSC draft guidance shared with PPA on 9 August and shared with members the same day. Comments to be sent to Secretariat by 31 August – FLC 310/21].

[POST MEETING NOTE: For ease of reference, please see below recent circulars issued on this subject:

Advertising: 24 June (FLC 257/21) - Consultation outcome on further advertising restrictions for products high in fat, salt and sugar

Advertising: 13 July (FLC 273/21) - Health and Care Bill

Promotions: 27 July (FLC 285/21) - HFSS promotions enforcement consultation response (UPDATE)

Promotions: 9 August (FLC 310/21) – Draft HFSS implementation guidance on restricting promotions of products high in fat, sugar or salt by location and price].

3) Invited Guest Speaker: Amy Glass (AG) – FDF

We welcomed AG to the meeting, who provided an overview of the Part II report by Henry Dimbleby (HD) on the National Food Strategy, highlighting areas of concern by the FDF and next steps of activity.

AG explained that the report was published on 15 July and had a core focus on diet and health and the environment as expected by FDF. Recommendations were encapsulated into 4 objectives: the junk food cycle, reducing diet-related inequalities, making the best use of our land and creating a long-term shift in our food culture. One area that was not expected was on reducing diet-related inequalities as that was already covered in the Part I report. The recommendations in this area had been updated.

AG went through the recommendations in more detail, starting by recommendation 1 on the introduction of a sugar and salt reformulation tax. The proposal is for a £3/kg tax on sugar and a £6/kg tax on salt sold for use in processed foods or in restaurant/catering businesses as an incentive for manufacturers to reformulate their products and to use some of the revenue to support lower income families to get fresh fruit/vegetables. The sugar tax applies to all sugar and other ingredients used for sweetening and it would replace the Soft Drinks Industry Levy (SDIL). Neither tax would apply to ingredients used in home cooking. It was also suggested that imported foods would be taxed under the proposals according to the sugar and salt content when they arrive in the UK, i.e. taxing the product instead of taxing the sale of sugar/salt. AG

also highlighted FDF's response to the report and their opposition to the proposed taxes as they will not help to incentivise reformulation due to the complexity of reformulation and the types of products compared with removing sugar from soft drinks. AG also talked about the consequential food price rises and mentioned that the Taxpayers Alliance published data showing that the cost of food for consumers would go up by £172 per year, which helped their response and gained media coverage. AG also mentioned the Prime Minister's (PM) response opposing to bringing in new taxes that would increase the price of food for families.

On recommendation 2, on introducing mandatory reporting for large food companies, it was suggested that companies would need to report on a whole range of different nutrients as well as sales of HFSS products and fruit and vegetables, food waste and total food and drink sales. AG said that this has gained a lot of media attention and support in general for this policy, including the Food Foundation and investors and many of the large retailers such as Tesco, Sainsbury's, Waitrose, Iceland, Co-op, as well as Greggs and Greencore. FDF does not yet have a position on this but, upon discussing this with its members, there is some concern as to the purpose of this reporting for manufacturers, especially those who predominantly produce HFSS products and the prospect of this data falling in the hands of NGOs, whereas for a retailer this may be helpful in determining shifts in consumer purchases/diets. FDF's members are also concerned about the potential burden of reporting, and therefore they would be grateful for any input from businesses as to what the potential impacts could be. AG said that FDF is aware that the BRC is speaking to its members about this and they will discuss it in more detail, e.g. what BRC's support actually means, what is already being done and what could work in the future, how they could do to avoid burden, what metrics would be used. FDF will continue to work with BRC on this as it wants to be part of the discussions, bearing in mind any implications for manufacturers.

Other areas of the report were discussed, such as the recommendation on food education and support for lower income families (e.g. Healthy Start schemes and free school meals), which are supported by the FDF. On environmental sustainability, the report is quite heavily focussed on the farming sector, e.g. the use of land, and FDF's views are that these recommendations could have gone a bit further. On trade, the FDF was pleased that the recommendations link with the recommendations made by the Trade and Agriculture Commission recommendations but again, their views are that the recommendations should have considered more the UK's future trade strategy. The FDF was also supportive on recommendation to support innovation.

AG also mentioned the National Food System Data Programme and the Government Buying Standards for Food (GBSF), highlighting that the Government response to the 2019 consultation on the GBSF, which was also published at the same time, updates several nutrition standards and commits to a further consultation on promotion of local, seasonal and sustainable produce later this year.

Finally, AG mentioned other recommendations, such as to set clear targets and bring in legislation for long-term change through the 'Good Food Bill', which would underpin all other recommendations in legislation, the expansion of the role of the Food Standards Agency (FSA) to cover food labelling and the creation of a national reference diet, much of which still needs to be explored.

AG then reminded members that HD's work is only one input to the Government of what the food strategy for England should be, and that the Food and Drink Sector Council (FDSC), of which the FDF is part, will also issue a separate report with recommendations due in September, setting out where the food chain could make a difference by working with the Government and citizens to change the food system. The report will cover a wide range of topics (not just health and environment). AG also mentioned that the FDF will also start developing their input to the Government White Paper (due 6 months after HD's Part II report, probably Jan.22) and conversations will kick off in September.

AG then welcomed any questions from members or any reflections on the report, either supporting or opposing the proposals.

