

PPA Food Law and Consumer Committee Meeting

Chair: Catharine Hall

25 March 2025

Agenda

1) Welcome and anti-trust statement

2) Minutes/action list

- FLC Notes and Action list from 14 November 2024 (FLC 011/25)

3) UK Food labelling update – Chris Conder and Ahmed Ghelle (Defra)

4) Company Shop Group – Lucy Crapper and Alistair Murray

5) Updates and discussions:

• Nutrition & Health

- UK-wide HFSS/LHF advertising restrictions (incl. CAP consultation)
- England and DA update HFSS promotion restrictions
- UPF developments
- Other diet and nutrition updates, incl. FDF DHC and NUT updates

BREAK

• Labelling and Composition

- Bread and Flour Regulations (BFR) update
- Other labelling, composition and regulation updates, incl. FDF FLL updates (incl. PAL, 'Not for EU' labelling, smoke flavourings, regulated products framework)

Agenda cont.

- **Food Safety**
 - Precision Breeding
 - CIPC
 - Acrylamide, 3-MCPD
 - MOAH/MOSH
 - Other food safety updates
- **Sustainability**
 - Packaging update (incl. EPR, PPWR)
 - Other sustainability updates

6) Committee matters

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

7) Risk Matrix

8) AOB

9) Next meetings/Close

Matters arising - FLC 14 November 2024

Action	Status
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.	No feedback received – ONGOING (Remove?)
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.	COMPLETED
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 .	COMPLETED
Secretariat to share additional information on GS1 QR Code project with members	COMPLETED
Secretariat to share with members examples of labels generated as part of the GS1 QR Code project trials.	COMPLETED
Members who did not submit salt data for crisps and savoury snacks for the year 2023-2024 to do so ASAP .	COMPLETED
Members interested in hosting a factory visit for the new Defra labelling team to contact the Secretariat ASAP .	ONGOING
Members are encouraged to begin discussions on the labelling challenge [flour fortification with folic acid] with their local/primary authorities .	ONGOING - to be discussed today
Secretariat to issue a new Doodle poll with proposed dates for 2025 FLC meetings (incl. an in-person meeting in the Summer)	COMPLETED
Members to provide suggestions for guest speakers for next FLC meeting .	ONGOING

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

UK Food Labelling Update

Chris Conder and Ahmed Ghelle

Department for Environment, Food & Rural Affairs (Defra)

Company Shop Group

Lucy Crapper and Alistair Murray
CSG

We're proud to be the **Surplus Stock People.**



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Part of the Biffa group

The surplus stock people

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A quick history lesson.

50 years ago.

Where it all began...
Opened staff shops on
factory sites supporting
FMCG



2002.

M&S approved us to
redistribute their own
label stock – the first
retailer to do so



2012.

Larger purpose-built
central distribution centre
and flagship superstore
Tankersley opened (just
down the road)



2015/19.

Won our first Queen's
Awards for Enterprise
and Sustainable
Development



2019.

First Company Shop
store opens in Scotland
(Renfrew)



2020.

First regional
distribution
centre Leicester



2021.

Winner of Queen's
award for Enterprise
in the Promoting
Opportunity



2022.

Company Shop Group
passes 100m items
redistributed in
a year for the first time



1985.

Constructed
temperature-controlled
distribution facility
Tankersley



2011.

Creation of network of
membership only stores
(company shop) first
Company Shop store
opens (Corby)



2013.

Launched UK's first
social supermarket,
Community Shop
(Goldthorpe)



2019.

Innovative processing
capabilities introduced
such as bottle wash
and X-ray



2020.

Awarded £1.97m of
funding as part of the
Government's scheme
to substantially reduce
food waste



2021.

Company Shop Group
becomes part of
Biffa plc



2022.

Community Shop
opens 10th store
(Tong St. Bradford)



2023.

Community Shop to
date supported 30,000
people through its
development
programmes



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Part of the **Biffa** group

The surplus stock people

Surplus stock isn't waste, it's opportunity.

As the Surplus Stock People, we look at surplus differently and we're committed to fundamentally changing the way businesses think about it.

Using our industry leading capabilities and expertise, we provide innovative solutions for handling your surplus, even the hard stuff which others can't take! This creates a financial return on stock that would have otherwise gone to waste. More than that, in thinking differently we're helping businesses provide meaningful support to some of Britain's most deserving communities, through our members only stores and award-winning social enterprise.

With your surplus and our expertise, together we can continue to make a positive impact on people and the planet.

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COMPANY SHOP

Value never felt so good

A network of 13 membership-based outlets and 10 staff shops at partner sites.

