

# PPA Food Law and Consumer Committee Meeting

**Chair: Catharine Hall**

21 March 2024

# Agenda

<b>1) Welcome and anti-trust statement</b>	14:00-14:05
<b>2) Minutes/action list</b>	14:05-14:10
• Minutes PPA FLC 22 November 2023 (FLC 105/24)	
<b>4) Committee matters</b>	14:10-14:25
• FDF Associations meeting	
• Committee priorities for 2024	
<b>5) Updates and discussions:</b>	
• <b>Nutrition &amp; Health</b>	14:25-14:50
• England and DA updates on HFSS promotional restrictions	14:25-14:30
• UK-wide HFSS advertising restrictions	14:30-14:35
• OHID Y1 calorie reduction programme progress report	14:35-14:40
• Other Diet and Nutrition updates (incl. FDF DHC and NWG)	14:40-14:50

# Agenda

- **Labelling and Composition** 14:50-16:15
  - Bread and Flour Regulations review 14:50-15:00
  - FSA Food Hypersensitivity Programme – Ben Rayner (FSA) 15:00-15:30
  - Windsor Framework, Not for EU and BTOM – George Hyde (FDF) 15:30-16:00
  - Other labelling, composition and regulation updates (incl. FDF FLL) 16:00-16:15
- **Food Safety** 16:15-16:35
  - Mineral oils
  - Glycoalkaloids
  - CIPC
  - Other food safety updates (incl. DON, T-2/HT-2, Acrylamide, 3-MCPD and glycidyl esters)
- **Sustainability** 16:35-16:45
  - EPR update
  - UK food waste reporting 16:35-16:45

# Agenda

- UK Forest Risk Commodities Regulation

<b>6) Risk Matrix</b>	16:45-16:55
<b>7) AOB</b>	16:55-17:00
<b>8) Next meetings/Close</b>	17:00

# Matters arising - FLC 22 November 2023

Action	Status
<b>Secretariat</b> to continue discussions with <b>members</b> to agree <b>priorities for 2024</b> .	Ongoing – to be discussed later
<b>Secretariat</b> to propose changes to <b>Media Monitoring guidelines</b> and circulate draft to members for feedback and discussion.	Completed. MM feedback received and guidelines updated Feb.24 (FLC 075/24)
<b>Secretariat</b> to raise the following key issues at the next <b>FDf Associations Meeting</b> (in addition to other topics already raised incl. HFSS/LHF, UPF, Windsor Framework): Intra-UK Regulatory Divergence, Precision Breeding and Acrylamide and GB imports (TOM/BTOM).	Completed
<b>Secretariat</b> to share with members <b>GSO Guidelines on Salt Limits in Food Products</b> (pending confirmation of permission)	Completed. Unable to progress. Restricted circulation.
<b>Members</b> to send any <b>feedback on the implementation of the HFSS placement/location restrictions to Secretariat</b>	No input received.
<b>Members</b> interested in the <b>FSA NI event</b> on 12 March 2024 on <b>healthier and sustainable vending</b> in the public and private sectors to contact Secretariat	Completed.
<b>Secretariat</b> to investigate <b>if FDF</b> is collecting data on <b>uptake of green lane and any issues</b> being faced by manufacturers	No FDF data on uptake of green lane. Completed.
<b>Secretariat</b> to send link to <b>webinar on TOM/BTOM to members</b> (only if relevant to members' products)	Completed (23/11)
<b>Members</b> to send any initial comments on the <b>DBT call for evidence on Better Regulation</b> to the Secretariat <b>by no later than 1 December</b> .	Completed. PPA submitted response on 11/01 (FLC 11/24)

# Matters arising - FLC 22 November 2023

Action	Status
<b>Members</b> to refer to final <b>food safety and sustainability slides</b> and relay any <b>questions</b> to the Secretariat.	Completed.
<b>Secretariat</b> to revise <b>Issues Matrix</b> as discussed at the meeting and circulate to members for approval.	Completed on 05/12/23 (FLC 420/23).
<b>Secretariat</b> to issue a <b>Doodle poll</b> with proposed dates for <b>FLC meetings in 2024</b>	Completed on 05/12/23. Dates confirmed on 11/01 (FLC 012/24) and July date confirmed 29/02 (FLC 105/24)
<b>Members</b> are invited to provide suggestions of <b>external speakers for the 2024 FLC meetings</b>	None received. Roll over.

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

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

# COMMITTEE MATTERS

# Committee Matters

## FDF ASSOCIATIONS ADVISORY GROUP MEETING

- Meeting 4 December:
  - Elections and government, FDF Manifesto, UPF, EPR
  - Call for evidence on Smarter Regulation and FSA Regulatory Reform
  - Associations' priorities
  - AAG Structure
- Next meeting: 25 March – agenda incl.:
  - FDF key activities
  - Update on Diet & Health
  - FDF Strategy review
  - UK-wide 'Not for EU' labelling
  - Associations priorities

## PPA PRIORITIES FOR 2024

- Most members contacted – happy with PPA proposals
- Feedback on MM received and changes actioned (THANK YOU 😊)
- PPA to discuss proposals with remaining members and put together proposal for change before next meeting.

## FDF priorities raised at AAG

- Regulatory Divergence
- EPR
- UPF
- Labour/skills
- Mycotoxins T-2/HT-2
- Sustainability
- Energy costs
- Argot alkaloids
- Supply of raw materials
- Ammonia (no availability in UK)
- CMA report
- Glyphosate
- Acrylamide
- EU Deforestation
- Coeliac UK – price report
- Potato harvest



**MEMBERS: Any further topics?**

# PPA draft priorities 2024

- **Priority area 1: Protecting the reputation of processed potato products and savoury snacks (Reputation)**
  - PPA lead: HFSS, salt/sodium, sugar (popcorn only), calories, portion size, NPM (product-specific).
  - FDF leverage: UPF, Obesity strategies, FDTP Health, food taxation, FOPNL.
- **Priority Area 2: Protect the UK market of processed potato products and savoury snacks (Licence to trade)**
  - PPA lead: Acrylamide, 3-MCPD and glycidyl esters, Glycoalkaloids, furans, T-2/HT-2, DON, PFAS, MOAH/MOSH, CIPC monitoring, PPPs, Additives, flavourings and processing aids, supply chain issues (product-specific).
  - FDF leverage: EU/UK and intra-UK regulatory divergence, Windsor Framework, BTOM, labelling, allergens, BFR, regulated products (e.g., authorisation of additives, flavourings, novel foods, GM/GE, health claims), furan.
- **Priority Area 3 Helping to set realistic goals for sustainable production of processed potato products and savoury snacks (Sustainability)**
  - PPA lead: Flexible packaging, pack fill (product-specific).
  - FDF leverage: FDTP Eco, food waste, Eco-labelling, EPR, Simpler Collections, palm oil.



**MEMBERS: Any feedback?**

# NUTRITION & HEALTH

# 2023

# 2024

# 2025

# 2026 +

## Jan - Dec

## Jan - Mar

## Apr - Jun

## Jul - Sep

## Oct - Dec

## Jan - Mar

## Apr - Jun

## Jul - Sep

## Oct - Dec

## Jan - Dec

FDTP launched (Jan.23)

OHID Health Incentives Scheme (Feb.23)

Ofcom consultation on frontline regulator (Feb.23)

WG Summary of responses to consultation on food environment (Jan.23)

BNF position statement on UPF (Apr.23)

BNF roundtable proceedings on UPF (May.23)

WHO guidelines non-sugar sweeteners (May.23)

Salt Awareness Week (May.23)

SG response consultation HFSS promo (May.23)

BNF Healthy Eating Week (Jun.23)

REUL Bill Royal Assent (Jun.23)

WG announcement on HFSS advertising (Jun.23)

WHO/IARC review carcinogenic sweeteners (Jul.23)

JECFA review aspartame (Jul.23)

WHO Guidelines on Fats and CHO Intakes (Jul.23)

Ofcom appoints frontline regulator (Jul.23)

SACN report on processed food and health (Jul.23)

DHSC consultation SI HFSS volume promo (Jul.23)

DHSC Framework Major Conditions Strategy (Aug.23)

Scottish Health Survey 2021 data on discretionary food (Aug.23)

SI delaying HFSS volume promos England (Sep.23)

2nd meeting FDTP health WG (Sep.23)

FDF Celebrating Food and Nutritive Week 20 (Sep.23)

NI consultation Obesity Strategy (Nov.23)

NCMP 2022/23 (Oct.23)

DHSC consultations on NHC (Aug.23)

ASA/CAP consultation guidance on HFSS advertising (Dec.23)

FDTP health consult group meeting (Nov.23)

Welsh CMO report (Nov.23)

England CMO report (Nov.23)

HoC Briefing Advertising to Children (Dec.23)

3rd meeting FDTP health WG (Dec.23)

SG roundtable HFSS promo restrictions (Dec.23)

NI consultation Obesity Strategy (Nov.23)

HoL Inquiry Committee Food, Diet & Obesity launched (Jan.24)

Govt. response BFR (incl. folic acid) (Jan.24)

4th meeting FDTP health WG (Feb.24)

OHID calorie reduction report (Feb.24)

HoL written call for evidence UPF/HFSS (Feb.24)

SACN review Vit D fortification (Early 2024)

WG HSCC Inquiry Prevention of ill health -obesity (Mar.24)

DHSC/DCMS Response to consultation secondary legislation/enforcement HFSS advertising (Early 2024 TBC)

ASA/CAP guidance on HFSS advertising (Mid. 2024)

NDNS Y12 (Spring.24)

DHSC Major Conditions Strategy (Spring.24)

England proposals FDTP Health (Summer.24)

SACN review UPF (Jun.24)

OHID report SDIL and milk-based/juices (2024 TBC)

New BFR (incl. folic acid) into force (Oct.24)

New BFR laid (incl. folic acid) (Summer.24)

OHID report SDIL and milk-based/juices (2024 TBC)

SG Good Food Nation Plan (End 2024)

SG Scottish Food Commission (End 2024)

NI DoH consultation action plan 'Healthy Futures' (Dec.24)

SG legislation on 'less healthy' food promos (Autumn.24 TBC)

NI DoH summary responses consultation Obesity Strategy (Summer.24)

EU Review Childhood Obesity Action Plan (Q3 24)

SG consultation on 'less healthy' food promos (Feb.24)

SG consultation draft Good Food Nation Plan (Jan.24)

HoL Inquiry Committee Food, Diet & Obesity report UPF/HFSS (Nov.24)

UK HFSS advertising restrictions DHSC guidance (Q1 2025)

NDNS urinary sodium analysis (2025)

OHID report on salt targets (2025 TBC)

OHID 2nd calorie reduction progress report (Early 2025 TBC)

OHID 2nd report 2024 salt reduction targets (2026)

OHID final calorie reduction progress report (2026)

OHID final report 2024 salt reduction targets (2027)

UK HFSS advertising restrictions into force (Oct.25)

HFSS Volume Price Restrictions come into force in England (Oct.25)

OHID 2nd report 2024 salt reduction targets (2026)

OHID final report 2024 salt reduction targets (2027)

WG HFSS promo restrictions come into force (Autumn.25 - Spring 26)

WG HFSS additional restrictions added to regulations (By Spring.26)

SG HFSS promo restrictions come into force (Oct.25)

NI DoH response to consultation action plan 'Healthy Futures' (Spring.25 TBC)

EU Childhood Obesity Action Plan Follow up (2025 TBC)

Flour fortification with folic acid becomes mandatory (Oct.26 TBC)

England ban on on-pack volume price promo HFSS come into force (Oct.26)

OHID 2nd report 2024 salt reduction targets (2026)

