

**PPA Food Law and Consumer (FLC) Committee
Minutes of the meeting 14 November 2024,
UK Flour Millers, London (and teleconference)**

<u>Participants:</u>		<u>Guest speakers</u>	
Catharine Hall	KP Snacks (Chair) (online)	Adam Hardgrave	FSA
Andrew Curtis	PPA (Secretariat)	Nuria Moreno	EUPPA
Vanessa Richardson	PPA (Secretariat)	Roshni Shah	GS1
Gillian Black	Taylor’s Snacks (online)		
Shane Green	McCain		
Darren Hewish	Tayto Group	Apologies	
Maria Virginia La Placa	Lamb Weston (online)	Meredith Williams	McCain
Charlotte Pick	McCain (online)		
Federica Tritschler	Lamb Weston		
Alex Turtle	FDF – partial attendance		

1) Welcome and anti-trust guidance

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

2) Review of meeting slides (2 July 2024) and any actions arising

The Secretariat reminded participants that the July meeting had been cancelled due to the then upcoming UK general election on 4 July, and consequent lack of political activity and limited engagement. The slides prepared for the cancelled meeting and actions were circulated to members (FLC 289/24). The Committee then proceeded to review the actions arising. See slides for details. In addition, please note:

- **Member engagement on issues related to the Northern Ireland Retail Movement Scheme (NIRMS) and Border Target Operating Model (BTOM):** Moved to rolling list of requests (see Addendum).

3) Updates

a) Nutrition and Health

The Secretariat gave an update on diet and health policy timings and highlighted some events which were not further discussed during the meeting, i.e.:

- **World Health Organization (WHO) updated guidelines on the use of low-sodium salt substitutes:** exp. end of 2024.
- **WHO SHAKE Technical Package for Salt Reduction** update: exp. end of 2024.
- **European Commission (EC) study on health taxes:** exp. end of 2024.
- **Office for Health Improvement and Disparities (OHID) Y2 progress report on calorie reduction programme:** exp. early 2025 (To be confirmed (TBC) – based on the fact that the Y1 report was published early 2024).

- **OHID Y1 report on 2024 salt reduction programme:** TBC – no indication given by OHID.
- **Department of Health and Social Care (DHSC) work on new England Obesity Strategy:** exp. Spring 2025 (may be published as part of the 10-year National Health Service (NHS) reform plan). **[POST MEETING NOTE:** The Food and Drink Federation (FDF) understands that the Obesity Strategy will be a standalone piece, or may sit with the upcoming Defra Food Strategy].
- **Year 12-15 National Diet and Nutrition Survey (NDNS):** Exp. Feb-Mar. 2025 (as informed by DHSC). Likely to be published after the NDNS Urinary Sodium Analysis.
- **WHO guidelines on polyunsaturated fatty acids:** exp. early 2025.
- **OHID research on impact of marketing of food High in Fat, Sugar and Salt (HFSS) on adults:** exp. May 2025
- **Scottish Government (SG) Good Food Nation Plan and establishment of a Scottish Food Commission:** exp. before May 2025.
- **UK and the EU reviews on Front of Pack Nutrition Labelling (FOPNL):** TBC (Review of Regulation on Food Information to Consumers (FIC) set to stay in Impact Assessment (IA) for the rest of 2024).
- **EU work on Nutrient Profiles for health claims:** No progress.
- **2018 Nutrient Profiling Model (NPM):** No progress.

i) **LHF/HFSS advertising restrictions (UK-wide)**

The Chair provided an update on the upcoming advertising restrictions of Less Healthy Foods (LHF). See slides for details.

Please also note:

- **Secondary legislation on LHF advertising restrictions:** **[POST MEETING NOTE:** [The Advertising \(Less Healthy Food Definitions and Exemptions\) Regulations 2024](#) were published on 3 December, along with the [DHSC LHF advertising restrictions guidance](#). These focus on the product categories in scope of the restrictions. The UK-wide advertising restrictions will come into force on 1 October 2025 (FLC 457/24)].
- **Advertising Standards Authority (ASA)/Committee of Advertising Practice (CAP) guidance on LHF advertising:** **[POST MEETING NOTE:** An interim statement is expected w/c 6 January 2025].

ii) **HFSS Promotion restrictions (England and Devolved Administrations (DAs))**

The Chair provided an update on developments on promotion restrictions of HFSS food in the UK and DAs. See slides for details. In addition, please note:

Wales:

- **Welsh Government (WG) HFSS promotions restrictions:** The Welsh legislation is expected to be laid by the end of 2024, with a 12-month transition period. The British Retail Consortium (BRC) has called for implementation to be delayed until March 2026 to avoid the Christmas period. **[POST MEETING NOTE:** The WG published the summary of responses to the call for evidence on consumption of energy drinks by children on 23 December (Part 2 of the ‘Proposals to make the food environment healthier’ consultation). Part 1 on promotions to be published separately. The legislation and the implementation guidance are still to be published].

