

PPA Food Law and Consumer Committee Meeting

Chair: Catharine Hall

14 November 2024

Agenda

1) Welcome and anti-trust statement

2) Minutes/action list

- FLC Notes and Action list from 2 July (FLC 289/24)

3) Updates and discussions:

• Nutrition & Health

- UK-wide HFSS advertising restrictions
- England and DA update HFSS promotion restrictions

4) GB Smoke Flavourings, Flavourings and other regulated products – Adam Hardgrave (FSA)

5) GS1: The next generation of barcodes – Roshni Shah (GS1)

BREAK

6) EU Potato Sustainability Update – Nuria Moreno (EUPPA)

7) Updates and discussions (cont.):

• Nutrition & Health

- PPA Salt/Sugar data collection 2023/2024
- Other Diet and Nutrition updates, incl. FDF DHC and NWG (incl. UPF, government priorities)

• Labelling and Composition

- Allergen Labelling and PAL update (UK and Codex)

Agenda cont.

- Defra cost of labelling research (and FDF work)
- Other labelling, composition and regulation updates, incl. FDF FLL (incl. Defra labelling team updates, BFR, 'Not for EU' labelling, recycling labelling)

BREAK

- **Food Safety**
 - Acrylamide
 - Glycoalkaloids
 - Other food safety updates
- **Sustainability**
 - Packaging update
 - Other sustainability updates

8) Committee matters

- FDF Associations meeting - priorities
- FLC Priorities for 2024-2025 (FLC 420/24)

9) Risk Matrix

10) AOB

11) Next meetings/Close

Matters arising - FLC 2 July 2024

Action	Status
Secretariat to follow up on discussions on priorities for 2024/2025	To be discussed today - COMPLETED
Members to send their salt/sugar data to PPA by <u>no later than 12 July</u>	To be discussed today – PARTIALLY COMPLETED
Members are encouraged to discuss the labelling challenge [flour fortification with folic acid] with their local/primary authorities (FLC 284/24)	To be discussed today - ONGOING
Members encouraged to send any issues that they may be encountering, both with NIRMS or BTOM, to the PPA Secretariat , who will work with the FDF and Defra/FSA as required to problem solve.	‘Not for EU’ NIRMS to be discussed today - ONGOING BTOM - COMPLETED
Members to provide comments to PPA on the new Welsh Government consultation on the healthy food environment <u>by no later than 9 August</u> (FLC 275/24).	To be discussed today - COMPLETED
Members to share any concerns on the FDF position on the Health workstream of the Food Data Transparency Partnership (FDTP) (FLC 233/24).	To be discussed today - COMPLETED
Members to contact the PPA Secretariat if they have been contacted by ADAS in relation to their food labelling costs work (work commissioned by Defra).	To be discussed today - COMPLETED
Secretariat to confirm FSA extension of smoke flavourings authorisations until 1 Jan. 2025.	To be discussed today - COMPLETED
Secretariat to propose changes to Issues Matrix and circulate to members for approval.	COMPLETED
Members to confirm availability for in-person FLC meeting on 14 November in London.	COMPLETED

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

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

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 promc (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)

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

SI delaying HFSS volume promos England (Sep.23)

1st meeting FDTP health WG (Jul.23)

2nd meeting FDTP health WG (Sep.23)

FDF Celebrating Food and Nutritio Week 20 (Sep.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)

DHSC Framework Major Conditions Strategy (Aug.23)

England CMO report (Nov.23)

HoC Briefing Advertising to Children (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)

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

SACN review Vit D fortification (May.24)

5th meeting FDTP health WG (Apr.24)

WG Consultation HFSS (enforcement and draft regs) (Jul.24)

WHO consultation guidelines nutrition labelling policies (Sep.24)

ATNI report NPM alignment (Sep.24)

FAO/WHO statement 'Principles of a Healthy Diet' (Oct.24)

UK GENERAL ELECTION (4 July)

DHSC/DCMS Response to consultation secondary legislation/enforcement' LHF advertisi' (Sep.24)

HoL Inquiry Committee Food, Dir & Obesit report UPF/HFSS (Oct.24)

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

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

Salt Awareness Week (May.24)

SACN review UPF (Oct.24)

SACN review non-nutriti' sweetener (Oct.24)

HoL Inquiry Committee Food, Dir & Obesit report UPF/HFSS (Oct.24)

ASA/CAP guidance on HFSS advertising (Late 2024)

DHSC response HoL inquiry UPF/HFSS (Dec.24)

UK secondary legislation LHF advertising restrictions (Late 2024)

DHSC LHF advertising restrictions guidance (Late 2024)

BFR Published (mid-Nov.24)

BFR Into force (mid-Dec.24)

WG HFSS promo restrictions legislation laid (End 2024)

WG HFSS promo restrictions guidance (End 2024)

SG response consultation HFSS promos (Late Autumn.24)

NI DoH summary responses consultation Obesity Strategy (Late 2024)

EU study on food taxes DGTAXUD (End 2024)

WHO guidelines salt substitutes (End 2024)

WHO 'SHAKE' Technical Package Salt (2024 TBC)

DHSC 10-year NHS reform plan (+ Obesity Strategy TBC) (Spring.25)

NDNS Y12-15 (Q1 2025 (Feb/Mar)

OHID research impact HFSS marketing on adults (May.25)

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

SG Good Food Nation Plan (By May.25)

SG Scottish Food Commission (By May.25)

SG legislation HFSS promos (Early 2025 TBC)

NI Obesity Strategy (Apr.25)

ANSES report on UPF (Early 2025)

EU Childhood Obesity Action Plan Follow up (2025 TBC)

IARC review UPF (2025-2029)

WHO guidelines poly unsaturates (Early 2025)

UK LHF advertising restrictions into force (Oct.25)

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

SACN review UPF (Nov.25)

OHID final calorie reduction progress report (Early 2026 TBC)

WG HFSS promo comes into force (End 2025)

SG HFSS promo restrictions info force (Early 2026 TBC)

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

OHID report on salt targets

UK Govt. response FOPNL

OHID response 2018 NPM consultation

WHO Guidelines UPF consumption

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

England review HFSS promotion regs (2027)

NDNS urinary sodium analysis (2026)

End transition BFR folic acid fortification (Dec.26 TBC)

OHID report SDIL and milk-based/ juices

EU Review Childhood Obesity Action Plan

Defra response to consultation on GBSF

DHSC Major Conditions Strategy

DHSC response Vit D

WHO Food Systems-Based Dietary Guidelines

TBC

OHID report on salt targets

UK Govt. response FOPNL

OHID response 2018 NPM consultation

WHO Guidelines UPF consumption

England proposals FDTP Health

EU NPM review

EU Proposals FOPNL

EU Childhood Obesity Action Plan

DHSC Major Conditions Strategy

DHSC response Vit D

WHO Food Systems-Based Dietary Guidelines

Defra response to consultation on GBSF

UK Diet and Nutrition calendar

Policy areas	Type of legislation	Consultation	Consultation response	Legislation/ guidelines due	Comes into force
England volume/location promotional restrictions HFSS	Secondary legislation under FSA 1990	Main - Apr.19 Enforcement – Feb.21 Delay volume – Jul.23	Main – Dec.20 Enforcement – Jul.21 Delay volume – Sep.23	Dec.21 Delay volume – Sep.23 GUIDANCE: Apr.22	Location: Oct.22 Volume: Oct.25
UK-wide advertising restrictions LHF – 9pm watershed	Secondary legislation under new Health and Social Care Act	Main - Jun.19 Secondary/Enforcement – Dec.22	Main - Jun.21 Secondary/Enforcement – Sep.24	Health & Care Act: Apr. 22 Secondary leg.: End 2024 GUIDANCE: End 2024	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	Oct.24	End 2024	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 Enforcement HFSS restrictions– Jul.24	Main – Jun.23 Secondary/Enforcement – End of 2024 Guidance – End of 2024	End of 2024	End of 2025
SG HFSS promo restrictions	Secondary legislation under Food Safety Act 1990	Main - July.22 2 nd – Feb.24	Main –May.23 2 nd – Late Autumn.24	Early 2025 TBC	Early 2026 TBC
NI Healthy Futures	TBC	Main strategy – Nov.23 Action plan – Dec.24	Main – Late 2024 Action plan – Spring 2025 TBC	TBC	TBC

