

# PPA Food Law and Consumer Committee Meeting

**Chair: Catharine Hall**

28 July 2021

# Agenda

- |  |             |
|--|-------------|
| 1) Welcome and anti-trust statement                          | 14:00-14:05 |
| 2) HFSS advertising and promotional restrictions (DHSC/DCMS) | 14:05-14:30 |
| 4) National Food Strategy (Amy Glass, FDF)                   | 14:30-14:50 |
| 5) Minutes/action list                                       | 14:50-15:00 |
| • Minutes PPA FLC 24 March 2021 (FLC 193/21)                 |             |
| • Document management system                                 |             |
| • PPA Newsletter – frequency and size                        |             |
| 6) Updates:  |             |
| • Nutrition  | 15:00-15:15 |
| • GBSF – Nutrition Standards                                 |             |
| • FDF DHC and NWG updates                                    |             |
| • Labelling and Composition                                  | 15:15-15:35 |
| • Bread and Flour Regulations                                |             |

# Agenda

- FSA and Codex work on hypersensitivity and allergen labelling
- FDF FLL updates
- Other labelling updates
- Food Safety 15:35-15:50
  - Acrylamide
  - Plant protection products
  - Other food safety/contaminant updates
- Transitional issues 15:50-16:00
  - Composites and EU Animal Health Regulation
  - Imports of HRFNAO and Border Operating Model (BOM)
- Consultations – updates 16:00-16:10
- 7) AOB 16:10-16:20
- 8) Issues of concern/Risk Matrix 16:20-16:30
- 9) Next meeting/Close 16:30

# **UK HFSS Advertising Restrictions**

## **England HFSS Promotional Restrictions**

**Lindsey Mannion, Stephanie Shields,  
Brittney MacKinlay, DHSC  
Milly Walpole, DCMS**

# National Food Strategy

**Amy Glass**  
FDF

# National Food Strategy

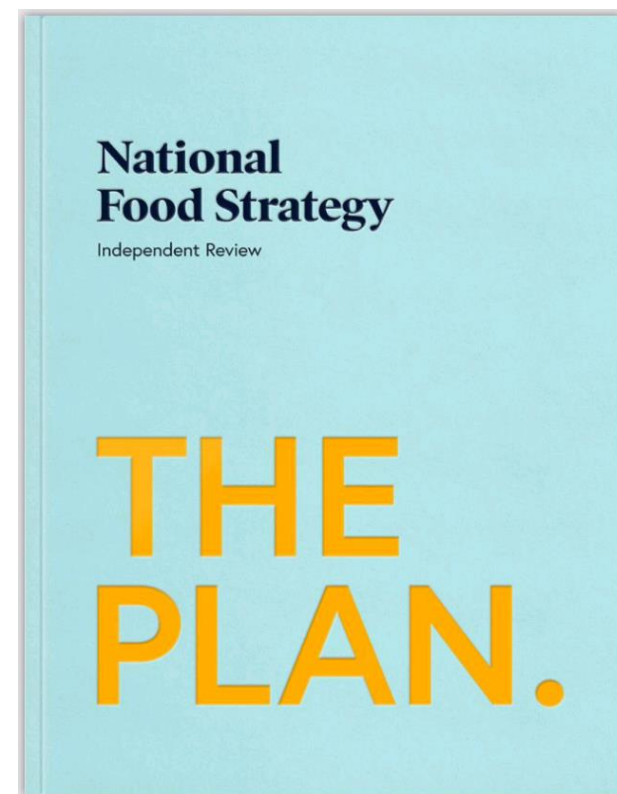
Amy Glass

UK Diet and Health Policy Manager

# Henry Dimbleby Independent Review



- Published on 15 July 2021
- Core focus on diet and health and the environment
- Recommendations grouped under four objectives:
  1. Escape the Junk Food Cycle to Protect the NHS
  2. Reduce diet-related inequality
  3. Make the best use of our land
  4. Create a long-term shift in our food culture



# Escape the Junk Food Cycle



- **Recommendation 1: Introduce a sugar and salt reformulation tax. Use some of the revenue to help get fresh fruit and vegetables to low income families.**
  - £3/kg tax on sugar and a £6/kg tax on salt sold for use in processed foods or in restaurants and catering businesses
  - Applies to all sugar and other ingredients used for sweetening, and is approximately the same rate as the Soft Drink Industry Levy which the sugar tax would replace.
  - Neither tax would apply to ingredients used in home cooking.
  - Imports of processed foods would also be taxed under the proposals, according to the sugar and salt content when they enter the UK.
  - To create an incentive for manufacturers to reduce the levels of sugar and salt in their products, by reformulating recipes or reducing their portion sizes.
  - Some of the revenue should be ringfenced to provide fresh fruit and vegetables to low income families.
- **Recommendation 2: Introduce mandatory reporting for large food companies.**
  - On sales of food and drink high in fat, sugars, or salt, types of protein, fruit and vegetables, and major nutrients, as well as reporting on food waste and total food and drink sales.
  - For businesses with more than 250 employees.

# Inequality, Land Use, and Food Culture



- To support **food education** in schools (Eat and Learn initiative)
- To support **families on lower incomes** (extending eligibility of Free School Meals and Healthy Start Scheme, extending funds for the Holiday Activities and Food Programme, trialling a 'Community Eatwell Programme' including prescribing fruit and veg)
- To improve **land use** (focussed on the farming sector)
- To define **minimum standards for trade** and a mechanism for protecting them
- To support **innovation** (to invest £1 billion in innovation to create a better food system, including £50m towards entrepreneurs and scientists working on **alternative proteins**)
- To create a **National Food System Data programme** (to find and compare information, model future scenarios and assess the effectiveness of different policies or logistical models)
- To strengthen **Government Buying Standards** to support sustainable healthy diets
- To set **clear targets** and bring in **legislation for long-term change** including a statutory target to improve diet-related health and developing a new Governance structure for food policy through a 'Good Food Bill'.
  - The bill would; **expand the role of the FSA** to include diet and health and monitor Government progress towards targets in the Bill; commit the FSA to developing a **food labelling system to describe the environmental impacts** of food products; include a **national reference diet** for a sustainable healthy diet; and a legal obligation for **local authorities to develop their own food strategies**) etc.

## Aim

- To bring together leaders and experts representative of the agri-food chain to contribute to the development and implementation of the National Food Strategy

## Deliverables

- FDSC report with policy recommendations for the NFS white paper (due September)

## Objectives

- To demonstrate where the food chain can make a difference by working with Government and citizens.
- To be ambitious, and demonstrate the willingness of the food chain to lift the lid on difficult issues to agree on new insights and approaches.

## Core themes

- Productivity and skills
- Sustainability
- Trade
- Obesity, nutrition, poverty
- Future regulatory framework & post COVID-19 recovery
- Innovation

### Co-chairs

- Stefano Agostini, CEO of Nestlé UK & Ireland
- Stuart Roberts, Deputy President of NFU

### Members

- FDF
- Nestlé
- Sainsbury's
- ABF
- AHDB
- UK Hospitality
- NFU
- McCain

# Next steps



- FDSC report due to be published in September.
- FDF to develop input to the White Paper.