Community Shop

OPEN for more

A not-for-profit social enterprise supporting the most deprived areas of the UK. A network of 13 membership-only stores, offering access to deeply discounted food and personal development support.

The surplus stock people

Where to find us.

Company Shop Superstores

COMPANY SHOP

Barnsley
Bradford
Corby
Darlington
Dudley
Grimsby
Leicester
Long Eaton
Middleton
Renfrew
Southampton
St Helens
Washington

Staff Shops



Surplus Shop

Ocado Erith
Ocado Dordon
Ocado Andover
Ocado Bristol
Ocado Luton
Ocado Bicester
Ocado Purfleet
Heinz Wigan
Premier Foods - Manor Bakeries
Unilever

Community Shops

Community Shop

Athersley
Beechwood
Bewsey (Warrington)
Eastfield (Scarborough)
Goldthorpe
Halton
Hoyland
Kirkdale
Knottingley (Wakefield)
Lambeth
Nunsthorpe (Grimsby)
Stocking Farm (Leicester)
Tong Street (Bradford)

Company Shop E-Commerce Stores



Nestlé Waters Buxton
Nestlé Gatwick
Nestlé York
Nestlé Newcastle-Upon-Tyne
Nestlé Dalston
Nestlé Purina, Subury
Nestlé Purina, Wisbech
Nestlé GXO East Midlands Gateway
Nestlé, Girvan



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A bit about our members.

Our members only retail stores
COMPANY SHOP

Qualifying sectors:



Approved FMCG Logistic
& Manufacturing
Organisations



NHS, Care Services &
Private Hospitals



Prison & Probation
Services



Fire Services



Police Services



British Armed Forces



Support Services



Registered Charities



Means-Tested
Benefit Recipients



Surplus
Membership

- Membership is lifelong and free of charge
- Allows access to a wide range of products (food and household) at around 50% saving
- Each member gets 2 nominations of family/friends to join too
- If you partner with us, your colleagues will get access to membership across our 13 Company Shop stores nationwide
- We can help you to promote membership internally



COMPANY SHOP GROUP
Part of the **Bliss** group

The surplus stock people

If you can eat it, use it or wear it we can redistribute it.

As the UK's first surplus redistributor, over the past five decades we've built up the infrastructure, logistics and expertise necessary to handle all kinds of surplus products.

So, no matter how big or unusual the surplus challenge might seem, we're always able to find a solution.

Read about some of the solutions we're particularly proud of [here...](#)



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What can be redistributed?



Categories.

- Fresh
- Chill
- Frozen
- Ambient
- Beers, Wines, Spirits
- Non food
 - Pet care
 - Household
 - Personal care
 - Homeware
 - Flowers etc.
 - Consumables
 - Clothing

Reasons.

- ✓ Work in progress & ingredients
 - ✓ Trial & NPD
 - ✓ Seasonal & promotional products
 - ✓ Old packaging, de-lists & rebrands
 - ✓ Specification or quality rejections
 - ✓ Stock with foreign labels
 - ✓ Products for 'chill to freeze'
 - ✓ Part pallets
 - ✓ Tempered surplus
 - ✓ Manufacturing errors
 - ✓ Damaged products
 - ✓ Underweight or light fills
 - ✓ Misaligned packaging
 - ✓ Bulk products
 - ✓ Short shelf life
- Plus, many more...

The surplus stock people

Your brand is in safe hands.

We know how important your brand is to you – it is to us too. But do you know where your surplus stock is going when using wholesalers or outlets? The reality is there is a lack of traceability with this method, meaning you could end up damaging the brand equity you have spent thousands investing in.

By redistributing surplus through Company Shop Group, your brand equity is protected through our fully traceable model. Our stores are member only, meaning we know who buys each product that is sold in our stores. Plus, you're in control of how we communicate your products to members, through in store POS and marketing channels.

Current method



With Company Shop Group



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**Creating value from
your surplus.**

**Whatever return
your business
requires we will
work with you
to achieve it.**

**Financial
returns.**

£158m paid back to industry partners in the last 5 years, £47m in the last year alone

**Social
returns.**

31m meals through our Community Shops in the past 10 years, including feeding 800k kids for free

**Environmental
returns.**

122,000T CO₂ saved through redistributing surplus in the last year

Reasons to talk to us.

We're trusted by over 800 of the UK's leading supermarkets, manufacturers and multi-nationals including...



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Welcome to Community Shop.



Community Shop
Part of Company Shop Group

OPEN for more

Community Shop
Part of Company Shop Group

OPEN for more



Our mission is to build stronger individuals and more confident communities. We do this by creating something better than simply giving out food. We provide a hand up, not a hand out.