LHF advertising restrictions (UK-wide)



- **NEW:** 12 September – [Govt. response](#) consultation secondary legislation (see [draft](#)):
 - TV 9pm watershed and paid-for online
 - Confirms LHF advertising restrictions will apply from 1 October 2025
 - Businesses/services in scope of the restrictions are unchanged from the draft version
 - Brand advertising and transactional content out of scope
 - Product categories to mirror HFSS promotion restrictions in England
 - 2004/05 NPM will define LHF
 - Consultation on application to IPTV – closed 10 October
- [ASA/CAP consultation](#) on guidance – closed on 7 February – still not published

NEXT STEPS:

- Secondary legislation exp. **before end of 2024**
- ASA/CAP guidance publication now exp. **before end of 2024**
- DHSC guidance on product categories exp. **before end of 2024**
- Regulation to come into force – **1 Oct. 2025**

Promotion restrictions (England and DAs)

ENGLAND:

- [Location/placement restrictions](#) in place since 1 Oct.2022
- [Guidance](#) updated Sep.23
- 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**

WALES:

- [Consultation](#) on healthy food environment (FLC 275/24) – ended 23 September
- PPA response submitted 29 September (FLC 364/24) – see [draft Regulation](#)
- Draft guidance circulated to members 3 September (FLC 342/24)



NEXT STEPS:

- Legislation still exp. **end of 2024**
- Guidance also exp. **end of 2024**
- Implementation (12-month transition) **exp. end of 2025**
- WG to consult on additional measures
 - Additional restrictions (e.g. meal deals, TPRs, free-standing displays) to be built into Regulation before May 2026 Senedd elections

Promotion restrictions (England and DAs)

SCOTLAND:



- [Consultation Restricting Promotions of HFSS foods](#) closed on 21 May.
- PPA response on 21 May (FLC 222/24)
- No new updates

NEXT STEPS:

- **NEW:** Consultation response **exp. Late Autumn 2024**
- Implementation exp. **Late Autumn 2025**
- SG working on Population Health Framework **exp. Dec.24**

NORTHERN IRELAND:



- Consultation on obesity strategy [Healthy Futures](#) closed on 1 March.
- PPA response submitted 13 February (FLC 073/24)
- No new updates

NEXT STEPS:

- Consultation response **exp. imminently**
- Consultation on action plan for obesity framework **in Dec.24**
- New Obesity Strategy **exp. Apr.25**

GB Smoke Flavourings, Flavourings and other regulated products

Adam Hardgrave
Food Standards Agency (FSA)

The next generation of barcodes

Roshni Shah

GS1



The next generation of barcodes

PPAUK

14th November 2024



Our purpose

As a neutral, not-for-profit membership organisation, we bring our members together to address industry problems that companies can't solve alone.

We harness the power of standards to transform the way people work and live.



GS1 UK



60,000

members

76%

from the retail industry

10bn

barcodes scanned everyday

Everything we do is built on standards

GS1 standards enable the **identification**, **capture** and **sharing** of information in a common format.



identify



capture



share

The next generation of barcodes

1974



2024



Our needs are evolving



Consumer demands

Consumers are **demanding more information** than ever about the products they are consuming:

e.g. Ingredients, allergens, nutrition, sustainability, authenticity, accessibility.



Sustainability

We need to **reduce the environmental impact** of the food supply chain. Waste reduction is a key component, both from food and packaging.

Improving **supply chain visibility** with real time information about products is key to unlocking.



Regulatory requirements

Regulators are requiring the **disclosure of more information** about products:
e.g. DPP, DRS, EUDR, EU wine regulations.



Digitalisation

Omni-channel shopper journey is blurring the lines between physical and digital shopping experiences.

Proliferation of new codes on pack to meet the demands of consumer engagement, packaging systems, regulation and POS.

Global industry support



Data carriers



EAN/UPC barcode



GS1 DataMatrix

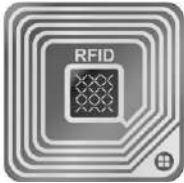


GS1®



(01)05012345000008

Digital Link QR Code



RFID

One code on pack, connecting a world of trusted data

- ✓ Consumers
- ✓ Retail POS
- ✓ Store operations
- ✓ Logistics
- ✓ Waste management
- ✓ Customs
- ✓ Regulators



What is a QR code powered by GS1?



```
https://id.bringoutthebranston.co.uk/01/05060336506022/10/ABCD/21/123?17=241225
```

Your domain name GTIN Batch Serial Expiry

- Product information
- Product history
- Certifications
- Carbon footprint
- Recycling information

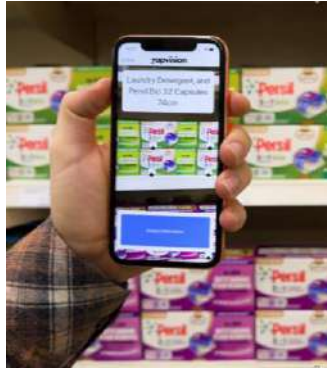
One smarter scan, many possibilities



Unlocking a world of possibilities



Engaging and informing consumers



Providing access to vital information for ALL



Safer, more efficient recalls



Reducing food waste



Enabling the circular economy

Retailers

High risk categories



Safety and waste reduction



Small scale pilots



Policy changes: UK & EU

- 1) FDTP shaping regulations
- 2) Gov healthy food strategy
- 3) Farm to fork food security and traceability



Q & A



Thank you

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LinkedIn

EU Potato Sustainability Update

Nuria Moreno

European Potato Processors' Association (EUPPA)



European Potato Processors' Association

Sustainable quality potato products for Europe



About Us



Who we are

EUPPA is the association that represents the European potato processing industry.