OHID final report 2024 salt reduction targets (2027)

WG HFSS additional restrictions added to regulations (By Spring.26)

SG HFSS promo restrictions come into force (Oct.25)

NI DoH response to consultation action plan 'Healthy Futures' (Spring.25 TBC)

EU Childhood Obesity Action Plan Follow up (2025 TBC)

**TBC**

UK Govt. response FOPNL

OHID response 2018 NPM consultation

EU study on food taxes DGTAXUD

DHSC response Vit D

EU NPM review

EU Proposals FOPNL

Defra response to consultation on GBSF

WHO Food Systems-Based Dietary Guidelines

# 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
England volume/location promotional restrictions HFSS	Secondary legislation under FSA 1990	Main - Apr.19 Enforcement – Feb.21 Delay volume – Jul.23	Main – Dec.20 Enforcement – Jul.21 Delay volume – Sep.23	Dec.21 Delay volume – Sep.23 GUIDANCE: Apr.22	Location: Oct.22 Volume: Oct.25
UK-wide advertising restrictions LHF – 9pm watershed	Secondary legislation under new Health and Social Care Act	Main - Jun.19 Secondary/Enforcement – Dec.22	Main - Jun.21 Secondary/Enforcement – Early 2024	Health & Care Act: Apr. 22 Secondary leg.: TBC GUIDANCE: Q1 2025	Oct.25
UK-wide LHF advertising restrictions - online		Main – Dec.20 Secondary/Enforcement – Dec.22			
ASA/CAP guidance LHF advertising (UK-wide)	N/A	Dec.23	Mid.24	Mid.24	Oct.25
FoP nutrition labelling	TBC	Jul-Oct.20	TBC	TBC	TBC
WG Healthy food environment consultation	Secondary legislation under Food Safety Act 1990	Main - Jun.22 Additional HFSS restrictions – Spring/Summer 2024 Guidance – TBC	Main – Jun.23 Secondary/Enforcement – Q3 2024 TBC Guidance – TBC	Autumn 2024	Autumn 2025/Spring 2026 (same as England)
SG HFSS promo restrictions	Secondary legislation under Food Safety Act 1990	Main - July.22 2 <sup>nd</sup> – Feb.24	Main – May.23 2 <sup>nd</sup> – Q3 2024 TBC	2024 TBC	Earliest 2025
NI Healthy Futures		Main strategy – Nov.23 Action plan – Dec.24	Main – Summer 2024 Action plan – Spring 2025 TBC		

# Promotion restrictions (England and DAs)

## ENGLAND:

- Location/placement restrictions in place since 1 Oct.2022
- No new updates



## NEXT STEPS:

- Volume promo restrictions to come into force on **1 Oct. 2025**
- Transition period for on-pack volume promos until **30 Sep. 2026** (confirmed in guidance)

## WALES:

- **NEW:** WG to implement same restrictions as England later in 2024
  - 12–18-month transition
  - Additional restrictions (e.g. meal deals, TPRs) to be consulted on and added at later stage
  - Informal consultation FDF (incl. 3 meal deal options – same as Scotland) (FLC 119/24)



**Members to respond to PPA by 28 March!**

## NEXT STEPS:

- WG to consult on additional restrictions (divergence) Spring/early Summer 2024
- Legislation exp. Autumn 2024
- Implementation exp. Autumn 2025/Spring 2026
  - Additional restrictions to be built into Regulation before May 2026 Senedd elections

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- **NEW:** WG Health and Social Care inquiry into the 'Prevention of ill health – obesity' (FLC 111/24).

# NEW: Scotland Promotion restrictions




- [Consultation Restricting Promotions of HFSS foods](#) published 27 February (FLC 099/24)

## DETAIL:

- Products:
  - 2-tier approach: pre-packed HFSS food and drink (2004/05 NPM) in categories in scope
  - Food categories mirror England – incl. both savoury snacks and potato products
- Types of promotions:
  - Price: multi-buys (e.g. BOGOF, 2 for £1, 50% extra free, incl. ‘on-pack’ promos), unlimited refills of soft drinks with added sugar, **TPRs** and **meal deals** (3 options: no HFSS, max. 1 HFSS or no discretionary food)
  - Locations: In-store (incl. checkout, aisle ends, entrances, covered external areas and **free-standing displays**) and online equivalent.
- Businesses:
  - Retail, **OOH**, wholesale and other businesses with > 50 employees, and online equivalent, incl. aggregators or delivery apps.
  - Exemptions for wholesale outlets (trade-only), charitable activities, care homes and schools. Specialist businesses and stores with a relevant area < 2,000 square feet exempt from location restrictions.
- Other:
  - Enforcement via Compliance Notices by local authorities
  - 12-month transition (+ extra 12 months for on-pack promos)
  - Guidance being developed

## NEXT STEPS:

-  Consultation closes **21 May** – PPA to draft response
- **Members to submit initial comments by 12 April**
- Consultation response exp. Q3 2024 earliest
- Implementation by **Q3 2025 the earliest**

	<b>England</b> See <a href="#">Implementation guidance</a> for further information	<b>Wales</b> See <a href="#">announcement</a> - awaiting further consultation	<b>Scotland</b> <a href="#">Under consultation until May 2024</a>
<b>Price / Volume Promotions in Scope?</b>			
Multibuys	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>
Extra free	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>
Free refills SSB in OOH	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>
Limits on portion size SSB in OOH	<b>No</b>	<b>Yes *</b>	<b>No</b>
Temporary price reductions	<b>No</b>	<b>Yes *</b>	<b>Yes</b>
Meal deals	<b>No</b>	<b>Yes *</b>	<b>Yes</b>
<b>Locations in Scope?</b>			
Store entrance and covered outside areas	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>
End of aisle including free standing display units within 50cm of end of aisle	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>
Free standing display unit	<b>No</b>	<b>Yes *</b>	<b>Yes</b>

Source: FDF (DHC meeting 06/03)

**\* PPA UPDATE (15/03) - Wales to go progress with same approach as England initially, and consult on these measures in Spring/early Summer 2024**

# NEW: Northern Ireland Obesity Strategy



- Consultation on new Obesity Strategy – [Healthy Futures](#) launched 24 November 2023 (FLC 413/23)
- Consultation closed 1 March – PPA response submitted 13 February (FLC 073/24)

## DETAIL:

- High-level proposals for intervention over life course on a ‘whole systems approach’
- Proposals based on specific themes: ‘Healthy Policies’ the most relevant, incl.:
  - Work with UK Government to further **restrict the broadcast advertising HFSS (incl. saturates) food**
  - Consider powers to **further reduce the marketing, promotion, packaging, and advertising of HFSS food**
  - Consider NI and UK nations’ policies on **price and place promotions of HFSS food**
  - Work with the UK nations to review and **enhance front of pack nutritional labelling on pre-packed products (monitor EU)**
  - **Increase the scale and breadth of reformulation** to produce healthier food lower in calories, saturated fat, sugar and salt
  - Expand the use of nutritional standards to ensure that **procurement and contracting in the public sector** supports the purchasing and selling of healthier food and drink.
- Mention of UPF - although no action on UPF

## NEXT STEPS:

- Summary of responses exp. Summer 2024.
- Consultation on action plan for ‘Healthy Futures’ strategy exp. Dec.24

# LHF advertising restrictions (UK-wide)



- [ASA/CAP consultation](#) on guidance launched Dec.23 (FLC 430/23)
- Closed 7 February 2024 – PPA support to FDF and AA responses (FLC 062/24)

## MAIN POINTS FDF RESPONSE:

- Further information on branding, e.g. ‘range of products’ vs an ‘identifiable product’.
- More clarity on ‘sufficient prominence’ and commercial partnerships and liability
- Suggestions on supporting resources to assist implementation.
- Supports AA and the ISBA positions on more technical matters.

## NEXT STEPS:

- **NEW:** DHSC response to consultation on secondary legislation – now exp. Spring.24?
- ASA/CAP guidance publication mid. 2024
- DHSC category guidance – Feb.25 TBC
- Regulation exp. to come into force – 1 Oct. 2025 (under a new Government)

# NEW: OHID calorie report

- OHID year 1 [calorie reduction progress report](#) 2017-2021 published 15 February (FLC 081/24)
- Member product [targets](#):
  - Chips and potato products: 10% by 2024
  - Crisps and savoury snacks: 5% by 2024





















## MAIN POINTS

- Covers manufacture, retail and OOH
- Limited progress
- Total calorie content (SWA) crisps and savoury snacks decreased by 0.6%
- Chips and potato products increased by 2%
- Apart from complete main meals and garlic cheesy bread, proportion of all products meeting max. calorie guidelines decreased
- Increase of sales volumes and total product calories in 7 out of 8 categories
- Acknowledgement of impact of Covid-19 on data collection and results
- Timeframe for delivery of reduction targets **extended until end of 2025**
  - **Also applicable for 20% sugar reduction targets**
- Government to consider 'other levers' if progress not made by 2025.



**Are members working towards calorie reduction programme?**

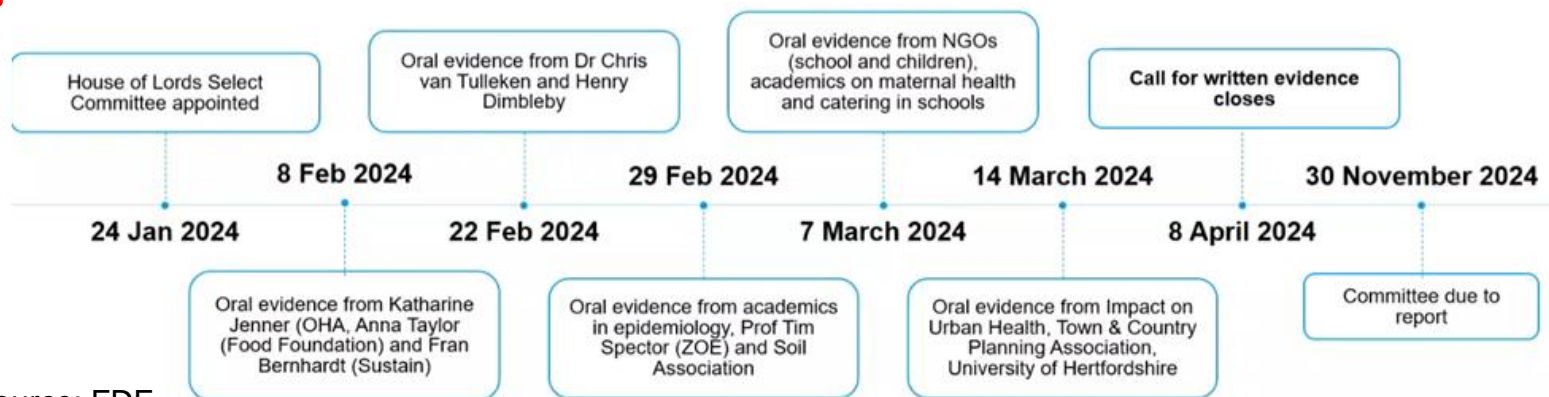
# OHID calorie report

	chips and potato products		crisps and savoury snacks		Largest decrease		Largest increase
Total calories (SWA)	+2.0% 		- 0.6% 		-2.4% (garlic cheesy bread) 		+10.4% (family meals) 
Calories per single serve (SWA)	+2.1% 		-1.0% 		-7.8% (garlic cheesy bread) 		<b>+2.1%</b> (chips and potato products) 
Single-serve products meeting max. calories	-6.3% 		-9.4% 		<b>-9.4%</b> (crisps and savoury snacks) 		+3.3% (main meals) 
Volume sales	+15.2% 		+25.9% (2 <sup>nd</sup> highest) 		-3.0% (main meals) 		+26.8% (garlic cheesy bread) 
Calories sold	+17.4% 		+25.3% 		-2.3% (main meals) 		<b>+25.3%</b> (crisps and savoury snacks) 