Scotland:

- **Scottish Government (SG) HFSS promotion restrictions:** The Scottish legislation is expected to be laid by the end of 2024, also with a 12-month transition period. **[POST MEETING NOTE:** The consultation response, the legislation and the implementation guidance are still to be published].

Northern Ireland (NI):

- **NI Obesity Strategy:** **[POST MEETING NOTE:** To date, neither the consultation response to the Healthy Futures Obesity Strategy nor the new consultation on the action plan for the obesity framework have been published].

4) Invited Guest Speaker: Adam Hardgrave (Food Standards Agency (FSA))

Adam Hardgrave (AH), Head of the Food Additives team at the FSA, provided an update on the status of food additives, flavourings and smoke flavourings in Great Britain (GB). AH joined the meeting in person.

AH started by giving an overview of the structure and responsibilities of the Chemical Safety Unit, of which the food additives team is part. AH then explained that the Chemical Safety Unit is currently undergoing restructuring and once the final structure is in place, an updated organogram will be shared.

AH then moved on to some of the recent work done by his team on food additives, particularly nitrates, nitrates in ham, and titanium dioxide. AH mentioned the recently published [risk assessment on titanium dioxide](#), which differs from the EU's stance. While the EU has removed titanium dioxide from the list of authorised food additives, it is being considered safe for consumption in GB, aligning with risk assessments from Canada, the US, Australia and Japan.

On smoke flavourings, AH talked about the new EU regulation ([Commission Implementing Regulation \(EU\) 2024/2067](#) – FLC 309/24) which has revoked the authorisations of all eight previously permitted smoke flavourings in the EU. The applicable transition period for foods other than cheese, meat and fish, is 1 July 2026.

The UK is currently evaluating the eight applications for smoke flavourings, looking at each smoke flavouring individually for genotoxic safety, rather than each component of the smoke flavouring. AH says that the FSA hopes to conclude the evaluation by the end of 2024, and to share the outcome in Jan./Feb. 2025. If a substance is found to be genotoxic, it will be removed from the market with an appropriate transition period. However, final ratification may take additional months due to the independent nature of the scientific committees supporting the FSA. We understand that the team will also explore the safety of traditional smoking methods to better understand these options and the associated risks at a later stage.

AH asked members to provide any feedback on their experiences related to the EU ban on smoke flavourings, and some indicated that their use of smoke flavourings is limited, and that reformulation work has been underway for some time to ensure compliance of products with EU requirements.

ACTION: Members to submit any feedback on the impact of the EU ban on smoke flavourings and their responses (e.g. reformulation of products, use of alternatives) to the PPA Secretariat to be shared anonymously with the FSA.

In response to a question, AH confirmed that products produced in NI need to comply with EU regulations but products made in GB which are sent to NI via NIRMS can comply with UK requirements, as long as they are not intended for sale outside of NI.

AH then explained how risk assessments and management have been reorganised since the UK left the EU, with the FSA handling both risk assessment and risk management. Independent scientific advisory committees, including the Committee on Toxicity (COT) and the Committee on Mutagenicity (COM), provide input to the FSA. These committees are supported by expert groups, such as the Joint Expert Group on Additives, Enzymes and other Regulated Products (AEJEG) the [Smoke Flavourings Working Group](#) (SFWG). The SFWG meets regularly and meeting agendas and minutes are published on their website [**POST MEETING NOTE:** meeting minutes for the 2024 meetings are not yet available].

AH also provided an update on the review of the Market Authorisations process (previously 'Regulated Products'). AH confirmed that the FSA and Food Standards Scotland (FSS) published the [summary of responses](#) in September, which supported the proposals. Under the new plans, the 10-year limit for authorisation of feed additives, smoke flavourings, and genetically modified organisms (GMOs) would be removed, allowing action on safety concerns based on emerging science. The new plans would also remove the need for new legislation for new substances to be authorised, allowing authorisations to come into effect following ministerial decision and subsequent publication in an official public register or list. [**POST**

MEETING NOTE: The FSA published an [update on the Market Authorisation process](#) for the December FSA Board meeting which highlights that they intend to lay legislation on 29 January 2025. Following Parliamentary scrutiny, they intend to bring the new process into operation from 1 April 2025. This will enable the fourth tranche of authorisations scheduled for 2025 to benefit from the streamlined process].