# Key Dates



|                              |  |
|------------------------------|--|
| June 2019                    | Michael Gove appointed Henry Dimbleby to conduct independent review of the food system                             |
| <b>29 July 2020</b>          | <b>Henry Dimbleby independent review part 1 published</b>  |
| Autumn 2020                  | Henry Dimbleby NFS part 2 citizens engagement  |
| <b>15 July 2021</b>          | <b>Henry Dimbleby independent review part 2 published</b>  |
| September 2021               | FDSC industry report due to be published   |
| <b>End 2021 / Early 2022</b> | <b>Defra white paper on the NFS for England due to be published (6 months after Henry Dimbleby's final report)</b> |
| 2022                         | Henry Dimbleby progress review of the NFS (6 months after the white paper)   |

# Matters arising - FLC 24 March 2021

| Action   | Status                        |
|--|-------------------------------|
| PPA secretariat will keep developments regarding MLs for <b>cadmium</b> , specifically nuts and seed oils under review and update members as required. | Ongoing action                |
| Members to submit any data on <b>tropane alkaloids</b> to the PPA secretariat.   | Ongoing action                |
| Secretariat to keep an eye on developments on each of the four nations <b>National Food Strategies</b> .   | To be covered today           |
| Olivier to investigate timings for the <b>EU</b> proposals on <b>sustainability labelling</b> and provide information for circulation to PPA members   | Completed                     |
| <b>Food waste targets</b> (2023) – invite EUPPA to join future FLC call to discuss work with JRC   | To be carried over?           |
| <b>Food waste targets</b> (2023) – Secretariat to speak to other trade associations to get overview on priorities/concerns                             | To be carried over?           |
| Secretariat to investigate and report back on UK and EU <b>flour fortification</b> requirements post EU Exit.  | To be covered today           |
| Secretariat to contact ESA and ask for comments and feedback on <b>Twitter</b> .   | Completed                     |
| Secretariat to investigate options for a <b>document management system</b> for the PPA/SNACMA website members area.                                    | To be covered today           |
| Secretariat to develop an <b>FLC priorities document</b>   | Ongoing                       |
| Secretariat to share with members <b>DHSC response</b> to consultation on <b>HFSS promotional restrictions</b>   | To be covered today           |
| Secretariat to update <b>overview table of nutrition, sustainability and labelling initiatives</b>   | To be covered today - ongoing |
| Secretariat to share with members draft response on <b>consultation on environmental principles</b> for comments.                                      | Completed                     |

# PPA newsletter

- Opinions/comments
  - Content
  - Frequency
  - Size
- Any other suggestions?

# NUTRITION & HEALTH

| 2019  | 2020  |   | 2021   |  |  |   | 2022   | 2023 +   |
|---|---|---|--|--|--|---|--|--|
| Jan - Dec   | Jan - Jun   | Jul - Dec   | Jan - Mar  | Apr – Jun  | Jul – Sep  | Oct - Dec   | Jan - Dec  |  |
| <p>PHE 2<sup>nd</sup> Sugar reduction report (Oct)</p>  | <p>Delivery Plan Healthy Weight, Healthy Wales (Jan.20)</p>                         | <p>Henry Dimbleby interim report National Food Strategy – Part 1 (Jul.20)</p>   | <p>Govt. response OOH enforcement calorie labelling (Feb.21)</p> | <p>Commission limit trans fats comes into force (Reg. 2019/649) (Apr.21)</p>   | <p>Govt. response enforcement promos HFSS (Jul.21)</p>               | <p>OHP takes over from PHE (Oct.21)</p>                                 | <p>Defra white paper National Food Strategy (Jan.22 TBC)</p> | <p>Health &amp; Care Act comes into force (HFSS advertising) (Jan.23)</p>                      |
| <p>SACN report on sat fat and health</p>  | <p>PHE stakeholder meeting baby food reformulation (Feb.20)</p>                     | <p>Government publishes Obesity Strategy (Jul.20)</p>                           |  |  | <p>Secondary legislation promos HFSS laid (July.21)</p>              | <p>Guidance on marketing and promos HFSS (end. 21 TBC)</p>              | <p>EFSA Opinion on nutrient profiles/FOP NL (Mar.22)</p>     | <p>Volume Price Promos HFSS no longer allowed on packs (Oct.23)</p>                            |
| <p>Consultation on fortification of folic acid (Sep)</p>  | <p>PHE consultation new salt targets (Feb.20)</p>                                   | <p>NDNS y 9-11 report (Dec.20)</p>  |  |  | <p>Health and Care Bill introduced (Jul.21)</p>                      | <p>PHE final assessment sugar reduction guidelines (Sep.21 TBC)</p>     | <p>EFSA final opinion dietary sugars (end 2021)</p>          | <p>NDNS urinary sodium analysis (2023)</p>   |
| <p>DHSC 'advancing our health' prevention green paper (including Ch3 of the childhood obesity plan) (Jul)</p> | <p>NDNS urinary sodium analysis</p>   | <p>Govt. response consultation OOH calorie labelling (Jul.20)</p>               |  | <p>Govt. response consultation advertising ban (TV + online) HFSS (Jun.21)</p> | <p>National Food Strategy – Part 2 (Jul.21)</p>                      | <p>FDSC report on National Food Strategy (Sep.21)</p>                   | <p>New legislation ban HFSS advertising (end 2021)</p>       | <p>SG Government secondary legislation HFSS promo restrictions (mid-end 2023)</p>              |
| <p>DHSC Consultation on marketing &amp; promotions (Apr)</p>  | <p>SG Consultation energy drinks (Jan.20)</p>                                       | <p>DHSC Consultation enforcement OOH calorie labelling (Jul.20)</p>             |  |  | <p>Govt. response GBSF (Jul.21)</p>                                  | <p>Govt. response FoP nutrition labelling (TBC)</p>                     | <p>Results EUREMO study (Dec.21)</p>                         | <p>Review Beating Cancer Action Plan (2024)</p>  |
| <p>DHSC Consultation on advertising (Jul)</p>   | <p>Govt. response consultation energy drinks</p>                                    | <p>DHSC consultation FoP labelling (Jul.20)</p>                                 |  |  | <p>Legislation on OOH calorie labelling signed into law (Jul.21)</p> | <p>Consultation secondary legislation HFSS advertising (Sep.21 TBC)</p> | <p>EU study on food taxes (2022)</p>                         | <p>EU Nutrient Profiles (Q4 2022)</p>  |
| <p>Healthy Weight Healthy Wales (Oct)</p>   | <p>PHE Nutrient profile review</p>  | <p>PHE calorie reduction programme launch (Sep.20)</p>                          |  | <p>PHE guidelines on baby foods (Spring 2021)</p>                              | <p>EU Code of Conduct (Jul.21)</p>                                   | <p>EU food reformulation programme (Q4 2021)</p>                        | <p>EU report on AVMSD (2022)</p>                             | <p>SG Government secondary legislation HFSS promo restrictions comes into force (2024 TBC)</p> |
| <p>Northern Ireland amended obesity strategy 'A Fitter Future for All' (Nov)</p>                              | <p>CAP/BCAP consultation on adopting new model</p>                                  | <p>Consultation online ban HFSS advertising (Nov.20)</p>                        |  |  | <p>EFSA draft opinion dietary sugars (Jul.21)</p>                    | <p>Consultation WG HWHW Priority 1 (Autumn.21 TBC)</p>                  | <p>EU report on AVMSD (2022)</p>                             | <p>SG HFSS Framework Legislation (Mid 2022 TBC)</p>  |
|   | <p>DHSC white paper prevention (marketing baby food and SDIL milk-based drinks)</p> | <p>PHE new salt targets (Sep.20)</p>  |  |  | <p>EP Draft Report on Beating Cancer Action Plan (Jul.21)</p>        | <p>SG Government HFSS Framework Bill introduced (Sep.21 TBC)</p>        | <p>OOH calorie labelling comes into force (Apr.22)</p>       | <p>SG Consultation enforcement secondary legislation HFSS promo restrictions (Autumn.22)</p>   |
|   | <p>DHSC consultation marketing baby foods</p>                                       | <p>PHE 3rd Sugar reduction report (Oct.20)</p>                                  |  |  |  | <p>EP Report on Beating Cancer Action Plan (Sep.21)</p>                 |  | <p>PHE/OHP final report 2024 salt reduction targets (2025)</p>                                 |
|   |   | <p>Govt. response consultation ban marketing &amp; promotions HFSS (Dec.20)</p> |  |  |  |   |  | <p>PHE/OHP calorie Y3 reduction progress report (2024)</p>                                     |
|   |   | <p>Consultation enforcement OOH calorie labelling (Jul.20)</p>                  |  |  |  |   |  | <p>PHE/OHP final calorie reduction progress report (2025)</p>                                  |