# OTHER DIET & NUTRITION

## UPF

- **NEW:** [House of Lords Food, Diet & Obesity Committee](#) work on UPF
  - Report on role of UPF and HFSS food and drink in a healthy diet and impact on health outcomes
  - Shifts in behaviours and trends, impact of government policy and the role of industry.
  - Final report due on 30 November 2024
  - Evidence sessions [08/02](#), [22/02](#), [29/02](#), [07/03](#), [14/03](#), 21/03 and 25/03
  - [Call for evidence](#) – closes 8 April (FLC 086/24):
    - Definitions UPF and HFSS
    - Consumer understanding, role of labelling, packaging and advertising
    - International policy and practice and effectiveness of government policy
    - Future policy tools
  - **Members are invited to send initial comments by 25 March**



Source: FDF

# OTHER DIET & NUTRITION

## UPF

- [Nesta](#) report
- [Bite Back](#) report
- [BJN study](#) on UPF vs traffic lights
- [The Times Health Commission](#) report
- [EIT Food](#) study on consumer perceptions of UPF
- BMJ umbrella [review of epidemiological meta-analyses](#) on UPF exposure and adverse health outcomes
- FDF re-considering UPF strategy in the UK

## FDTP:

- [Meetings](#) 1 December and 29 February
- Ongoing discussions on health metric options
- FDTP proposals expected in **Summer.24**

## Enforcement of NHC:

- [Nutrition and Health Claims \(England\) \(Amendment\) Regulations 2024](#) laid 20 February
- Improvement Notices for NHC breaches instead of criminal prosecution
- Comes into force **1 October 2024**
- [WG response](#) published 6 February – but still no legislation – exp. come into force **1 October 2024**
- UK-wide SI on revocation of redundant tertiary legislation on Health Claims **exp. Summer.24**

# OTHER DIET & NUTRITION

## Europe Beating Cancer

- Updated [implementation roadmap](#) on 26 February:
  - Evaluation of 2014-2020 EU Action Plan on Childhood Obesity – results **exp. Q3 2024 – potential follow-up actions 2025**
  - Proposal for mandatory **FOPNL** – will remain **at IA stage throughout 2024**

## EP report on NHC Regulation

- Adopted in plenary on 18 January
- Not legally-binding – EC may accept reco or not
- Reco for EC to progress work on nutrient profiles for NHC and mandatory harmonised FOPNL
  - EC may consider re-presenting proposals after EU elections in June.24
- Reco for EC to set up knowledge network for enforcement discrepancies, update guidance, consider health claims in online comms and reconsider ‘on-hold’ health claims and botanicals

# FSA Hypersensitivity Programme update

**Ben Rayner**

**Food Hypersensitivity Team Leader (FSA)**



Ben Rayner, FSA



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## Provision of allergen information in the non-prepacked sector

FSA are considering ways in which the provision of allergen information in the non-prepacked sector could be improved.

Our research has shown that:

### People with food hypersensitivity:

- Strive for a “normal experience” when eating outside the home
- prefer written information supported by verbal communication

### Food Businesses:

- Prefer a conversation to take place and feel the need to treat people with a FHS differently to ensure their safety



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## Provision of allergen information in the non-prepacked sector

### Key activity

- FSA Board agreed revised policy for provision of allergen information
- Food Law Codes of Practice: Food standards controls - specific 'Allergen Information' risk factor introduced
- Best practice guidance for FBOs
- FSA free-to-use on-line allergen training promoted through main aggregators



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## Precautionary allergen labelling (PAL)

PAL refers to voluntary food labels to help manage and communicate the risk of reaction to allergens that could be unintentionally present within a food product.

We have gathered a wealth of evidence on PAL over the past 3 years:

### **Consumers**

Consumers find PAL confusing and vague – overall they want PAL statements on food products to be trustworthy, meaningful, and to enable them to understand the risk that that is being conveyed.

### **Food businesses**

There are a range of barriers to the effective application of PAL - generally, the smaller the business, the greater the challenge in applying PAL.

- PAL is inconsistently applied by food business and is confusing to consumers
- We have gathered evidence and improved existing advice provision
- We want and develop a single system for applying PAL

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## Precautionary allergen labelling

### Key activity

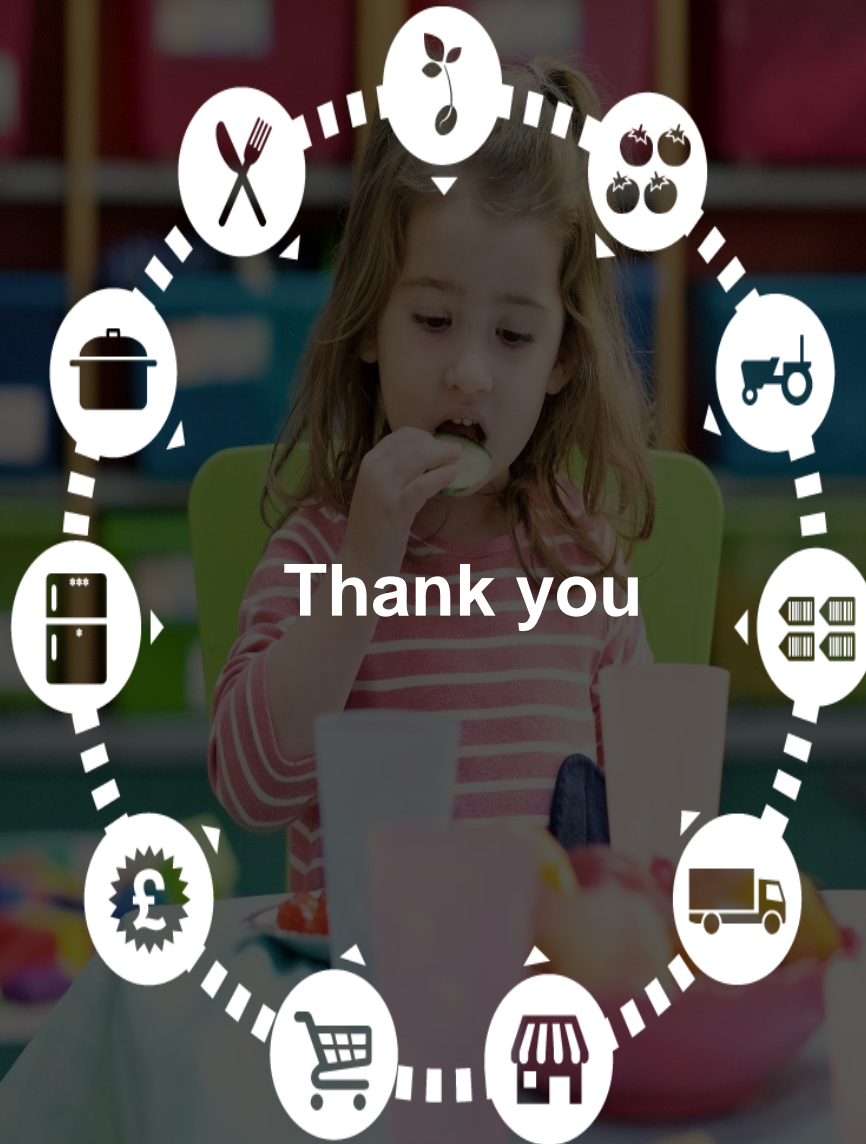
- Updated and improved guidance for business:
  - [New best practice standards for businesses](#)
  - Worked with trade bodies to [update guidance](#) for their members
  - Produce a [PAL checklist](#) for smaller business
- Consumer research and [information campaigns](#)



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## Codex Committee on Food Labelling (CCFL)

- Codex Alimentarius Commission is an international body which establishes food standards to protect the health of consumers and promote fair trade
- UK food law is aligned with Codex standards
- The UK is an influential, and engaged member of Codex
- [Ad hoc Joint FAO/WHO Expert Consultation on Risk Assessment of Food Allergens](#)
- Key current activity is to gather UK stakeholder responses to proposed draft PAL guidelines in advance CCFL48



Thank you

# Windsor Framework, 'Not for EU' and BTOM

**George Hyde**  
Trade Policy Manager (FDF)

# PPA Trade Update

**21/03/24**

**George Hyde**  
Trade Policy Manager  
[george.hyde@fdf.org.uk](mailto:george.hyde@fdf.org.uk)

1. GB wide 'Not for EU' consultation (Summary and Next steps)
2. NIRMS
  - a) Enforcement and Compliance
  - b) Labelling issues and next steps
3. The UKIMS Customs Green Lane
4. Safeguarding the Union (31/01/2024)
5. Border Target Operating Model (BTOM)
6. Discussion and Q&A

- Consultation closed on Friday 15<sup>th</sup> March, FDF response [here](#).
- Key points include:
  - Implementation cost impact (artwork etc.)
  - Ongoing/longer term cost impact (duplication of all aspects of the production process e.g. new processes and systems, new warehouse space, machinery etc)
  - False premise, misguided solution
  - Competitiveness of EU exports will be undermined
  - Reduced choice and higher prices
  - Huge uncertainty around products in scope, subject to evolving EU regulations
- Karen is meeting with the Cabinet Office Secretary for Northern Ireland, Steve Baker this afternoon
- Media stories with various publications including FT, Guardian, Times, Sunday Express
- Legal advice
- Devolved Opposition
- Alternative proposals

# Retail Movement Scheme (NIRMS)



- **Enforcement/Compliance updates from 1 March**
  - Spot checks in stores to check compliance with shelf level labelling requirements
  - Goods in scope of product level labelling refused entry
  - More permanent relaxations on box level labelling requirements
- **Further guidance expected soon**
  - Updates to packing list requirements to accompany the General Certificate
  - Further detail on phase 2 product level labelling requirements
  - Working through member queries for phase 3

# 'Not for EU' labelling timeline



	Product	Marking level
1 Oct 2023	Meat and certain dairy	Product level (i.e. no box or shelf needed)
	All other products	Box and shelf level
1 Oct 2024	All further 'dairy' products* <i>*UK wide labelling proposed to begin</i>	Added to product level and will no longer need box or shelf
1 July 2025	All further products except exemptions	Added to product level and will no longer need box or shelf
	Goods <b>exempt from official controls</b> (mostly shelf stable retail goods)	Remain on box and shelf level

# Exemptions from Official Controls (Composites)



- Certain products are exempt from Official Controls at BCPs – these are also the goods that **do not require product level labelling** in any of the three phases (instead have box and shelf level)
- This includes:
  - Certain shelf stable composites (**not containing processed meat**) listed in [EU Commission delegated regulation 2021/630](#) –
    - POAO ingredients originate from countries **authorised** and **listed** to export to the EU
    - Dairy in products must have been treated to become shelf stable at ambient temperature
    - Products must be securely packaged and labelled for human consumption

ex 2005 20 20

Potato chips and crisps suitable for immediate consumption **that meet the requirements of Article 3(1), point (a).**

- All other composite/POAO products will require product level labelling

# Exemptions from Official Controls



- Many other shelf stable products which do not require EHCs, phytosanitary certificates etc. **and do not contain POAO**
  - e.g. canned fruit and veg, flour, spices, vinegar, nuts, popcorn, crackers, tea, coffee, jams etc.
  - Frozen goods which do not contain POAO e.g. frozen chips, frozen peas
- According to OCR regulations, controls on these products are on a risk basis only and are conducted either at point of release for free circulation, place of destination or warehouse/premise of operator responsible for consignment
- Defra have indicated that where goods are subject to temporary controls (e.g. High Risk Food of Non-Animal Origin) these goods would require product level labelling as per the OCR regulations

# The Stages of SPS Control

## Documentary Control

e.g. health certificate



## Identity Control

e.g. truck registration, seal check, weight, number of packages, labels



## Physical Control

e.g. Hygiene, integrity of packaging, temperature, aspect of product

### Non-Retail Scheme

100%

### Retail Scheme

100%

### Non-Retail Scheme

Higher % in line with OCR regulations and risks to animal and plant health

### Retail Scheme

Starting at **10%** in October 2023, **8%** in October 2024 and **5%** in July 2025

### Non-Retail Scheme

Higher % in line with OCR regulations and risks to animal and plant health

### Retail Scheme

**No set level**, risk-based intervention only

# Safeguarding the Union

## Consent

- Legislative change: ending automatic pipeline of EU law - law which applies in Northern Ireland will be subject to the democratic oversight of the Northern Ireland Assembly through the **Stormont Brake** and the **democratic consent mechanism**
- Safeguards allowing democratically elected representatives in Northern Ireland to reject new or amending EU law.

