

PPA Food Law and Consumer Committee Meeting

Chair: Catharine Hall

21 July 2022

Agenda

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|---|-------------|
| 1) Welcome and anti-trust statement | 14:00-14:05 |
| 2) Food labelling update – Tom Stafford (Defra) | 14:05-14:30 |
| 3) Minutes/action list | 14:30-14:35 |
| • Minutes PPA FLC 16 March 2022 (FLC 310/22) | |
| 4) Updates: | |
| • Nutrition | 14:35-15:15 |
| • England promotional and advertising restrictions | |
| • Devolved administration consultations on HFSS promos – input required | |
| • National Food Strategy White Paper for England | |
| • Other FDF DHC and NWG updates | |
| • Labelling and Composition | 15:15-15:45 |
| • Sunflower oil – Ukraine | |
| • Allergen labelling and PAL consultation | |
| • Other FDF FLL updates (incl. EU FIC review, BFR, eco-labelling, plant-based and consultation on imperial units) | |

Agenda

- Sustainability 15:45-16:15
 - Acrylamide
 - 3-MCPD and glycidyl esters
 - Glycoalkaloids
 - Other contaminants (tropane alkaloids, mycotoxins, furans)
 - PPPs (1,4 DMN, CIPC, others)
- Sustainability 16:15-16:25
 - EPR
- 5) AOB 16:25-16:40
- 6) Risk Matrix and FLC priorities 16:40-16:55
- 7) Next meetings/Close 17:00

Food Labelling Update

Tom Stafford
Food Information and Labelling Team,
Defra

Matters arising - FLC 1 December 2021

Action	Status
Secretariat to keep an eye on developments on each of the four nations National Food Strategies .	To be covered today
Secretariat to investigate and report back on UK and EU flour fortification requirements post EU Exit.	To be covered today
Members to submit feedback to Secretariat on Slack (document management system).	Pending
Secretariat to continue to monitor FSA work on UK/EU regulatory divergence and provide updates on some of the FDF monitoring of relevance.	To be covered today
Secretariat to develop an FLC priorities document	Ongoing
Secretariat to contact DHSC to find out when technical guidance on HFSS promotional restrictions is expected.	Completed
Secretariat to make contact with new OHID team (understood to be former PHE team).	Partly completed – awaiting response from OHID diet improvement team
Members interested in engaging with OHID on the Better Health Good Choice app to contact the PPA Secretariat.	Pending
Secretariat to liaise with the new OHID team to explore solutions for NDNS data extraction , and to explore options with another organisation (likely to incur a charge) for data analysis on potatoes and crisps.	Ongoing – awaiting response from OHID
Members are invited to comment on risks and opportunities outlined by FDF (on nutrition-related topics)	Pending
Secretariat to update members on latest discussions on sunflower oil substitution and labelling	To be covered today

Matters arising - FLC 1 December 2021

Action	Status
Secretariat to share final draft of enforcement opinion on dairy designations used for plant-based products (and meat designations)	Pending
Members to submit data on salt for crisps, savoury snacks, popcorn and potato products ; and sugar data for popcorn by <u>8 July</u>	Pending
Members to submit data on all topics covered in addendum	Pending

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

3-MCPD	Mycotoxins (aflatoxins, ochratoxin A, patulin, fusarium toxins, fumonisings, deoxynivalenol (DON) and zearalenone (ZEA))
Acrylamide	Perfluoroalkyl substances (PFAS)
Cadmium	Pesticides (CIPC)
Dioxins	Tropane alkaloids
Glycoalkaloids	UK import/EU export issues (e.g. composites, HRFNAO)
Hydrocyanic acid (HNC)	Supply chain shortages (e.g. sunflower oil, lecithins, etc)/substitution issues

NUTRITION & HEALTH

2020	2021				2022				2023 +
Jan - Dec	Jan - Mar	Apr – Jun	Jul – Sep	Oct - Dec	Jan - Mar	Apr – Jun	Jul – Sep	Oct - Dec	Jan - Dec
<p>Delivery Plan Healthy Weight, Healthy Wales (Jan.20)</p> <p>Henry Dimbleby interim report National Food Strategy – Part 1 (Jul.20)</p> <p>PHE stakeholder meeting baby food reformulation (Feb.20)</p> <p>Government publishes Obesity Strategy (Jul.20)</p> <p>NDNS y 9-11 report (Dec.20)</p> <p>PHE consultation new salt targets (Feb.20)</p> <p>Govt. response consultation OOH calorie labelling (Jul.20)</p> <p>NDNS urinary sodium analysis (Mar.20)</p> <p>DHSC Consultation enforcement OOH calorie labelling (Jul.20)</p> <p>PHE 3rd Sugar reduction report (Oct.20)</p> <p>DHSC consultation FoP labelling (Jul.20)</p> <p>Consultation online ban HFSS advertising (Nov.20)</p> <p>PHE Nutrient profile review</p> <p>PHE calorie reduction programme launch (Sep.20)</p> <p>Govt. response consultation ban marketing & promotions HFSS (Dec.20)</p> <p>PHE new salt targets (Sep.20)</p> <p>Consultation enforcement marketing & promos HFSS (Dec.20)</p> <p>Northern Ireland amended obesity strategy 'A Fitter Future for All' (Nov)</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 consultation advertising ban (TV + online) HFSS (Jun.21)</p> <p>Secondary legislation promos HFSS laid (July.21)</p> <p>Health and Care Bill introduced (Jul.21)</p> <p>National Food Strategy – Part 2 (Jul.21)</p> <p>Govt. response GBSF (Jul.21)</p> <p>Legislation on OOH calorie labelling signed into law (Jul.21)</p> <p>EU Code of Conduct (Jul.21)</p> <p>EFSA draft opinion dietary sugars (Jul.21)</p> <p>EP Draft Report on Beating Cancer Action Plan (Jul.21)</p>	<p>Govt. response enforcement n promos HFSS (Jul.21)</p> <p>Govt. response folic acid in flour (Sep.21)</p> <p>Guidance on OOH calorie labelling (Sep.21)</p> <p>Health and Care Bill introduced (Jul.21)</p> <p>National Food Strategy – Part 2 (Jul.21)</p> <p>Govt. response GBSF (Jul.21)</p> <p>Legislation on OOH calorie labelling signed into law (Jul.21)</p> <p>EU Code of Conduct (Jul.21)</p> <p>EFSA draft opinion dietary sugars (Jul.21)</p> <p>EP Draft Report on Beating Cancer Action Plan (Jul.21)</p>	<p>OHID takes over from PHE (Oct.21)</p> <p>FDSC report on National Food Strategy (Oct.21)</p> <p>Legislation HFSS promos approved (Dec.21)</p> <p>SG Good Food Nation Bill (Oct.21)</p> <p>EP Report on F2F (Oct.21)</p> <p>EFSA consultation on draft opinion on FOPNL and nutrient profiles (Nov. 2021)</p>		<p>Better Health obesity campaigns (Jan. 22)</p> <p>Health & Care Act (Apr 2022)</p> <p>Defra white paper England Food Strategy (June.22)</p> <p>England OOH calorie labelling comes into force (Apr.22)</p> <p>Consultation GBSF (Jun.22)</p> <p>SG consultation OOH calorie labelling (Apr. 22)</p> <p>OHID call for evidence vit. D (Apr.22)</p> <p>DHSC Guidance on promos HFSS (Apr.22)</p> <p>OHID Health Incentives Scheme (TBC.22)</p> <p>Salt Awareness Week (Mar.22)</p> <p>EFSA final opinion dietary sugars (Feb.22)</p> <p>EP Report on Beating Cancer Action Plan (Feb.22)</p>	<p>OHID 1st calorie reduction report (Sep.22 TBC)</p> <p>OHID report on salt targets (Sep.22 TBC)</p> <p>OHID Health Disparities white paper (Later 22)</p> <p>Consultation secondary legislation/enforcement HFSS advertising (Jul.22 TBC)</p> <p>Consultation on BFR (Aug/Sep 22 TBC)</p> <p>OHID final sugar report (Summer.22)</p> <p>PHE/OHID report on cost of healthy diet (Summer.22)</p> <p>OHID review Covid-19 and excess weight (Summer.22)</p> <p>OHID calorie reduction TF (Sep.22)</p> <p>Govt. response FOPNL (2022 TBC)</p> <p>SG consultation HFSS promos (Jul.22)</p> <p>EU JRC report on nutrient profiles (TBC.22)</p> <p>Results EUREMO study (Q2 2022)</p>	<p>OHID 1st calorie reduction report (Sep.22 TBC)</p> <p>OHID report on salt targets (Sep.22 TBC)</p> <p>OHID Health Disparities white paper (Later 22)</p> <p>Consultation secondary legislation/enforcement HFSS advertising (Jul.22 TBC)</p> <p>Consultation on BFR (Aug/Sep 22 TBC)</p> <p>OHID final sugar report (Summer.22)</p> <p>PHE/OHID report on cost of healthy diet (Summer.22)</p> <p>OHID review Covid-19 and excess weight (Summer.22)</p> <p>OHID calorie reduction TF (Sep.22)</p> <p>Govt. response FOPNL (2022 TBC)</p> <p>SG consultation HFSS promos (Jul.22)</p> <p>EU JRC report on nutrient profiles (TBC.22)</p> <p>Results EUREMO study (Q2 2022)</p>	<p>OHID 1st calorie reduction report (Sep.22 TBC)</p> <p>OHID report on salt targets (Sep.22 TBC)</p> <p>OHID Health Disparities white paper (Later 22)</p> <p>Consultation secondary legislation/enforcement HFSS advertising (Jul.22 TBC)</p> <p>Consultation on BFR (Aug/Sep 22 TBC)</p> <p>OHID final sugar report (Summer.22)</p> <p>PHE/OHID report on cost of healthy diet (Summer.22)</p> <p>OHID review Covid-19 and excess weight (Summer.22)</p> <p>OHID calorie reduction TF (Sep.22)</p> <p>Govt. response FOPNL (2022 TBC)</p> <p>SG consultation HFSS promos (Jul.22)</p> <p>EU JRC report on nutrient profiles (TBC.22)</p> <p>Results EUREMO study (Q2 2022)</p>	<p>OHID 1st calorie reduction report (Sep.22 TBC)</p> <p>OHID report on salt targets (Sep.22 TBC)</p> <p>OHID Health Disparities white paper (Later 22)</p> <p>Consultation secondary legislation/enforcement HFSS advertising (Jul.22 TBC)</p> <p>Consultation on BFR (Aug/Sep 22 TBC)</p> <p>OHID final sugar report (Summer.22)</p> <p>PHE/OHID report on cost of healthy diet (Summer.22)</p> <p>OHID review Covid-19 and excess weight (Summer.22)</p> <p>OHID calorie reduction TF (Sep.22)</p> <p>Govt. response FOPNL (2022 TBC)</p> <p>SG consultation HFSS promos (Jul.22)</p> <p>EU JRC report on nutrient profiles (TBC.22)</p> <p>Results EUREMO study (Q2 2022)</p>