# UK Diet and Nutrition calendar

| Policy areas  | Type of legislation  | Consultation                             | Consultation response                  | Legislation/<br>guidelines due       | Comes into force |
|---|--|--|--|--------------------------------------|------------------|
| OOH calorie labelling                                   | Secondary legislation under FSA 1990                       | Main - Dec.18<br>Enforcement – Jul.20    | Main – July.20<br>Enforcement – Feb.21 | Jul.21 (TBC)<br>GUIDANCE: SOON       | Apr.22           |
| Volume/location promotional restrictions HFSS           | Secondary legislation under FSA 1990                       | Main - Apr.19<br>Enforcement – Feb.21    | Main – Dec.20<br>Enforcement – Jul.21  | Jul.21 (DRAFT REG)<br>GUIDANCE: SOON | Oct.22           |
| Advertising restrictions HFSS – 9pm watershed           | Secondary legislation under new Health and Social Care Act | Main - Jun.19                            | Jun.21                                 | Health & Care Act (late 2021 TBC)    | Jan.23           |
| Advertising restrictions - online                       |  | Main – Dec.20                            |  |                                      |                  |
| Advertising restrictions (ALL) – SECONDARY LEGISLATION* |  | Main – Sep.21 (TBC)<br>Enforcement – TBC | Main – TBC<br>Enforcement – TBC        | Legislation: TBC<br>GUIDANCE: TBC    |                  |
| FoP nutrition labelling                                 | TBC  | Jul-Oct.2020                             | TBC                                    | TBC                                  | TBC              |
| HW:HW food environment consultation                     | TBC  | Autumn.21                                | TBC                                    | TBC                                  | TBC              |
| SG HFSS promo restrictions                              | Secondary legislation (under Framework Legislation)        | Autumn.22 (TBC)                          | TBC                                    | Mid-end 2023 (TBC)                   | 2024 (TBC)       |

\* Categories in scope to be taken forward in secondary legislation. Consultation of draft will take place.

# GBSF – Nutrition Standards

- [Response](#) to the 2019 consultation published 15 July (FLC 278/21).
- Government will update reducing salt (voluntary and mandatory), reducing sat. fats (mandatory), meal deals (mandatory), increasing fibre (voluntary) nutrition standards.
  - Retain the best practice nutrition standard requirement for menus (for food and beverages).
- 3 key changes:
  - “Main meals within a meal deal should include a starchy carbohydrate, **which is not prepared with fats or oils...**”
  - “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” – **ban on HFSS food removed.** – PPA seeking clarification.
  - “Savoury snacks are only available in **packet sizes of 35g or less.**” – now part of mandatory standard – “Savoury snacks are only available in packet sizes of 30g or less.” – as proposed for voluntary standard.
- Savoury snacks “include crisps and any product made from small pieces of potato, wheat, rice, corn or other base ingredient, which have been baked, extruded, cooked or processed in any way. Crisps are defined in this instance as products that comprise sliced whole, fried potato.”
- Encourages offers of oven baked options – instead of fried e.g. fried chips, wedges, waffles, croquettes and hash browns.
- Technical guidance will contain supporting information, e.g. clarity on the preparation of carbohydrates in meal deals – exp. Autumn 21.
- Calorie and allergen labelling: voluntary standard updated to include calorie and allergen labelling where not stated in Law.
- Implementation period – 12 months
- Government will allow implementation period of 3 years for the 2024 salt standard.
- Government to consult later this year on promotion of local, seasonal, sustainable produce and public sector contracts accessibility to SMEs.
- Powers to amend Health and Social Care Act 2008 in new Health and Care Bill

# FDF D&H and Nutrition

**FDF D&H met on 13th July and 3<sup>rd</sup> June**

**FDF Nutrition WG met on 13<sup>th</sup> May and 20<sup>th</sup> April**

- **HFSS Advertising restrictions**
  - FDF seeking clarification on ‘identifiable HFSS ad’, ‘media supporting transitional content’, ‘paid for product-specific sponsorship’ and retailer own brand products on own media.
  - FDF developing argument on exemption for brand advertising.
  - FDF’s understanding that CAP/ASA will now work with Government to develop new legislation/guidance.
- **DHSC future work plan**
  - Focus on increasing strategic thinking on future priorities (next chapter Obesity Strategy?), engaging with NFS White Paper work, PHE move to OHP on 1<sup>st</sup> October.
  - Main focus is drivers of childhood obesity, mainly overconsumption of calorie - UPFs not a current focus but could change due to increasing media activity.
- **Devolveds:**
  - Scotland - SNP win - commitment to bring forward legislation on HFSS promotional restrictions in this Parliament. Awaiting consultation response on promotional restrictions.
  - Wales: Labour majority win. Delivery of HW:HW further delayed. Consultation on food environment expected this year.

# FDF D&H and Nutrition

- **FDF's Celebrating Food and Nutrition Week (CFNW 13-17 September 2021)**
  - Theme will be 'Action on Fibre' – will include Parliamentary event, media site visits and media engagement.
  - Some members signing fibre commitment.
  - Feeding Change Report will be updated and launched – will include case studies from members on reformulation, smaller portions and healthier NPD, increasing fibre, sustainable healthy diets, food redistribution/food poverty initiatives.
- **Nutrient Profiling WG (FLC 244/21):**
  - FDF preparing a paper to share with DHSC on recommendations for the update of the NPM Technical Guidance.
  - Call for an NPM calculator, change sodium to salt, and further worked examples.
  - On multipacks - DHSC confirmed separately that when a multipack contains at least 1 HFSS product, the whole product is considered HFSS, for the purposes of the promotional restrictions.
  - Some discussions on tolerances and rounding rules, now we are outside of the EU.
  - Some companies in discussion with GS1 to record HFSS status and fruit/veg/nut scoring on barcodes.
  - BRC and FDF working with Mike Rayner to develop guidance for retailers on how to identify HFSS products for retailer-led promotions.