There were further discussions about the FSA's role in tracking regulatory developments in the EU and the complexities of doing so since the UK lost its seat in EU forums. AH also talked about how his team uses this information to inform FSA's priorities. The Secretariat then asked if the FSA has any plans to put together a divergence tracker to inform businesses about areas of regulatory divergence (in the food additives, flavourings, etc). AH said there are no plans to develop such a tool but that other trade associations have asked for the same.

The group then discussed the work of the FSA Horizon Scanning team, and AH explained that, although they do not work directly together, his team provided information to the Horizon Scanning team. The Secretariat mentioned that the FSA's Horizon Scanning team had asked to communicate their email address to members to enable interested members to be added to their circulation list.

ACTION: Secretariat to share email address of **FSA EU Horizon Scanning team** with members - Members who are interested in joining the FSA EU Horizon Scanning team to contact euengagement@food.gov.uk directly. **[POST MEETING NOTE: COMPLETED (FLC 442/24)].**

The Secretariat asked a question about whether the FSA was following current EU discussions on natural flavourings. AH stated that, although they were monitoring discussions, this was a very low priority for the FSA at present.

AH asked PPA and members to support his team's work on Codex-related issues as the FSA was receiving very limited input from industry on additive-related queries. The FSA is the UK Codex contact point for additive-related issues (within the Codex Committee on Food Additives (CCFA)). This is very important to ensure that the FSA considers input on additives and other substances that are used by the industry in the UK. AH explained that often the requests were sent by the Codex teams with very short turnaround times. PPA asked if it is possible for AH's team to simplify the email requests to facilitate distribution.

Finally, a question was asked about whether the FSA had any intention of publishing a database on food additives similar to the EU database. Most members agreed that it would be a very useful tool given the difficulty in accessing food additive information online (e.g. technical issues in displaying additives tables on legislation.gov.uk). AH recognised that the format of the legislation tables on the website made searching difficult and said that the FSA has asked the National Archives to fix the display of the additive tables online. AH warned members against relying on the EU food additives database for accuracy reasons and also given the growing level of regulatory divergence between GB and the EU (e.g. titanium dioxide). However, AH hopes that the market authorisation reforms and the subsequent UK registers will facilitate searching in the future, although food additives would only follow at a later stage.

AH also mentioned that the FSA was considering new legislation to align with the EU on additives usage where there was agreement on the safety assessment.

POST MEETING NOTE: The FSA is now consulting on a new tranche market authorisations for several regulated products. The consultation closes on 19 February (FLC 007/25)].

The PPA Secretariat and members thanked AH for joining the meeting and answering questions.

5) Invited Guest Speaker: Roshni Shah (GS1)

Roshni Shah (RS), Engagement Manager at GS1 joined the meeting in person and provided an update on the 'Sunrise 2027' project. See slides for further detail. GS1 is a not-for-profit global membership organisation that develops standards-based solutions to address the challenges of data exchange, including the provision of Global Trade Item Numbers (GTIN) for retail barcodes.

The project is supported by 22 leading companies in the consumer goods sector (including Barilla, Nestlé, Alibaba.com, e Carrefour) and aims at a global transition from barcodes to GS1-standard QR codes by the end of 2027. This is the ambition, and not a cut down date. QR code testing is already underway in 48 countries. Australia is leading the way having started trials back in 2019.

At UK level, a project trial, which is being piloted by businesses including Tesco, Unilever, Nestle and Lidl, focusses on embedding detailed product data (e.g., batch numbers, expiry dates) to enhance supply chain transparency and reduce waste.

The discussion focused on the adoption of GS1-standard QR codes on packaging and the practicalities of implementation. These barcodes can either be pre-printed on packaging materials or printed in-line during production. While in-line printing allows real-time updates, it requires specific production line capabilities and validation processes, which may involve significant adjustments depending on factory setup. Many retailers, including Amazon, mandate GS1-standard barcodes linked to a registry to prevent counterfeiting and ensure product authenticity.

RS then covered some of the benefits of adopting GS1-standard QR codes, including the ability to provide dynamic, real-time updates to product information, such as addressing ingredient substitutions, regulatory changes, and traceability. RS outlined the role of GS1-standard QR codes in reducing packaging waste, as it eliminates the need for frequent label changes, contributing to environmental sustainability.