UK Diet and Nutrition calendar

Policy areas	Type of legislation	Consultation	Consultation response	Legislation/ guidelines due	Comes into force
OOH calorie labelling	Secondary legislation under FSA 1990	Main - Dec.18 Enforcement – Jul.20	Main – July.20 Enforcement – Feb.21	Jul.21 GUIDANCE: Sep.21	Apr.22
Volume/location promotional restrictions HFSS	Secondary legislation under FSA 1990	Main - Apr.19 Enforcement – Feb.21	Main – Dec.20 Enforcement – Jul.21	Dec.21 GUIDANCE: Apr.22	Location: Oct.22 Volume: Oct.23
Advertising restrictions HFSS – 9pm watershed	Secondary legislation under new Health and Social Care Act	Main - Jun.19 Secondary/Enforcement – Jun.22 TBC	Main - Jun.21 Secondary/Enforcement - TBC	Health & Care Act: Apr. 22 Secondary leg.: TBC GUIDANCE: TBC	Jan.24
Advertising restrictions - online		Main – Dec.20 Secondary/Enforcement – Jun.22 TBC			
FoP nutrition labelling	TBC	Jul-Oct.20	Jun.22 TBC	TBC	TBC
WG Healthy food environment consultation	TBC	Jun.22	Autumn.22	Proposals due Winter.22/23	By 2030 (TBC)
SG HFSS promo restrictions	Secondary legislation under Scottish Act*	Main - July.22 Enforcement - TBC	Main - Winter.22/23 TBC Enforcement - TBC	2024 TBC	Earliest Autumn* 2024 TBC

*A Public Health Bill is required before restrictions can be introduced. The earliest it would be laid is Sep/22 and therefore it is unlikely it would be into Parliament in the Spring.24.

Promotional restrictions HFSS (England)

- [The Food \(Promotion and Placement\) \(England\) Regulations 2021](#) published Dec.21 (FLC 506/21)

WHERE ARE WE?

- UK Government [announcement](#) on 14 May (FLC 262/22): Volume promo restrictions delayed until Oct.23
- [DHSC Implementation Guidance](#) published on 6 April (FLC 193/22)
- [BRC guidance](#) on categories in scope published in June (FLC 303/22)

NEXT STEPS:

- Awaiting SI confirming delays in implementation
- Awaiting DHSC implementation guidance to be amended to reflect changes
- Location/placement restrictions come into force 1 October 2022
- Volume price restrictions come into force 1 October 2023
- Awaiting confirmation on 'on-pack' promotions – delayed until Oct.24 TBC
- Further discussions on implementation - ongoing

WG consultation on food environment



- [WG consultation on healthy food environment](#) published 9 June (FLC 300/22)
- Proposals under 3 main themes:
 - **Healthier Shopping Baskets**
 - Healthier Eating out of our Homes
 - Healthier Local Food Environments
- Main proposals under 'Healthier Shopping Baskets' incl.:
 - 'Value' promotional restrictions: e.g. multi-buy (e.g. BOGOF), **temporary price reductions** and volume offers (e.g. **free items**, larger packaging volume for same price and **meal deals**)
 - Location-based promotional restrictions: incl. store entrances, till point, end of aisle, **free-standing display** units and online equivalents
 - 2-tier system: consideration of **2018 NPM model** (if published in time) applied to a **wider number of food categories** (see next slides)
 - Exploring future use of taxation powers on foods high in calories, fat and sugar.



NEXT STEPS:

- **Members to provide any initial views to PPA by 29 July**
- PPA to draft response
- Consultation closes on 1 September
- Consultation response exp. Autumn 2022
- Consultation on enforcement exp. Winter 22/23

SG consultation on promo restrictions

- [SG consultation](#) launched 1 July on promotional restrictions of HFSS food and drink.
- Separate proposals on OOH calorie labelling ([consultation](#) now closed).
- Include price and location promotional restrictions:
 - Price: Multi-buys (incl. BOGOF, 3 for 2, 'extra free' and 'Y for £X', incl. **meal deals**, **temporary price reductions**).
 - Location (incl. checkout areas, end of aisle, store entrances, **islands/bin displays** and online equivalent)
- Products in scope :
 - 2 tier system: consideration of **2018 NPM model** (if published in time) applied to a **wider number of food categories** (see next slides)



NEXT STEPS:

- **Members to provide any initial views to PPA by 29 August**
- PPA to draft response
- Consultation closes on 23 September
- Consultation response exp. Winter 22/23
- Primary legislation required before restrictions can be put in place (secondary legislation).
- Earliest restrictions would come into force Autumn 24.