A member asked a question about FDF's views on the likelihood of the tax proposals going ahead, given HD's optimistic outtake despite the PM's opposition to them. In response, AG said that she does not think

that the industry should be complacent. Time should be used to think and strengthen FDF's arguments, and to ensure that these views are inputted into the White Paper, making it very clear as to why they oppose these taxes (noting that the PM is known for changing his mind about taxes very easily). AG also said we should also think about other proposals made, the potential impact on trade and World Trade Organization (WTO) agreements, and the differential impacts on imports compared to UK produced goods. After a follow up question about the report from the FDSC, AG confirmed that the same arguments will be made in this report, and added that in that, a recommendation will be made that the policy should focus on incentives for positive change, rather than taxes.

Another member asked more details about the argument on the impact on trade, to which AG advised that, according to colleagues working on the Trade and Customs working group, the concern is if imported products are treated differently to UK products leading to a potential WTO challenge. The report suggests that the salt/sugar tax should apply to the overall imported product, rather than on sugar and salt sold, which is the approached proposed for UK products. In addition, this is also likely to add more red tape to imports.

A final comment was made by a member on the perception that the report caused very little impact, and specifically mentioned the proposal on taxes, and the fact that Defra does not have the power it once had to propose taxes, which now have to come from the Treasury, and that it would be unlikely to be proposed under the current administration, raising concerns about taxes being a long-term goal. To this, AG stated that the key argument for now should be around food prices, quoting the FDF report 'Eating into Household Budgets' published on 20 July, which highlighted the overall impact of all current policies that the Government is trying to implement on household spend on food, and that the FDF will be thinking about other fora through which they could disseminate its messages.

The Secretariat also asked if the FDF knows how advanced the discussions on the mandatory reporting for large companies are, as it seems that the FSA has been upscaling their information resources and capacity for some time now, potentially in preparation for future work. AG said she does not know how involved the FSA has been up until this point, but she is also aware of ongoing projects on data analysis of the food system, such as a data dashboard, and agreed this is something that they need to start looking into more closely.

As no more questions were asked, the Secretariat thanked AG for her time and presentation.

[POST MEETING NOTE: For ease of reference, PPA's circular number on the NFS is FLC 276/21].

4) Review of minutes (24 March 2021) and any actions arising

Before starting on the minutes from the last meeting, the Secretariat asked for any reflections/comments on the presentations from DHSC/DCMS and FDF. The main areas of concern highlighted were the lack of clarity on the DHSC proposals, and the expectations of what will be covered in the upcoming guidance. The Chair also brought up the question on brand advertising, and highlighted concerns about asking questions to DHSC, which could prompt an unwelcomed response. The Secretariat suggested that PPA and members work together to agree on which questions we want to ask at this stage or once the guidance is issued, if any. A member also noted the comment made by DHSC that the exemption of brand advertising not being written in the legislation and concerns that NGOs have already identified this as a loophole which will need to be amended. The Secretariat also noted that the Health & Care Bill gives the Secretary of State (SoS) powers to amend the legislation and guidance, including the guidance on NPMs, and the member highlighted the concern that the Bill, as currently written, allows any SoS to amend the NPM guidance without consultation, but that the industry has been told all along that the restrictions on promotions and advertising would be based upon the current NPM model.

The Committee then confirmed that the minutes of the previous FLC meeting on 24 March were correct and proceeded to review the actions arising from the meeting. To note:

- On cadmium and tropane alkaloids – ongoing monitoring, same as other contaminants. Members were invited to send any data on occurrence of these chemicals in their products.
- Food waste targets – carried over from 2020 meeting. Original discussion for EUPPA to join next call to give an update on EU waste targets but UK angle would be more pertinent. Potential to invite FDF Sustainability team or Wrap to join next FLC meeting in December depending on members' interest.
- FLC priorities document – ongoing work.
- PPA Newsletter/document management system – The Secretariat asked for feedback on the PPA monthly newsletter, in particular with regards to its content, frequency and size. The feedback from members during the meeting was very positive, so the newsletter will continue to go out at the same frequency. The Secretariat also suggested to include a list of circulars sent during the month within the monthly newsletter, which was also well received, so that will be included going forward.
- Document management system – The Secretariat explained that PPA is still exploring a new document management system and that a trial will undertaken in August.

[POST MEETING NOTE: The European Commission (EC) published Regulation (EU) 2021/1323, amending Regulation (EC) 1881/2006 as regards maximum levels of cadmium in certain foodstuffs (FLC 313/21)].

[POST MEETING NOTE: The EC also published Regulation (EU) 2021/1408, amending Regulation (EC) 1881/2006 as regards maximum levels of tropane alkaloids in certain foodstuffs (FLC 314/21)].

ACTION: Members to confirm to PPA Secretariat if there is interest in an update on UK waste targets as part of the next FLC meeting in December.

ACTION: Members to send any additional feedback on newsletter to PPA.

5) Nutrition and Health

a) Nutrition and health policy timings update

The Secretariat gave an update on diet and health policy timings, explaining that a lot of the UK policy activity expected happened in July, including:

- the Government response to the consultation on HFSS advertising restrictions on 24 July;
- the Health and Care Bill on 6 July;
- the NFS report by HD;
- the Government response to the consultation on GBSF on 15 July;
- the Government response to the enforcement consultation on HFSS promotional restrictions and the draft legislative text on 21 July; and
- confirmation that the SI on Out of Home (OOH) calorie labelling has been signed into law.

On the EU side, the EU Code of Conduct on Responsible Food Business and Marketing Practices was published on 5 July, the European Food Safety Authority (EFSA) draft opinion on dietary sugars on 22 July and the European Parliament (EP) Special Committee on Beating Cancer (BECA) draft report was published mid-July.