RS also talked about the challenges of adopting the new technology, such as lack of familiarity with the codes and smartphone accessibility, and therefore a broader consumer education campaign would need to be part of the implementation process. Other challenges include the regulatory requirements (which require some information to be displayed directly on product labels), space on labels during a transition phase (which would require double coding, i.e. QR codes and barcodes on the same product) and, more importantly, the development of a whole infra-structure for the application of codes by manufacturers and reading by retailers.

GS1 is actively collaborating with governments, including the Department for Environment, Food & Rural Affairs (Defra), and industry bodies, to align on standardised approaches for data transparency and traceability. They have a dedicated policy team and presence on the Board of the Food Data Transparency Partnership (FDTP).

To support industry readiness, GS1 is hosting workshops and roundtable discussions with key stakeholders, including representatives from marketing, supply chain, packaging, and regulatory teams. These sessions aim to share insights, showcase case studies, and prepare companies for the transition. Members are encouraged to participate in these discussions and incorporate QR codes considerations into new product development processes to future-proof operations.

The group emphasised the need to raise awareness within trade associations and other industry organisations to ensure alignment and shared understanding of evolving standards. RS said that GS1 will continue engaging with stakeholders, providing updates on pilot projects, and facilitating knowledge sharing through workshops. Members are invited to contribute insights, express interest in additional discussions, and explore the potential benefits of adopting the new technology.

RS asked members who would be interested in joining their circulation list for project updates to email her directly.

ACTION: Members interested in being added to the **GS1 database** for **updates** on the ongoing **GS1 QR Code project** to contact Roshni Shah directly on Roshni.shah@gs1uk.org.

ACTION: Secretariat to share **additional information on GS1 QR Code project** with members. [POST MEETING NOTE: COMPLETED (FLC 442/24)].

Members asked RS if it would be possible to share examples of labels which have been generated as part of the trial. RS said she would send some examples to be shared with members.

ACTION: Secretariat to share with members **examples of labels** generated as part of the project trials.

The Secretariat asked a question as to whether the retail sector would lead the move to QR codes. RS confirmed that the changes would be primarily led by the retail sector, but different sectors are leading on different fronts, e.g. information on product waste led by the fresh food sector, whereas companies like Unilever are leading on accessibility of information.

The PPA Secretariat and members thanked RS for the thorough presentation, for joining the meeting and answering questions.

6) Invited Guest Speaker: Nuria Moreno (European Potato Processors' Association (EUPPA))

The Secretariat welcomed Nuria Moreno (NM), Secretary-General at EUPPA, who also joined the meeting in person, to provide an update on EUPPA's work on sustainability. See slides for further detail.

NM began with an introduction to EUPPA, its objectives, and its key activities. EUPPA is headquartered in Brussels, serves as a trade association representing the interests of the potato processing industry across Europe. The association's scope includes producers of chips, French fries, potato flakes, chilled and frozen potato products, and other potato specialties.

Attention turned to EUPPA's strategic priorities, which were recently refined through an initiative called the 'Blueprint for the future'. This process, conducted in collaboration with the Board, identified four key pillars for the association's work, namely: Sustainable Raw Material supply, Food Safety and Innovation, Strengthening the Potato Value Chain and Sustainability.

NM talked about the importance of stakeholder engagement. EUPPA collaborates with European regulatory authorities, including the EC, the European Parliament (EP), and the European Food Safety Authority (EFSA), as well as with industry bodies such as FoodDrinkEurope. Particular emphasis was placed on the Potato Value Chain (PVC) coalition, which represents stakeholders across the entire potato supply chain and provides opportunities for collaboration on shared challenges and strategic initiatives. NM also discussed the close relationships with PPA, and the importance of ensuring collaboration and knowledge-sharing, particularly given evolving (and diverging) EU and UK legislation.

The discussion then transitioned to updates on EU policies relevant to sustainability, including the EU Green Deal, the Circular Economy Act, sustainable production and consumption strategies, and water resilience frameworks. New revisions to the Climate Adaptation Plan, industrial clean energy strategies, and the Nature Restoration Law are anticipated to affect potato production indirectly.

On the Corporate Sustainability Reporting Directive (CSRD), NM explained that companies are now required to conduct 'double materiality' assessments, evaluating both their impacts on the environment and how external factors affect their operations. NM explained that 'double materiality' in sustainability reporting requires companies to disclose how sustainability issues, such as climate change, affect their financial risks, as well as the company's own positive and negative impacts on people and the environment, emphasising that addressing these challenges ultimately carries financial costs for companies as they adapt their practices.