Key Differences



Scotland

- Temporary Price Reductions
- Meal Deals
- Island/bin displays
- Wider category scope

- Online delivery platforms
- No proposals for business size/floor space exemption

Wales

- Temporary Price Reductions
- Meal deals and free items
- Free standing display units
- Wider category scope

- Close to use-by date promotions

Comparison of proposals



	England	Wales	Scotland
Categories	<p>Soft drinks Crisps and savoury snacks Breakfast cereals Confectionery Ice cream Cakes Sweet biscuits Morning goods Desserts and puddings Yogurts Pizza Chips and potato products Ready meals, meal centres, breaded and battered products</p>	<p><u>Option 1: England categories</u></p> <p><u>Option 2: Additional categories</u> Garlic bread Pies and quiches Bread with additions Savoury biscuits crackers and crispbreads Cooking sauces and pastes Table sauces and dressings Processed meat products Pasta /rice/ noodles with added ingredients and flavours Prepared dips and composite salads as meal accompaniments Egg products /dishes Sweet spreads</p>	<p><u>Option 1 – discretionary categories</u> Confectionery Sweet biscuits Crisps Savoury snacks Cakes Pastries Puddings Soft drinks with added sugar</p> <p><u>Option 2</u> Option 1 plus ice cream and dairy desserts</p> <p><u>Option 3</u> <i>Matched to England categories</i></p> <p><u>Option 4 – all categories in UK-wide reformulation programmes</u></p>

PPA NOTE: All 3 proposals are 2-tiered (cat + NPM). Both Welsh and Scottish proposals consider the application of the 2018 NPM model (if passed).

Comparison of proposals



	England	Wales	Scotland
Entry into Force	1 October 2022 (location) 1 October 2023 (volume)	<i>By 2030</i>	Seeking views on an appropriate lead in time for enforcement and implementation Unlikely to be before 2024
Qualifying Businesses	Retailers that sell pre-packed food and drink and OOH businesses that sell unlimited refills Retailers that employ 50 or more people (medium and large) including symbol groups	Retailers that sell pre-packed food and drink and OOH businesses that sell unlimited refills Businesses that employ 50 or more people (medium and large) including symbol groups	Retailers that sell pre-packed food and drink and unlimited refills. (Retail, OOH, online equivalents including online delivery) Seeking views on exempting businesses from location restrictions on the basis of employee number and/ or floor space.

Comparison of proposals

	England	Wales	Scotland
Online purchasing	Online locations: homepage, pop-ups, favourites, checkout or searching/browsing	Online volume promotion restrictions and online location promotion restrictions (e.g. pop-up page)	Online retail, OOH, wholesale outlets including home delivery services
Store size	185.8 square metres (2000 square feet)	185.8 square metres (2000 square feet)	<i>Seeking views on exempting businesses from location restrictions on the basis of employee number and/ or floor space.</i>
Exemptions	Specialist retailers exempt from location restrictions Non-prepacked products and OOH sector products	Specialist retailers exempt from location restrictions Non-prepacked food Close to use by date promotions	Specialist retailers exempt from location retailers Non-prepacked food



Questions for members:

- **Would you support alignment with England proposals?**
- **Any other comments?**

Advertising restrictions HFSS (UK-wide)

- Health and Care Bill gained Royal Assent on 28 April ([Health and Care Act 2022](#)) (FLC 225/22)
 - Powers to SoS to delay implementation of HFSS advertising restrictions

WHERE ARE WE?

- UK Government [announcement](#) on 14 May (FLC 262/22): UK-wide advertising restrictions delayed until 1 Jan.24
- CAP and ASA working on implementation guidance.
- CAP confirmed that additional restrictions in H&C Act will be ‘bolted on top’ of existing HFSS advertising rules

NEXT STEPS:

- Consultation on secondary legislation and enforcement – **exp. Imminently!**
- Ofcom to consult to appoint frontline regulator (exp. to be the ASA)
- ASA/CAP/BCAP to consult on guidance. Exp. Autumn 22.
- CAP guidance exp. Jan. 2023
- Restrictions exp. to come into force 1 January 2024.

England Food Strategy

- [Defra White Paper](#) published on 13 June (FLC 307/22)
- Responds to HD's independent reviews published in [2020](#) and [2021](#)
- Recognises the importance of UK food and drink manufacturing
- Action on health/diets shifted to **Health Disparities White Paper** (due later in 2022)
- Proposals based on 3 objectives: agriculture and secure food supply, healthy/sustainable/affordable diets and trade
- Key proposals:
 - Launching the **Food Data Transparency Partnership** - health, animal welfare and environmental outcomes – will consult on health metrics and explore similar approach on sustainability and welfare.
 - Publishing sustainable land use framework in 2023.
 - Consulting on GBSF (FLC 311/22) and improved food waste reporting (FLC 309/22).
 - Promoting farming to maintain domestic production and supporting research and innovation.
 - Supporting work on alternative proteins and gene editing.
 - Developing a 'What Works Centre' for on-farm innovation with agricultural sector and AHDB.
 - Working with industry on R&I to support net-zero in agriculture, soils and peat, waste and land use.
 - Strengthening FOPNL to support consumers to make informed and healthier choices.
 - Developing mandatory methodology for eco-labels.
 - Publishing a statement on the UK's SPS regime.
 - Review if COOL can be strengthened by mandating how and where information is displayed, e.g. FOP

England Food Strategy

OTHER IMPORTANT POINTS:

- No primary legislation required to take proposals forward
- Does **not** take forward HD's proposals on new salt or sugar taxes
- References 'junk food cycle' but does not endorse it
- More work needed on ultra-processed foods to determine their role in driving obesity
- Recognises shared responsibility of industry, Government and consumers to identify solutions to obesity problem.
- Healthier food environment incl. calorie and portion size reduction and new technologies, as well as consumers empowered to make healthier choices
- References previous models (e.g. 'responsibility deal') to create incentives for change – whilst noting Government role to create level playing field through regulation and unintended consequences of intervention (e.g. multipacks of sweets to reduce portion size)
- Recognises industry efforts in reformulation, but more is needed.
- Notes interconnection between nutrition and sustainability

AMBITIONS

Halve childhood obesity by 2030

Reduce the healthy life expectancy (HLE) gap by 2030

Add 5 years to HLE by 2035 and reduce the proportion of the population living with diet-related illnesses

Other areas
Ethnic disparities with disease and chronic conditions;
Smoking

Working with the food industry to create a healthier food environment

Randomized control trials to encourage and enable healthier and more sustainable diets

Strengthening the FOPNL scheme to support consumers to make informed choices

Transparency Partnership & how this will incentivise reformulation and promote healthier

With a focus on prevention and disparities by ethnicity, socioeconomic background and geography

FDF D&H and Nutrition

- **OHID Calorie Reduction Taskforce**

- Planned for September.
- FDF tasked to come up with proposals.
- **Member views? Is calorie reduction the way forward? Or broader remit?**



- **Reformulation: voluntary v. mandatory (FLC 299/22)**



- FDF paper from May on voluntary v. mandatory salt (and potentially others) reformulation targets.
- **Member views on?**
 - What are the pros and cons of a voluntary approach?
 - What are the pros and cons of a mandatory approach?
 - Which approach would best drive further reformulation?
 - If a mandatory approach was taken forward what should this look like?

- **FDF updated position on non-HFSS reformulation**

- Shift in diets must be successful and sustainable.
- Proud of progress, but sometimes not possible for technical reasons and also for consumer acceptance.
- Need to recognise positive reformulation that falls short of the NPM.

- **FDF work on the junk food cycle (FLC 352/22)**

- FDF reviewing the 'junk food cycle' referenced in HD's independent report.
- Humans predisposed to consume calorie-dense foods so industry produces more.
- Potential impact on gut hormone feedback loops – bordering on addiction.