# Other

- **FDF Eating into Household Budgets report**
  - Estimated an increase of £160 per year (£3 per week) on food and drink shopping per household if forthcoming measures on HFSS advertising and promotional restrictions, EPR, DRS and Plastic Packaging Tax, and the SDIL are put in place.
  - Costs to sector of £8.3 billion over the next 3 years.
  - Higher prices to disproportionately hit the poorer the hardest (11% increase in shopping bills).
- **Draft FDSC Food Strategy Report**
  - D&H report calls for partnerships with Government and academia - innovation, balanced diets, food processing and technical support for the development of reformulation/portion size programmes beyond 2030.
  - Plan to share with Defra draft reports over the summer.
- **WHO Global Sodium benchmarks (FLC 188/21)**
  - Based on a WHO compilation and analysis of national and regional data on existing sodium targets.
  - Includes savoury snack products (crisps and nuts).
  - 1.25 g salt for potato crisps (UK max. 1.38g), 0.7g salt for nuts (UK max. 1.20g) and 1.3g salt for extruded snacks (UK max. 1.9g).
  - Will be included into the preparatory discussions for the UN Food Systems Summit.
  - May have an impact on EU and MS discussions.

# Health and nutrition UK x EU

|                                 | EU  | UK   |
|---------------------------------|---|--|
| <b>Reformulation</b>            | <ul style="list-style-type: none"> <li>• Reformulation initiatives F2F – Q4 2021</li> <li>• Also part of Beating Cancer Plan</li> <li>• Also being considered as part of the Code of Conduct</li> </ul>   | <ul style="list-style-type: none"> <li>• England Voluntary programmes (currently led by PHE) on:               <ul style="list-style-type: none"> <li>• Salt – Sep/2020 (2024 targets – 1<sup>st</sup> progress report 2022)</li> <li>• Sugar – 2016 (2020 targets – final progress report 2021)</li> <li>• Calories – Sep/2020 (2024 targets – 1<sup>st</sup> progress report 2022)</li> <li>• Baby foods</li> </ul> </li> </ul>        |
| <b>Nutrient profiles</b>        | <ul style="list-style-type: none"> <li>• Nutrient profiles to restrict promotion of food high in salt, sugars and fats in F2F - Q4 2022</li> <li>• EFSA report on nutrient profiles due Mar 2022</li> </ul>   | <ul style="list-style-type: none"> <li>• EU approved nutrition and health claims (NHCs) in retained legislation</li> <li>• UKNHCC new UK risk assessment body for claims (taking over from EFSA)</li> <li>• Awaiting government response on new NPM – no updates</li> <li>• England promotions and UK advertising restrictions based on 2004-5 Ofcom NPM model – no plans to extend their use to restricting the use of NHCs.</li> </ul> |
| <b>Taxation</b>                 | <ul style="list-style-type: none"> <li>• Food taxes will be considered under Beating Cancer Plan (EU to publish study mapping fiscal measures on sugars, soft drinks and alcoholic beverages in 2022) to advise on feasibility.</li> </ul>  | <ul style="list-style-type: none"> <li>• SDIL</li> <li>• Henry Dimbleby’s Report 2 of the NFS proposes a new £3/kg tax on sugar and a £6/kg tax on salt for use in processed foods or in restaurants.</li> </ul>   |
| <b>Advertising</b>              | <ul style="list-style-type: none"> <li>• Self-regulation at MS level</li> <li>• Advertising restrictions being considered under Beating Cancer Plan (EC to prepare a report in 2022 on the implementation of the provisions of the Audio-visual Media Service Directive (AVMSD) including those on unhealthy foods and drinks)</li> </ul> | <ul style="list-style-type: none"> <li>• Self-regulating advertising restrictions in place (ASA)</li> <li>• 9pm watershed and total paid-for online advertising restrictions of HFSS food based on 2004-5 NPM model to be introduced from Jan. 2023.</li> <li>• Applicable UK-wide.</li> </ul>   |
| <b>Promotional restrictions</b> | <ul style="list-style-type: none"> <li>• Promotional/marketing restrictions TBC</li> </ul>  | <ul style="list-style-type: none"> <li>• Promotional (volume and location) restrictions of HFSS food based on 2004-5 NPM model to be introduced from Oct.2022 (England only).</li> <li>• Expecting similar proposals in Scotland and Wales. NI TBC.</li> </ul>   |

# Labelling UK x EU

|                            | EU  | UK   | Other   |
|----------------------------|---|--|---|
| <b>General labelling</b>   | <ul style="list-style-type: none"> <li>Regulation (EU) No. 1169/2011</li> </ul>   | <ul style="list-style-type: none"> <li>Retained - Regulation (EU) No. 1169/2011, as modified by The Food and Drink (Miscellaneous Amendments Relating to Food and Wine Composition, Information and Labelling) <a href="#">Regulations 2021</a> (UK-specific rules on COOL and name and address FBO).</li> <li>UK Labelling Review – post Defra White Paper NFS</li> </ul> | <ul style="list-style-type: none"> <li>Codex General Standard for the Labelling of Prepackaged Foods</li> <li>Codex work on e-commerce</li> </ul>     |
| <b>Nutrition labelling</b> | <ul style="list-style-type: none"> <li>Regulation (EU) No. 1169/2011, as amended</li> </ul>   | <ul style="list-style-type: none"> <li>Retained - Regulation (EU) No. 1169/2011, as last amended end of 2020.</li> <li>UK Labelling Review – post Defra White Paper NFS</li> </ul>   | <ul style="list-style-type: none"> <li>Codex Guidelines on Nutrition Labelling</li> </ul>   |
| <b>FOPNL</b>               | <ul style="list-style-type: none"> <li>Proposal for a harmonised mandatory front-of-pack nutrition labelling in F2F - Q4 2022</li> </ul>  | <ul style="list-style-type: none"> <li>UK ‘call for evidence’ consultation on FOPNL Jul-Oct/20 – first step</li> <li>In parallel, UK government commissioning research to understand the impact of specific FOPNLs on healthier choices.</li> <li>UK Labelling Review – post Defra White Paper NFS</li> </ul>  | <ul style="list-style-type: none"> <li>Codex work on FOPNL</li> </ul>   |
| <b>NHC</b>                 | <ul style="list-style-type: none"> <li>Regulation (EC) No. 1924/2006, as amended</li> <li>Regulation (EU) 432/2012, as amended</li> </ul> | <ul style="list-style-type: none"> <li>Retained – Regulation (EC) 1924/2006, as last amended end of 2020.</li> <li>UKNHC Register</li> <li>UK Labelling Review – post Defra White Paper NFS</li> </ul>   | <ul style="list-style-type: none"> <li>Codex General Guidelines on Claims</li> <li>Codex Guidelines for Use of Nutrition and Health Claims</li> </ul> |
| <b>Allergen labelling</b>  | <ul style="list-style-type: none"> <li>Regulation (EU) No. 1169/2011</li> </ul>   | <ul style="list-style-type: none"> <li>Regulation (EU) No. 1169/2011</li> <li>Food Information Regulations 2014 (incl. PPDS)</li> <li>UK Labelling Review – post Defra White Paper NFS</li> </ul>  | <ul style="list-style-type: none"> <li>Codex General Standard for the Labelling of Prepackaged Foods</li> <li>Guidelines on PAL</li> </ul>            |