[POST MEETING NOTE: The Calorie Labelling (Out of Home Sector) (England) Regulations 2021, published on 27 July, are now available as an SI].

b) Government Buying Standards for Food and Catering Services (GBSF)

The Secretariat provided an update on the Government response to the 2019 consultation on the GBSF, which resulted in further tightening of the standard. Unfortunately, despite our response to the consultation, 3 key changes are being made to the standard:

- Main meals within a meal deal must include a carbohydrate which is not prepared with fats or oils: PPA had objected as some members produce oven chips with very low fat content which might be covered, and it would also prevent the preparation of a whole host of dishes, such as baked potato

with butter and cheese, roasted potato, etc. The original text was modified somewhat but it is still unclear as to whether the prohibition is on fats and oils added during the cooking process or if it also included fats/oils added during the manufacturing process, even if at a low level. Both PPA and FDF wrote to DHSC seeking clarification, and DHSC responded to PPA stating that technical guidance will be published by the Autumn, which will clarify this point.

- Meal deals: updated mandatory nutrition standard. Any foods and drinks within a meal deal must also meet the relevant GBSF standards for the healthier options – for example, healthier sandwiches – requirement to ban HFSS foods altogether removed.
- Portion sizes for savoury snacks: PPA has a long standing position opposing requirements on pack sizes based on weight, arguing instead that portion size should be aligned with other categories in the GBSF and based on calorie content (especially as the Government policy is based on calorie reduction). Although PPA contested it the Government has not changed its position, establishing a 35g limit on savoury snacks as part of the mandatory standard and a voluntary 30g limit.

PPA is now waiting for the technical guidance to be published. No further changes are expected to the GBSF at this stage, although we are waiting for clarification on the first point.

ACTION: Secretariat to share the DHSC response with members once received.

[POST MEETING NOTE: On 19 August, DHSC published the technical guidance document on the updated GBSF (FLC 322/21). The new document provides clarification on the mandatory standard for main meals including starchy carbohydrates prepared with fats and oils: “*Chips and potato products and other starchy carbohydrate options where fat or oil is used during the manufacturing process but are oven baked prior to serving can be included as part of a main meal within a meal deal (e.g. oven baked chips)*”. It also allows other starchy carbohydrates prepared without oil/fats such as jacket potatoes served with salad to be included, with an option to provide reduced/low fat spread/oil-based dressings separately “*to offer freedom of choice*”. No changes are made to the requirement of a portion size for crisps/snacks based on weight].

c) FDF D&H and Nutrition

The Secretariat provided an overview of points covered by the FDF in its Diet & Health Committee and Nutrition Working Group (WG), starting with the work being done by FDF on the upcoming HFSS advertising restrictions. This includes seeking clarification on terms such as ‘identifiable HFSS ad’ and on the issue of retailer own brand HFSS products being allowed to be advertised in their own media, pointing out DHSC’s comment that further clarity on the boundaries between the HFSS online promotional restrictions and advertising restrictions will be provided through the technical guidance, and that this guidance is unlikely to be issued until at the very least the end of the year, due to the progress of the Health and Care Bill.

They are also developing the argument on the exemption of brand advertising as the definition is open to interpretation allowing NGO activity to extend the rules outside of their intended purpose. They will also continue to work with CAP/ASA as they understand that the Government is now working with them to develop the new legislation and guidance.

On future plans for DHSC work, the Secretariat explained that Kevin Dodds, Deputy Director of the Healthy Weight and Nutrition Team at DHSC, had joined one of the FDF meetings. He had stated that whereas the focus so far this year has been on the implementation of the obesity strategy, the priority for the rest of the year will be on strategic planning, with the potential for the next chapter of the Obesity Strategy, input into the NFS and the Public Health England (PHE) move to the Office for Health Protection (OHP) in October. There was also a question about the relevance of ultra-processed foods (UPFs). Kevin Dodds’ answer was that UPFs were not a priority at the time of the meeting (noting that the meeting took place before the NFS report by HD) as focus will be on overconsumption of calories by children, but that the situation could change depending on media activity/scientific developments.

On activity by the devolved administrations, the Secretariat highlighted a recent Scottish Parliamentary question on HFSS promotional restrictions to which the Government stated its intentions to bring forward legislation within the current Parliament. It is currently working to strengthen the evidence base

underpinning the proposals and engaging with other UK administrations for possible alignment of policy and legislation. This follows the Scottish consultation on promotional restrictions of discretionary foods from 2018, to which a Government response is still pending.

[POST MEETING NOTE: Since the meeting FDF has clarified that the expectation is that the legislation on HFSS promotional restrictions will be included in the Scottish Government Programme, which will be published in September, rather than the legislation itself being published in September].

On Wales, the Secretariat confirmed that in recent communication with the Welsh Government, they advised that the Healthy Weight: Healthy Wales (HW:HW) strategy has been further delayed and that the consultation on the Food Environment, which includes proposals on promotional restrictions of HFSS foods, is now expected in the Autumn.

On FDF's Celebrating Food and Nutrition Week, which will take place between 13-17 September 2021, the theme will be 'Action on Fibre' and will include a Parliamentary event and media engagement, with some of their members signing a fibre commitment. FDF confirmed that its 'Feeding Change' report will be updated with case studies of their members on reformulation, smaller portions and commitments towards sustainable healthy diets.