- **Government roundtable on 11 May – 'promoting healthy lives and economic recovery'**

- Covered rising obesity, worsening inequalities and the junk food cycle
- Encouraging meeting overall – intention to establish a working partnership with industry.
- FDF tasked to consider how industry can contribute to obesity reduction (see next slide).
- Some loss of traction due to Cabinet changes – next steps TBC.

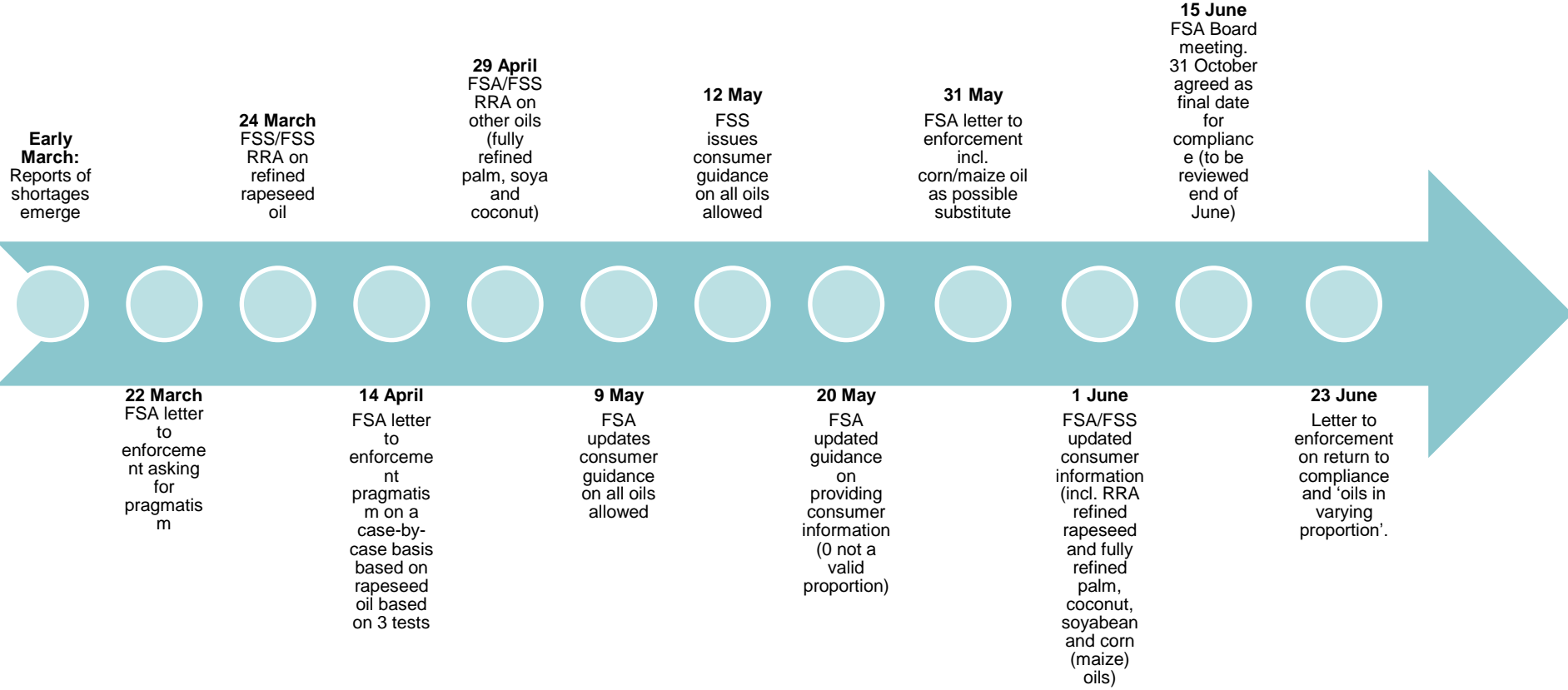
The Role of Food and Drink Manufacturers



Themes	Education <i>Amplifying health messaging to educate people about healthy lifestyles</i>	Nudging <i>Nudging consumers to healthier options and appropriate portion sizes</i>	Product Innovation <i>New product development and renovation to support healthier diets</i>	Data <i>Informing policy making to shift to a healthier food system</i>
Initiatives	Products – on pack messaging, recipe suggestions, portion sizes	Trials in store - supporting the Consumer Goods Forum and IGD trials to nudge consumers to healthier diets	Reformulation – adapting product recipes to reduce calories, sugars, salt and increase fibre, fruit and veg	Food Data Transparency Partnership – work with Government to develop appropriate metrics
	Communities – supporting initiatives in local constituencies / schools	'Good Choice' app - work with OHID to improve and scale up use of the app	Portion sizes – offering a range of appropriate portion sizes	
	Workplaces - workplace health and wellbeing programmes	Health incentives - work with OHID to scale up the pilot programme spearheaded by Sir Keith Mills	Fortification – mandatory and voluntary fortification to improve nutritional status of the population	
			Innovation hubs – share our expertise with innovation hubs across the UK to enable small businesses and entrepreneurs to innovate	

FOOD LABELLING & COMPOSITION

SUNFLOWER OIL - UKRAINE



SUNFLOWER OIL - UKRAINE

- **FSA Board Meeting 15 June**

- [Board meeting paper](#) 15 June
 - Acknowledges businesses have been acting responsibly in response to the crisis.
 - Proposed an end date for businesses to return to labelling compliance by 31 October to be confirmed by end of June.
- Board agreed to review 31 October deadline at the next FSA Board meeting in September.
- Acknowledgement by some that date is unrealistic given market volatility.

- **Latest announcement (23 June)**

- FSA working towards 31 October for return to compliance but date is under review.
- Return to compliance: *addressing substitution that results in the presence of undeclared ingredients in products.*
- Guidance on vegetable oils 'in varying proportion' from 20 May stands, but...
- *Packaging and labelling choices should be guided by the availability of vegetable oils alongside what each business can reasonably foresee being in its products.*
- Pragmatic enforcement will continue – incl. on rules on grouping veg. oils – but should be agreed on a case-by-case basis.
- Other mitigations should also be considered, e.g. inkjetting, overstickering, point of sale.
- FSA website [updated](#) – outlines nutrient and sustainability profiles of different types of oil.

Allergen Labelling

- **PAL consultation (May contain)**

- Strong support for standardising wording and execution on PAL for pre-packed foods (97%)
- 'Not suitable for those with an allergy to [allergen]' was the preferred statement (not 'main contain')
- PAL should only be applied following risk assessment.
- Current guidance for business on the use of PAL is viewed as inadequate.
- Support for FSA voluntary standards on PAL use:
 - Specifying allergen(s)
 - Not to be used on a 'free-from' label for the same allergen
 - Should only be used when there is unavoidable risk of allergen cross-contact
- Support for standardising information on risk of allergen cross-contact within supply chains and setting allergen thresholds.
- **Next steps:**
 - FSA intends to develop a range of options which will enable food businesses to understand their responsibilities and the steps that they need to follow prior to providing PAL labels and information.