## Monitoring

- Intertrade UK/Independent Monitoring Panel
  - to consider where the red lane is being used for trade that could legitimately be moved within the UK internal market systems.
  - advice to business to expand activities across the UK
  - internal Market Assessment of future regulatory changes
  - monitoring cases of UK/EU divergence (areas that fall outside of UK public health and consumer standards)

# The UK Internal Market Scheme (UKIMS)



- Customs Scheme replacing former 'UK trader scheme' from 30 September 2023
- No physical presence in NI is required – traders based anywhere in the UK can apply.
- No tariffs where they would ordinarily apply for a UK-Movement – e.g. goods not significantly transformed or processed in the UK or high in Rest of World content/ingredients
- Further customs simplifications to be rolled out in Oct 2024

## Oct 2023

- Physical presence in NI no longer required
- Movements not as risk where for sale or final consumption in NI.
- Increased processing threshold (from £500k to £2m)

## Oct 2024

- Full international customs requirements will no longer apply:
  - Reduced data (ordinary commercial data only)
  - No customs checks (except for risk based intervention)
  - No 80 field supplementary declaration
- Simple 'goods profile'
- Facilitations extend to parcels/e-commerce

# Border Target Operating Model



➤ THE BORDER TARGET OPERATING MODEL

# Key Dates and Timelines



## From 31 January:

- Documentary requirements introduced
- Pre-notification via IPAFFs where applicable

## From 31 April 2024:

- Introduction of documentary and risk-based identity and physical checks on medium risk products and on high-risk food and feed of non-animal origin from the EU.
- Low risk products must move via a BCP able to accommodate the type of commodity in the very unlikely event of risk-based intervention

## From 31 October 2024:

- Introduction of Safety and Security declarations for EU imports using a reduced dataset.
- Potential Introduction of the UK Single Trade Window to remove duplication across the different pre-arrival datasets (Safety and Security, SPS and pre-lodge customs declarations).

- Risk categorisation:
  - Seed potatoes/seeds are high risk
  - Potatoes are 'low risk' pending ongoing risk assessment
- Other updates:
  - We await details on Common User Charge at Government operated BCPs (estimated at £10 per low risk consignment (all the goods included under the same CHED))
  - Pre-notification derogations

# FOOD LABELLING, COMPOSITION & REGULATION

# NEW: Bread and Flour Regulations review

- [Government response](#) to consultation published 17 January (FLC 019/24)

## DETAIL

- Mandatory addition of folic acid to non-wholemeal flour at 250mg/100g
- Increase min. level of calcium carbonate, iron and niacin to 15% NRV (Reg. 1925/2006)
- Update purity criteria for calcium carbonate added to flour (Reg. 231/2012)
- Clarification that fortification applies only to non-wholemeal flour from ‘common wheat’
- Amend the composition wholemeal flour – min. levels of natural iron, thiamine and niacin barrier to trade
- Exempt small-scale mills producing < 500 MT flour per year
- Improvement Notices as primary enforcement regime
- 24-month adjustment period from laying date of SI
- NOT PROGRESSED: Proposal to exempt flour used in small quantities (<10%)

## WHAT HAPPENED SO FAR

- UK Government notification WTO (FLC 091/24) – deadline 9 April (and EU?)
- Meeting with trade associations on 18 March to discuss labelling solutions – mixed views

## NEXT STEPS

- SI exp. to be laid in July 2024 (Q3 DAs) – England coming into force 1 October 2024.
- Defra working on guidance

England implementation exp. 1 October 2026

**Members encouraged discuss labelling challenge with local/primary authorities**

# OTHER LABELLING, COMP. and REGS.

- **Retained EU Law Act 2023**
  - [Retained EU Law \(Revocation and Reform\) Act 2023 \(Consequential Amendment\) Regulations 2023](#)
  - [Retained EU Law \(Revocation and Reform\) Act 2023 \(Consequential Provision\) Regulations 2024](#)
  - Change the status of 'Retained EU Law' to 'assimilated law' and related terms in primary and secondary legislation.
- **Consultation on units of measurement**
  - Government [response](#) published 27 December 2023 (Jan.24 PPA newsletter)
  - Maintaining status quo – metric system to remain primary unit of sale
  - Work on guidance to promote the use imperial measures alongside metric
- **[DBT call for evidence on Smarter Regulation](#) (FLC 373/23)**
  - PPA response submitted 11 January (FLC 011/24).
  - PPA call for joined up approach between regulators/government departments and better engagement.
  - No timeframe for response – likely to stall (due to elections)
- **[UK-wide Consultation on Fairer Food Labelling](#) (FLC 121/24)**
  - Launched 12 March – closes 7 May.
  - Origin labelling of certain foods, incl. presentation and use of flags
  - **Members to send any comments to PPA by 19 April – if they want PPA to respond**
- **UK guidance fresh/pure/natural and vegetarian/vegan**
  - Work paused – nothing expected in the immediate future

# OTHER LABELLING, COMP. and REGS.

- **Plant-based/vegan**

- FSIFG Draft Opinion on dairy designations in plant-based foods – 11 January (FLC 022/24)
  - Interpretation of the law as it stands – Defra has no intention of changing the law at present
  - Considered misspelling, ‘Not e.g. Cheese’, alternative to, dairy terms no longer legislated, processing terms
  - More leniency on the use of plant-based terms in secondary descriptors
  - PPA input – more examples on dairy terms when conveying flavour - e.g., cheese/butter flavour and better structuring
  - Final version exp. soon – will be considered a live document
- ISO standard (FLC 094/24):
  - 2 concepts: A (no use of animal-derived ingredients) and B (limited (<5%) and conditional use of animal-derived ingredients)
    - No ingredients from slaughtered or dead animals permitted.
  - Title change agreed - ‘Plant-based foods and food ingredients – Definitions and technical criteria for labelling and claims’
  - No definition of ‘synthetic ingredient’ (as in PAS 224)
  - Publication exp. June-September 2024
- [FSA campaign](#) on risks of vegan labels to people with allergies – 5 March

# OTHER LABELLING, COMP. and REGS.

- **Recycling labelling**

- [Proposals](#) for binary labelling from 31 March 2026 (flexibles from 31 March 2027)
- Defra reviewing implementation dates following EPR deferment announcement
- Announcement on revised dates exp. late Spring 2024
- EPR consultation response “in due course”
- Labelling guidance exp. later 2024

- **Environment labelling**

- IGD reco to Defra end of 2023
- Defra interest (also considering other outputs), but no endorsement of eco-labelling scheme
- No plans to rollout environmental labelling on a mandatory basis
- Defra watching IGD work on method standardisation – working with FDTP
- Consultation on environmental labelling unlikely to go ahead
- IGD working on labelling toolkit – what to label, impact scores, applying the label, comms and governance.

- **Codex update:**

- [Guidelines](#) on food information for foods sold via e-commerce - likely to be adopted at CCFL48
- [Guidelines](#) on the use of technology to provide food information – next iteration exp. April.24



# OTHER LABELLING, COMP. and REGS.

- **FDF 'Fight for the Label' project**
  - Explainer on costs, timescales and complexities of food label change process
  - Initial member session 5 February
  - FDF revised explainer paper
  - Request for feedback on costs/resource implications from members
  - Defra-commissioned research on food labelling costs (ADAS)
  - Questionnaires to be sent to industry in March

Draft key messaging:



Food manufacturers need 18 - 24 months to implement any new statutory food labelling changes to reduce directly-attributable cost burdens.

Over-stickering is a hugely impractical and costly label change method, only to be used as a last resort or on very small batches of products.

Industry needs clear coordination procedures from all relevant UK regulators for policy changes that lead to food label changes. This is in order to allow FBOs to line up changeover timeframes and implement single label updates, thus mitigating costs on industry and these having to be passed onto consumers.

Establish a regulatory framework on digital food labelling, with authoritative guidance, to harness the power of the digital technologies and future-proof food information to consumers. This will enable businesses to respond to consumer pressure to provide more up to date information, improve access to vital information and react to temporary ingredient disruptions; whilst reducing packaging waste.

An aligned intra-UK approach to food labelling is required for a functioning UK market, with this not requiring reliance on the UK Internal Market Act.

- **Have members received ADAS/Defra questionnaire?**
- **Members interested to send data to FDF to please contact PPA Secretariat**

# OTHER LABELLING, COMP. and REGS.

- **FSA Smoke Flavourings update**
  - FSA working on risk assessment of 8 authorised smoke flavourings – no timeframe
  - FSA call for industry information on smoke flavouring usage
  - FSA considering EFSA’s Opinion but unlikely to take same approach on genotoxicity
  - Work unlikely to be completed by June.24 deadline – likely further extension until Dec.24 (at least)
- **Other FSA updates**
  - [FSA Board Meeting](#) – 20 March
  - [Regulated products reform](#) – agreed Dec.23 – proposal to remove renewals requirement
    - Consultation exp. early April.
    - Intention to implement before general election.
    - Further recos. on knowledge sharing in June FSA Board meeting.
  - [FSA Consultation on authorisation of several regulated products](#) (FLC 052/24) – closes 29 March
  - [FSA/FSS Consultations on Regulation 2019/1793 on increased controls on imported HRFNAO](#) (FLC 120/24) – closes 24 April (**comments by 12 April**)
- **FSA updates to note:**
  - FSA Chair [Susan Jebb departure](#) (end of June) + [Scientific Advisory Committees appointments](#)
  - [FSA CEO letter](#) to local authorities – budget planning to ensure EHO and TSO funding
  - [FSA report on consumer attitudes towards divergence of food standards](#)
  - [FSA Food Surveillance Programme](#)

# OTHER LABELLING, COMP. and REGS.

- **EU FIC Review (FOPNL, origin and date marking)**

- Work ongoing – no news

*EC SCoPAFF Dec 2023: "The Commission explained that work to review the Regulation on Food Information to Consumers is ongoing. As with all legislative proposals, an impact assessment is currently being prepared, based on scientific evidence provided by the European Food Safety Authority and the Joint Research Centre, and on consultations with citizens, stakeholders and targeted surveys with Member States, businesses, SMEs, and consumer/health organisations. Given the complexity of this work, focus is on gathering robust evidence and data, particularly as regards impacts of food labelling on consumer behaviour, given the objective of empowering consumers to make informed, healthy and sustainable food choices"*

- **EU Directive on Green Claims**

- EP adopted position on Green Claims Directive in plenary on 12 March
- Council to define General Approach in coming months
- Trilogue negotiations **exp. end 2024/early 2025**
- New [EU Directive](#) on greenwashing comes into force 26 March – EUMS to enact by 27 March 2026 and come into force by **27 September 2026**

- **EU review smoke flavourings (FLC 079/24)**

- EFSA opinion published Nov.23 – 6 out of 8 genotoxic and could not rule out other 2
- Proposal **exp. April SCoPAFF meeting**
- Discussions now on transitional measures – EU MSs agree on 'sufficient time'
- FoodDrinkEurope, EFFA calls for min. 24-month transition (FLC 063/24, 067/24)
- Swedish letter to EC on concerns over switch to traditional smoking (FLC 045/24)
- If no draft regulation is agreed prior to elections, additional 6-month extension

# FOOD SAFETY

# Acrylamide – ML and BML proposals

**Commission is still preparing to set new and revised Benchmark and Maximum Levels for Acrylamide in certain foods**

**Latest discussion at EU Working group on environmental and industrial contaminants (14 December 2023)**

- Commission confirmed that a new detailed proposal for (B)MLs is still being worked on.
- (B)MLs will be based on the latest monitoring data (2019-2022).
- When setting MLs clear food categories are needed for enforcement.
- Applying measurement uncertainty to BMLs is not necessary because they are target values that should serve as an incentive to further research.
- Another stakeholder forum is anticipated to inform of Commission/Member State discussions.