EUPPA plans to consolidate common topics (e.g., water usage, food waste) across member reports to identify sector-wide priorities but emphasized that commitments remain the responsibility of individual companies.

The Corporate Sustainability Due Diligence Directive (CSDDD) also requires companies to ensure compliance with human rights and environmental standards throughout their supply chains. Clarity on this regulation is still evolving.

NM outlined ongoing regulatory discussions impacting the sector (which are mainly monitored by EUPPA, rather than EUPPA taking a leading role) including the EU Packaging and Packaging Waste Regulation (PPWR), the EU Green Claims Directive, food waste reduction targets, and the EU Deforestation Regulation (EUDR), noting that the EP had agreed to delay its implementation by one year, to the end of 2025 (FLC 440/24).

[POST MEETING NOTE: On 23 December, [Regulation \(EU\) 2024/3234](#), amending the EUDR ([Regulation \(EU\) 2023/1115](#)) was published on the EU Official Journal This Regulation confirms that the main provisions of the EUDR will apply from 30 December 2025 for large operators and traders, and 30 June 2026 for micro- and small enterprises (FLC 006/25). Also, on 17 December, the PPWR was adopted. The Regulation is expected to be published in January 2025, and will enter into force 18 months after publication. Secondary legislation is also required for implementation of the provisions (FLC 004/25)].

NM also discussed the EUPPA Sustainability Report, published in early 2022, which was highlighted as a collection of best practice from members, showcasing initiatives across the supply chain. Updates to this report may follow in 2025 once input on materiality assessments from companies is gathered and consolidated.

Finally, health and nutrition topics were acknowledged as an emerging priority for the future (targeted for 2025 as part of the initiative 'Blueprint for the future'). While not currently a central focus, discussions are underway to develop fact-based sector responses to issues like Ultra-Processed Foods (UPF). NM highlighted that close collaboration with other stakeholders, including PPA, would be very beneficial.

NM concluded with an open floor for questions, emphasising the need to address the complexities of evolving EU regulations and their impact on global operations. The Secretariat and members thanked NM for the presentation, for attending the meeting in person, and for answering questions.

7) Updates

a) Nutrition and Health (cont.)

iii) PPA Salt & Sugar data collection 2023/24

The Secretariat provided an overview of the results of the PPA analysis of members' data on salt levels in savoury snacks and processed potato products, and sugar in popcorn, for the period between April 2023 and March 2024. See slides for further detail. In addition:

Salt:

- Trends indicate minimal changes compared to the previous year, but overall results remain better than in 2020.
- For standard crisps, salt data received so far is partial, as not all members have submitted data.
- Standard crisps and Extruded snacks continue to meet 2024 salt reduction targets, with salt and vinegar crisps nearing compliance. Pelleted snacks have slightly exceeded the targets, but only marginally.
- In the flavoured nuts and popcorn categories, progress has been made in reducing salt, particularly in flavoured nuts.
- Sweet popcorn has shown no significant changes, while savoury popcorn experienced increased sales, leading to a rise in the Sales Weighted Average (SWA) salt content.
- Overall, the processed potato category continues to meet the 2024 salt reduction targets, although waffle, shapes and hash browns are slightly behind.
 - The Secretariat noted that the 'processed potato category' was considered as a whole for the salt reduction programme (there are no sub-categories) and therefore the whole category already complied with 2024 salt targets.

ACTION: Members who did not submit salt data for crisps and savoury snacks for the year 2023-2024 to do so ASAP.

Sugar:

- There was a slight increase in sugar SWA in popcorn due to higher sales volumes.
- Nevertheless, 62.2% of the category now complies with the 2020 sugar targets, marking an improvement over last year.

iv. Other Diet & Nutrition updates

• UPF

The Secretariat covered recent updates on UPF since the last meeting. See slides for further detail. In addition:

- Both the FSA and the FSS reviews state that current evidence doesn't support changes to dietary guidance.
- The Scientific Advisory Committee on Nutrition (SACN) published a [draft review](#) of UPF in October. The final version is expected to be published ahead of the next SACN meeting on 21 November, but no major changes are expected. **[POST MEETING NOTE: To date, the final review has not been published].**
- The FDF is developing a strategy to maintain consumer trust in processed foods, testing different messages based on consumer concerns.