Clear support for standardised PAL statements for prepacked foods

A clear majority of all groups supported standardising the following elements of PAL:

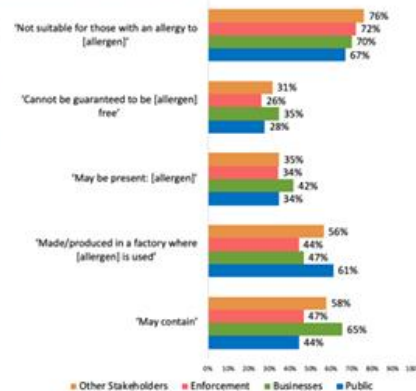
- PAL format for all prepacked foods (97%)
- Highlighted text (96%)
- Font size (90%)
- Location (89%)
- Font style (83%)
- Providing further information on why PAL is used (82%)



Support standardising PAL formats for prepacked foods

'Not suitable for' is the preferred PAL statement wording

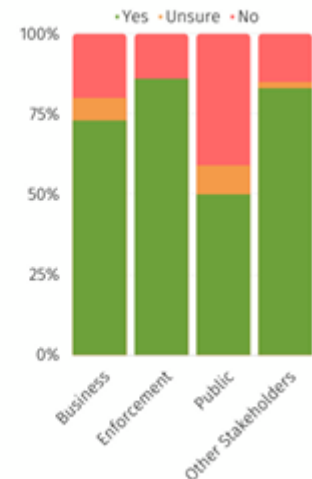
'Not suitable for...' was the most favoured wording for PAL statements across all groups.



Only apply PAL when risk is unavoidable

The majority of all groups stated PAL should only be applied following the application of a risk assessment.

This included 86% of enforcement respondents, 73% of businesses and 83% of other stakeholders



FDF FLL

- **EU FIC Revision:**

- FOPNL, COOL, date marking and nutrient profiles for health claims (in scope of Regulation 1924/2006)
- [Summary report](#) published in May.22 (FLC 246/22)
- JRC reports on FOPNL and COOL due soon.
- [EFSA scientific advice](#) on nutrient profiling for FOPNL and NHCs (also see [EFSA page](#))
- Proposals still expected Q4 2022.
- Nutriscore algorithm evaluation – proposal summer 2022.
- Updates on MS discussions: Ireland, Austria and France.

- **Environmental Labelling:**

- EU proposal proposals (under Framework on Sustainable Food Systems) exp. 2023.
- EU Green Claims Initiative proposal – delayed until end of 2022 (TBC).
- EC proposal on ‘empowering consumers for the green transition’ (amends UCPD and CRD).
- IGD Environmental Labelling Project – [trials by UK retailers](#).
- FDF position on Environmental Food Information and proliferation of schemes (FLC 316/22).



Consultation on imperial units (FLC 301/22)

- Runs from 3 June until 26 August.
- At present imperial units can be displayed alongside metric units (with less prominence)
- **Question for members:** *What would be the consequences of your business having the freedom to sell products in imperial measures, if you wished?*
- FDF will respond against any weight changes for food labelling.

FDF FLL

- **Vegan/vegetarian and plant-based labelling:**
 - Enforcement opinion on dairy designations progressing – meat one parked.
 - ISO Standard in development – BSI Mirror Group – publication exp. Aug. 2023.
 - UK Vegetarian Society changed position on products containing shellac.
- **Bread and Flour Regulations:**
 - 12-week BFR consultation exp. Summer or Later in 2022
 - Legislation exp. 2023 – implementation period TBC.
- **Period of adjustment for labels post-Brexit**
 - Incl. FBO name and address and COOL (e.g. EU/Non-EU)
 - End date still 30 September 2022 but possibly delayed to end of 2023 (in line with import controls)
 - Legislation needed to allow postponement.
 - Defra unable to provide an update.
- **FLL UK/EU Labelling Divergence Tracker**
 - Live [document](#) maintained by FLL Committee tracking UK/EU regulatory divergence.
 - Other committees also working on similar trackers.
 - Interested members to contact Secretariat.

FOOD SAFETY

EU acrylamide legislation process

Commission is working on three key issues:

- review of the existing benchmark levels (BMLs)
- establishment of new BMLs
- establishment of maximum levels (MLs)



Acrylamide other developments

EFSA review of 'Eisenbrand' study

- 'Assessment on genotoxicity of acrylamide', published 5 May 2022.
- Based on the new data evaluated, the MOE approach is still considered appropriate, and an update of the 2015 Opinion is not required at the present time.

FDE Impact assessment

- FDE working on collecting data to support an impact assessment (based upon an ESA/PPA questionnaire).

ESA and EUPPA data collection

- ESA and EUPPA call for 2021 data completed. Summary data being compiled.

FSA annual monitoring report

- Expected 'Autumn' 2022.

New genomic techniques

- Association of Applied Biologists Acrylamide Conference, held 23-24 May 2022, Kent, UK.
- PPA Board mtg at JIC, 26 September 2022.

3-MCPD and Glycidyl esters

Food	Suggested ML for glycidyl esters (µg/kg)	Suggested ML for sum of 3-MCPD and 3-MCPD esters (expressed as 3-MCPD) (µg/kg)
Cereal based foods for infants and young children (including biscuits and rusks) – MLs apply to food as placed on the market	75	100
Baby food (Ready-to-eat meals for infants and young children)	15	25
Margarine and similar products	750	1250
Crisp bread	150	250
Biscuits, (cookies) including biscuits with filling	250	500
Crackers (cereal based- sticks salty)	150	500
Pastries and cakes	400	700
Mayonnaise/vegetable oil based sauces	300	500
Seasoning or extracts	500	1000
Supplements containing special fatty acids	400	750
Potato crisps / vegetable crisps	400	700
(Chocolate) spread	250	750
Instant noodles	750	750
French fries	250	400
Breakfast cereals	50	50

Consultation

- Launched on 2 December 2021; deadline 17 January 2022.

Forum

- Held on 23 February 2022. FDE presented on behalf of whole industry.

MS discussions

- Ongoing discussions with MS: 14 March, 28 June, September +
- German oil industry (OVID) symposium, 27-28 June.

Forum

- December 2022 (date TBC). Further consultation(s)?

Final texts?

- MLs anticipated for baby foods – still debate over other foods
- January 2023? Implementation date? Transition periods?
- WTO notification period (2-months).
- EP and Council scrutiny (3-months).

Glycoalkaloids in potatoes and potato-derived products

EU Monitoring Recommendation

[Commission Recommendation \(EU\) 2022/561](#) on monitoring the presence of glycoalkaloids in potatoes and potato-derived products was published in the Official Journal on 7 April 2022.

- The recommendation request that MS, with the **active involvement of food business operators**, should carry out investigations to identify the factors leading to levels above the **'indicative level' of 100 mg/kg as sum of α -solanine and α -chaconine in potatoes and processed potato products.**
- The recommendation also sets analytical requirements, and requests that data is to be submitted to EFSA by 30 June each year.

MYGLINKO project (Germany)

Tentative Timeline:

- 09/2022: Kick off meeting–Project presentation
- 02/2023: Presentation of first results (WP1 and WP2), choice of cultivars for WP3 and WP4.
- 11/2023: Presentation of results (WP1 and WP2), beginning of WP3
- 09/2024: Presentation of first results of WP3 and WP4, beginning of WP5
- 02/2025: Presentation of final results + final meeting

- EUPPA has issued a call for data: however, there are issues with the proposed test methods for the degradation products β - and γ - solanine and chaconine and the aglycon solanidine (availability of accredited laboratories). Also, historic data has not been sampled as per the Recommendation.
- ESA has agreed to co-ordinate a data collection activity with BDSI/LCI (sub-group to be set up to discuss issues).
- Belgian ALKAPO project (papers to be published) has detected high levels, particularly in potato crisps <https://fiwap.be/documentation/projet-alkapo/>

Other contaminants (1)

Contaminant	Detail
<p>Commission Recommendation (EU) 2022/553 on monitoring the presence of <i>Alternaria</i> toxins in food (published 6 April 2022)</p>	<ul style="list-style-type: none"> • Sets indicative values (not action limits). • Tree nuts, sunflower and sesame seeds, paprika powder, sunflower oil, cereals foods for infants and young children, dried figs, processed tomato products. • To inform future EFSA opinion.
<p>Commission Regulation (EU) 2021/1408 as regards MLs of tropane alkaloids in certain foodstuffs (published 30 August 2021)</p>	<ul style="list-style-type: none"> • Will apply from 1 September 2022. • Includes maize for popping (5.0µg/kg). • Foodstuffs lawfully placed on the market before 1 September 2022, may remain on the market until their date of minimum durability or use-by-date.
<p>Commission Regulation (EU) 2022/617 as regards MLs of mercury in fish and salt (published 13 April 2022).</p>	<ul style="list-style-type: none"> • Immediate application. • Includes salt (0.10µg/kg) [Aligns with Codex]. • Foodstuffs lawfully placed on the market before 1 September 2022, may remain on the market until their date of minimum durability or use-by-date.
<p>T-2 & HT-2: MLS for unprocessed and final consumer under discussion. Final vote in September 2022?</p>	<ul style="list-style-type: none"> • Lowering of TDI means shifting from Indicative Values to MLs. • JECFA also recently reviewed T-2 & HT-2. It's summary conclusions (combined with deoxynivalenol for a group TDI) suggest that they are aligned with the EFSA conclusions re exposure risk (2016).