# Labelling UK x EU

|                                 | EU   | UK   | Other   |
|---------------------------------|--|--|---|
| <b>Environmental Claims</b>     | <ul style="list-style-type: none"> <li>• EU Green Claims Initiative – proposal exp. Dec.21, coming into force from 2023.</li> <li>• Environmental Footprint (PEF) – legislative proposals</li> <li>• EU Citizen’s Initiative for ‘European EcoScore’</li> <li>• FDE position paper on substantiating green claims – timings TBC</li> </ul> | <ul style="list-style-type: none"> <li>• UK carbon labelling – BEIS decarbonisation Strategy – no timings for food.</li> <li>• CMA guidance on environmental claims: not food-specific. Exp. Aug/Sep.21</li> </ul> | <ul style="list-style-type: none"> <li>• Foundation Earth Eco-Impact: Rollout exp. 2022.</li> </ul> |
| <b>Animal welfare labelling</b> | <ul style="list-style-type: none"> <li>• Ongoing EU work on animal welfare labelling</li> </ul>  | <ul style="list-style-type: none"> <li>• Upcoming consultation on animal welfare, incl. labelling</li> </ul>   |   |

# Sustainability UK x EU

|   | EU   | UK   |
|---|--|--|
| <b>Packaging/plastics/waste/recyclability</b> | <ul style="list-style-type: none"> <li>• SUP Directive</li> <li>• PPWD revision (proposals exp. Late 2021-early 2022 – Legislative Act exp. Q4 2022).</li> </ul> | <ul style="list-style-type: none"> <li>• UK-wide. Plastic Packaging Tax (PPT) – to be introduced from Apr.2022 (secondary legislation under the Finance Act 2021).</li> <li>• UK-wide: EPR (under Environment Bill) – phased approach from 2023.</li> <li>• DRS (England, Wales and NI): applicable for drink containers – from late 2024 the earliest.</li> </ul> |
|   |  |  |
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# FOOD LABELLING & COMPOSITION

# Bread and Flour Regulations 1998

- Removal of mutual recognition clauses - The Food (Amendment and Transitional Provisions) (England) [Regulations 2021](#) (SI 2021, No. 616)
- Came into force on 17 June 2021.
- England businesses lose access to unfortified flour for the domestic market from 1 October 2022
- New Regulations allow:
  - the production and sale of unfortified flour in England for export
  - the import of unfortified flour for use in products for export
- UKIM allows free circulation within the UK – still no SIs in Scotland or Wales
- Defra confirmed establishment of WG on flour
- Government commitment to review the BFR – review being scoped:
  - Will consider DHSC decision on folic acid
  - Defra will hold a public consultation on policy options
  - Defra states that issues raised by stakeholders are ‘technically complex’ and therefore the review will require sufficient time to consider all responses.
  - Defra plans to update technical guidance on flour on gov.uk
- Defra understanding that imported products made with unfortified flour are acceptable in GB as not in scope of BFR.

# Flour – Folic acid

- 2019 consultation on fortification of flour with folic acid.
- Parliament: “substantial progress” made in June, incl. “positive dialogue with Devolved Administrations”
- “Priority for the Government” according to Parliament.
- Update expected after the summer recess.

# Allergy labelling – UK/FSA

## PPDS/Natasha Law

- New law applies 1 October 2021 – in all 4 UK nations.
- PPDS foods will require an ingredients' list and product name to be displayed.
- New [PPDS Hub](#) and [guidance](#) and other resources on FSA website ([FSA-led webinar](#) 4 August).

## Precautionary/Advisory Allergen Labelling (PAL)

- FSA commissioning research on application of PAL and consumer perceptions
- Consultation planned for Q3/Q4 FY21/22 - format and wording, compliance, risk-analysis, traceability in the supply chain and effective advice and communication mechanisms.

## Research

- [Final report of the Science Council Working Group on FHS](#) – informs research priorities
- Incl. FHS prevalence, PAL, PPDS and key trend analysis of incidents and hospitalisations.

## Food Allergy Safety Scheme (FASS)

- Provision of allergen information in the OOH sector.
- Work in early stages of development.
- Further research on how to link up with existing FHRS.

## Food Allergic Reaction Reporting Mechanism Scheme (FARRM)

- Platform for reporting severe allergic reactions directly to the FSA.
- Data will be used to identify patterns and trends, inform policy decisions and research priorities.
- Proof of concept testing of platform between July and December 21.

## International Engagement

- Influencing development of international standards and best practice
- Quantitative Risk Assessment Guidance with ILSI
- Report on Upper Thresholds for PAL use with ILSI

# Codex Work on Allergen Labelling

## Codex Committee on Food Labelling - Allergen Labelling Electronic Working Group (FLC 275/21).

- Ongoing work – to be presented at the CCFL 46 in September.
- Recent [consultations](#) on amendments to the GSLPF on hypersensitivity terminology and labelling exemptions.
- PAL guidance should form part of it or be reviewed separately and list of allergens – likely separate workstreams, as depend on outcome of FAO/WHO expert consultation.
- Harmonisation of allergen thresholds – potentially at CCFL 46 (Sep.21)

## Ad hoc FAO/WHO expert consultation on risk assessment of food allergens (FLC 202/21)

- Part 1 report: Review and validation of Codex priority allergen list through risk assessment (May.21) to **to enable review of allergen labelling in GSLPF**
- Recommendations:
  - immune-mediated hypersensitivities required for inclusion – intolerances excluded (e.g. lactose, sulphite) – derived ingredients evaluated on a case-by-case basis for potential exclusion.
  - intolerances should be excluded from this list
  - Prevalence, severity and the potency of food/ingredient - 3 key criteria to establish priorities.
  - Priority allergens: Cereals containing gluten, 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) – not priority – country-dependent.
  - “watch list” to include pulses, insects and other (e.g. kiwi fruit) for future evaluation
- Expecting 2<sup>nd</sup> report from discussions in Mar-Apr.21 - Review and establish threshold levels in foods of the priority allergens
- Discussions on PAL to start in Oct.21

# FDF FLL

## Future of food labelling in GB

- FSA Board Paper on '[Strategic Priorities for FSA Policy and Regulation](#)' – food responsibility distributed across governments
- New FSA team being brought together to bolster roles in food labelling policy.
- New FSA Chair Prof Susan Jebb – obesity background
- NFS calls for reform in food policy responsibilities.

## Common Framework on Food Composition Standards and Labelling

- Provisional paper published on 23 March 2021 – still under discussion
- Stakeholder engagement on 17 June.

## GB Food Labelling – EU exit

- The Food and Drink (Miscellaneous Amendments Relating to Food and Wine Composition, Information and Labelling) [Regulations 2021](#) laid on 28 May (FLC 223/21)
- Amend Food Information Regulations 2014, amongst others.
- Confirm 21-month period of adjustment on EU-exit changes (e.g. COOL and FBO name and address).

## GB flour compliance

- FSAI note published in Feb.21 on Flour from GB with added vitamins and minerals.
- Based on EC advice.
- Defra response (FLC 143/21) reconfirming UK's interpretation
- FSAI raised issue with EC and MSs and FDF raised with FDI, but so far no response from EC.

## FOPNL

- Response to 2020 consultation to be published "as soon as possible".
- Morrisons establishing own FOPNL system due to be rolled out by end of 2021.

## OOH calorie labelling

- Draft legislation introduced 13 May and SI approved by both houses on 22 July.
- Applicable from 6 April 2022.

# FDF FLL

## Nutrition and Health Claims

- NHC Regulation allows trade marks/brand names considered health claims until 19 January 2022
  - DHSC's views is that it is a cut-off date
  - DHSC to engage with devolveds to agree on interpretation (early August) and will then communicate.
- On-hold health claims – plans to run a call for evidence in summer but due to resources unlikely until end of summer recess.
- Updated GB NHC guidance to reflect EU-exit likely end of 2021

## Improvement notices for health claims:

- Paper issued to the DHSC on 7 May.
- Will require a full consultation - likely early 2022 before being considered.