6

national associations

from Belgium, France, Germany, Italy, the Netherlands and the United Kingdom

14

individual companies

> 90%

of Europe's processed potato production by both value and volume



25.000

people employed



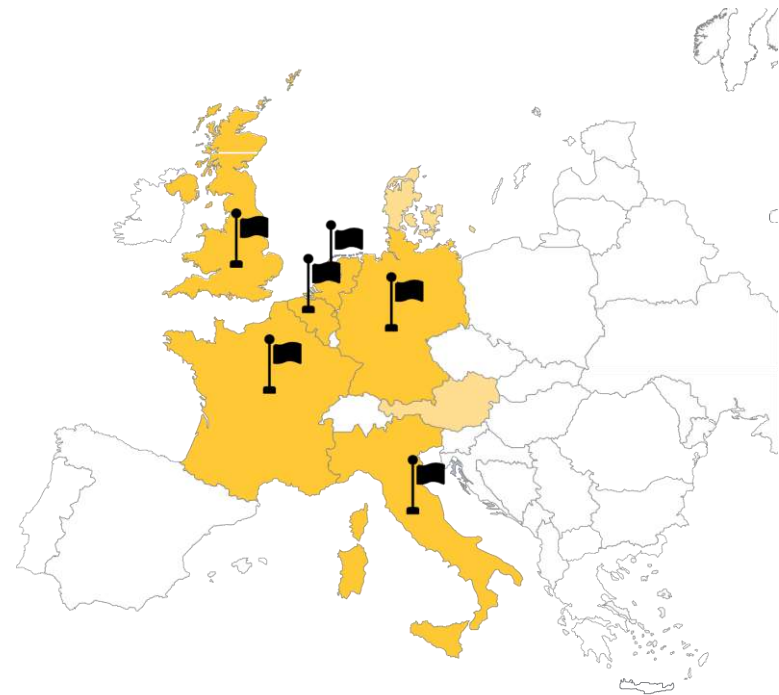
45

Production facilities



> 6 million tonnes

Annual volume of production of French fries and potato-derived products



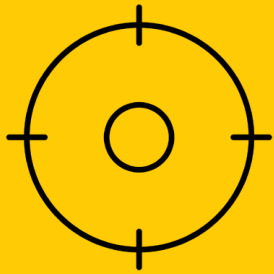
Our Members

National Associations

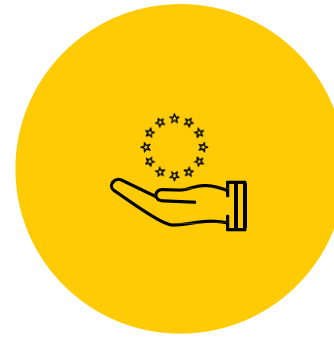
Companies



Our Vision



Our industry's strategy is to be highly **innovative, sustainable, competitive, and acting responsible** for the current and future needs of our planet and our consumers.



We are **adding value to an important crop** that is well rooted in a European growing tradition with strong ties to farmers.



EUPPA's role is to support the **sustainable growth** of the sector of processed potatoes and **promote the interests** of our members at European level.

Strategic Priorities

A Europe where our businesses and suppliers can innovate and flourish in a sustainable way



Sustainable supply of raw material

Addressing challenges from an environmental and economic perspective: use of plant protection products, soil health, biodiversity, etc.



Food safety & innovation

A policy & regulatory framework where safety and quality are not compromised, while allowing for innovation. Focus on mitigating contaminants in processed potato products, ingredient use, consumer information and labelling, supporting research



Strengthening the potato value chain

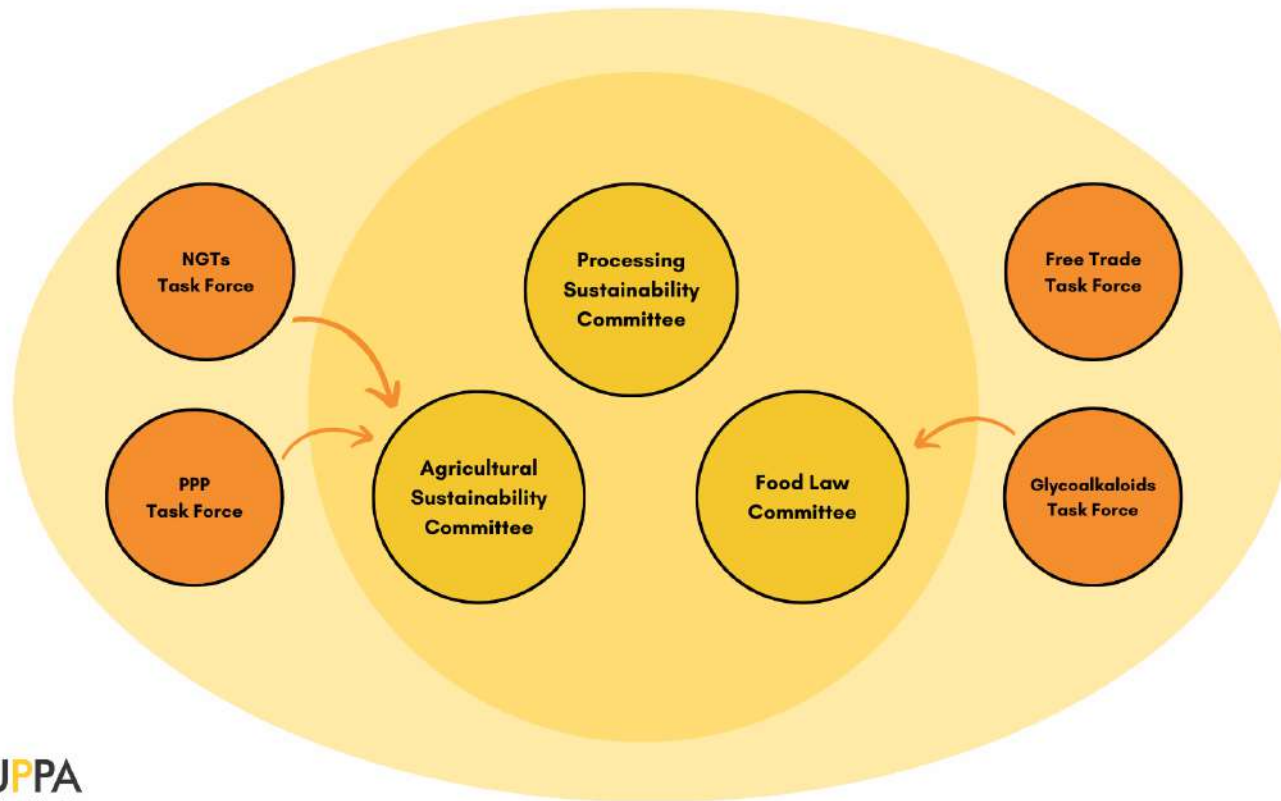
Supporting fair trade globally, competitiveness and a level playing field across our supply chain



Sustainability

Take a leading role in supporting members to reduce the environmental impact of their products and processes: packaging, food loss & waste, energy use, water reuse etc.

Committees & Task Forces



Organisation

EUPPA General Assembly	
Members: National Associations & Companies	
National Associations	Belgapom, BOGK, FNTPT, PPA, Unione Italiana Food, VAVI
Companies	11er, Agristo, Aviko, Clarebout, Pomuni, KMC, McCain, Agrarfrost, Schne-Frost, Wernsing, Pizzoli, Farm Frites, Lamb Weston, Peka Kroef
EUPPA Board of Directors	
Mr Erwin Pardon	President of the Association
Mr Marc Van Herreweghe	Chairperson of the Board
Mr Ernst-Rainer Schnetkamp	Vice-Chairperson of the Board
Mr Nicola Pizzoli	Treasurer
Mr Andrew Curtis	Director
Mr Alain Duranleau	Director
Mr Maarten van Delst	Director
Mr Filip Wallays	Director
Mr Stefan Wernsing	Director
Mr Stephan van Kuik	Director
EUPPA Secretariat	
Ms Nuria Moreno	Secretary-General & Sustainability Affairs
Ms Alice Grassi	Communication
Mr Alessandro Piccione	Regulatory Affairs
Ms Juliette Marie Margueritte	Agricultural Sustainability
Mr Arthur Tchasse	Finance
Ms Melissa Platt-McCarthy	Assistant

Our stakeholders

EU regulatory authorities



Public entities



Food & Drink industry



- Companies
- National federations (FEVIA, FNLI, ANIA, etc.)
- Sectors (fruit & veg processors, dairy, meat, brewers, soft drinks, fruit juice, etc.)

Agri-food chain



Potato Value Chain



Sustainability overview



EUPPA Manifesto

EUPPA priorities for a Europe where our businesses can thrive and create value

1 Support Global Competitiveness and Trade

Opportunities: EUPPA members are committed to keeping Europe at the forefront of global food systems by producing safe, delicious, and affordable potato-based products. By investing in innovation and research, we aim to maintain our competitive edge and support thriving local food systems worldwide.