**Proposal expected in second half of 2024.**

- Related: Commission Working Group on Additives, held 23-24 January 2024 discussed E491 in acrylamide reducing yeast (in food enzyme).
- Related: Codex expected to receive draft discussion paper on acrylamide (prepared by India) for CCFF 18-21 April.

# Acrylamide – Data collection and mitigation

**ESA Annual call for data on sliced potato crisp and dough based (formed) potato snacks, cereal snacks, and vegetable crisps/snack products issued at beginning of February 2024.**

- Sliced crisps: deadline end March.
- Dough based (formed) potato snacks, cereal snacks, and vegetable crisps/snack products: deadline end April.
- Nuts request is pending – awaiting input from Chair on format.
- EFSA Continuous call for data issued 1 March 2024: Deadline 30 June 2024.

Draft review paper has been produced on vegetable crisps: Not shared with wider ESA membership at this stage.

EUPPA yet to issue its formal call for data

FoodDrinkEurope Acrylamide Toolbox to be updated this year.

ACRYRED Project: Reducing acrylamide exposure of consumers by a cereals supply-chain approach targeting asparagine. Planned forum in Brussels, 4-5 September 2024.

**ACTION: Members to submit monitoring data to the secretariat by deadlines.**

**ACTION: Members provide any updates on sector specific tools for inclusion on revision of Toolbox.**

# Glycoalkaloids in Potatoes and Potato-derived Products

ESA, EUPPA, Europatat and Starch Europe organised an online event dedicated to glycoalkaloids.

Webinar: 13 March 2024. 100+ participants

- Experts from various projects attended and presented on their current findings.
- Q&A Session
- Aimed at building consensus and challenging some of the conclusions from certain projects

EFSA Continuous call for data issued 1 March 2024: Deadline 30 June 2024.

'Glycoalkaloids transformation during potato crisps production? Method validation and industrial trial'.  
Raters, M., Strohmaier, R. & Heckel, F. *Eur Food Res Technol* (2024). (Published 15 Feb 2024)

LINK: <https://doi.org/10.1007/s00217-023-04463-y>

# T-2 & HT-2 – Voted favourably (September 2023)

1.9	T-2 and HT- 2 toxin	ML (µg/kg)	Remarks
1.9.1	Unprocessed cereal grains: - malting barley - barley other than malting barley - maize and durum wheat - oats with husk - other cereals	200 150 100 1250 50	Except rice. Except unprocessed maize grains for which it is evident e.g. through labelling or destination, that it is intended for use in a wet milling process only (starch production). The maximum level applies to unprocessed cereal grains placed on the market for first-stage processing
1.9.2	Cereals placed on the market for the final consumer - oats - barley, maize and durum wheat - other cereals	100 50 20	Except rice
1.9.3	Cereal milling products - oat milling products (including oat flakes and oat bran) - bran from other cereals and maize milling products - other cereal milling products	100 50 20	Except rice milling products
1.9.5	Bakery wares, pasta, cereal snacks and breakfast cereals other than those referred to in 1.9.4	20	Except rice milling products. Pasta means pasta (dry) with a water content of approximately 12 %.

- New MLs applicable as from 1 July 2024
- Draft Reg. amending Reg. 2023/915 as regards MLs of T-2 and HT-2 toxins in food was notified to WTO (Deadline for comments 04/03/24)

# Mineral Oil Hydrocarbons (MOH) in Food

## EFSA's updated risk assessment published 13 September 2023

- Concluded that MOSH do not pose a risk to public health at the current levels of exposure, but important to keep studying the possible long-term effects of MOSH on human health.
- One type of MOAH (3 or more aromatic rings) may contain genotoxic substances that can damage DNA in cells and may cause cancer. For substances such as these, a safe level cannot be established.
- Recommended more research to be done on the type of MOAH present in food and more toxicity data to be collected to better assess the risks they pose.

## Commission proposals

- Commission considers that most sources of MOHs in food are avoidable by following good practices.  
“Good practices exist to avoid MOAH in food, so no MOAH should be present in food at levels above the limit of quantification (LOQ)”.
- Proposes MLs for MOAH in either:
  - Relevant contributors to exposure and for foods that may contain very high concentrations of MOAH.
  - MLs for all foods other than fresh or frozen fruits, vegetables, meat, offal, fish and seafood.
- Permits MS enforcement action on the basis of Article 14 of GFL.
- Proposes Monitoring Recommendation on MOHs in food with ‘indicative levels’ to be established. Includes:
  - Animal and vegetable oils and fats: 15 mg/kg
  - Eggs, grains, grain containing products, tree nuts, pulses, oilseeds, products containing tree nuts, pulses and oilseeds, composite products, dairy, dairy containing products, imitation dairy and imitation meat, seasonings... 5.0 mg/kg
- Proposes Regulation on methods for the sampling and analysis of MOHs in food.
- European Commission Stakeholder Forum held 18 January 2024: Discussions will continue through 2024.

# Deoxynivalenol – Voted favourably (September 2023)

1.4	Deoxynivalenol	ML (µg/kg)	Remarks
1.4.1	Unprocessed cereal grains except products listed in 1.4.2 and 1.4.3	1000	Except unprocessed maize grains intended to be processed by wet milling and rice. The maximum level applies to unprocessed cereal grains placed on the market for first-stage processing
1.4.2	Unprocessed durum wheat grains and unprocessed maize grains	1500	Except unprocessed maize grains for which it is evident e.g. through labelling or destination, that it is intended for use in a wet milling process only (starch production). The maximum level applies to unprocessed durum wheat grains and unprocessed maize grains placed on the market for first-stage processing
1.4.3	Unprocessed oats with husk	1750	The maximum level applies to unprocessed oat grains with husk placed on the market for first-stage processing
1.4.4	Cereals placed on the market for the final consumer, maize for popping and popcorn	750	Except rice
1.4.5	Cereal milling products with the exception of products listed in 1.4.6	600	Except rice milling products
1.4.6	Maize milling products - maize milling products placed on the market for the final consumer - maize milling products not placed on the market for the final consumer - pre-cooked polenta ready to eat	750 1000 250	
1.4.7	Bakery wares, cereal snacks and breakfast cereals	400	Except rice products. Including small bakery wares.

- New MLs applicable as from 1 July 2024
- Draft Reg. amending Reg. 2023/915 as regards MLs of DON in food was notified to WTO (Deadline for comments 04/03/24)

# CIPC (PPTC Lead)

**Chlorpropham (CIPC, sprout suppressant previously authorised in EU and GB for use on potatoes).**

Raw materials (potatoes) may be contaminated via residues in stores, even after extensive cleaning.

A temporary MRL (tMRL) of 0.35mg/kg has been established (as opposed to a default MRL of 0.01mg/kg).

Data supplied by industry is reviewed by the Commission every year.

Latest Potato Value Chain (PVC) report (2022-2023 monitoring data) was reviewed by PAFF on 1-2 February 2024.

Based on latest data, the existing tMRL could be lowered to either 0.25 mg/kg (97.5th percentile of the data population) or to 0.2 mg/kg (95th percentile).

Commission has also discussed possibility to reduce change the requirement for industry to submit data from annually to every two years.

In GB MRL has been lowered to 0.35mg/kg (in force from April 2024) – similar data submission requirements have been requested by national authorities.

“CRMG” established: PPA providing secretariat

**ACTION: Members to support CIPC data submission requirements and promote cleaning best practice.**

# SUSTAINABILITY

# Packaging developments

## Extended producer responsibility (EPR) reporting

- Deadlines set out in the regulations.
- No enforcement action will be taken about late submission if data is submitted by 31 May 2024.

## Small organisations

- Collect 2023 packaging data – but do not have to report it
- Collect 2024 data and submit it by April 2025

## Large organisations

In England, Scotland and Northern Ireland data to be submitted by:

- 1 October 2023 to report for January to June 2023
- 1 April 2024 to report for July to December 2023

In Wales, submit data for July to December 2023 by 1 April 2024.

# Packaging developments

- [Amendments to The Packaging Waste \(Data Reporting\) \(England\) Regulations 2023 \(EPR Data SI\)](#) published Feb 2024.
  - Adds to the definition of household packaging within EPR
  - Aim to avoid inadvertently capturing packaging that does not enter the public or household collection system.
  - EA currently developing guidance to support these amendments.
- EPR Scheme Administrator (SA) still not appointed since the delay announcement in July 2023.
- A series of 'sprint' meetings have been taking place looking at transition to a more producer-led SA design.
- EPR base fees were expected to published end January 2024 with further updates until December 2024.
- Further detail on modulated fees in terms of materials proposed for higher fees, fee-setting approach and 2025 reporting categories is also expected to be published in early 2024.

# UK Forest Risk Commodities Scheme

- Defra consulted in 2021/22 on plans to implement due diligence provisions in the Environment Act, to tackle illegal deforestation in UK supply chains. Further details announced in December as part of COP28.
- The Forest Risk Commodities Scheme will be introduced through provisions in Schedule 17 of the Environment Act 2021.
- Secondary regulation will be laid when parliamentary time allows (Q1/2 2024?).
- This legislation will require regulated businesses to establish and implement a due diligence system for any regulated commodity, and any products derived from them, that they use in their UK commercial activities
- Commodities in scope are: Non-dairy Cattle products (beef and leather), cocoa, palm, and soy.
- Organisations using these commodities in UK supply chains with a global turnover of over £50m are in scope of the regulations, but those with an annual volume threshold of 500 tonnes may submit an exemption.
- Organisations will have a grace period to prepare for regulation before the beginning of the first reporting period.
- Unlimited Variable Monetary Penalties will be in place as part of civil sanctions.
- Concerns:
  - That the regulation's approach will require multiple reporting on the same commodity as it moves through the supply chain.
  - Impact on SMEs and their ability to comply.

# EU Deforestation Regulation (EUDR)

- In May 2023, the EU adopted a Regulation 2023/1115 on deforestation-free products, which applies to cattle, cocoa, coffee, palm oil and soya and the finished products in which they are found.
- Applies from 30 December 2024.
- The Regulation applies only to products listed in the Annex I listed by SIC code.
- Products not included in Annex I are not subject to the requirements of the Regulation, even if they contain relevant commodities in the scope of the Regulation.
- Companies will only be able to export products to the EU if the supplier can confirm the product didn't contribute to deforestation or forest degradation.
- Companies will need to provide a due diligence statement, the text of which is available in Annex II of the legislation.
- 18 months after entry into force, the Commission will classify different countries and regions into low, standard and medium risk. This will determine the level of checks and intervention by competent authorities in EU Member States.
- A further review will take place to consider adding maize and biodiesel (No specified date).