## Environmental claims

- Will be considered as part of Defra White Paper on NFS.
- No agreed standardised approach for food – WRAP, Foundation Earth 'ECO IMPACT'
- CMA guidance: 8 week consultation on draft consumer protection law guidance on environmental claims (FLC 214/21).
- ASA/CAP – Climate Change and Environment Project – crackdown on misleading 'green claims.
- EC work on Green Claims Initiative ongoing – proposal exp. Dec.21 and legislation in force from 2023.
- EU PEF methodology – only available for some product categories (e.g. pasta, dairy). FDE developing a position paper on substantiating green claims and the use of PEF.
- EU Citizen's Initiative calling for a 'European EcoScore' - (FLC 266/21).

## ABC Programme

- Changes to enforcement underpinned by rapid increase in online food sales and reducing LA resources
- 3 key outcomes for 2021:
  - Enterprise-level approach – large influential retailers
  - Assurance of online food sales
  - Proportionate and targeted regulation – hygiene delivery model and interventions until compliance achieved.

# FDF FLL

## ‘Natural claims’

- MEP letter to Commission calling for tighter regulation. Commission no intention to pick up on this area & highlighted nutrition & health claims, flavourings and Article 36 of FIC regulations are already in place.

## EFSA Guidance on date marking – part 2

- Guidance on date marking and related food information (part 2) published in April (FLC 174/21).
- EC put on hold work on developing guidance on date marking – pending work under the IA on the EU FIC.

## EU Addition of vitamins and minerals to food

- EC working on mandate for EFSA to update scientific advice.

## COOL:

- ECJ ruling on Groupe Lactalis x Premier Ministre and others on 1 October 2020.
- French decree not meet criteria of Art. 39(2) of FIC – no *proven and objective* link between origin and quality – annulled.
- FDE complaint about Italian decrees – no EC response yet.

## Vegan/vegetarian/plant-based

- FDE not to undertake additional work to seek alignment of the EVU/FDE joint position with the ISO Vegetarian and Vegan Standard (**ISO 23662:2021**).
- Amendment 171 (on the use of dairy descriptors for plant-based alternatives) withdrawn on the reform of the legislation on the CMO/CAP.

# Other labelling

## Health and Care Bill (FLC 273/21):

- Clause allows the Government (and/or, where appropriate, a devolved authority) to make regulations to implement any new policies regarding food information and labelling, whilst retaining a level of scrutiny (to “support the alignment of labelling policies across the three nations”). Examples given are changes to food labelling as a result of the consultation on Front of Pack Nutrition Labelling (FOPNL) and alcohol calorie labelling, which fall under the Obesity Strategy ‘Tackling obesity: empowering adults and children to live healthier lives’.
- The intention of the power is to broaden the reach for any modifications to Regulation (EU) No. 1169/2011 to those matters that fall within the scope of section 16 (1) (e) of the Food Safety Act (FSA) 1990. The Bill also introduces new sections to the FSA 1990.

## Codex update:

- CCFL 46 Due to take place 27 Sep. to 1 October (virtually).
- Agenda now available – items to be covered include:
  - FOPNL
  - Guidelines on e-commerce
  - Revision of GSLPF on allergen labelling and PAL guidance.
  - Use of technology in food labelling
  - Labelling of foods in joint presentation and multipack formats
- Steve Wearne – FSA Director of Global Affairs – candidate for Chairperson of CAC.

# FOOD SAFETY

# Acrylamide

- Following a Commission Working Group meeting on 25 May 2021, a paper has been shared which proposes new and revised BMLs, and also includes some draft MLs.
- Targeted stakeholder consultation on BMLs and MLs expected after 22 June 2021 Working Group meeting (anticipated week of 19 July 2021). Proposed values on following slide.
- ESA Annual Acrylamide data collection survey:
  - sliced potato crisps/chips only (closed 21 May 2021).
  - dough based (formed) potato snacks, cereal snacks, nuts and vegetable crisps/snack products (closed 31 May 2021).
- EUPPA collecting data for French fries and has agreed to address root vegetable fries (board meeting on 15 June 2021)
- EFSA data for 2020 has also been received by secretariat (Public Access to Documents request).
- Data will now be reviewed. Initial summary data for sliced potato crisps included in annex to these slides.
- FSA has confirmed that its annual survey on acrylamide and furan is expected to be published in September. As usual PPA will receive early notification (24-48 hours) prior to publication. [NB typically the date of the FSA annual survey slips by weeks or even months].

# Acrylamide – proposed values

| Food   | BML [ $\mu\text{g}/\text{kg}$ ]<br>Reg. 2017/2158 | Revised BML<br>[ $\mu\text{g}/\text{kg}$ ]<br>NEW | Possible ML [ $\mu\text{g}/\text{kg}$ ]<br>NEW |
|--|---|---|--|
| 1. French fries (ready-to-eat)<br>--> as placed on the market ready to eat or after preparation in the laboratory according to instructions on the label. (standardised frying procedure)              | 500   | 500   | 850  |
| 2a. Potato crisps from fresh potatoes and from potato dough<br>2b. Potato-based crackers<br>2c. Other potato products from potato dough (such as potato based savoury snacks – moisture content < 5 %) | 750   | 700   | 1000   |
| 5b. Crackers with the exception of potato based crackers (including savoury cereal based snacks)   | 400   | 300   | 500  |
| Fruit crisps/chips   | -   | 250   | -  |
| Vegetable crisps other than potato and cereal  | -   | 700   | -  |
| Rösti  | -   | 800   | -  |
| Other potato based dishes (heated in oven or frying) (including potato croquettes)   | -   | 300   | -  |
| Root and tuber vegetable fries   | -   | 500   | -  |

NB: Document does not include proposals for almonds. However, colleagues in Spain have been asked to provide data on toasted almonds to help the Commission set an appropriate BML.

# 3-MCPD-Esters

- Commission stakeholder forum on Tuesday 2 March 2021 also covered glycidyl esters and 3-MCPD esters.
- LCI (German lab associated with BDSI) presented on behalf of the sector (joint presentation on behalf of ESA and CAOBISCO).
- The presentation was well received and appears to have influenced Commission and MS thinking.
- On 27 April 2021 (FDE meeting) Commission confirmed that:
  - Possible maximum levels considered are based on the available data in the EFSA database and other factors (such as typical vegetable oil content).
  - Significant divergences in certain cases observed among levels found in food and levels expected in food taking into account fat content.
  - **Important information provided during stakeholder forum on Tuesday 2 March 2021.**
  - **This information will be taken into account in follow-up discussions.**
- As with acrylamide ESA issued a request to EFSA for all member states MCPD data on crisps and snacks for 2014 to present. EFSA data has been received and is undergoing review.

# Chlorpropham (CIPC, Sprout Suppressant )

## Europe and NI

- EU non-renewal of approval was published in the OJ on 18 June 2019.
- A temporary EU Maximum Residue Level (tMRL) of 0.4 mg/kg was agreed and published on 10 February 2021.
- The tMRL will be reviewed on an annual basis: the expectation is that industry will test and provide data annually to the Commission.
- The current MRL of 10 mg/kg will continue to operate until the new tMRL comes into force on 2 Sept 2021.
- EUPPA leading on implementation of the CIPC monitoring plan and reporting to the European Commission (via Arvalis). The aim is to deliver a first report to the Commission by December this year.
- So far 38 data suppliers have provided data:
  - 6 countries involved: Belgium, France, Germany, The Netherlands, Poland, UK
  - 1,702 data samples collected to date.
  - Check for visual problems/data errors still to take place but estimated that only 2% of the total samples received are above 0.30 mg/kg.