On Nutrient Profiling, FDF held a special meeting (FLC 244/21) to discuss proposed changes to the 2011 Department of Health (DH) Nutrient Profiling Technical Guidance to be submitted to DHSC, which needs to be updated/modernised in light of upcoming legislation on HFSS promotional and advertising restrictions. Many requests were made by the WG, including an NPM calculator, sodium to be replaced by salt and more worked examples. FDF members did not want to raise some questions as they want to avoid the guidance to become overly prescriptive, such as how to treat seeds, pulses, pulse flours and processed nuts. They also agreed not to raise questions in relation to multipacks, but since the meeting DHSC clarified that when one item within a multipack is considered HFSS, the entire multipack will be considered HFSS

[POST MEETING NOTE: This is also clarified in the draft guidance on HFSS promotional restrictions].

Other points discussed were rounding rules and tolerances, as the only guidance available is EU guidance, and the work being done by BRC and FDF with Mike Rayner to develop further guidance for retailers on how to identify HFSS products for retailer-led promotions. Assumptions will be agreed on fibre and fruit/veg/nut percentages when manufacturer information is not available. FDF will ensure any assumptions document is pragmatic and allows for flexibility.

[POST MEETING NOTE: On 17 August, FDF and BRC have jointly sent a letter to DHSC with recommendations on how to update the NPM Technical Guidance (FLC 320/21)].

A question was asked about when the NPM Technical Guidance and calculator would be available. The Secretariat informed that DHSC had not confirmed timescales on that. With regards to the calculator, the current guidance does not include an integrated calculator, but the Secretariat is aware that the FDF has an old calculator.

ACTION: Secretariat to contact FDF to find out plans for the updated guidance and whether or not the FDF calculator can be shared with PPA members.

[POST MEETING NOTE: The Secretariat had already shared the FDF NPM calculation tool with members on 14 June 2021 (FLC 244/21)].

On the FDF report 'Eating into Household Budgets', published on 20 July: this estimated an annual increase of £160 per household on shopping bills and £8.3 bn for the sector, as a result of upcoming legislation on HFSS promotional and advertising restrictions, Extended Producer Responsibility (EPR), Deposit Return Schemes (DRS) and the Plastic Packaging Tax, as well as the existing Soft Drink Industry Levy (SDIL).

On the FDSC report mentioned earlier by AG, this is still in draft stage and being consulted on, but the Diet and Health section will make four key recommendations:

- 1. The food and drink industry being partners with the government and academics looking to innovate across the food chain for health and the environment.*
- 2. Working with the government to build a public health campaign on diets that can be advocated and amplified by the whole food industry, including labelling.*
- 3. Developing a narrative on the importance of balanced diets, rather than just calorie reduction, including a clear articulation of the misconception around food processing.*
- 4. Supporting a government-led 2030 Challenge on reformulation and portion sizes by providing technical expertise – committed to with a product reformulation roadmap through to 2030 that incentivises and rewards reformulation.*

On the World Health Organization (WHO) report on Global Sodium Benchmarks (FLC 188/21): This was published in May and is based on a WHO compilation and analysis of national and regional data on current sodium targets. The intention of the report is for it to serve as basis for dialogue between the food industry and countries and accelerate progress in reducing sodium intake, following similar discussions on trans fats. The report is intended to be included in the documentation for the United Nations (UN) Food Systems Summit in September and highly likely to have impact on discussions at EU and UK level.

d) Diversion trackers

As discussed in the previous FLC meeting in March, the Secretariat started working on trackers to follow developments of topics in health and nutrition, labelling and sustainability in the UK and EU and track where diversion occurs now that the UK has left the EU.

The Secretariat presented the work in progress trackers to members highlighting that PPA also wants to include work of international bodies, such as Codex and WHO. The Secretariat asked for feedback on the content, format, and usefulness of the documents. The Chair pointed that it will be useful if the trackers could clearly differentiate between proposals and legislation.

ACTION: *Secretariat to continue to update trackers and clearly differentiate proposals from legislation. Once updated trackers to be made available on the Snacma website.*

6) Food Labelling and Composition updates

a) Bread and Flour Regulations (BFR)

The Chair gave an update on the latest status of flour and the BFR, starting with the publication of The Food (Amendment and Transitional Provisions) (England) Regulations 2021 (FLC 223/21), which came into force on 17 June, noting that the Government response was still pending.

[POST MEETING NOTE: The Government response was published on 29 July (FLC 305/21)].

The new Regulations amend the mutual recognition clauses in England, but as this is a devolved matter, equivalent provisions are expected in Wales and Scotland, leading to potential regulatory diversion in this area. The UK Internal Market Act 2020 (UKIM) allows for free circulation of flour within the UK and would mitigate potential impacts of differing implementation across devolved nations.

The changes were made to ensure compliance with WTO Most Favoured Nation (MFN) rules. The new rules mean that from 1 October 2022 (the end of the period of adaptation provided by the Regulations), it will not be possible to import unfortified flour for use in products intended to be sold in England, however, exemptions are given allowing the production and sale of unfortified flour in England for export or the import of unfortified flour for use in products intended for export.

The Chair added that there are other pending questions on flour which have been captured by PPA's and FDF's responses to the consultation but not yet addressed by Defra, e.g. use of unfortified flour in small quantities or a requirement not to label it and the outcome of the folic acid fortification consultation. Defra

is planning to set up a flour WG to review the BFR going forward, meaning that further changes on flour regulation are likely to come, which will lead to further labelling changes. PPA has been invited to join the flour WG.

A final remark was made on the fact that the BFR regulates the sale and import of flour, and therefore imported products containing flour are understood to be out of scope of the BRF and should be able to continue. The Secretariat added that Defra has stated this is also their understanding.