# Food Waste

- To date the voluntary approach to food waste reporting in the UK has been broadly successful with almost half of large food businesses in England measuring and reporting voluntarily in 2022.
- Key framework is the industry-lead WRAP / IGD Food Waste Reduction Roadmap (FWRR)
- However, the number of businesses voluntarily reporting food waste has stalled and is expected to plateau.
- In June 2022 the Government launched a consultation on improved food waste reporting by large food businesses in England.
- The Government responses was published in July 2023: it concluded that a regulatory approach was not suitable at this time, and they would continue to take a voluntary approach.
- Food campaign group 'Feedback' then applied for a judicial review of the Government's decision.
- In November Government announced that it had withdrawn its response and that the Secretary of State will reconsider food waste reporting in the future.
- Expected that Defra will be providing a paper to the Secretary of State in mid-March 2024 (unclear if this has happened yet).
- Also in early March, WRAP launched its Food Waste Reduction Roadmap "Call To Action" Day: in attempt to increase voluntary reporting.

# Risk Matrix

## Food Issues Risk Matrix (November 2023)

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
<b>Big Company Impact</b> <b>Cost</b> <b>Reputation</b> <b>Media</b>	Acrylamide 3-MCPD/Glycidyl-Esters HFSS Advertising/Promotions restrictions Wales obesity strategy Scotland obesity strategy Portion Size/Calories CIPC tMRL monitoring BREXIT/Devolution-associated issues/Regulatory divergence Windsor Framework Packaging waste/Taxation/EPR Salt/Sodium reduction (2024 targets) Ultra-Processed Foods/Junk food cycle Loss of pesticide active substances	Pesticides MRLs Food taxation Collective loss of Fungicides FDTP Health workstream FOPNL developments	England obesity strategy Nutrient profiling (Ofcom model review UK)
<b>Moderate Impact</b> <b>Cost</b> <b>Material availability</b> <b>Working practice</b>	Environment Act (implementation)/EU Farm to Fork Strategy Food waste Allergens (precautionary labels/vegan) Bread and Flour Regulations Review Glycoalkaloids Furan Contaminants (T-2, HT-2) UK Target Border Operating Model (TOM) Supply chain issues (raw materials shortages) Northern Ireland Obesity Strategy	Contaminants (DON) Eco-labelling/FDTP Environment workstream Nutrient Profiling (EU F2F Strategy) Future FSA reforms	Pack Fill
<b>Small Impact</b> <b>Cost</b> <b>Materials</b> <b>Change</b>	Flavourings reviews GBSF/CQUIN Tropane alkaloids Plant-based/vegan and vegetarian definitions Sugars (popcorn)	UK NPM Technical Guidance Update PFAS MOAH/MOSH	Palm Oil (compound ingredients)

New issue

Changed priority

Identified as a potential high-profile media issue

AOB

# Dates of next 2024 meetings

- Wednesday, 10 July 2024 – In-person - London (UK Flour Millers)
- Thursday, 14 November 2024 - Online



## **QUESTION: Suggestion of guest speakers for next meeting?**

### ***Potential GUEST SPEAKERS:***

- *FSA on additives/flavourings (incl. smoke flavourings)/enzymes, etc. or contaminants*
- *FSA on regulated product reforms?*
- *Defra on the FDTP Eco*
- *OHID/DHSC on FDTP Health*
- *SG on diet policy*
- *WG on diet policy*
- *Trading Standards/enforcement updates*
- *OHID on reformulation or policy*
- *EUPPA on contaminants*
- *Defra labelling team*
- *Defra on BFR*

# ANNEX CONSULTATIONS

# Consultations - ongoing

Consultation	Closing date	Comments/status
EC stakeholder consultation on requirements for sampling and methods of analysis for autocontrols for the presence of mycotoxins and plant toxins in food	March. TBC	ESA response TBC.
<a href="#"><u>FSA consultation on applications for authorisation of misc. regulated products: 4 novel foods, 3 additives, removal of 22 flavourings and limits for ethylene oxide</u></a>	29/03/24	No PPA response planned.
<a href="#"><u>FSS consultation on applications for authorisation f misc. regulated products: 4 novel foods, 3 food additives, removal of 22 flavourings and proposals to set a limit for ethylene oxide in food additives</u></a>	29/03/24	No PPA response planned.
Informal FDF consultation WG additional HFSS promotion restrictions	05/04/24	PPA to draft response.
<a href="#"><u>HoL written call for evidence on the role of UPF and HFSS in diets and their influence on health outcomes</u></a>	08/04/24	PPA to draft response.
<a href="#"><u>SG consultation on the National Good Food Nation Plan</u></a>	22/04/24	No PPA response planned.
<a href="#"><u>FSA consultation on Amendments to assimilated Regulation 2019/1793: Official controls applied to Imported High Risk Food and Feed not of Animal Origin</u></a>	25/04/24	PPA response TBC.

Last updated 16/03/2024

# Consultations - ongoing

Consultation	Closing date	Comments/status
<a href="#"><u>FSS consultation on Regulation 2019/1793 on increased controls of certain food and feed of non-animal origin (Review 3)</u></a>	25/04/24	PPA response TBC.
<a href="#"><u>Defra consultation on fairer food labelling</u></a>	07/05/24	PPA response TBC.
<a href="#"><u>SG consultation on Restricting Promotions of Food and Drink High in Fat, Sugar or Salt: Consultation on the Detail of Proposed Regulations</u></a>	21/05/24	PPA to draft response.
<a href="#"><u>WG Health and Social Care Committee Inquiry on 'Prevention of ill health – obesity'</u></a>	07/06/24	No PPA response planned.

# Consultations - expected

Consultation	Exp.	Comments/status
<b>WG consultation on additional levers on the promotion of HFSS food/drink</b>	Spring/Early Summer 2024	No longer consulting on implementation
<b>FSA consultations on the regulated products frameworks</b>	Early April.24	
<b>WG consultation on guidance on HFSS promotional restrictions</b>	Q2 2024 TBC	Targeted consultation (trade associations) exp. early 2024
<b>FDTP Health WG proposals</b>	Spring 2024 TBC	Unsure if there will be a consultation
<b>NI DoH consultation on action plan for NI 'Healthy Futures' strategy</b>	December 2024	
<b>NI consultation on catering and vending standards (A Fitter Future for All)</b>	TBC	Under existing Obesity Strategy.
<b>PAL – full impact assessment, thresholds, additional testing requirements</b>	2025	

# Consultations - closed

Consultation	Closing date	Comments/status
<a href="#">Defra Gene editing (England)</a>	17/03/21	Govt. response published <b>29/09/21</b> .
<a href="#">Defra changes recognition clauses (England) (BFR)</a>	22/03/21	Govt. response published <b>29/07/21</b> .
<a href="#">Defra Draft Policy Statement on Environmental Principles</a>	02/06/21	Environmental Act published <b>10/11/21</b> .
<a href="#">Extended Producer Responsibility (UK-wide)</a>	04/06/21	PPA response. Government <a href="#">response</a> published <b>26/03/22</b>
<a href="#">Defra Introducing a Deposit Return Scheme (England)</a>	04/06/21	No PPA response as not applicable. Govt. <a href="#">response</a> published <b>20/01/23</b> .
<a href="#">Defra Consistency of household and business waste collections (England)</a>	04/07/21	Government <a href="#">response</a> published <b>25/10/23</b>
<a href="#">CMA Draft guidance on environmental claims</a>	16/07/21	Final guidelines published <b>Sep.21</b>
<a href="#">HMRC Plastic Packaging Tax: draft secondary legislation consultation</a>	17/08/21	FDF response. Consultation response <b>TBC</b>
<a href="#">EA Review of the water industry national environment programme (WINEP)</a>	16/09/21	Govt. <a href="#">response</a> published <b>13/12/21</b> .
<a href="#">BEIS Reforming the framework for better regulation</a>	01/10/21	Consultation <a href="#">response</a> published <b>31/01/22</b> (through The Benefits of Brexit).

# Consultations - closed

Consultation	Closing date	Comments/status
<a href="#"><u>FSS Food composition standards review</u></a>	12/10/21	PPA contribution through FDF.
<a href="#"><u>FSA Wales Proposed amendment of the Mutual Recognition clauses in certain domestic food legislation in Wales</u></a>	28/10/21	PPA contribution through FDF. <a href="#"><u>Summary of responses</u></a> published <b>15/12/21</b> .
<a href="#"><u>EA Review of Charges for Water Resources</u></a>	10/11/21	Govt. <a href="#"><u>response</u></a> published 09/03/22.
<a href="#"><u>SG Agricultural transition in Scotland</u></a>	17/11/21	No PPA sector-specific response. Govt. <a href="#"><u>response</u></a> published <b>26/08/22</b> .
<a href="#"><u>Northern Ireland Food Strategy Framework</u></a>	19/11/21	No PPA response. <a href="#"><u>Summary of responses</u></a> published <b>28/03/22</b> .
<a href="#"><u>Defra Consultation on 'A Plant Biosecurity Strategy for Great Britain'</u></a>	30/11/21	Govt. <a href="#"><u>response</u></a> published <b>05/04/22</b>
<a href="#"><u>HMRC Technical consultation on Plastic Packaging Tax (General) Regulations 2021</u></a>	01/12/21	PPA response submitted. Consultation response <b>TBC</b>
<a href="#"><u>SG Local food for everyone – a discussion: consultation</u></a>	02/12/21	No PPA response. Govt. <a href="#"><u>response</u></a> published <b>13/07/22</b>

# Consultations - closed

Consultation	Closing date	Comments/status
<a href="#">Defra Call for evidence on Labelling for Animal Welfare</a>	06/12/21	PPA contribution through FDF. Consultation <a href="#">response</a> published 30/08/22. Review ongoing.
<a href="#">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</a>	06/12/21	PPA contribution through FDF. Summary of <a href="#">responses</a> published <b>16/06/22</b> .
<b>Targeted Stakeholder Commission consultation on monitoring recommendation of the presence of glycoalkaloids in potatoes and potato-derived products</b>	09/12/21	ESA lead. PPA contribution through FDF. EC recommendation ( <a href="#">2022/561</a> ) published <b>06/04/22</b> .
<a href="#">HSE Formulation Guidance for PPP Ecotoxicology risk assessments</a>	13/12/21	No PPA response.
<a href="#">BEIS Call for evidence – Combined Heat and Power (CHP)</a>	20/12/21	<a href="#">Summary of responses</a> published <b>28/03/22</b> .
<a href="#">Defra Moving the abstraction and impounding licensing regime into the Environmental Permitting Regulations</a>	22/12/21	No PPA response.
<a href="#">EFSA Consultation on draft scientific opinion on the development of harmonised FOPNL and the setting of nutrient profiles for restricting nutrition and health claims</a>	09/01/22	EFSA opinion published <b>19/04/22</b> .

# Consultations - closed

Consultation	Closing date	Comments/status
<a href="#">Defra Consultation to reform the Agriculture and Horticulture Development Board</a>	10/01/22	No PPA response. Consultation <a href="#">response</a> <b>08/03/22</b>
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.
<a href="#">DAERA Environment Strategy Consultation</a>	18/01/22	<a href="#">Summary of responses</a> published <b>28/03/22</b> .
<a href="#">EC consultation on recycled plastic in food packaging</a>	18/01/22	FDF response. Commission adoption <b>15/09/22</b> .
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.
<a href="#">FSA consultation on the review of retained Regulation 2016/6 on importing food from Japan following the Fukushima nuclear accident</a>	11/02/22	<a href="#">Summary of responses</a> published <b>21/04/22</b>
<a href="#">Consultation on proposals to ban commonly littered single-use plastic items in England</a>	12/02/22	No PPA response. <a href="#">Summary of responses and Government response</a> published <b>14/01/23</b> .