## GB

- Despite request for industry CRD has not confirmed the tMRL as it was published after EU Exit. Therefore, in GB (but not NI), the MRL of 10 mg/kg continues until further notice.
- CRD has confirmed that it does not require any further industry data to complete assessment.
- Potential divergence from EU tMRL is problematic.
- No additional updates on 1,4-DMN (alternative sprout suppressant). CRD deadline for review is 6 October 2021. EUPPA Board has agreed to collect data on levels in finished products.

## **Annex 2**

### **Summary Acrylamide data for 2020 Sliced potato crisps (chips)**

**Initial (unconfirmed) review of data.  
Subject to amendment.**

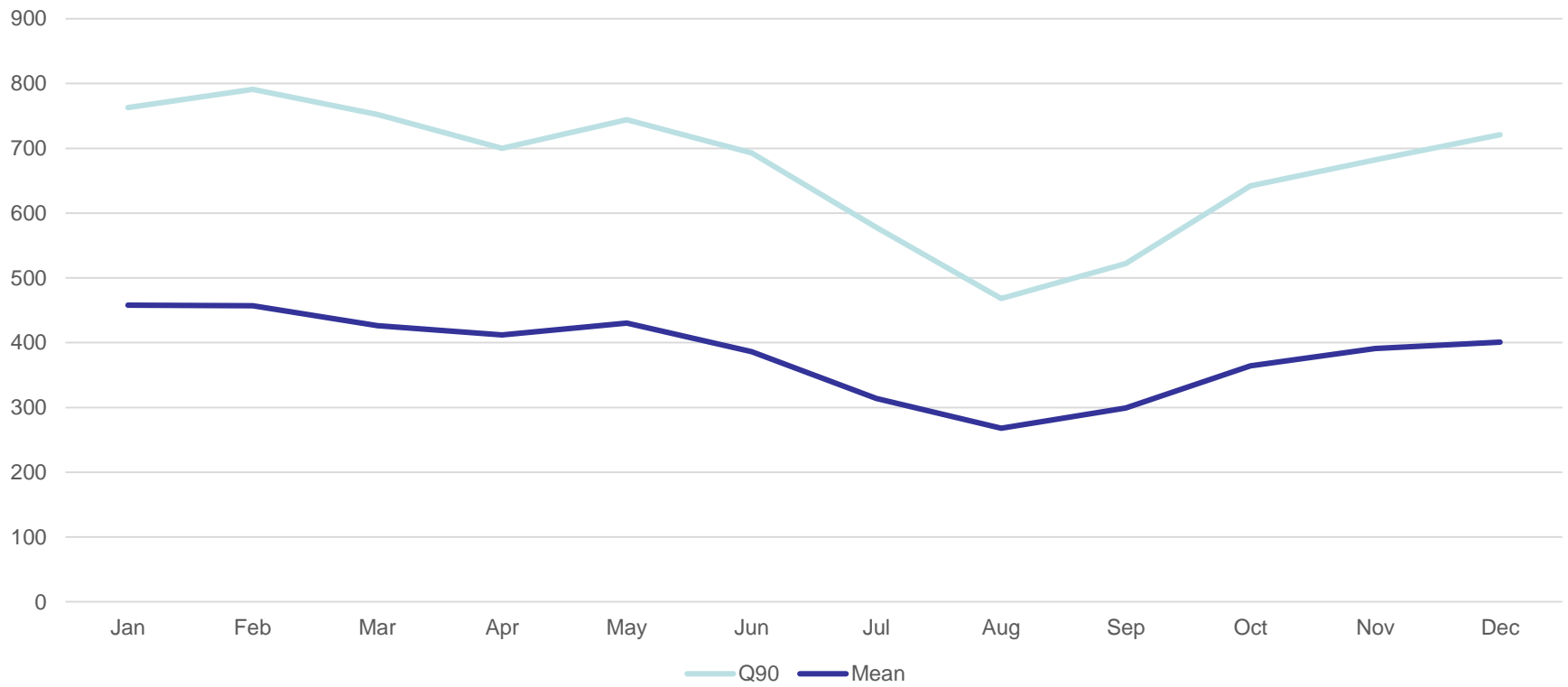
**CONFIDENTIAL**

# Summary

- 11,778 data points received. Covers a total of 21 countries (2019: 18 countries, 2018: 19 countries, 2017: 22 countries).
- Mean value was 384 µg/kg (Mean for 2019 was 380 µg/kg. Mean for 2018 was 359 µg/kg).
- Highest single value in 2020 was 3,432 µg/kg.
- 0.17% of data points were above 2,000 µg/kg, 0.53% of data points were above 1,500 µg/kg (2x the current BML).
- 2.84% of data points were above 1,000 µg/kg and 7.7% of data points were above the 750 µg/kg BML (2019: 8.5%, 2018: 6.8%).
- 9.75% of data points were above 700 µg/kg (proposed revised BML)
- 2 data points used GC-MS/MS. 8,892 used LC-MS/MS. 50 used HPLC. 2,833 results used other test methods (not specified).
- 8,934 data points were from accredited laboratories. 2,844 were from non-accredited laboratories.

| Year | Mean | Q90  | Q95  | Max   | %>750 µg/kg | %>1000 µg/kg | %>1500 µg/kg | %> 2000 µg/kg |
|------|------|------|------|-------|-------------|--------------|--------------|---------------|
| 2002 | 763  | 1581 | 2080 | 2500  | -           | 23.8         | -            | 4.8           |
| 2003 | 573  | 976  | 1118 | 2080  | -           | 8.1          | -            | 0.7           |
| 2004 | 624  | 1168 | 1580 | 4450  | -           | 12.8         | -            | 1.2           |
| 2005 | 621  | 1085 | 1210 | 1780  | -           | 13.5         | -            | 0.0           |
| 2006 | 577  | 1100 | 1350 | 2830  | -           | 11.3         | -            | 1.3           |
| 2007 | 570  | 1000 | 1270 | 5900  | -           | 10.0         | -            | 0.9           |
| 2008 | 472  | 903  | 1170 | 4300  | -           | 7.5          | -            | 0.8           |
| 2009 | 500  | 1037 | 1400 | 6000  | -           | 10.9         | -            | 1.5           |
| 2010 | 435  | 780  | 1020 | 12000 | -           | 5.2          | -            | 1.0           |
| 2011 | 358  | 680  | 870  | 3090  | -           | 3.2          | -            | 0.2           |
| 2012 | 415  | 784  | 1020 | 4500  | -           | 5.2          | -            | 0.2           |
| 2013 | 423  | 830  | 1090 | 2635  | -           | 6.2          | -            | 0.3           |
| 2014 | 397  | 740  | 920  | 2049  | -           | 3.7          | -            | 0.0           |
| 2015 | 422  | 790  | 1020 | 2600  | -           | 5.2          | -            | 0.2           |
| 2016 | 412  | 770  | 1018 | 3400  | -           | 5.6          | -            | 0.6           |
| 2017 | 378  | 692  | 906  | 4100  | 8.2         | 3.5          | 0.9          | 0.2           |
| 2018 | 359  | 665  | 832  | 3600  | 6.8         | 2.7          | 0.5          | 0.1           |
| 2019 | 380  | 710  | 873  | 3000  | 8.5         | 2.8          | 0.5          | 0.1           |
| 2020 | 384  | 695  | 820  | 3432  | 7.7         | 2.8          | 0.5          | 0.1           |

# Sliced potato crisps 2020 data



# TRANSITIONAL ISSUES

# COMPOSITES

- **Any feedback from members/issues?**

# HRFNAO

## Phased Introduction of GB Border Controls

- **1 January 2021:** full controls on non-EU origin high-risk food and feed not of animal origin transiting through the EU destined for GB.
- **1 October 2021:** pre-notification on IPAFFS for all high-risk food and feed not of animal origin imported from the EU.
- **1 January 2022:** introduction of documentary, identity and physical checks on all high-risk food and feed not of animal origin imported from the EU.