On the issue of folic acid fortification, the Chair continued that this has recently been discussed in Parliament confirming engagement and a positive response by the devolved administrations and therefore suggesting a desire to go ahead with the proposals. An update is expected in the Autumn.

As a final remark, the Secretariat added that the FSA Guidance Notes on the BFR will be updated, but Defra has not provided timescales.

[POST MEETING NOTE: The first meeting of the Flour WG will take place on 22 September. The Secretariat will keep members informed of next steps].

[POST MEETING NOTE: FSA Wales has now issued its own consultation on the amendment to mutual recognition clauses (FLC 339/21), closing on 28 October. Food Standards Scotland (FSS) has also issued its own consultation on the matter (FLC 343/21), closing on 12 October].

ACTION: Members to contact the Secretariat with any views/comments that they would like PPA to convey to the Defra Flour WG (by 21 September) and whether or not they would like PPA to respond to the FSA Wales and FSS consultations (by 30 September).

b) Allergy labelling – UK/Codex

The Secretariat provided an update on allergen labelling developments in the UK, as it remains one of FSA's priorities, and particular focus is currently being given to the implementation of the Natasha Law, which comes into force 1 October 2021, establishing a mandatory labelling regime (list of ingredients and product name) for products considered Prepacked for Direct Sale (PPDS). The law has been passed in the 4 UK nations and applies throughout the UK. The FSA has recently launched a PPDS Hub and guidance and will be running a webinar for businesses on 4 August.

ACTION: Secretariat to circulate meeting slides with links to FSA PPDS Hub and webinar. **COMPLETED 28 July.**

Other relevant areas of work are:

- Precautionary Allergen Labelling (PAL): FSA is commissioning two studies, on application of PAL and consumer perceptions of PAL. A stakeholder consultation on PAL is expected in late 2021/early 2022 **[POST MEETING NOTE:** Timescales as clarified by FDF] to feed into the FSA research, and will seek views on format and wording, compliance, risk-analysis, traceability and advice/communication.
- Food Allergy Safety Scheme (FASS): Provision of allergen information for the OOH sector to demonstrate the requisite level of allergen management and communication. FSA looking at how (and if) it can be integrated with the Food Hygiene Rating System (FHRS).
- Food Allergic Reaction Reporting Mechanism Scheme (FARRM): Platform for consumers to report allergy reactions when buying food outside the home environment. Positive consumer reaction to plans as a means to raise awareness about food allergies. Proof of concept testing to take place from Jul-Dec.
- International engagement: FSA is working closely with Codex to influence international policy. Also working with International Life Sciences Institute (ILSI) on quantitative assessment of allergens and upper threshold for PAL use.

The Secretariat also gave an update on the work being done by Codex and the Food and Agriculture Organization (FAO) and the WHO. The Codex Committee on Food Labelling (CCFL) will hold its 46th session

meeting in September, being delayed from 2020 due to the Covid-19 pandemic. This has allowed extra time for work progression in many areas, including allergen labelling, with a recent consultation on proposed amendments to the Codex General Standard for the Labelling of Prepackaged Foods (GSLPF). Some of the proposed changes include definitions of hypersensitivity and removal of certain labelling exemptions (e.g. 5% rule not applying to allergen labelling). However, no work is being done to change the list of allergens or thresholds, as they are awaiting completion of the work currently being undertaken by the FAO/WHO. The consultation also included the proposal guidance on PAL, and whether or not that should be part of the GSLPF, but that will be discussed during CCLF46, in context of the work being done by FAO/WHO on quantitative risk assessment.

On the FAO/WHO work, the Secretariat explained the work currently being done by the Ad hoc FAO/WHO expert consultation on risk assessment of food allergens (FLC 202/21), and the first report which consisted of a review and validation of Codex priority allergen list through risk assessment and resulted in a series of recommendations which will feed into the work on the GSLPF.

Conclusions:

- Only foods or ingredients that cause immune-mediated hypersensitivities should be included on the list of foods and ingredients included in GSLPF.
- Foods or ingredients, e.g. lactose, sulphite, and food additives causing intolerances should be excluded from this list.
- Prevalence, severity and the potency of food/ingredient - 3 key criteria to be used to establish the priority allergen list.
- Priority allergens: Cereals containing gluten (i.e., wheat and other *Triticum* species, rye and other *Secale* species, barley and other *Hordeum* species and their hybridized strains), crustacea, eggs, fish, milk, peanuts, sesame, specific tree nuts (almond, cashew, hazelnut, pecan, pistachio and walnut).
- Buckwheat, celery, lupin, mustard, oats, soybean and tree nuts (Brazil nut, macadamia, pine nuts), should not be listed as global priority allergens due to lack of data on the key criteria - may be considered by individual countries.
- Pulses, insects and other foods such as kiwi fruits to be included in a “watch list” and evaluated for the priority allergen list when data on key criteria becomes available due to increase in consumption of plant-based foods and alternative protein sources.
- Foods and ingredients derived from the list of foods known to cause immune-mediated hypersensitivities should be evaluated on a case-by-case basis for potential exclusion.

A second report from discussions in Mar-Apr.21 on threshold levels is expected soon. The work to review and evaluate the evidence in support of PAL starts in October.