2 Secure the Supply of High-Quality Raw Materials:

Partnering closely with potato-growing communities, we focus on sustainable farming practices, soil health, and fair revenue models to ensure a consistent supply of top-quality potatoes. Our efforts aim to support food security and improve rural livelihoods.

3 Facilitate the Green Transition: Sustainability is at the core of our industry. Through innovative practices, we aim to reduce our environmental footprint, promote resource efficiency, and achieve zero waste. We are dedicated to advancing sustainable manufacturing and packaging solutions to build a greener, more resilient food system.

From Field to Plate

Rooted in Europe's soil, the potato processing sector encompasses a wide range of products used in numerous meals throughout different cuisines and multiple eating moments of the day. From field to plate, we prioritize quality, innovation, and sustainability, nurturing a growing sector that provides food security and fair income to growers.

How much do you know about the European potato processing industry?

6M tonnes annual volume of production of French fries and potato-derived products	7,8kg / capita average annual volume of consumption of French fries and potato-derived products	2.9M tonnes Volume of Extra-EU27 exports in 2023 <small>(non-member from January 2023 to 2024 on 2023 basis)</small>	25.000 directly employed people in the sector	€7.3B / year turnover
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EUPPA priorities for a Europe where our businesses can thrive and create value

- 1 Support global competitiveness and trade opportunities**
As food manufacturers, we contribute to Europe's leading position in global food systems by providing safe, affordable and delicious potato-based products that boost the internal and the global market. Europe is one of the world's most competitive and high-quality sourcing potato for potato-based products. However, our industry is at risk of becoming less competitive in the global market due to cost increases in materials and energy. The industry aims to continue investing and growing in Europe, but staying globally competitive is key to keep up with these ambitions.
For our sector to thrive, it is crucial for EU policy to maintain an ambitious trade agenda and to be able to count on a level playing field in the EU internal market as well as fair trade in processed potato products globally.
- 2 Secure the supply of high-quality raw materials**
As the third most consumed food crop globally, potatoes contribute to food security and rural livelihoods around Europe. Our sector operates close to potato growing communities and partners with them to share knowledge, adapt to climate change, improve soil health, and protect potato yields. This secures the long-term supply of high-quality potatoes for processing. Income security is key to sustaining farmers' livelihoods and within the potato value chain we focus efforts towards fair revenue models for growers.
To ensure agricultural resilience while minimizing environmental impact, the EU decision makers should support the potato chain in its transition to more sustainable practices and innovative technologies. This is essential to address concerns around the risk of declining yields and quality, as well as increasing costs. Moreover, access to finance and to productive arable land is needed.
- 3 Facilitate the green transition in potato processing**
Sustainability lies at the very core of the European potato processing sector. Through innovation and strategic initiatives, our industry seeks to advance sustainable manufacturing practices, thereby supporting a greener and more resilient food system in Europe.
To continue this green transition, we call for an approach whereby there is policy and financial support for decarbonization, innovation, and sustainable manufacturing practices. This involves stimulation of investments in renewable energy infrastructure, recycling, circularity, and zero waste management. It also entails fostering innovation through digital tools and implementing coordinated policy proposals that are measured for their impact, all while ensuring the global competitiveness of our industry.

SCAN HERE TO FIND OUT MORE

FutureFriendlyFries
The European Potato Processors' Association (EUPPA)
www.euppa.eu | @EUPPA_EU

EUPPA
European Potato Processors' Association

New EU political mandate

What is coming... Von der Leyen's political guidelines & Commissioner hearings

- Continue the course of **EU Green Deal** incl. implementation of existing legislation
- Propose a new **Circular Economy Act**, to create market demand for secondary materials and a single market for waste (critical raw materials)
- Continue the shift to a more sustainable pattern of production and consumption, incl. **sustainable agricultural practices** that ensure fair income for farmers
- European **Water Resilience Strategy** to address scarcity (especially in farming), properly manage sources and take a circular economy approach
- A new **Climate Adaptation plan** - how the EU can adapt to climate change impact and become climate resilient by 2050
- **Clean Industrial Deal** – in the first 100 days – to support European businesses to achieve the climate objectives and circular economy.
- **Nature Restoration Law** (NRL) implementation



Wopke
Hoekstra
Commissioner for **Climate,
Net-Zero and Clean Growth**



Jessika
Roswall
Commissioner for **Environment,
Water Resilience and a
Competitive Circular Economy**

Corporate Sustainability Reporting & Due Diligence

(CSRD &
CSDDD)

Embedding sustainability in business strategy

Company focus

- Include sustainability in business strategy to continue to evolve
- Compliance with changing legislative environment

Double materiality assessments

EUPPA Focus: CSRD materiality harmonisation through a 'potato processing sector materiality matrix'.

What do we want to achieve?

- Common understanding at EUPPA level of top 10 most material topics.
- Members are supported in their CSRD implementation by having ref to a sector-specific materiality matrix

Result: Green Transition framework with identification of EUPPA Lead, Monitor and Observe topics

Recent developments

PPWR: Final phase of the legislative process

- On 24 April, the European Parliament plenary endorsed the provisional agreement reached during the trilogues with a large majority
- December 2024/January 2025 - Signature and publication of the Regulation in EU Official Journal
- Many details will be defined through secondary legislation or standards (e.g. calculations for recycled content, empty space, and reuse, regulation of substances of concern)

Green Claims: trilogues

- European Parliament & Council have endorsed their positions. Trilogue negotiations to start
- Differentiation between explicit environmental claims and environmental labels, outlining specific obligations for each

Food Waste Reduction Targets (10% for processing): trilogues

- European Parliament & Council have endorsed their positions. Trilogue negotiations to start.
- There is discussion on the reference year for reduction targets: 2020 (as proposed by EC) or to 2025.

EU Deforestation Regulation (EUDR): implementation

EC announced the Regulation's application will be postponed by 1 year i.e. application as of 30 December 2025 for large companies and on 30 June 2026 for micro and small enterprises. Decision by the European Parliament on 14 Nov on postponement and amendments.

EUPPA Sustainability Report



Check out [this video](#) too!



A final remark...

EUPPA's "Blueprint for the future" recognises the importance of addressing (defensively) **health** matters into EUPPA's communication and strategic roadmap. Health matters relate to potato advocacy, ultra-processed food, fat and salt reduction, portioning, PPP's and other. This needs to be based on a scientific approach.

Work in progress for 2025...

Note: consumer communication is not the scope





Follow EUPPA on LinkedIn!

Thank you for your support.

EUPPA | European Potato Processors' Association

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NUTRITION & HEALTH

PPA members' progress

Salt and Sugar Reduction Targets - SNACKS

Data analysis on information supplied by members on **sugar and salt** values in their products for the period **1 April 2023 – 31 March 2024**.

Crisps and snacks (salt):

- Standard crisps (provisional): SWA up by 0.01g per 100g – **meet 2024 targets**
- Extruded snacks: SWA down by 0.4g per 100g – **meet 2024 targets**
- Pelleted snacks: SWA up by 0.17g per 100g – **no longer meet 2024 targets**
- Salt & Vinegar Products: SWA down by 0.03g per 100g

Flavoured nuts and popcorn (salt):

- Flavoured nuts: SWA down by 0.01g per 100g.
- Savoury Popcorn: SWA up by 0.03g per 100g.
- Sweet Popcorn: No change in SWA vs. 2022-2023.

Popcorn (sugar):

- 99.8% of products meets 5% reduction targets (vs. 98.5% 2022-2023).
- 62.2% of products meets 20% reduction target (vs. 61.4% 2022-2023).