**SLIDE AMENDED POST-MEETING DUE TO CONFIRMATION RECEIVED FROM THE FSA**

# HRFNAO

## **NEW: From 1 October 2021:**

### **Goods in Annex I:**

- Pre-notification on a Common Health Entry Document (CHED) via IPAFFS (The UK's new online import control system) ONLY.

### **Goods in Annex II:**

- Pre-notification on a Common Health Entry Document (CHED) via IPAFFS (The UK's new online import control system) ONLY- no need for an EHC or certificate of analysis.

### **NOT A REQUIREMENT:**

- To enter GB via an appropriately approved border control post (BCP).
- To be subject to relevant import controls (documentary / identity and physical checks) before release onto the UK market.

**New Border Operating Model (BOM) published on 20<sup>th</sup> July.**

**SLIDE AMENDED POST-MEETING DUE TO CONFIRMATION RECEIVED FROM THE FSA**

# HRFNAO

## **NEW: From 1 January 2022:**

### **Goods in Annex I:**

- Pre-notification on a Common Health Entry Document (CHED) via IPAFFS (The UK's new online import control system) ONLY.

### **Goods in Annex II:**

- Pre-notification on IPAFFS
- Certificate of analysis – possible to provide the original cert. of analysis from import to EU provided no alterations (no additions or reductions) to consignment and that the details of the certificate and the consignment/load moving to GB match.
- EHC from the EU MS.

### **All must:**

- Enter GB via an appropriately approved border control post (BCP)
- Be subject to relevant import controls (documentary / identity and physical checks) before release onto the UK market.

**New Border Operating Model (BOM) published on 20<sup>th</sup> July.**

**SLIDE AMENDED POST-MEETING DUE TO CONFIRMATION RECEIVED FROM THE FSA**

# CONSULTATIONS

# Consultations - closed

| Consultation  | Closing date             | Comments/status   |
|---|--------------------------|---|
| <a href="#">DHSC advertising restrictions (9pm TV watershed and online)</a>             | June/19 and Dec/20 resp. | Govt. response now published ( <b>24 June</b> ). Health & Care Bill introduced to Parliament 6 July.  |
| <a href="#">DHSC enforcement promotional restrictions HFSS foods</a>                    | 22/02                    | Govt. response now published ( <b>21 July</b> ). Draft secondary legislation published, under the Food Safety Act 1990.                     |
| <a href="#">Defra Gene editing (England)</a>  | 17/03                    | PPA contribution. Awaiting Govt. response ( <b>exp. late summer 2021</b> )  |
| <a href="#">Defra changes recognition clauses (England) (BFR)</a>                       |                          | PPA contribution. Govt. response not yet issued ( <b>exp. late summer 2021</b> ) but <a href="#">legislation</a> already laid and in force. |
| <a href="#">Defra Draft Policy Statement on Environmental Principles</a>                | 02/06                    | No PPA response. Govt. response <b>exp. Sep/21</b> . Will feed into Environment Bill.   |
| <a href="#">Extended Producer Responsibility (UK-wide)</a>                              | 04/06                    | PPA contribution. Govt. response <b>exp. Sep/21</b> .   |
| <a href="#">Defra Introducing a Deposit Return Scheme (England)</a>                     | 04/06                    | No PPA response as not applicable. Govt. response <b>exp. Sep/21</b> .  |
| <a href="#">Defra Consistency of household and business waste collections (England)</a> | 04/07                    | PPA contribution. Gov. response TBC.  |
| <a href="#">CMA Draft guidance on environmental claims</a>                              | 16/07                    | PPA contribution into FDF's response. Final guidelines <b>exp. Aug/Sep.21</b>   |

# Consultations - ongoing

| Consultation  | Closing date | Comments/status  |
|---|--------------|--|
| <a href="#"><u>HMRC Plastic Packaging Tax: draft secondary legislation consultation</u></a> | 17/08        | PPA to review and draft a response in due course. Plan to align with FDF's response. |
| <a href="#"><u>BEIS Reforming the framework for better regulation</u></a>                   | 01/10        | Would members like PPA to respond?   |

# Risk Matrix

## Food Issues Risk Matrix (March 2021)

Decreasing impact on business

| Risk Analysis  | Current Issue<br>Actions in hand<br>Dynamic situation   | Future Issue<br>Plans in preparation  | Managed issue<br>Controlled/monitored<br>Could reoccur<br>Outstanding actions |
|--|---|---|---|
| <b>Big Company</b><br><b>Impact</b><br><b>Cost</b><br><b>Reputation</b><br><b>Media</b>          | Acrylamide<br>MCPD/Glycidol-Esters<br>Advertising/Marketing to children/<br>Promotions/Total online advertising ban<br>Obesity - New Government<br>strategy/Scotland/Wales<br>Portion Size/Calories/PHE 5-10% reduction<br>CIPC and 1,4DMN authorisation<br>BREXIT/Devolution-associated<br>issues/Common Frameworks<br>Packaging waste/taxation/pack fill/EPR<br>Food waste<br>Salt/Sodium reduction (2024 targets)<br>FOP developments<br>Loss of pesticide active substances | Pesticides MRLs<br>Furan<br>Food taxation<br>Collective loss of Fungicides  |   |
| <b>Moderate Impact</b><br><b>Cost</b><br><b>Material availability</b><br><b>Working practice</b> | Environment Bill/EU Farm to Fork Strategy<br>Allergens (precautionary labels/vegan)<br>Folic acid/other fortificants (due to Brexit)<br>Nutrition Profiling (including Ofcom and EU<br>Nutrient Profiles in F2F Strategy)<br>Ultra-Processed Foods<br>Glycoalkaloids  | Sat Fat (Public Perception/media<br>attention)<br>School food standards (England and<br>Scotland)<br>National Food Strategy<br>Cadmium (only nuts and oil seeds)<br>Official controls/FSA Funding model<br>Glutamates (possible amends to max<br>permitted levels)<br>Contaminants (T-2, HT-2 and DON)<br>Eco-labelling |   |
| <b>Small Impact</b><br><b>Cost</b><br><b>Materials</b><br><b>Change</b>                          | Flavourings reviews<br>GBSF consultation/CQUIN/Hospital Food<br>Review<br>Tropane alkaloids<br>Plant based/vegan and vegetarian definitions<br>Chlorates  | Sugars (popcorn)  | Palm Oil (compound<br>ingredients)  |

New issue

Changed priority

Identified as a potential high-profile media issue

# Dates of 2021 meetings

- **1 December 2021**