[POST MEETING NOTE: The part 2 report from the Ad hoc FAO/WHO expert consultation on risk assessment of food allergens was published on 20 August (FLC 344/21) recommending Reference Doses (RfD) for walnut and pecan, cashew and pistachio, almond, peanut, egg, hazelnut, wheat, fish and shrimp. A decision is still pending on milk and sesame].

c) FDF FLL

Due to time constraints, the Chair focussed on the most important points, as the slides summarise other topics discussed:

- GB Flour compliance: In February, the Food Safety Authority of Ireland (FSAI) published an opinion on their interpretation on the use of UK/GB fortified flour stating that the finished product would also have to meet the conditions of Regulation (EC) 1925/2006 on fortification of foodstuffs, which was said to be based on EC advice. Defra issued a note with their opinion on the matter, confirming that the finished product does not need to be fortified if one ingredient is fortified (FLC 143/21). FSAI raised the issue with the EC and the FDF raised it with Food and Drink Ireland (FDI), but we are not yet aware of a response. PPA will continue to monitor the situation and revert to members with any updates.

- Front of Pack Nutrition Labelling (FOPNL): Government response to 2020 consultation expected 'as soon as possible'. It was also discussed during the meeting that Morrisons will be rolling out its own version of FOPNL by the end of 2021.
- Food Labelling Review: No news, but only likely to happen after publication of the Defra White Paper on the NFS in January, and Defra has informed that it is likely to happen piecemeal, rather than a full review of labelling provisions.
- Nutrition and Health Claims (NHC): Exemption in Regulation (EC) 1924/2006 for the use of health claims in use before the Regulation entered into force as part of trademarks/brand names ends 19 January 2022. Legislation is unclear as to what happens to products on the market if they are on sale in Jan. 2022. DHSC's opinion is that it is a cut-off date, but still need to discuss with the devolved administrations in early August and will then start communicating to stakeholders. The Chair also mentioned that further work is still being done for customary descriptions (e.g. digestive biscuits) both at UK and EU level around derogations for those types of product. Also, DHSC plans to carry out a call for evidence on on-hold health claims after summer recess and issue updated guidance on NHC to reflect all the necessary EU-exit changes at the end of 2021.
- Improvement notices for health claims: DHSC remains supportive of this proposal. Because it makes a change to the current enforcement regime will require a full consultation - hence likely early 2022 before being considered.
- Environmental claims: Competitions and Markets Authority (CMA) consultation on draft consumer protection law guidance on environmental claims closed on 16 July. A response is expected in August/September, which will follow on to guidance. The Chair noted that the consultation was very generic and not food focussed. PPA contributed to the FDF response to this consultation, which stated that food is one of the more complex areas and separate food-specific guidance might be needed, and that the ASA has started to focus on environmental claims, so it is likely to become a key area of concern.
- ABC (Achieving Business Compliance) Programme: FSA programme proposals to streamline enforcement regime making better use of existing resources taking into account the risk factor of different types of businesses, supporting the ongoing local authority (LA) recovery plan. Trials have been carried out with some LAs and so far, the response on flexibility provided on the new risk assessment model is positive.
- Natural claims: Following submission of a letter by MEPs to the EC, the EC confirmed they are not in scope of NHC Regulations (with the exception of when used in conjunction with a nutrition claim, e.g. naturally high in fibre) and would be considered voluntary indications in scope of Art. 36 of Regulation (EU) 1169/2011 on Food Information to Consumers (FIC) and therefore EC's rules are already appropriate. The Secretariat added that Defra confirmed no bandwidth to work on reviewing the old FSA guidance on Fresh, Pure and Natural in 2021.
- EFSA (European Food Safety Authority) guidance on date marking: In April EFSA issued the part 2 guidance on date marking. The EC is not actively working on it but may consider it as part of Farm to Fork (F2F) work.
- EU addition of vitamins and minerals to food: EC work in establishing maximum levels for vitamins and minerals added to food.
- Country of Origin Labelling (COOL): Some EU countries are laying down national legislation requiring COOL for certain foods. It was noted that the French Council of State Court issued a ruling on the Groupe Lactalis case. The French Court ruled that the national legislation does not meet the criteria in Article 39(2) of the FIC Regulation as there is no proven and *objective* link between milk quality and its origin/provenance. Outcome likely to be considered in GB as FIC applies. Also, FoodDrinkEurope (FDE) is still waiting for a response to the complaint lodged with the EC on the Italian Decrees mandating COOL for Italian products, but the EC decided to postpone its decision, possibly due to their intentions of introducing COOL labelling as part of F2F. FDE has written to the EC expressing concerns on both national and EU proposals.
- Vegetarian/vegan labelling: FDE not planning to do any further work to seek alignment of joint EVU/FDE position in light of the ISO International Standard "Definitions and technical criteria for foods and food ingredients suitable for vegetarians or vegans and for labelling and claims" (FLC 104/21). Also, the Chair mentioned the withdrawal on Amendment 171 on the use of dairy descriptors for plant-based alternatives, but stated that due to the lack of definition more work in

this area is envisaged **[POST MEETING NOTE:** Following the Business Expert (Food Standards and Labelling) Group (BExG), PPA was informed that Trading Standards (TS) has been working on a draft opinion on the use of dairy descriptors for plant-based foods. An excerpt of the draft opinion has been shared with members for initial comments (FLC 346/21). Also, we informed members that BSI PAS 224:2020 on 100% plant-based foods – Characteristics and composition – Code of practice is being proposed as a seed document for a full ISO standard on ‘Plant-based foods – Terms and definitions’ (FLC 306/21). Finally, Defra has confirmed work on guidance on vegan and vegetarian claims is on hold due to other priorities/workload].

d) Other Labelling

The Secretariat drew the attention of members to future changes to food labelling/nutrition which will be enabled through the Health and Care Bill (FLC 273/21) and the level of scrutiny and powers given to the Secretary of State (SoS) to amend food labelling legislation on matters falling under the Government’s Obesity Strategy, such as FOPNL.