Salt data 2024 – Crisps (Provisional)

Product Category		FSA 2012 Targets	SNACMA April 2014 Status	SNACMA April 2015 Status	SNACMA April 2016 Status	PHE 2017 Targets	SNACMA April 2017 Status	SNACMA April 2018 Status	SNACMA April 2019 Status	SNACMA April 2020 Status	SNACMA April 2021 Status	SNACMA April 2022 Status	SNACMA April 2023 Status	SNACMA April 2024 Status	PHE (OHID) 2024 Targets
Standard Crisps	Ave.	1.38	1.33	1.33	1.30	1.31	1.26	1.28	1.26	1.28	1.28	1.25	1.23	1.24	1.25
	Max.	1.63	-	-	-	1.45	-	-	-	-	-	-	-	-	1.38
Extruded Snacks	Ave.	1.88	1.83	1.69	1.64	1.7	1.71	1.59	1.65	1.59	1.55	1.43 ^c	1.43	1.39 ^c	1.61
	Max.	2.5	-	-	-	2.0	-	-	-	-	-	-	-	-	1.90
Pelleted Snacks	Ave.	2.25	2.10	2.10	2.11	2.13	2.10	2.05	2.06	2.12 ^a	2.14 ^b	2.01 ^c	1.90 ^c	2.07 ^d	2.03
	Max.	No Max	-	-	-	2.88	-	-	-	-	-	-	-	-	2.73
Salt & Vinegar Products (all)	Ave.	2.13	1.98	1.98	1.97	1.88	1.98	2.03	1.94	1.99	1.90	1.83 ^c	1.83	1.86 ^e	1.78
	Max.	3.0	-	-	-	2.5	-	-	-	-	-	-	-	-	2.25

^a This value had been incorrectly reported last year (previously 2.09)

^b Slight increase due to the removal of a product from the pelleted category in 2020-2021.

^c Large decrease due to reformulation and drop in sales.

^d Increase due to inclusion of a limited number of products with a higher salt content combined with an increase in sales.

^e Increase due to inclusion of a limited number of products with a higher salt content.

PHE (OHID) 2024 salt reduction targets:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/915406/2024_salt_reduction_targets_070920-FINAL-1.pdf

Salt data 2024 – Popcorn and Nuts (Final)

Product		SNACMA April 2020 Status	SNACMA April 2021 Status	SNACMA April 2022 Status	SNACMA April 2023 Status	SNACMA April 2024 Status	PHE (OHID) 2024 Targets
Flavoured Nuts	Ave.	1.54	1.54	1.50	1.39	1.38^c	1.00
	Max	-	-	-	-	-	1.20
Savoury Popcorn	Ave.	1.76	1.52	1.50	1.27 ^c	1.30^d	1.23
	Max	-	-	-	-	-	1.44
Sweet Popcorn	Ave.	0.77	0.80 ^a	0.88 ^b	0.83 ^c	0.83	0.76
	Max	-	-	-	-	-	1.00

^a Slight increase in SWA for sweet popcorn due to the introduction of new products and an overall increase in tonnage (16%).

^b Increase due to increase in sales tonnage of many products (approx. 14% on sweet).

^c Some decrease partly due to reformulation and new product but also decreases in tonnage.

^d Increase due to large increase in sales.

PHE (OHID) 2024 salt reduction targets:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/915406/2024_salt_reduction_targets_070920-FINAL-1.pdf

Sugar data 2024 – Popcorn (Final)

Year	PHE Sales Weighted average (g per 100g)	Target 5% reduction (g per 100g)	Target 20% reduction (g per 100g)	SNACMA Sales Weighted Average (G per 100g)	SNACMA Minimum (g per 100g)	SNACMA Max (g per 100g)
2017	60.6	57.5	48.4	38.0	15.9	64.0
2018-2019	60.6	57.5	48.4	34.8	1.0	64.3
2019-2020	60.6	57.5	48.4	36.6	1.0	64.0
2020-2021	60.6	57.5	48.4	35.1	1.0	64.0
2021-2022	60.6	57.5	48.4	33.8	1.1	64.0
2022-2023	60.6	57.5	48.4	30.4 ^a	1.0	64.0
2023-2024	60.6	57.5	48.4	30.6^b	1.0	65.4

^a Reduction mainly due to decreases in sales, but also some reformulation work.

^b Increase primarily due to an increase in sales.

Total 16 products, of which:

- 99.8% of volume meet PHE SWA baseline
- 99.8% of volume meet PHE's 5% reduction targets
- **62.2% of volume meet PHE's 20% reduction targets**

PHE 2020 sugar reduction targets:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/604336/Sugar_reduction_achieving_the_20_.pdf

PPA members' progress

Salt and Sugar Reduction Targets - POTATO

Data analysis on information supplied by members on **salt** values in their products for the period **1 April 2023 – 31 March 2024**.

Processed potato products:

- Chips with coatings: SWA up by 0.02g per 100g – **meet 2024 targets**
 - Waffles, shapes and hash browns: SWA down by 0.05g per 100g – **still above 2017 targets**
 - Wedges, mash and others: SWA down by 0.02g per 100g – **meet 2024 targets**
 - All processed potato products (except dehydrated mash): No change in SWA from 2022-2023.
-
- **Collectively, the category 'All processed potato products (except dehydrated mash)' continues to meet 2024 targets.**

Processed Potato Products 2024 – Salt (Final)

Product Category		FSA (DH) 2012 targets	SNACMA April 2013 Status	SNACMA April 2014 Status	SNACMA April 2015 Status	SNACMA April 2016 Status	PHE 2017 targets	SNACMA April 2017 Status	SNACMA April 2018 Status	SNACMA April 2020 Status	SNACMA April 2021 Status	SNACMA April 2022 Status	SNACMA April 2023 Status	SNACMA April 2024 Status	PHE (OHID) 2024 Targets
Chips with Coatings	Ave.	0.49	-	-	-	-	0.46	-	0.43	0.41	0.29	0.29	0.29	0.31 ^a	0.39
	Max	0.75	-	-	-	-	0.69	-	-	-	-	-	-	-	0.65
Waffles, Shapes & Hash Browns	Ave.	0.49	-	-	-	-	0.46	-	0.65	0.63	0.69	0.62	0.57	0.52 ^b	0.39
	Max	0.75	-	-	-	-	0.69	-	-	-	-	-	-	-	0.65
Wedges, Mash & Others	Ave.	0.49	-	-	-	-	0.46	-	0.57	0.41	0.47	0.40	0.36	0.34 ^c	0.39
	Max	0.75	-	-	-	-	0.69	-	-	-	-	-	-	-	0.65
Processed Potato Products (all*)	Ave.	0.49	-	-	-	-	0.46	-	0.47	0.43	0.33	0.33	0.33	0.33	0.39
	Max	0.75	-	-	-	-	0.69	-	-	-	-	-	-	-	0.65

* Except dehydrated instant mash.

^a Increase mainly due to an increase in sales.

^b Decrease attributed to reductions in salt content of products and also a decrease in sales.

^c Decrease due to a reduction in sales.

PHE (OHID) 2024 salt reduction targets:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/915406/2024_salt_reduction_targets_070920-FINAL-1.pdf

OTHER DIET & NUTRITION

UPF

- SACN [statement](#) on processed foods and health– **Jul.23** (FLC 262/24)
- House of Lords Food, Diet & Obesity Committee [inquiry](#) on UPF – **Jan.24**
 - [Call for evidence](#) – **Feb-Apr.24** (FLC 086/24)
- FSA [advice](#) for consumers on UPF – **May.24**
- FSS [position statement](#) on processed and ultra-processed foods – **Aug.24** (FLC 332/24)
- SACN [draft rapid review](#) of UPF **Oct.24** (FLC 381/24)
- House of Lords [report](#) on food system and UPF – **Oct.24** (FLC 406/24)
- FAO/WHO joint [statement](#) on principles of a healthy diet - **Oct.24** (FLC 411/24)
- ANSES review of UPF - **Early 2025**
- University of Copenhagen study – review and update NOVA definition – **exp. 2026**
- IARC review of UPF (2025-2029) – **exp. 2027**
- WHO guidance on consumption of UPF – **timelines TBC**
- Next SACN review UPF – **Nov.25**

FDF Activity

- FDF working with consultancy with Milltown and Partners on UPF communication strategy
- Aim is to maintain consumer trust in processed food
- Timescales TBC

OTHER DIET & NUTRITION

HoL Report – Recipe for Health: a plan to fix our broken system

- “The House of Lords Food, Diet and Obesity Committee demands that the Government should develop a comprehensive, integrated long-term new strategy to fix our food system, underpinned by a new legislative framework.”