Other contaminants (2)

Contaminant	Detail
DON (Deoxynivalenol): MLs for unprocessed and final consumer under discussion. Final vote in September 2022?	<ul style="list-style-type: none"> Includes MLs for various cereals and cereal snacks.
Ochratoxin A: New MLs and reduced levels for some existing products. Voted on 28 February, expected to be adopted by Commission in August 2022.	<ul style="list-style-type: none"> Notified to WTO for comments. Will apply from 1 January 2023. Last minute change to products containing significant oil seeds, vine fruit or nuts. (4µg/kg instead of 3µg/kg).
Commission Regulation 2021/1399 as regards MLs of ergot sclerotia and ergot alkaloids in certain foodstuffs (published 25 August 2021)	<ul style="list-style-type: none"> JECFA 2021 – lower AfRD than EFSA 2021 assessment in same year. Will assess lowering of the MLs for ergot sclerotia in unprocessed cereals with the exception of corn and rice – 1 July 2024 (review due in second half of 2023). Also milling products are due to be reviewed in 2024.
Hydrocyanic acid: New MLs. Voted on 28 February, expected to be adopted by Commission in August 2022.	<ul style="list-style-type: none"> Notified to WTO for comments. Will apply from 1 January 2023. Includes MLs for linseed and almonds.
Commission Recommendation (EU) 2022/495 on monitoring the presence of furan and alkylfurans in food (published 28 March 2022)	<ul style="list-style-type: none"> Includes potato based crisps and crackers. As with glycoalkaloids ESA has agreed to co-ordinate a data collection activity with BDSI/LCI (sub-group to be set up to discuss issues).

Chlorpropham (CIPC)

- **UK: Indications of movement from HSE on setting a temporary MRL (tMRL)**
[Email from Rachel Scrivens indicating she is now looking at the issue].
- EU: Via the 'Potato Value Chain' (PVC), occurrence data was collected, and a report submitted to the European Commission in December 2021.
- Current EU tMRL discussed at the EU Standing Committee (SCoPAFF) on pesticide residues (22-23 February 2022) and a draft text was presented for discussion as part of the subsequent meeting on 11-12 April 2022 (Member States were invited to submit their comments by 13 May 2022).
- The Commission has **proposed lowering the current tMRL (0.4mg/kg) in potatoes to 0.35 mg/kg**, based on the available monitoring data.
- EU Member States agree with the proposal and the modification to the tMRL will be included in an upcoming draft regulation – the Commission plans to put for vote most likely in September.
- The PVC has started a further data collection activity for this season. **So far two PPA members have provided data and a third is in the process of finalising their submission.**

1,4-DMN

UK Status:

- Despite the information received last year from the ECP, the application for full approval is apparently still 'live'.
- DormFresh received communications from HSE suggesting that more processing studies were required.
- A laboratory has been contracted to undertake the work and the preliminary results have been shared with HSE (June 2022).
- The results are positive in that they show that processing significantly reduces 1,4-DMN and its metabolites. Final results are expected imminently.
- Issue now is how quickly HSE can turn around the data and authorise the active (8-12 weeks lead time is required to ship materials to GB).
- PPA and supply chain has put pressure on Government to act quickly and ensure that devolved governments and (if required) the ECP can authorise with minimal delay.
- Industry meeting with Minister Victoria Prentis will take place on 5 July 2022. [NB: PPA still awaiting a reply from Minister Prentis to a related letter sent 26 May 2022].

Processing factors (pesticides)

Commission Information Note on Article 20 of Regulation (EC) 396/2005 on Processing Factors and Composite Food And Feed (published 22 February 2022)

LINK: https://ec.europa.eu/food/system/files/2022-02/pesticides_mrl_guidelines_proc_imp_sante-2021-10704.pdf

- Article 20(1) of Regulation (EC) No 396/2005 states that where MRLs are not set out in Annexes II or III for processed and/or composite food or feed, MRLs should be calculated taking into account changes in the levels of pesticide residues caused by processing.
- Article 20 gives the possibility to establish Annex VI for specific concentration or dilution factors, however Annex VI has not yet been established.
- Annex I on products of plant and animal origin to which MRLs apply also contains a category for processed food products. This category is also still empty.
- The aim of the note is not to establish EU harmonised processing factors or to set MRLs for processed food and feed.
- The intention is to provide guidance on how to implement the processing factors in a harmonised way, so that those established by one MS could be accepted by the others.
- The note also provides indications for FBOs, including importers from third countries, to prepare themselves and have the necessary information at hand if national authorities request further documentation during their official controls.

SUSTAINABILITY

Packaging Extended Producer Responsibility (EPR)

<p>Consultation (24 March – 4 June 2021)</p>	<p>PPA response:</p> <ul style="list-style-type: none"> • EPR proposal would impose unavoidable costs upon businesses who use flexible packaging (in addition to the Plastic Packaging Tax). • The projected cost to producers had increased dramatically since the previous estimate and when compared to models in other countries. • Strongly opposed the inclusion of litter management costs in full net costs to be paid by producers.
<p>Summary of consultation responses and Government response (published 26 March 2022)</p>	<ul style="list-style-type: none"> • Business payments dropped in favour of maintaining the current PRN system. • ‘Out of bin litter’ not included. • EPR implementation will be delayed until 2024 (full implementation 2025). • Chemical recycling not included. • Compostable and biodegradable packaging required to apply the ‘do not recycle’ label. • ONS has determined the eventual scheme administrator will be a public body. • All packaging types will be required to be labelled either ‘recycle’ or ‘do not recycle’ by 31 March 2026 (except for plastic films and flexibles by 31 March 2027). • Recyclable plastic film and flexible packaging to be collected for recycling from households and businesses across the UK by 31 March 2027.
<p>Guidance: Packaging waste: prepare for extended producer responsibility (published 7 June 2022)</p>	<p>Sets out basic requirements:</p> <ul style="list-style-type: none"> • Businesses in scope. • Reporting requirements. • Timescales.
<p>Scheme Administrator</p>	<p>Ongoing discussion and lobbying of Government (e.g., meeting with Jo Churchill Parliamentary Under Secretary of State at Defra, 6 July 2022)</p>

AOB

Risk Matrix

Food Issues Risk Matrix (March 2022)