As a final note, the Secretariat gave a brief update on other matters to be discussed during CCFL46 that will happen in September. In addition to the previously discussed items on food allergen labelling, CCFL has also been working on FOPNL, guidelines on e-commerce covering food information requirements for food sold online, the use of technology in food labelling to consider other means of providing food information such as mobile apps and labelling of food in joint presentation and multipack formats. On this last point, the Secretariat agreed to provide more information to members but believes this work may be in its early stage. The Secretariat added that Steve Wearne, FSA’s Director of Global Affairs, has been nominated candidate for Chairperson of the Codex Alimentarius Commission (CAC), suggesting that the UK wants to exert a higher level of influence on Codex work.

[POST MEETING NOTE: PPA has been invited to join Defra’s National Codex Consultative Committee (NCCC) meeting ahead of the CCFL meeting early in September].

ACTION: Secretariat to provide further information on Codex work on labelling of food in multipack formats.

7) Food safety

a) Acrylamide

The Secretariat gave an overview of the recent developments on acrylamide in foodstuffs, noting that acrylamide is the biggest topic this year at European level.

EC WG meetings took place in May and June where a revision of the current Benchmark Levels (BMLs) was discussed as well as proposals for new BMLs for products which were not previously covered by the Regulations and for the first time some Maximum Levels (MLs) for certain products not previously covered (other than products intended for children).

The European Snacks Association (ESA) has been collecting acrylamide data for crisps and other savoury snacks, including roasted nuts, and is planning to issue a full summary to members over the summer period. EUPPA is co-ordinating data collection for fries

An EU stakeholder consultation is expected imminently, for comment over the summer period (originally expected mid-July). In the UK, the FSA’s annual survey on acrylamide and furans is now expected in September. Businesses should have already been notified if their products have been sampled and tested and should be aware of the results.

A list of all BMLs (target and proposed) and proposed MLs is given within the slides and for French fries the BMLs have not changed, but there is a potential ML of 850 µg/kg, which may be possible to achieve for French fries. The list also has some new categories, including Rosti, other heated potato-based products and cereal-based snacks. The list does not currently list roasted almonds, but these may still appear in the consultation. The Secretariat noted that the data within the Annexes (initial review of the ESA acrylamide data for 2021) is confidential and subject to change.

b) 3-MCPD esters

The Secretariat then gave an update on the status of discussions on 3-MCPD esters, which are contaminants that are formed during the production (refining) of oils. Draft MLs are unlikely to be issued during the summer, but these will probably be discussed within the standing group after the summer. Legal limits have recently been established for oils, but some EU Member States (EU MSs) are arguing that limits should also be set for finished foodstuffs. The counterargument is that the fat content of foodstuffs is known and therefore it is possible to calculate the value within the final products. The EC seems to have taken that into consideration and is holding discussions with EU MSs on that point.

The Secretariat informed members that, following an information request, ESA has received a significant set of data on both acrylamide and 3-MCPD esters from EFSA. ESA will try to see if it is possible to replicate some of the figures that the EC has arrived at, but with regards to 3-MCPD esters it already appears to be difficult to replicate the values due to missing information.

c) CIPC

The Secretariat updated members on developments on CIPC, which is a sprout suppressant used on potatoes. PPA members have supplied data on test results for CIPC in potatoes from stores which have previously used CIPC treatment. The data has gone to Arvalis, a France-based agricultural organisation. CIPC is no longer available for use since 8 October 2020, and therefore it is unlikely to have been used during the last storage season. There was a lot of activity in 2020 to clear stores as best as possible using cleaning protocols, and a temporary Maximum Residue Level (tMRL) will be imposed by the EU in September of 0.4 mg/kg (the Regulation having been published in February 2021). However, as the UK no longer follows EU law, the 0.4 mg/kg tMRL has not been adopted and therefore the ML of 10 mg/kg still applies (exception is NI, which still follows EU legislation). This is not a concern in terms of compliance, but the figure is not aligned with the EU, which is looking to review the tMRL again after Christmas. Therefore, the UK could be 6 -9 months behind in terms of progress made in this area. It was noted that it is possible that the Chemicals Regulation Division (CRD), the UK authority responsible for approval of plant protection products, may decide that tighter levels are required, or that higher levels are acceptable in the UK, both of which present problems for the industry in terms of exports and imports. This issue is being monitored by the Primary Production Technical Committee (PPTC). The PPTC is also following up on other pending issues, such as 1,4-DMN, the successor of CIPC, for which authorisation of use is still pending in the UK and is unlikely to be obtained before 6 October. There will be another PPTC meeting in August and another couple of meetings in between to discuss storage developments.

8) Transitional issues

a) Composites

The Chair took the opportunity to ask members if they are still experiencing issues or concerns since the introduction of new EU controls on imports of composites which came into force in April, and were discussed during the last FLC meeting in March, noting the uncertainty around the issue of pasteurised milk in shelf-stable composite products, and the new requirements for private attestations. Due to time constraints, members were invited to share any issues/concerns with the Secretariat for further discussion.

ACTION: *Members to contact Secretariat with any issues/concerns arising from the implementation of EU controls on imports of composite products.*

b) High Risk Foods Not of Animal Origin (HRFNAO)

The Chair gave an overview of the phased introduction of GB border controls for HRFNAO, recapping the presentation given by David Lowe, Head of Import and Exports Strategy Team of the FSA, during the FLC meeting in March, and highlighting the controls coming into force in October.