Key recommendations:

- Large food businesses a report on the healthiness of their sales
- Exclude businesses (and trade associations) that derive more than a defined share of sales from LHF from political discussions on future food policy
- Give FSA independent oversight of the food system.
- Introduce a salt and sugar reformulation tax - “as soon as possible” – and within a maximum of two years.
- Ban the advertising of less healthy food across all media by the end of this Parliament
- Commission further research into the links between UPF and adverse health outcomes and review dietary guidelines

Other recommendations:

- Mandatory regulation instead of voluntary targets
- Publish a detailed response to 2023 SACN statement on UPF within 2 months – Government position
- Publish a code of conduct on ministerial and officials’ meetings by the end of 2025
- Review of Eatwell Guide
- Implement the 2018 NPM without further delay
- FDTP Health WG to finish its work no later than the end of September 2025 – mandatory reporting on healthier food sales
- Legislation to mandate sugar, salt and calorie reduction targets – mandatory reporting and fines for non-complying businesses
- Include meal deals to HFSS promotion restrictions
- Ban the use of brand and licensed characters, cartoons and NHC on the packaging of HFSS food and drink
- Introduce mandatory FOPNL that clearly distinguishes healthier and less healthy products
- Immediately review and update the school food standards and GBSF – incl. SACN’s recommendations on free sugars and fibre

Government required to reply within 2 months

OTHER DIET & NUTRITION

Government priorities

- Focus on prevention as part of '10-year plan'
- Key policies include:
 - ban on advertising of 'junk food' to children
 - Free breakfast clubs for primary schools
 - Ban sale of energy drinks to under 16s
 - Restrict fast food outlets near schools

Predictions for a new obesity strategy...

fdf

Reannouncing current commitments!

Key policies called for across the NGO community which may be considered:

- A sugar/salt tax (possibly to fund the roll out of breakfast clubs)
- Mandatory reporting on sales of unhealthy foods
- Mandatory front of pack nutrition labelling
- Restricting packaging of appeal to children / cartoon characters on pack
- Restricting sports sponsorship

Other 'high risk' areas to keep under review:

- Implementing the 2018 NPM
- Controls for industry lobbying
- Further advertising restrictions

FDF Activity:

- Understand impact to companies
- Review evidence
- Updating our positions

OTHER DIET & NUTRITION

FDTP:

- No Ministerial steer - work paused

EU report [Strategic Dialogue on the Future of EU Agriculture](#) (FLC 347/24):

- EC to measure effectiveness of national measures and industry voluntary commitments on marketing of HFSS to children by 2026 and legislate accordingly.

Nutri Score (FLC 294/24):

- No movement – political block

ATNI report on [Sector Alignment on the use of NPMs](#) (FLC 366/24):

- Based on one or more NPMs: Health Star Rating, Nutri-Score, the UK NPM (2004/05).
- No reference to processing

WHO updates:

- WHO consultation on nutrition policies – Sep-Oct.24
- CCEURO to start new work on dietary guidelines – to be discussed May.25

FOOD LABELLING, COMPOSITION & REGULATION

Allergen Labelling

CCFL48 27 Oct-1 Nov

- [Revision of GSLPF provisions on allergen labelling](#): definition of 'food allergen', allergen exemptions, sulphite declaration and presentation
 - FSA broadly supportive, except on sulphites
 - **For adoption at CAC47 (25 Nov)**
- [Guidelines on Precautionary Allergen Labelling \(PAL\)](#): gluten (coeliacs) vs. cereal allergies and quantitative vs. qualitative risk assessment
 - [FSA Board meeting 18 September](#) - agreement 3 (out of 4) draft Codex principles:
 - PAL should only be used when the unintended presence of a food allergen cannot be prevented or controlled.
 - PAL should be based on the findings of a risk assessment.
 - PAL should be accompanied by education and information to ensure proper understanding and use by consumers, healthcare providers, and food business operators.
 - Insufficient evidence to support adoption of ED05 threshold
 - To progress to Step 5 – more work needed
 - FAO/WHO to provide:
 - guidance for qualitative risk assessment
 - scientific advice on the level of reference doses or concentrations for cereals containing gluten or gluten.
 - capacity building activities to countries on the PAL and risk assessment.
 - request extension of deadline for completion of work to 2026.

Allergen Labelling

Allergen FYI:

- FSA [consultation on allergen information in the OOH sector](#) – closes 27 November
 - Guidance **exp. Early 2025**
- Contamination of mustard ingredients with peanuts:
 - 20 September [FSA allergy alert](#) mustard ingredients from FGS Ingredients Ltd. contamination with peanut (FLC 363/24)
 - 30 September FSA [online guidance](#) for businesses (FLC 375/24) – updated 25 October
 - 18 October [FSA update](#) on investigations
 - Limited to products containing mustard supplied by FGS Ingredients
- Behenic acid from mustard seeds – EU allergen labelling exemption
 - [Delegated Regulation \(EU\) 2024/2512](#) amending Annex II to [Regulation \(EU\) No 1169/2011](#)
 - Allergen labelling exemption for emulsifiers E 470a, E 471, and E 477 when produced from behenic acid derived from mustard seeds
 - Applies from 1 April 2025 in EU (incl. NI)
 - Does not apply in GB
 - FSA waiting for GB risk analysis to be completed
- [FDF guidance on Allergen Recall Prevention](#) published 5 November (FLC 426/24)

Defra cost of labelling research

- Defra commissioned consultancy ADAS to conduct research on food labelling costs (FLC 301/24):
 - Explore in-depth views on current food labelling practices,
 - Understand how labelling influences your business decisions,
 - Identify challenges faced by businesses in implementing labelling requirements, and
 - Gather ideas and perspectives for improving food labelling to better serve both consumers and producers.
- Original kick off Spring 2024 – delayed due to limited feedback and elections
- Interviews extended until end of October (FLC 391/24)
- PPA participation and member engagement
- No timescales for completion
- FDF work on ‘Explainer on the UK Label Change Process’:
 - Flow diagram of labelling process (from legislation to label write off)
 - Industry considerations for food labelling policy
 - Detailed overview of label change process and costs
 - Case studies
 - List of upcoming regulatory changes affecting labels

OTHER LABELLING, COMP. and REGS.

- **New Defra Labelling Team**

- New Team Leader – Davon Singh
- Awaiting Ministerial steer on priorities
- New team keen to visit factories



MEMBERS: Members interested in hosting Defra team to contact PPA Secretariat

- **Bread and Flour Regulations (FLC 417/24)**

- Legislation expected **imminently** (mid-Nov.) – exp. to apply from Dec.24
- 2-year transition to apply – fully applicable from Dec.26 TBC
- No labelling easements as such, but risk-based and proportional approach to enforcement during transition
- Defra drafting enforcement note to be disseminated to local authorities on pragmatism



MEMBERS: Members encouraged to begin discussions with local/primary authorities ASAP

- **‘Not for EU’ labelling (FLC 373/24)**

- Government [confirmation](#) GB-wide ‘Not for EU’ labelling would not apply from Oct.24
- Amended [labelling guidance](#) published in Sep.24
- On-pack ‘Not for EU’ labelling to apply to composite products from Jul.25 (unless exempt)
- Defra confirmation on HRFNAO – will require labelling from phase 3 (Jul.25)
- Pork scratchings in scope of Phase 1
- Other products still under discussion with Defra

OTHER LABELLING, COMP. and REGS.