# Consultations - closed

Consultation	Closing date	Comments/status
<a href="#">Defra Call for evidence on commonly littered and problematic plastic items</a>	12/02/22	<a href="#">Consultation response</a> published <b>14/01/23</b>
<a href="#">DAERA Independent strategic review of NI Agri-Food Sector</a>	23/02/22	No PPA response. Consultation response <b>TBC</b>
<a href="#">EC consultation on revision of Reg. (EU) 1169/2011 on food information to consumers</a>	07/03/22	<a href="#">Summary of responses</a> published on <b>03/05/22.</b>
<a href="#">EC consultation on facilitating healthier food choices – establishing nutrient profiles</a>	07/03/22	<a href="#">Summary of responses</a> published on <b>03/05/22.</b>
<a href="#">Defra Implementing due diligence on forest risk commodities</a>	11/03/22	Government <a href="#">response</a> published <b>June.22</b>
<a href="#">FSA consultation on Precautionary Allergen Labelling (PAL)</a>	14/03/22	<a href="#">Summary of responses</a> published <b>06/06/22.</b>
<a href="#">BEIS consultation on Draft Vertical Agreements Block Exemption Order</a>	16/03/22	Govt. <a href="#">response</a> published <b>May.22</b>
<a href="#">EC consultation on imports of agricultural and food products – applying EU health and environmental standards</a>	16/03/22	<a href="#">Commission adoption</a> <b>03/06/22</b>
<a href="#">Defra consultation on ending the retail sale of peat in horticulture in England and Wales</a>	18/03/22	No PPA response. Govt. <a href="#">response</a> published <b>27/08/22</b>

# Consultations - closed

Consultation	Closing date	Comments/status
<a href="#"><u>SG National litter and flytipping strategy consultation</u></a>	31/03/22	No PPA response. <a href="#"><u>Summary of responses</u></a> published <b>28/07/22</b>
<a href="#"><u>EFRA Committee call for evidence on Common Frameworks</u></a>	08/04/22	No PPA response.
<a href="#"><u>Defra Introduction of mandatory digital waste tracking</u></a>	15/04/22	No PPA response. <a href="#"><u>Summary of responses</u></a> published 15/12/22. Consultation outcome <b>TBC</b>
<a href="#"><u>DIT UK-New Zealand FTA: Trade and Agriculture Commission call for evidence</u></a>	22/04/22	No PPA response. Consultation response <b>TBC</b>
<a href="#"><u>2030 Strategic Framework for International Climate and Nature Action</u></a>	24/04/22	No PPA response. <a href="#"><u>Summary of responses</u></a> published <b>30/03/23</b>
<a href="#"><u>HMRC Call for Evidence: An independent customs regime</u></a>	02/05/22	No PPA response. <a href="#"><u>Summary of responses</u></a> published <b>25/07/22</b>
<a href="#"><u>Defra Nature Recovery Green Paper</u></a>	11/05/22	No PPA response. Consultation response <b>TBC</b>
<a href="#"><u>OHID Vitamin D: call for evidence</u></a>	15/05/22	No PPA response. Consultation response <b>TBC (work on hold)</b>
<a href="#"><u>HM Treasury: Online sales tax: policy consultation</u></a>	20/05/22	<a href="#"><u>Consultation response</u></a> published <b>09/02/23</b>

# Consultations - closed

Consultation	Closing date	Comments/status
<a href="#">Defra consultation on reforms to PRN and PERN system and operator approval</a>	21/05/22	No PPA response. Govt. <a href="#">response</a> published <b>28/10/22</b> .
<a href="#">Defra – Tenant Farmers to share their views</a>	30/05/22	No PPA response.
<a href="#">Developing the UK Emissions Trading Scheme (UK ETS)</a>	17/06/22	No PPA response. Govt. <a href="#">response</a> published <b>31/08/22</b>
<a href="#">DIT Trade with Switzerland</a>	22/06/22	No PPA response. Govt. <a href="#">response</a> published <b>15/05/23</b>
<a href="#">Defra Environment Act 2021: environmental targets</a>	27/06/22	No PPA response. Govt. <a href="#">response</a> published <b>16/12/22</b> .
<a href="#">SG call for evidence on single-use food containers and other commonly littered single-use items</a>	30/06/22	No PPA response. Consultation response <b>TBC</b>
<a href="#">SG Mandatory calorie labelling in the OOH sector in Scotland</a>	01/07/22	No PPA response. Consultation <a href="#">response</a> published <b>30/05/23</b> .
<a href="#">FSA/FSS: Amendments to Retained Regulation 2019/1793 on controls applied to imported food and feed not of animal origin</a>	07/07/22	No PPA response. Summary of responses published <a href="#">12/10/22</a> .

# Consultations - closed

Consultation	Closing date	Comments/status
<a href="#"><u>EC consultation on future legislative framework for Sustainable Food Systems</u></a>	21/07/22	ESA response. Commission adoption <b>exp. Q3 2023</b> .
<a href="#"><u>FSA consultation on transitional arrangements for edible insects in GB</u></a>	10/08/22	No PPA response. <a href="#"><u>Summary of responses</u></a> published <b>03/10/22</b>
<a href="#"><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></a>	10/08/22	No PPA response. <a href="#"><u>Summary of responses</u></a> published <b>06/09/22</b>
<a href="#"><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></a>	10/08/22	No PPA response. <a href="#"><u>Summary of responses</u></a> published <b>06/09/22</b>
<a href="#"><u>EC consultation on food waste targets</u></a>	16/08/22	EUPPA and ESA responses. <a href="#"><u>Summary of responses</u></a> published 19/09/22
<a href="#"><u>Environmental Standards Scotland – draft strategic plan</u></a>	17/08/22	No PPA response. Govt. <a href="#"><u>response</u></a> published <b>30/09/22</b> .
<a href="#"><u>FSA Enhanced Investigatory Powers for the Food Standards Agency (FSA)</u></a>	18/08/22	No PPA response. <a href="#"><u>Summary of responses</u></a> published <b>17/11/22</b> .

# Consultations - closed

Consultation	Closing date	Comments/status
EC targeted consultation on the draft recast of Regulation (EC) 1881/2006 setting maximum levels for contaminants in food	19/08/22	No PPA response. Consultation response <b>TBC</b>
<a href="#">SG Delivering Scotland's circular economy: a consultation on proposals for a Circular Economy Bill</a>	22/08/22	No PPA response. <a href="#">Responses</a> published.
<a href="#">SG Delivering Scotland's circular economy: a Route Map to 2025 and beyond</a>	22/08/22	No PPA response. Consultation response <b>TBC</b>
<a href="#">OPSS/BEIS Consultation on choice of measurement: markings and sales</a>	26/08/22	PPA response submitted. Consultation <a href="#">response</a> published <b>27/12/23</b>
Defra/FSA/WG/SG consultation on extending the period (currently due to end 30 September 2022) during which some EU business address requirements and labelling terms are still permitted on the GB market to 31 December 2023 (no link)	30/08/22	PPA response submitted. Consultation response <b>07/09/22</b>
<a href="#">WG Consultation on Healthy Food Environment (HWHW)</a>	01/09/22	PPA response submitted. <a href="#">Summary of responses</a> published 31/01/23. Oral <a href="#">statement</a> from WG on <b>27/06/23</b> confirming WG decision.

# Consultations - closed

Consultation	Closing date	Comments/status
<a href="#">FSA consultation on proposed changes to Welsh law in relation to EU Directives on animal feed, food contact materials and extraction solvents</a>	01/09/22	No PPA response. <a href="#">Summary of responses</a> published <b>18/01/23</b> .
<b>EC targeted consultation on provisions on sampling and analysis for control on compliance with MLs for mycotoxins and plant toxins in food</b>	02/09/22	ESA response TBC. Consultation response <b>TBC</b>
<a href="#">Defra Consultation on possible changes to public sector food and catering policy (GBSF)</a>	04/09/22	No PPA response. <a href="#">Govt. response</a> published on <b>28/07/23</b> .
<a href="#">Defra Consultation on Improved food waste reporting by large businesses in England</a>	05/09/22	No PPA response. Consultation <a href="#">response</a> published <b>28/07/23</b> .
<a href="#">UK Government consultation on the UK Single Trade Window</a>	15/09/22	No PPA response. Consultation response <b>TBC</b>
<a href="#">OHID consultation on SACN draft report on feeding young children aged 1-5 years</a>	16/09/22	No PPA response. Consultation response <b>TBC</b>
<a href="#">EC consultation on proposals for a new Regulation on the Sustainable Use of Plant Protection Products</a>	21/09/22	EUPPA response. Consultation response <b>TBC</b>

# Consultations - closed

Consultation	Closing date	Comments/status
<a href="#"><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></a>	20/09/22	No PPA response. <a href="#"><u>Summary of responses</u></a> published <b>21/02/23</b> .
<a href="#"><u>SG consultation on restricting promotions of food and drink high in fat, sugar or salt</u></a>	23/09/22	PPA response submitted. Consultation <a href="#"><u>response</u></a> published <b>30/05/23</b> .
<a href="#"><u>Defra consultation on contractual practice on the UK Pig Sector</u></a>	07/10/22	No PPA response. <a href="#"><u>Summary of responses</u></a> published <b>06/04/23</b> .
<a href="#"><u>FSS consultation on The Food and Feed (Miscellaneous Amendments) (Scotland) Regulations 2022</u></a>	10/10/22	No PPA response. <a href="#"><u>Summary of responses</u></a> published <b>24/11/22</b> .
<a href="#"><u>Defra consultation on the Groceries Code Adjudicator: statutory review, 2019 to 2022</u></a>	11/10/22	No PPA response. Consultation response <b>TBC</b>
<a href="#"><u>SG BRIA survey restricting promotions of food and drink high in fat, sugar or salt</u></a>	21/11/22	No PPA response. Consultation <a href="#"><u>response</u></a> published <b>30/05/23</b> .
<a href="#"><u>SG consultation on proposals for a new Agricultural Bill</u></a>	21/11/22	No PPA response. Consultation response <b>TBC</b>
<a href="#"><u>Defra/DHSC/FSA/FSS consultation amending The Bread and Flour Regulations 1998 and The Bread and Flour (Northern Ireland) Regulations 1998</u></a>	23/11/22	PPA response submitted on <b>18/11/22</b> . Consultation <a href="#"><u>response</u></a> published <b>17/01/24</b> .