Decreasing impact on business ↓

Risk Analysis	Current Issue Actions in hand Dynamic situation	Future Issue Plans in preparation	Managed issue Controlled/monitored Could reoccur Outstanding actions
Big Company Impact Cost Reputation Media	Acrylamide 3-MCPD/Glycidyl-Esters HFSS Advertising/Promotions restrictions Obesity - New Government strategy/Scotland/Wales/Northern Ireland Portion Size/Calories CIPC and 1,4DMN authorisation BREXIT/Devolution-associated issues/Regulatory diversion Packaging waste/Taxation/EPR/ Food waste Salt/Sodium reduction (2024 targets) FOPNL developments Loss of pesticide active substances Sunflower oil supply and substitutions (labelling)	Pesticides MRLs Furan Food taxation Collective loss of Fungicides Mandatory reporting for large businesses (National Food System Data Programme - NFS) Nutrient profiling (Ofcom model review UK)	
Moderate Impact Cost Material availability Working practice	Environment Act (implementation)/EU Farm to Fork Strategy Allergens (precautionary labels/vegan) Bread and Flour Regulations Review Nutrient Profiling (EU F2F Strategy/UK NPM Technical Guidance Update) Ultra-Processed Foods/Junk food cycle Glycoalkaloids National Food Strategy	Contaminants (T-2, HT-2) Eco-labelling	Sat Fat (Public Perception/media attention) Cadmium (only nuts and oil seeds) Contaminants (DON) Pack Fill
Small Impact Cost Materials Change	Flavourings reviews GBSF/CQUIN/Hospital Food Review Tropane alkaloids Plant-based/vegan and vegetarian definitions Sugars (popcorn)	Fluoride (EU)	Palm Oil (compound ingredients) Chlorates

New issue

Changed priority

Identified as a potential high-profile media issue

Dates of 2022 meetings

- **14 September 2022 TBC**
- **30 November 2022**

Meeting formats TBC

Members to express their preference by completing our [survey](#) (by 29 July**)**

ANNEX

CONSULTATIONS

Consultations - ongoing

Consultation	Closing date	Comments/status
<u>EC consultation on future legislative framework for Sustainable Food Systems</u>	21/07/22	ESA response TBC.
<u>FSA consultation on transitional arrangements for edible insects in GB</u>	10/08/22	No PPA response planned.
<u>FSA consultation on removal of the requirements to use the 'Do Not Eat' pictograph on active and intelligent food contact materials in GB</u>	10/08/22	No PPA response planned
<u>FSA consultation on proposed changes to national (England only) law in relation to EU Directives on animal feed, food contact materials and extraction solvents</u>	10/08/22	No PPA response planned
<u>Defra survey on dual regulatory regime in Northern Ireland</u>	15/08/22	Members encouraged to respond directly. PPA cannot respond.
<u>EC consultation on food waste targets</u>	16/08/22	EUPPA responding. ESA response TBC.
<u>Environmental Standards Scotland – draft strategic plan</u>	17/08/22	No PPA response planned.
<u>SG Delivering Scotland's circular economy: a consultation on proposals for a Circular Economy Bill</u>	22/08/22	No PPA response planned.
<u>SG Delivering Scotland's circular economy: a Route Map to 2025 and beyond</u>	22/08/22	No PPA response planned.

Consultations - ongoing

Consultation	Closing date	Comments/status
<u>EC consultation on proposal for a new Regulation on the Sustainable Use of Plant Protection Products</u>	22/08/22	ESA response TBC.
<u>OPSS/BEIS Consultation on choice of measurement: markings and sales</u>	26/08/22	PPA response TBC.
<u>WG Consultation on Healthy Food Environment (HWHW)</u>	01/09/22	PPA response TBC.
EC targeted consultation on provisions on sampling and analysis for control on compliance with MLs for mycotoxins and plant toxins in food	02/09/22	ESA response TBC.
<u>Defra Consultation on possible changes to public sector food and catering policy (GBSF)</u>	04/09/22	PPA response TBC.
<u>Defra Consultation on Improved food waste reporting by large businesses in England</u>	05/09/22	PPA response TBC.
<u>FSA/FSS call for evidence: Use of recycled plastic, originating from ocean-bound/cycle schemes and similar environmental collection, in food contact material products</u>	20/09/22	No PPA response planned.
<u>SG consultation on restricting promotions of food and drink high in fat, sugar or salt</u>	01/07/22	PPA response TBC.
<u>Defra consultation on contractual practice n the UK Pig Sector</u>	07/10/22	No PPA response planned.

Consultations - expected

Consultation	Exp.	Comments/status
DHSC consultation on secondary legislation/enforcement HFSS advertising restrictions	Jul.22	
Defra Bread and Flour Regulations	Later in 2022	

Last updated 17/06/2022

Consultations - closed

Consultation	Closing date	Comments/status
Defra Gene editing (England)	17/03/21	Govt. response published 29/09/21 .
Defra changes recognition clauses (England) (BFR)	22/03/21	Govt. response published 29/07/21 .
Defra Draft Policy Statement on Environmental Principles	02/06/21	Environmental Act published 10/11/21 .
Extended Producer Responsibility (UK-wide)	04/06/21	PPA response. Government response published 26/03/22
Defra Introducing a Deposit Return Scheme (England)	04/06/21	No PPA response as not applicable. Govt. response exp. Q2 2022 .
Defra Consistency of household and business waste collections (England)	04/07/21	Gov. response exp. Q2 2022 .
CMA Draft guidance on environmental claims	16/07/21	Final guidelines published Sep.21
HMRC Plastic Packaging Tax: draft secondary legislation consultation	17/08/21	FDF response. Consultation response TBC
EA Review of the water industry national environment programme (WINEP)	16/09/21	Govt. response published 13/12/21 .
BEIS Reforming the framework for better regulation	01/10/21	Consultation response published 31/01/22 (through The Benefits of Brexit).

Consultations - closed

Consultation	Closing date	Comments/status
<u>FSS Food composition standards review</u>	12/10/21	PPA contribution through FDF. Consultation response TBC .
<u>FSA Wales Proposed amendment of the Mutual Recognition clauses in certain domestic food legislation in Wales</u>	28/10/21	<u>Summary of responses</u> published 15/12/21 .
<u>EA Review of Charges for Water Resources</u>	10/11/21	Govt. <u>response</u> published 09/03/22.
<u>SG Agricultural transition in Scotland</u>	17/11/21	No PPA sector-specific response. Consultation response TBC
<u>Northern Ireland Food Strategy Framework</u>	19/11/21	No PPA response. Consultation response exp. 2022
<u>Defra Consultation on 'A Plant Biosecurity Strategy for Great Britain'</u>	30/11/21	Consultation response 05/04/22
<u>HMRC Technical consultation on Plastic Packaging Tax (General) Regulations 2021</u>	01/12/21	PPA response submitted. Consultation response TBC
<u>SG Local food for everyone – a discussion: consultation</u>	02/12/21	No PPA response. Consultation response TBC

Consultations - closed

Consultation	Closing date	Comments/status
Defra Call for evidence on Labelling for Animal Welfare	06/12/21	PPA contribution through FDF. Consultation response exp. Jun.22
FSA NI Consultation on proposal to allow flour millers to place unfortified flour on the NI market, subject to it being destined for countries outside the UK, or used in products destined to be sold outside of the UK	06/12/21	PPA contribution through FDF. Consultation response TBC
Targeted Stakeholder Commission consultation on monitoring recommendation of the presence of glycoalkaloids in potatoes and potato-derived products	09/12/21	ESA lead. PPA contribution through FDF. EC recommendation (2022/561) published 06/04/22.
HSE Formulation Guidance for PPP Ecotoxicology risk assessments	13/12/21	No PPA response. Consultation response TBC
BEIS Call for evidence – Combined Heat and Power (CHP)	20/12/21	Summary of responses published 28/03/22 .
Defra Moving the abstraction and impounding licensing regime into the Environmental Permitting Regulations	22/12/21	No PPA response. Consultation response exp. Summer.22
EFSA Consultation on draft scientific opinion on the development of harmonised FOPNL and the setting of nutrient profiles for restricting nutrition and health claims	09/01/22	EFSA opinion published 19/04/22 .