- **Recycling labelling (FLC 382/24)**
 - Defra confirmation binary labelling will no longer apply from 1 April 2027
 - Plans to introduce mandatory UK-wide recycling labelling via amendment to EPR legislation in 2025
 - Defra will review EU packaging legislation to explore potential for consistency.
- **Eco labelling**
 - Ministerial confirmation to progress FDTP work
 - Defra working with consultancy on LCA-based methodology for labelling
 - Plans to remain voluntary
 - Defra commissioned work on standardised product-level multi-metrics – **exp. Mar.26**
- **HRFNAO**
 - New GB revision of official controls legislation on HRFNAO exp. imminently
 - Likely to come into force Dec.24
 - Next revision exp. Jan.25
- **ABC Programme/National Level Regulation (NLR)**
 - Trials with 5 retailers – discussion at FSA Sep.24 Board meeting
 - Several concerns raised
 - All long-term work paused – FSA to focus on engagement
 - Further information on next steps in Dec.24 FSA Board meeting
- **CCFL48**
 - 3 items adopted: GSLPF (allergen labelling), guidelines on e-commerce and guidelines on the use of technology to provide food information
 - Further work needed on PAL guidelines and GSLPF provisions on multipack labelling
 - New work on guidelines on food labelling provisions in emergencies
 - Other proposals, incl. sustainability labelling, definition of ‘added sugar’, ‘high in’ nutrition claims on, and labelling of trans fats not progressed.

OTHER LABELLING, COMP. and REGS.

- **EU review smoke flavourings**
 - [Commission Implementing Regulation \(EU\) 2024/2067](#) published deleting entries SF-001 to SF-010 from the Union list of authorised smoke flavouring primary products (FLC 309/24).
 - Transitional provisions for different types of food:
 - Products (other than cheeses, meats and processed fish) placed on the market by **1 July 2026** can be sold through
 - Preparations containing those smoke flavouring primary products allowed to be placed on the market until the dates set out for the foods they are intended for.
 - (Products with) smoke flavourings may not be used to make another (composite) product after the phase-out period.
- **EU Directive on Green Claims**
 - [Draft report](#) released 11 October
 - Trilogue negotiations now expected **Q1/Q2 2025**
 - Official adoption **exp. until mid-2025**
 - EUMS have 24 months to transpose legislation – and provisions should apply within 36 months
 - [Directive \(EU\) 2024/825](#) (Empowering consumers for the green transition) amends UCPD applies from **27 Sep.2026**
 - Bans generic and partial environmental claims, and claims based on GHG offsetting
- **EU marketing standards**
 - [Commission Delegated Regulation \(EU\) 2023/2429](#) **applies from 1 January 2025**
 - Establishes mandatory of origin labelling for certain types of nuts and dried fruit at EU level
- **EU Official Controls Regulation – [Notice on Implementation](#) (FLC 432/24)**
 - Published 8 November
 - Updates 2022 version
 - Provides clarification on definitions, processes/activities subject to OC, methods, delegation of powers, etc.

FOOD SAFETY

ACRYLAMIDE: Progress of ML and BML proposals

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

Commission presented as part of the ACRYRED conference (4-5 September):

- Confirmed that a new detailed proposal for (B)MLs is still being worked on.
- Delay cause by challenges/difficulties encountered with analysis of data held by EFSA.
- Another stakeholder forum is anticipated in 2025 to inform of Commission/Member State discussions.

(B)MLs will be based on occurrence data, and will be split into two sets:

- Sampling years 2016-2017-2018 (ante Regulation (EU) 2017/2158)
- Sampling years 2019-2020-2021-2022-2023 (Post Regulation (EU) 2017/2158)

Data from 2016-2018 will only be used if there is limited data available.

MLs to be set for broad categories to **minimize the risk of misclassification.**

This means that the MLs have to be set taking into account the food subcategory with the highest acrylamide levels (i.e. higher MLs).

The difference between the BML and the ML, for certain food subcategories, might be large.

(B)MLs on agenda for next meeting Commission Working Group on Environmental contaminants, 12-13 December 2024

ACRYLAMIDE: Other items of relevance

- The FAO/WHO Codex Alimentarius “Code of Practice for the Reduction of Acrylamide in Foods” (CAC/RCP 67-2009).
 - Current version published in 2009.
 - In April 2024 Codex agreed to start work on a revised version of the COP.
- In July 2024 China issued its own draft National Food Safety Standard Code of Principle for The Control of Acrylamide Contamination in Food and notified this to WTO
- On 18 June 2024 “SAFE” (Safe Food Advocacy Europe) launched an update to its ‘awareness-raising campaign on acrylamide’.
LINK:
<https://www.safefoodadvocacy.eu/safe-launches-campaign-on-acrylamide-calls-for-urgent-action-on-limiting-the-substance-in-food/>
- IARC report on the recommendations on priorities for monographs during 2025-29. Includes Acrylamide and Glycidamide (‘High priority’ review together within next 2.5 years)
LINK:
https://monographs.iarc.who.int/wp-content/uploads/2024/11/AGP_Report_2025-2029.pdf
- Mark Willis (FSA) has informed that due to resource issues within the FSA, the acrylamide data call is now scheduled for 2025 (date TBC).
- The data call will seek both quantitative data and risk management measures from various sectors to understand where acrylamide is occurring.

GLYCOALKALOIDS FORUM – FOLLOW-UP

As a follow-up of the meeting, PVC prepared a draft Statement of the Potato Value Chain on Glycoalkaloids in Potatoes and Potato Products. The intention is to share the document with the Commission.

Main Points:

- PVC believes a risk-benefit assessment is crucial when discussing GAs content in potatoes.
- In terms of consumer exposure, proper storage and home preparation, especially peeling, are important to minimize exposure to GAs
- There is no common understanding in the sector about the analytical method used to measure GAs at European level
- The PVC would like to stress that there are still many research gaps regarding GAs occurrence, mitigation measures, etc. GAs are important to ensure plants' natural resistance. Also, GAs concentration in potatoes to be processed can be limited via various good manufacturing practices.
- Data collection activity through EUPPA and ESA continues.

CONTAMINANTS: Other items of relevance

- IARC report on the recommendations on priorities for monographs during 2025-29 (see attached).
Includes Bisphenol A, S and F; Aflatoxins; ZEAR; Ethylene oxide; Mancozeb; Glyphosate; Furan; Fumonisin B1; amongst 215 items prioritised.
- LINK:
https://monographs.iarc.who.int/wp-content/uploads/2024/11/AGP_Report_2025-2029.pdf
- 'MLs for 3-MCPD esters and glycidyl esters in foods other than the foods for which a ML is already established in Regulation (EU) 2023/915': on agenda for next meeting Commission Working Group on Environmental contaminants, 12-13 December 2024.
- As with acrylamide:
 - Delays due to interpretation of EFSA data.
 - Another stakeholder forum is anticipated in 2025 to inform of Commission/Member State discussions.

SUSTAINABILITY

Simpler recycling

Provisions made under Environment Act (2021)

In England, new regulations (Simpler Recycling, implemented under The Environment Act 2021 (Commencement No. 9 and Transitional Provisions) Regulations 2024. S.I.2024 No. 639 (C. 40) will make it a legal requirement for non-household municipal premises to **separate food waste and dry mixed recyclables from general waste**.