# Consultations - closed

Consultation	Closing date	Comments/status
<a href="#"><u>FSA/FSS consultations on applications for authorisation of miscellaneous regulated products: two novel foods, one food additive and one flavouring</u></a>	11/12/22	No PPA response. <a href="#"><u>Summary of responses</u></a> published 09/03/23.
<a href="#"><u>FSA consultation on proposed changes to the Food Law Code of Practice (England) in relation to a new food standards delivery model</u></a>	09/01/23	No PPA response. <a href="#"><u>Summary of responses</u></a> published <b>08/06/23</b> .
<a href="#"><u>FSA consultation on proposed changes to the Food Law Code of Practice (Northern Ireland) in relation to a new food standards delivery model</u></a>	09/01/23	No PPA response. <a href="#"><u>Summary of responses</u></a> published <b>08/06/23</b> .
<a href="#"><u>EC Consultation on the revision of EU rules on food contact materials</u></a>	11/01/23	No PPA response. <b>Commission adoption Q2 2023.</b>
<a href="#"><u>DHSC call for evidence on the Antimicrobial resistance national action plan</u></a>	20/01/23	No PPA response. <a href="#"><u>Govt. response</u></a> published <b>16/08/23</b> .
<a href="#"><u>Welsh Parliament consultation on general principles of the Food (Wales) Bill</u></a>	27/01/23	No PPA response. <a href="#"><u>Summary of responses</u></a> published.
<a href="#"><u>FSA consultation on applications for authorisation of miscellaneous regulated products: one novel food and one food additive</u></a>	06/02/23	No PPA response. Consultation response <b>TBC.</b>

# Consultations - closed

Consultation	Closing date	Comments/status
<a href="#"><u>FSS consultation on the amendment to the specification of one additive (Rebaudioside M)</u></a>	06/02/23	No PPA response. <a href="#"><u>Summary of responses</u></a> published <b>10/03/23</b>
<a href="#"><u>WG consultation on separate collection of waste materials for recycling: a code of practice for Wales</u></a>	15/02/23	No PPA response. <a href="#"><u>Summary of responses</u></a> published <b>10/03/23</b>
<a href="#"><u>WG consultation on proposals for enforcing businesses, public and third sector recycling regulations in Wales</u></a>	15/02/23	No PPA response. <a href="#"><u>Summary of responses</u></a> published <b>27/04/23</b>
<a href="#"><u>WG consultation on nutrient management: managing the application of livestock manures sustainably</u></a>	17/02/23	No PPA response. <a href="#"><u>Summary of responses</u></a> published <b>10/10/23</b> .
<a href="#"><u>WRE draft Regional Water Resources Plan for Eastern England</u></a>	20/02/23	No PPA response. Consultation response <b>TBC</b>
<a href="#"><u>GCA: 2023 Groceries Code Adjudicator (GCA) Survey</u></a>	26/02/23	No PPA response. <a href="#"><u>Survey results</u></a> published <b>15/06/23</b> .
<a href="#"><u>WG consultation: Just Transition to Net Zero Wales</u></a>	15/03/23	No PPA response. <a href="#"><u>Summary of responses</u></a> published <b>26/10/23</b> .
<a href="#"><u>DHSC/DCSM consultation on introducing further advertising restrictions on TV and online for HFSS products</u></a>	31/03/23	PPA response submitted on 29/03/23. Consultation response exp. <b>Late 2023</b> .

# Consultations - closed

Consultation	Closing date	Comments/status
<a href="#">CMA consultation on draft guidance on environmental sustainability agreements</a>	11/04/23	No PPA response. <a href="#">Summary of responses</a> and <a href="#">guidance</a> published <b>12/10/23</b> .
<a href="#">Ofcom public consultation on the implementation of new statutory restrictions regulating the advertising of 'less healthy' food and drink</a>	21/04/23	PPA contribution to FDF response. Consultation <a href="#">response</a> published <b>10/07/23</b> .
<a href="#">EFSA public consultation on the draft scientific opinion on the update of the risk assessment of mineral oil hydrocarbons (MOH) in food</a>	30/04/23	ESA response TBC.
<b>CAP pre-consultation on guidance on LHF advertising restrictions</b>	05/05/23	This is an informal consultation (no link). PPA response sent on 05/05/23
<a href="#">EFRA Committee call for evidence on Resources and Waste provisional Common Framework</a>	05/05/23	No PPA response.
<a href="#">DESNZ consultation on Climate Change Agreements: extension and future scheme (2023)</a>	10/05/23	No PPA response. Consultation <a href="#">response</a> published <b>16/11/23</b> .
<a href="#">Defra consultation on strengthening environmental civil sanctions</a>	15/05/23	No PPA response. Govt. <a href="#">response</a> published <b>12/07/23</b> .

# Consultations - closed

Consultation	Closing date	Comments/status
<a href="#">Cabinet Office consultation on the Draft Border Operation Model (BTOM/TOM)</a>	19/05/23	No PPA response. <a href="#">TOM published</a> 29/08/23.
<a href="#">FSA consultation on updates to Technical Guidance on Food Allergen Labelling (incl. PAL)</a>	22/05/23	PPA response sent on <b>22/05/23</b> . <a href="#">Summary of responses</a> and <a href="#">updated guidance</a> published <b>04/09/23</b> .
<a href="#">HMRC consultation on Draft Regulations: The Plastic Packaging Tax (General) (Amendment) Regulations 2023</a>	22/05/23	No PPA response. Consultation response <b>TBC</b>
<a href="#">MAC call for evidence on the Shortage Occupational List (SOL)</a>	26/05/23	No PPA response.
<a href="#">WG consultation on proposals for enforcement of the Environmental Protection (Single-use Plastic Products) (Wales) Bill</a>	09/06/23	No PPA response. <a href="#">Summary of responses</a> published <b>03/10/23</b> .
<a href="#">HM Treasury/DESNZ consultation addressing carbon leakage risk to support decarbonisation</a>	22/06/23	No PPA response. Consultation <a href="#">response</a> published <b>18/12/23</b> .
<a href="#">Home Office consultation on Nitrous oxide: legitimate uses and appropriate controls</a>	27/06/23	No PPA response. Consultation <a href="#">response</a> published <b>05/09/23</b> .
<a href="#">FSA consultation on developing a modernised food hygiene delivery model in England</a>	30/06/23	No PPA response. <a href="#">Summary of responses</a> published <b>19/10/23</b> .

# Consultations - closed

Consultation	Closing date	Comments/status
<a href="#">FSA consultation on developing a modernised food hygiene delivery model in Wales</a>	30/06/23	No PPA response. <a href="#">Summary of responses</a> published <b>19/10/23</b> .
<a href="#">FSA consultation on developing a modernised food hygiene delivery model in Northern Ireland</a>	30/06/23	No PPA response. <a href="#">Summary of responses</a> published <b>19/10/23</b> .
<a href="#">Defra consultation on Charging arrangements at government-run border control points</a>	09/07/23	No PPA response. Consultation response <b>early 2024</b>
<a href="#">DBT open consultation Retained EU employment law reforms</a>	17/07/23	No PPA response. <a href="#">Consultation response</a> published <b>08/11/23</b> .
<a href="#">EFSA draft Scientific Opinion on PBDEs in food</a>	20/07/23	No PPA response.
DHSC consultation on HFSS volume price promotional restrictions SI (Informal)	27/07/23	Amended SI exp. Sep.23.
<a href="#">FSA consultation on the additional proposal for enhanced investigatory powers for the FSA</a>	06/08/23	No PPA response. <a href="#">Summary of responses</a> published <b>07/09/23</b> .
EC targeted stakeholder consultation on the re-evaluation of the authorised food additives 'sulfur dioxide-sulfites (E220-228)	15/08/23	PPA response TBC.

# Consultations - closed

Consultation	Closing date	Comments/status
<a href="#">FSA consultation on amendments to Retained (EU) Regulation 2019/1793: Official controls applied to imported High Risk Food and Feed Not of Animal Origin</a>	28/08/23	No PPA response. <a href="#">Summary of responses</a> published 23/11/23.
<a href="#">FSS 2023 Review of Commission Implementing (EU) Regulation 2019/1793 on increased import controls of certain food and feed of non-animal origin</a>	28/08/23	No PPA response. <a href="#">Summary of responses</a> published 23/11/23.
<a href="#">FSS consultation on updates to FSS Technical Guidance on food allergen labelling and information requirements</a>	08/09/23	PPA response submitted (same response as for FSA consultation). Consultation response <b>TBC</b>
<a href="#">FSA/FSS call for evidence on UK accession to CPTPP</a>	10/09/23	No PPA response. Consultation <a href="#">response</a> published <b>11/01/24</b>
<a href="#">Defra consultation on Draft producer responsibility obligations (packaging and packaging waste) regulations</a>	09/10/23	No PPA response. Consultation response <b>TBC</b>
<a href="#">HMRC consultation on Plastic Packaging Tax – chemical recycling and adoption of a mass balance approach</a>	10/10/23	No PPA response. Consultation response <b>TBC</b>
<a href="#">DESNZ call for evidence: Enabling Industrial Electrification</a>	20/10/23	No PPA response. Consultation response <b>TBC</b>

# Consultations - closed

Consultation	Closing date	Comments/status
<a href="#">EFSA consultation on the assessment report on the active substance Fosthiazate</a>	23/10/23	No PPA response.
<a href="#">FSA/FSS Call for data: T-2 and HT-2 toxins in food</a>	31/10/23	PPA response TBC. Consultation response <b>TBC</b>
<a href="#">OHID consultation on nutrition and health claims on food: proposed legislative reforms</a>	31/10/23	PPA response submitted on 31/10/23. Consultation <a href="#">response</a> issued <b>06/02/24</b> .
<a href="#">FSA consultation on the post implementation review of The Materials and Articles in Contact with Food (England) Regulations 2012</a>	09/11/23	No PPA response. Consultation response <b>TBC</b>
<a href="#">FSA consultation on the post implementation review of the Plastic Kitchenware (Conditions on Imports from China) (England) Regulations 2011</a>	09/11/23	No PPA response. Consultation response <b>TBC</b>
<a href="#">WG consultation on the introduction of improvement notices for nutrition and health claims</a>	15/11/23	PPA submitted response on 13/11/23. Consultation <a href="#">response</a> issued <b>06/02/24</b> .
<a href="#">Defra consultation on Simpler recycling in England: additional policies</a>	20/11/23	No PPA response. Consultation response <b>TBC</b>
<a href="#">DESNZ call for evidence on UK greenhouse gas emissions reporting: Scope 3 emissions</a>	14/12/23	No PPA response. Consultation response <b>TBC</b>

# Consultations - closed

Consultation	Closing date	Comments/status
<a href="#"><u>FSA consultation on proposals for a new framework in England for the regulation of precision bred organisms used for food and animal feed</u></a>	08/01/24	No PPA response. Consultation <a href="#"><u>response</u></a> published <b>07/03/24</b> .
<a href="#"><u>ASA/CAP consultation on restrictions on ads for “less healthy” foods</u></a>	07/02/24	PPA response through FDF. Guidance <b>exp. mid-2024</b> .
<a href="#"><u>DESNZ consultation on Climate Change Agreements: consultation on a new scheme</u></a>	14/02/24	No PPA response. Consultation response <b>TBC</b>
<a href="#"><u>Defra consultation on The UK fresh produce sector: review of the supply chain</u></a>	22/02/24	PPA response issued. Consultation response <b>TBC</b>
<a href="#"><u>GCA annual survey on the 2024 Groceries Code Adjudicator</u></a>	25/02/24	No PPA response. Consultation response <b>TBC</b>
<a href="#"><u>NI DoH Strategic Framework to Prevent the Harm caused by Obesity, and Improve Diets and Levels of Physical Activity</u></a>	01/03/24	Consultation deadline extended from 16/02. PPA response submitted 13/02. Summary of responses exp. <b>Summer.24</b>
<a href="#"><u>SG consultation on Scotland's draft Circular Economy and Waste Route Map to 2030</u></a>	15/03/24	No PPA response. Consultation response <b>TBC</b>
<a href="#"><u>Defra consultation on the Marking of Retail Goods (UK-wide ‘Not for EU’)</u></a>	15/03/24	PPA response submitted 15/03 (FLC 118/24). Consultation response <b>TBC</b>
<b>EU targeted consultation on the establishment of MOAH limits in food additive specifications</b>	15/03/24	No PPA response. Consultation response <b>TBC</b>