Consultations - closed

Consultation	Closing date	Comments/status
Defra Consultation to reform the Agriculture and Horticulture Development Board	10/01/22	No PPA response. Consultation response 08/03/22
Targeted Stakeholder Commission consultation on 3-MCPD esters and glycidyl fatty esters MLs in foods	17/01/22	ESA lead. PPA response through ESA. Ongoing work.
DAERA Environment Strategy Consultation	18/01/22	Summary of responses published 28/03/22 .
EC consultation on recycled plastic in food packaging	18/01/22	FDF response. Ongoing work.
EC Targeted Stakeholder Commission consultation on dioxins and dioxin-like PCBs	21/01/22	ESA lead. Ongoing work.
EC Targeted Stakeholder Commission consultation on BMLs and MLs for acrylamide	21/01/22	ESA lead. Ongoing work.
FSA consultation on the review of retained Regulation 2016/6 on importing food from Japan following the Fukushima nuclear accident	11/02/22	Summary of responses published 21/04/22
Consultation on proposals to ban commonly littered single-use plastic items in England	12/02/22	No PPA response. Consultation response TBC

Consultations - closed

Consultation	Closing date	Comments/status
<u>Defra Call for evidence on commonly littered and problematic plastic items</u>	12/02/22	No PPA response. Consultation response TBC
<u>DAERA Independent strategic review of NI Agri-Food Sector</u>	23/02/22	No PPA response. Consultation response TBC
<u>EC consultation on revision of Reg. (EU) 1169/2011 on food information to consumers</u>	07/03/22	Summary of responses published on 03/05/22 .
<u>EC consultation on facilitating healthier food choices – establishing nutrient profiles</u>	07/03/22	Summary of responses published on 03/05/22 .
<u>Defra Implementing due diligence on forest risk commodities</u>	11/03/22	Government <u>response</u> published June.22
<u>FSA consultation on Precautionary Allergen Labelling (PAL)</u>	14/03/22	<u>Summary of responses</u> published 06/06/22 .
<u>BEIS consultation on Draft Vertical Agreements Block Exemption Order</u>	16/03/22	Government response published May.22
<u>EC consultation on imports of agricultural and food products – applying EU health and environmental standards</u>	16/03/22	Proposal adopted 03.06.22
<u>Defra consultation on ending the retail sale of peat in horticulture in England and Wales</u>	18/03/22	No PPA response. Consultation response TBC

Consultations - closed

Consultation	Closing date	Comments/status
<u>SG National litter and flytipping strategy consultation</u>	31/03/22	No PPA response. Consultation response TBC
<u>EFRA Committee call for evidence on Common Frameworks</u>	08/04/22	No PPA response. Consultation response TBC
<u>Defra Introduction of mandatory digital waste tracking</u>	15/04/22	No PPA response. Consultation response TBC
<u>DIT UK-New Zealand FTA: Trade and Agriculture Commission call for evidence</u>	22/04/22	No PPA response. Consultation response TBC
<u>2030 Strategic Framework for International Climate and Nature Action</u>	24/04/22	No PPA response. Consultation response TBC
<u>HMRC Call for Evidence: An independent customs regime</u>	02/05/22	No PPA response. Consultation response TBC
<u>Defra Nature Recovery Green Paper</u>	11/05/22	No PPA response. Consultation response TBC
<u>OHID Vitamin D: call for evidence</u>	15/05/22	No PPA response. Consultation response TBC
<u>HM Treasury: Online sales tax: policy consultation</u>	20/05/22	No PPA response. Consultation response TBC
<u>Defra 2030 Strategic framework for international climate and nature action</u>	21/05/22	No PPA response. Consultation response TBC

Consultations - closed

Consultation	Closing date	Comments/status
<u>Defra consultation on reforms to PRN and PERN system and operator approval</u>	21/05/22	No PPA response. Consultation response TBC
<u>Defra – Tenant Farmers to share their views</u>	30/05/22	No PPA response. Consultation response TBC
<u>Developing the UK Emissions Trading Scheme (UK ETS)</u>	17/06/22	No PPA response. Consultation response TBC
<u>DIT Trade with Switzerland</u>	22/06/22	No PPA response. Consultation response TBC
<u>Defra Environment Act 2021: environmental targets</u>	27/06/22	No PPA response. Consultation response TBC
<u>SG call for evidence on single-use food containers and other commonly littered single-use items</u>	30/06/22	No PPA response. Consultation response TBC
<u>SG Mandatory calorie labelling in the OOH sector in Scotland</u>	01/07/22	No PPA response. Consultation response TBC
<u>FSA/FSS: Amendments to Retained Regulation 2019/1793 on controls applied to imported food and feed not of animal origin</u>	07/07/22	No PPA response. Consultation response TBC
<u>FSA Enhanced Investigatory Powers for the Food Standards Agency (FSA)</u>	18/08/22	No PPA response. Consultation response TBC

GBSF consultation

- Defra [consultation on proposals for changes to the GBSF](#) published 9 June (FLC 311/22)
- Main objectives:
 - **Promote procurement of local, sustainable, healthier food and catering**
 - Open up to wider range of companies, incl. SMEs
 - Increase transparency
 - Improve guidance (simple, evidence-based and aligned with broader Government policy).
- Main proposals:
 - Broader scope: food sourcing, healthier/sustainable menu choices and sustainable catering
 - Making GBSF mandatory across all public sector organisations
 - Recommendation that it also applies to retail settings on public sector premises (although not mandatory)
 - New target that 50% spend on locally-produced or certified to a higher standard (20% of which must be certified to higher standard) –multi-ingredient products: at least 50% must be produced/grown locally.
 - New requirements for soya and soya products and updated standards on palm oil – to be “demonstrably legal and sustainable”
 - New data reporting requirements
 - Nutrition standards revisited to support consumption of fruit/veg consumption and increase fibre consumption

NEXT STEPS:

 **Members to provide any initial views to PPA by 15 July – to gauge interest in PPA responding.**

- Consultation closes on 1 September



PPA Call for data – salt and sugar

REMINDER for members to please send in their data on salt and sugar:

SALT:

- Top 5 selling products for standard potato crisps, pelleted snacks, salt and vinegar products and flavoured nuts
- Top **10** selling products for extruded and sheeted snacks
- Top 5 selling products for savoury (incl. sweet and salty) and sweet popcorn
- Top 5 selling products for chips with coatings; waffles, potato shapes and hash browns and wedges, mash and others

SUGAR:

- Top 5 selling products for sweet popcorn

- As sodium (in g)
- Excludes retailer brands
- Excludes multipacks – only individual products
- Use salt and vinegar tab for salt and vinegar products
- Only one entry per product (exclude different pack sizes of the same product)
- Use Excel templates provided – error on template
- **By 8 July 2022**

Final report on 2020 sugar targets

Exp. In the Summer.22

Allergen Labelling - Codex

- Review of the GSLPF and guidance on PAL
- Based on scientific advice provided FAO/WHO (FLC 249/22)
- Ongoing consultation – ends 8 July
- Proposed changes to GSLPF include:
 - only immune-mediated hypersensitivities (e.g. IgE-mediated) and coeliac disease should be included on the list of foods and ingredients included in section
 - Amended priority list:
 - Cereals containing gluten (i.e. wheat and other *Triticum* species, rye and other *Secale* species, barley and other *Hordeum* species and their hybridized strains) and products of these;
 - Crustacea and products of these;
 - Eggs and egg products;
 - Fish and fish products;
 - Peanuts and products of these;
 - Milk and milk products;
 - Sesame and sesame products;
 - Specific tree nuts, i.e. almond, cashew, hazelnut, pecan, pistachio and walnut, and products of these.
 - Further considerations on buckwheat, celery, lupin, mustard, soya, oats, lactose and sulphite and other nuts (e.g. Brazil nut, macadamia, pine nut)
 - Pulses, insects and kiwi fruit to be included in watch list.
- Consultation also considers whether to retain current labelling exemptions based on the level of processing, labelling format