Recyclable waste streams include:

- *Paper and card*
- *Plastic*
- *Glass*
- *Metals*
- *Food waste*

By **31 March 2025**, non-household municipal premises in England (including businesses), will be required to recycle all the recyclable waste streams, *excluding garden waste and plastic film*.

By **31 March 2027** (subject to legislative confirmation), businesses and other non-household premises with fewer than 10 employees will be included in scope.

WRAP are conducting a survey to understand industry awareness (deadline 26 November 2024): <https://www.surveymonkey.com/r/BVQBX2J>

Packaging developments

Budget announcements (30 October 2024)

- *The rate of Plastic Packaging Tax (PPT) will increase in line with the Consumer Price Index (CPI).*
 - *The new rate of PPT will be £223.69 per tonne.*
 - *Will apply to plastic packaging containing less than 30% recycled plastic that is manufactured and imported into the UK from 1 April 2025.*
 - *LINK: <https://www.gov.uk/government/publications/autumn-budget-2024-overview-of-tax-legislation-and-rates-ootlar/annex-a-rates-and-allowances#indirect-tax>*
- *The Government Response to Mass Balance Approach (MBA) Consultation*
 - *Confirms that a MBA will be allowed to account for chemically recycled plastic for the purposes of PPT from a future date to be determined.*
 - *At the same time the changes for MBA are introduced, pre-consumer waste will no longer be classified as recycled plastic for the purpose of PPT.*
 - *LINK: <https://www.gov.uk/government/consultations/plastic-packaging-tax-chemical-recycling-and-adoption-of-a-mass-balance-approach>*

EPR Regulations

Updated Extended Producer Responsibility (EPR) for Packaging Illustrative Base Fees

EPR Regulations apply to all UK organisations that import or supply packaging.

- *Revised illustrative base fees for year 1 of EPR for packaging published on 30 September 2024*
- *Provides a fee range for each category of waste packaging material and explains how the ranges were calculated.*
- *The illustrative fees have decreased across all materials when compared to the first set of illustrative base fees released on 15 August 2024.*
- *The size of the ranges has also decreased across all the materials (except for wood).*

Using Report Packaging Data (RPD) to calculate fees

- *The revised base fees use an updated methodology, using 'Report Packaging Data' (RPD) on producer reported tonnages from 2023 alongside Defra-modelled Local Authority costs.*
- *This is the same underlying approach and datasets that the Scheme Administrator intends to use for final fees from 2025, with all tonnages based on RPD data.*

Deforestation

UK Forest Risk Commodities Regulations

- Legislation not passed Parliamentary process during ‘wash-up’ period
- Government keen on progressing but awaiting Ministerial steer
- Defra says next steps will be provided “in due course”

EU Deforestation Regulations (EUDR) – Regulation (EU) 2023/1115

- Regulations adopted Jun.23
- Original implementation 30 December 2024
- Potential postponement announcement exp. Today (14 November) – Dec.25 (large businesses)/Dec.26 (SMEs)
 - [EC resources](#)

- the EUDR currently covers more commodities, including wood, rubber, coffee and dairy cattle products
- the EUDR targets individuals, as well as businesses
- the EUDR applies to “operators” and “traders”
- the EUDR has no turnover threshold, but smaller businesses that are classed as SMEs have less onerous obligations
- the EUDR prohibition is wider and extends to commodities that have been produced through legal as well as illegal deforestation - they must be deforestation-free, produced in accordance with local laws and covered by a due diligence statement

Source: [Hill Dickinson](#)

COMMITTEE MATTERS

Committee Matters



FDF ASSOCIATIONS ADVISORY GROUP MEETING

- **Meeting 29 July – priorities:**

- Import control of herbs and spices
- Supply of crops - harvesting
- Regulatory Divergence (e.g. glyphosate, mycotoxins, ISO standards (whole grain/meal))
- 'Not for EU' labelling – clarity on composite product definitions
- Sustainability (agricultural, food, environmental)
- Coeliac UK – Cost Report
- Ultra Processed Foods (UPF)
- CMA Report
- Bread and Flour Regulations
- UK & EU Deforestation policies
- Trade – seed potatoes (impact of Brexit), loss of Mancozeb use in potatoes



MEMBERS: Any further topics?

- **Next meeting: 9 December**

FLC priorities 2024/2025

- Endorsed by PPA Board in October – distributed to members 4 November (FLC 420/24)
- Priority topics identified by Members – FLC Issues Matrix
- Identifies priorities for PPA and areas where FDF resources can be leveraged:
 - advocacy, horizon scanning and knowledge exchange
- 3 pillars – reputation, licence to trade and sustainability
 - **Priority area 1: Protecting the reputation of processed potato products and savoury snacks (Reputation)**
 - **PPA lead:** HFSS/LHF, salt/sodium, sugar (popcorn only), calories, portion size, NPM, GBSF/CQUIN (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, CIPC tMRL monitoring, Glycoalkaloids, additives/processing aids, flavourings/smoke flavourings, supply chain issues (product-specific).
 - **FDF leverage:** EU/UK and intra-UK regulatory divergence, Windsor Framework, BTOM, labelling, allergens, vegan/vegetarian/plant-based foods, BFR, regulated products (e.g., authorisation of additives, flavourings, novel foods, GM/GE, health claims), EU Contaminants (incl. PFAS, T2/HT2, DON, MOSH/MOAH), Future FSA reforms.
 - **Priority Area 3 Helping to set realistic goals for sustainable production of processed potato products and savoury snacks (Sustainability)**
 - **FDF leverage:** FDTP Eco, food waste, Eco-labelling, packaging waste, EPR, Simpler Collections, UK/EU Deforestation.

Risk Matrix

Food Issues Risk Matrix (July 2024)

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 Wales obesity strategy Scotland obesity strategy Portion Size/Calories CIPC tMRL monitoring BREXIT/Devolution-associated issues/Regulatory divergence Packaging waste/Taxation/EPR Salt/Sodium reduction (2024 targets) Ultra-Processed Foods	Food taxation FDTP Health workstream FOPNL developments	England obesity strategy Nutrient profiling (Ofcom model review UK)
Moderate Impact Cost Material availability Working practice	Environment Act (implementation)/EU Farm to Fork Strategy Food waste Allergens (precautionary labels/vegan) Bread and Flour Regulations Review EU Glycoalkaloids EU Contaminants UK Border Target Operating Model (BTOM) Supply chain issues (raw materials shortages) Northern Ireland Obesity Strategy Windsor Framework/'Not for EU' labelling EU Deforestation UK Deforestation EU Smoke flavourings review GB Smoke flavourings review	Eco-labelling/FDTP Environment workstream Nutrient Profiling (EU F2F Strategy) Future FSA reforms	
Small Impact Cost Materials Change	EU Flavourings reviews GBSF/CQUIN Plant-based/vegan and vegetarian definitions Sugars (popcom) EU MOAH/MOSH	UK Recycling labelling EU PFAS	

New issue

Changed priority

Identified as a potential high-profile media issue

AOB

Dates of next 2025 meetings

TBC

- ! Secretariat to circulate Doodle poll with potential meeting dates for 2025
- ! Members to indicate whether they want to continue with physical meetings
- ! Members: Suggestion of guest speakers for next meeting?

Potential GUEST SPEAKERS:

- *FSA on contaminants*
- *FSA on regulated product reforms*
- *OHID/DHSC*
- *SG on diet policy*
- *WG on diet policy*
- *Trading Standards/enforcement updates*
- *OHID on reformulation or policy*
- *EUPPA on contaminants*
- *Defra labelling team*