- **House of Lords (HoL) Report – Recipe for Health: a plan to fix our broken system**

The Secretariat covered the recently published report of the HoL Special Inquiry Committee on Diet, Health and Obesity on the Food System review (FLC 406/24). It was noted that the original objective of the Committee was to “consider the role of foods, such as ‘ultra-processed foods’ and foods high in fat, sugar and salt, in a healthy diet and tackling obesity”. See slides for further detail. In addition:

- The FDF is not overly concerned with the recommendations, noting that the report received limited attention due to its publication timing.
- The government is expected to respond within two months. **[POST MEETING NOTE:** On 25 November, the DHSC sent a letter to the Committee requesting an extension to the deadline to reply to the report until 31 January 2025 “to allow the Government sufficient time to work between departments to explore all recommendations thoroughly and to issue comprehensive and effective responses”].
- There is scepticism about the full implementation of these recommendations, especially the introduction of the 2018 NPM.
- The FDF believes the government will be cautious in implementing changes that could increase food costs, bearing in mind recent budget announcements and future elections.

- **Government priorities**

The Secretariat briefly covered potential priorities for the new UK Government as predicted by the FDF. These priorities are based on predictions from various sources, including the media, NGOs, and recent reports. However, it is unclear which direction the government will take, especially given concerns about rising food costs and ongoing NHS reforms. See slides for further detail.

b) Food Labelling, Composition & Regulation

i. Allergen Labelling

The PPA Secretariat gave an update on the recent developments on allergen labelling at Codex and UK level. See slides for further details. In addition:

- Revision of Codex General Standard for the Labelling of Pre-packaged Foods (GSLPF) provisions on allergen labelling **[POST MEETING NOTE:** At the 47th session of the Codex Alimentarius Commission (CAC47), held on 25-30 November, the proposed GSLPF provisions on allergen labelling were adopted at Step 8 (final adoption). The Guidelines on the use of Precautionary Allergen Labelling (PAL) were adopted at Step 5 (further work needed). It was agreed to extend the deadline for completion of the PAL guidelines until 2026. CAC47 also endorsed the recommendation to request the Codex Committee on Food Hygiene (CCFH) to consider updating the Code of practice on food allergen management for food business operators (CXC 80-2020) to ensure consistency with the GSLPF (see [draft report](#))].

ii. Defra cost of labelling research

See slides for further details.

iii. Other Labelling, Composition and Regs.

The Secretariat provided several updates under this agenda item. Please see slides for details. In addition:

- **New Defra Labelling Team:**
ACTION: Members interested in hosting a factory visit for the new Defra labelling team to contact the Secretariat ASAP.
- **Bread and Flour Regulations (BFR):** [POST MEETING NOTE: [The Bread and Flour \(Amendment\) \(England\) Regulations 2024](#) were published on 14 November, amending the Bread and Flour Regulations 1998. They came into force on 13 December 2024. The Regulations include a 24-month transition period for implementation of new fortification requirements of non-wholemeal wheat flour with folic acid. An enforcement note has been sent to local/primary authorities recommending a risk-based and proportional approach to enforcement during the transition period (FLC 436/24 and FLC 450/24). Defra is currently developing amended guidance on the BFR. [Legislation has also been published in NI](#) (FLC 460/24) and Scotland, but Wales is still to publish].
ACTION: Members are encouraged to begin discussions on the labelling challenge [flour fortification with folic acid] with their local/primary authorities.
- **High Risk Foods Not of Animal Origin (HRFNAO):** [POST MEETING NOTE: [The Official Controls \(Import of High-Risk Food and Feed of Non-Animal Origin\) \(Amendment of Commission Implementing Regulation \(EU\) 2019/1793\) \(England\) \(No. 2\) Regulations 2024](#) were laid on 18 November, and will enter into force on 18 December 2024. [The Official Controls \(Import of High-Risk Food and Feed of Non-Animal Origin\) \(Amendment of Commission Implementing Regulation \(EU\) 2019/1793\) \(No. 2\) \(Wales\) Regulations 2024](#) were laid on 27 November and will also enter into force on 18 December].
- **ABC Programme/National Level Regulation (NLR):** [POST MEETING NOTE: the NLR programme was discussed at the [December FSA Board meeting](#). Long-term legislative changes have been paused to prioritise stakeholder engagement. FSA to create an additional forum for a more holistic set of discussions about reform with representatives of regulatory delivery partners, businesses and consumers, and all potential legislative changes. FSA expects to get this work started in early 2025. New proposals exp. Jun.25].
- **48th meeting of the Codex Committee on Food Labelling (CCFL48):** [POST MEETING NOTE: All items adopted at CCFL48 were adopted at [CAC47](#)].

c) Food Safety

The Secretariat gave an update on recent relevant developments on acrylamide, glycoalkaloids and other contaminants. See slides for details. Please also note the following:

i) Acrylamide

- ACRYRED is a project partly funded by the EU which aims to establish a multi-disciplinary research and communication network on reducing acrylamide formation, involving the entire value chain from grains to consumer products.
- The first day of ACRYRED forum, in September, looked at results of research into acrylamide formation in cereals, incl. cereal snacks.
- The second day of the forum was predominantly represented by trade associations presenting on their own findings. Also, the EC presented on the status of discussions at EU level. There was also a presentation by an NGO.
- Presentations from some experts at the forum took a critical view of the EFSA risk assessment, challenging EFSA's position on acrylamide genotoxicity.
- The Maximum Level (ML) approach for acrylamide was criticised, but there is no international general consensus on the matter.