The Chair then noted the recent work done with PPA on trying to obtain clarity from the FSA on the documentation requirements coming into force in October, as there was a clear lack of information on GB imports, especially when compared to all the information available on EU exports.

From the information provided by the FSA, it is clear that the required Export Health Certificates (EHCs) must be obtained from the EUMS the product is being exported from, but there is still uncertainty as to whether it is possible to use certificates of analysis from origin or if products needed re-testing in the EU. PPA was continuing to seek clarity on this matter.

And finally, the Chair noted that a new Border Operating Model (BOM) had been published on 20 July (FLC 292/21) with updated timings for the phased introduction of border controls. The Secretariat noted that the new BOM appeared to postpone the certification requirements on HRFNAO coming into force in October until January 2022 but that would need to be confirmed.

ACTION: *Members to contact Secretariat with any issues/concerns arising from the implementation of the GB border controls on HRFNAO.*

ACTION: *Secretariat to confirm changes to controls on HRFNAO in the new BOM.*

[POST MEETING NOTE: The Secretariat contacted David Lowe at the FSA who confirmed that HRFNAO belonging to **Annex II** of **Regulation (EU) 2019/1793** coming from the EU will now only be **subject to documentary, identity and physical checks and required to enter the UK via an approved Border Control Post (BCP) from 1 January 2022**, i.e. the controls have been further postponed from 1 October 2021 (FLC 315/21). The presentation slides have been amended to reflect this important change. PPA contacted the FDF to discuss the advice from the FSA. FDF contacted the FSA for confirmation and received the advice below, which confirms the advice given to PPA:

Direct from non-EU countries

There weren't any intermediate actions here and the full controls are applied from Jan 1st 2021 (at the end of the transitional period).

From the EU

It is worth remembering that there are currently no HRFNAO originating from the 27 Member States (MSs). These requirements apply to goods that have been cleared for the EU market and subsequently exported to GB. As you know, these are split into 3 stages and in the Border Operating Manual:

- Stage 1 - Jan 2021
- Stage 2 - Oct 2021
- Stage 3 - Jan 2022

At present, the requirements are the same as when we were a Member State. At Stage 2, importers will be required, via IPAFFS, to pre-notify in advance of the consignment's arrival. Documentary and physical checks will not be undertaken. The other import paperwork required by the legislation (Official Certificate & Results of Sampling and Analysis) will not be required. Consignments are not required to enter GB via an appropriately designated BCP. At Stage 3, all the requirements of the import controls would be in effect.

Goods transiting the EU

From 1st January 2021 any non-EU-originating HRFNAO that transits the EU, needs to enter GB via an appropriate approved BCP to undergo all checks. Consignments will not have been controlled upon entry to the EU as they are not intended to be placed on the EU market. They are allowed to cross the EU (under Customs control) for import into GB. Arrangements would be the same for non-EU imports].

9) Consultations

The Secretariat provided a brief update on consultation responses issued since the last FLC, most of which are now closed.

As previously discussed, the Government has now responded to the consultations on HFSS advertising restrictions and enforcement of HFSS promotional restrictions. On the consultation on Gene Editing (GE) technologies, we expect a Government response late in the summer and the consultation on the removal of recognition clauses in certain compositional standards, a Government response is expected imminently, given that the legislation has already been laid [**POST MEETING NOTE:** The Government response to the England consultation on removal of recognition clauses (BFR) was published on 29 July (FLC 305/21)].

On sustainability issues, a response to the Defra consultation on the Draft Policy Statement on Environmental Protection is expected in September, which will feed into the Environmental Bill.

Also, in September, responses to the Defra consultations on Extended Producer Responsibility (EPR) and Deposit Return Scheme (DRS) are expected, as well as the CMA consultation on the Draft Guidance on Environmental Claims.

The Secretariat also updated members on two ongoing consultations, the HMRC consultation on the Plastic Packaging Tax, to which PPA plans to respond via FDF, and the BEIS consultation on Reforming the Framework for Better Regulation, which may be of interest to members.

ACTION: Members to inform PPA if there is interest in PPA responding to the BEIS consultation on better regulation.

10) Risk matrix

The group considered a number of relevant EU/UK topics and revised the Risk Matrix, which is being circulated to members. Changes include:

- ‘Sat Fat (Public Perception/media attention)’ moved to ‘Managed issue/controlled/could reoccur’
- Removal of ‘School Food Standards’ as not currently being discussed.
- ‘National Food Strategy’ moved from ‘Future Issue’ to ‘Current Issue’ due to the publication of the HD reports.
- ‘Cadmium (only nuts and seeds)’ moved from ‘Future Issue’ to ‘Managed Issue/controlled/could reoccur’ as not an issue of concern at present.
- Replaced ‘Official controls/FSA Funding Model’ with ‘ABC Programme’.
- ‘Glutamates (possible amends to max permitted levels)’ moved from ‘Future Issue’ to ‘Managed Issue/controlled/could reoccur’ as not an issue of concern at present.
- ‘Sugars (popcorn)’ moved from ‘Future Issue’ to ‘Current Issue’ as popcorn is in scope of PHE’s sugar reduction programme.
- Wording of the online advertising ban changed from ‘total’ to ‘paid for’ on HFSS advertising restrictions to reflect the upcoming requirements.

11) Next meeting dates

The next 2021 FLC meeting will take place on:

- 1 December 2021

We will update members on the format of the December meeting closer to the time.