- EU still considering new MLs and Benchmark Levels (BMLs) as well as revised BMLs. Changes are not expected until at least Q1-Q2 2025 (TBC), after which a consultation should follow.
- There are issues related to how EFSA collects and analyses data. Changes in coding and format hinder comparisons between historical and recent data. It is also unclear if acrylamide levels have decreased as a result of mitigation efforts.
- Home preparation is a challenge for products such as French fries, due to consumer preparation variability, so unlikely to be subject to MLs. However, it is still possible that a much lower ML could be set for the product as sold.
- Vegetable crisps also remain a challenge for the setting of acrylamide BMLs as current mitigation tools are designed for potatoes.
 - Not many manufacturers of vegetable crisps in the EU and market share is very small, not warranting research.
 - Acrylamide results from Dr Steve Powers received: 2023 samples performed worse compared with those from 2022 (FLC 437/24), suggesting a current lack of appropriate mitigation measures. It is also possible that the results were affected due to the poor weather affecting crops (and therefore product sugar levels).
 - Ongoing discussions within the European Snacks Association (ESA) and FoodDrinkEurope to develop new tools for vegetable crisps within the acrylamide toolbox, but these will have to be top line. The same applies to sweet potatoes.
 - SAFE (Safe Food Advocacy Europe) campaigning for acrylamide control levels for vegetable crisps and nuts, although they are more focussed on raising consumer awareness.
- At UK level, BMLs are likely to be preferred (over MLs) and call for data is scheduled for 2025.
 - In principle, ESA has agreed to provide EU data.
- There are no timescales for the development of the Codex Code of Practice for the Reduction of Acrylamide in Foods, but progress is slow and it is expected to take years.
- SAFE has launched a consumer awareness campaign, emphasising the need for stricter acrylamide limits.

ii) Glycoalkaloids

- A draft statement summarising the discussions at the PVC glycoalkaloids forum in March and providing recommendations for the EC was drafted in May. **[POST MEETING NOTE: On 28 November, the PVC joint statement was sent to DG SANTE (FLC 451/24)].**
- EUPPA submitted French fry-related glycoalkaloid data to EFSA at the end of June.
- ESA lacked comprehensive member data, so relied on German-based LCI research for insights. Summary and a peer-reviewed paper were sent directly to the EC to expedite the process, bypassing the complexities of the EFSA system.
- Additional research is being sponsored by EUPPA, with results expected 2025.
- Continued efforts are focussed on addressing glycoalkaloid management and measurement challenges.

d) Sustainability

The Secretariat provided a brief update on recent relevant developments on recycling, packaging (incl. EPR), and the UK and EU Deforestation Regulations. See slides for further details. Please also note the following:

i) Extended Producer Responsibility (EPR):

- An interim scheme administrator for EPR was appointed earlier this year.
- Plans are underway for the transition to an industry-led scheme administrator.
- Regulations still haven't been published.
- Businesses must submit packaging usage data to the regulator.
- While enforcement has been lenient, stricter compliance began in May.
- These updates reflect the evolving regulatory landscape on sustainability practices.
- Businesses should stay informed and ensure compliance with upcoming deadlines and changes.
- **[POST MEETING NOTE: Defra published the [Recyclability Assessment Method \(RAM\)](#) on 23 December].**

ii) UK Forest Risk Commodities Regulations:

- FDF had submitted some counter proposals to Defra suggesting:
 - The removal of embedded commodities from the regulation's scope
 - A clarified scope using CN codes
 - Enforcement of compliance at the point of import
- FDF says the Government is keen on progressing but awaiting Ministerial steer.
- Businesses are encouraged to review available summaries and FAQs to stay informed on potential changes (see links on slide).
- **[POST MEETING NOTE: There have been no further updates on the UK Forest Risk Commodities Regulations].**

8) Committee matters

Two items were discussed as part of this agenda item – see slides for details:

• The Food and Drink Federation (FDF) Associations Advisory Group (AAG) Meeting

The PPA Secretariat attended the meeting of the FDF AAG on 29 July. See slides for details. Recent discussions included 'Not for EU' labelling and topics raised by PPA, including mancozeb and trade in seed potatoes. The next meeting will take place on 9 December. Members are encouraged to report any additional topics they would like to be included in the Committee's list of priorities. **[POST MEETING NOTE: Minutes for the December AAG meeting have not yet been published].**

The PPA Secretariat also discussed with members a recent proposal by the FDF for Andrew Curtis (AC) to consider taking on the Chairmanship of the AAG. Responsibilities include attending and steering meetings, but no additional resource burden is envisaged. A benefit of becoming the Chair of the AAG is membership of the FDF Board, providing direct insight into top-level discussions.

Members were consulted and all responded positively. The PPA Secretariat will further discuss this with the PPA Board on 27 November. **[POST MEETING NOTE: The Board approved the PPA request to accept FDF's invitation for Chairmanship of the AAG].**

- **FLC priorities 2024/2025**

The Secretariat provided an update on the discussions on priorities for the FLC (see slides for details).

The document is based on priority topics identified by members through the FLC Issues Matrix. It serves as a live document, updated alongside the Issues Matrix and aims to guide the Committee's work, including:

- Ownership of initiatives vs. leveraging FDF resources.
- Engagement with lawmakers and reporting priorities.

The document marks the start of a conversation about evolving work priorities and strategies. Ongoing updates will ensure alignment with sector needs and available resources.

9) Risk matrix

The Risk Matrix was discussed during the meeting and the following changes were agreed:

- Condensed all UK Obesity Strategies under heading 'UK Obesity Strategies' and placed it as 'current issue' x 'moderate impact'.
- Added 'DHSC 10-year NHS reform plan' as a new item under 'future issue' x 'moderate impact'.
- Re-worded 'Brexit/Devolution-associated issues/Regulatory divergence' to 'EU/UK Devolved regulatory divergence'.
- Moved 'Salt/Sodium reduction (2024 targets)' from 'current issue' x 'big impact' to 'future issue' x 'big impact'.
- Renamed 'EU Glycoalkaloids' to 'Glycoalkaloids' and moved from 'current issue' x 'moderate impact' to 'future issue' x 'moderate impact'.
- Removed 'EU Contaminants'.
- Removed 'Supply chain issues (raw material shortages)' – will address individual issues as they arise.
- Rename 'Windsor Framework/'Not for EU' labelling' to 'NIRMS/'Not for EU' labelling'.
- Moved 'EU Deforestation' from 'current issue' x 'moderate impact' to 'future issue' x 'moderate impact'.
- Renamed 'EU Smoke flavourings review' to 'EU Smoke flavourings' and moved from 'current issue' x 'moderate impact' to 'managed issue' x 'moderate impact'.
- Moved 'UK Smoke flavourings review' from 'current issue' x 'moderate impact' to 'future issue' x 'moderate impact'.
- Added 'Smoked ingredients' as 'future issue' x 'moderate impact'.
- Moved 'GBSF/CQUIN' to 'future issue' x 'small impact'.
- Moved 'Plant-based/vegan and vegetarian definitions' to 'future issue' x 'small impact'.
- Removed 'FSA Future Reforms' – will watch developments and re-assess in the future.
- Moved 'Nutrient profiling (Ofcom model review UK)' from 'managed issue' x 'big impact' to 'future issue' x 'big impact'.

10) AOB

No further items were discussed.

11) Next meeting dates

Members agreed to continue holding at least one physical meeting per year (in the Summer), and two online meetings. Ad-hoc meetings would be arranged as and when necessary. The Secretariat agreed to send a Doodle poll to agree meeting dates in 2025.

- **ACTION: Secretariat** to issue a new Doodle poll with **proposed dates for 2025 FLC meetings** (incl. an in-person meeting in the Summer).

[POST MEETING NOTE: Completed (FLC 456/24). Meeting dates confirmed as below (FLC 010/25):

- **Online:** 25 March – 1:30pm start
- **In-person:** 01 July – 11am start (venue TBC)
- **Online:** 12 November– 1:30pm start].

There was a brief discussion about future speaker suggestions. It was agreed to aim to invite Davon Singh (Defra Labelling Team Leader) for the first meeting of next year (Feb./Mar.) to provide updates on labelling developments.

- **ACTION: Members** to provide suggestions for guest speakers for next FLC meeting.

ADDENDUM:

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

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