Community Shop

Community Shop



Why we are needed?

4m

children live in households that have experienced food insecurity in the past month*

1.5m

low-income families experience a poor diet**

9.7m

adults experienced food insecurity in the past month*

6.5m

people are going without essentials like showers, transport and toiletries**

*Source: The Food Foundation **Joseph Rowntree Foundation

Community Shop

Community Shop

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Community Store

Community Store offers food and household products from well-known brands at deeply discounted prices, all powered by surplus and donated food from our amazing partners. For those on the cusp of food poverty, this helps feed families while making sure perfectly good products don't go to waste.

Community Hub

Community Hub provides life-changing training and personal development through the What If plan, powered by the profits from the Community Store. It helps people increase their confidence, build on strengths, and overcome barriers in their lives. Community Hub inspires people to become the best version of themselves.



Community Kitchen

Powered by Community Store's wide range of products, Community Kitchen is a welcoming space where people can enjoy good quality meals at low-cost prices. Not only that, but through a range of events and family activities, it's a place that brings communities together. People rebuild a positive relationship with food through cook clubs, seasonal activities and kids eat free all year round - a lifeline for many struggling families.



Community Shop

Community Shop



Community Shop

[Click to watch Michelle's Story](#)

Meet Michelle, one of our amazing members, who uses Community Shop to provide her family with healthy and affordable food...



Community Shop

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Community Shop

OPEN for more

Delivered unwavering support to

73,000+

families

in the UK's most deprived communities

☆ **Stronger** ☆
individuals
more confident
communities

Collaborated with

800+

community partners

3,000+

members have achieved employment since joining Community Shop

Be the **best** version of you!

Empowered people to grow by delivering more than

218,000

personal development programmes

Brought communities together, serving over

10,000

Christmas dinners

surplus can change lives

Fed over **880,000**

kids with wholesome, home-cooked meals

for free

Received generous support, funding and stock donations

from over **200**

retail and manufacturing partners

Saved members over

£54m

on their shopping

2,800+

members have gone into higher education opportunities

Helped to put quality, affordable food on tables. We created

40m meals

all with food that might have otherwise gone to waste

Community Shop

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Together we
*can power lasting
positive change.*

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NUTRITION & HEALTH

2024

2025

2026

2027 +

Jan - Dec

Jan - Mar

Apr - Jun

Jul - Sep

Oct - Dec

Jan - Mar

Apr - Jun

Jul - Sep

Oct - Dec

Jan - Dec

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

UK GENERAL ELECTION (4 July)

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

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

4th meeting FDTF 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)

5th meeting FDTF health WG (Apr.24)

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

Salt Awareness Week (May.24)

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

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

SACN review Vit D fortification (May.24)

UK secondary legislation LHF advertising restrictions (Dec.24)

DHSC LHF advertising restrictions guidance (Dec.24)

SACN review UPF (Oct.24)

SACN review non-nutritive sweeteners (Oct.24)

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

Updated BFR Published (mid-Nov.24)

BFR Into force (mid-Dec.24)

WHO consultation guidelines nutrition labelling policies (Sep.24)

ATNI report NPM alignment (Sep.24)

DHSC response HoL inquiry UPF/HFSS (Jan.25)

ASA/CAP consultation on LHF advertising guidance (Feb.25)

ASA/CAP guidance on LHF advertising (May.25)

SACN conclusions 2024 rapid review UPF and review 2023 statement (Spring.25)

DHSC Reco on UPF (Within 2 months of SACN position statement - TBC)

UK LHF advertising restrictions into force (Oct.25)

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

UKRI report on public perception of UPF (Jan.26)

End transition BFR folic acid fortification (Dec.26)

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

England review HFSS promotion regs (2027)

UK review LHF advertising regs (2030)

IARC review UPF (2027 TBC)

HoL Inquiry Committee Food, Diet & Obesity debate UPF/HFSS (Mar.25)

Salt Awareness Week (May.25)

DHSC 10-year NHS reform plan (+ Health Vision TBC) (Summer.25)

BNF Snack-tender (Sep.25)

SACN review UPF evidence (Nov.25)

SG response consultation HFSS promos (Early 2025)

NDNS Y12-15 (May/ Jun.25)

PHW Position on UPF (2025)

SACN statement non-nutritive sweeteners (2025)

SG meeting HFSS promos guidance (Early 2025)

HWHW Delivery Plan 2025-2027 (Apr.25)

NI Obesity Strategy framework consultation analysis (Mar.25)

NI review nutritional standards in vending in HSC (Summer.25)

SG legislation HFSS promos (2025)

SG Scottish Dietary Goals review (End 2025)

WG HFSS promo restrictions legislation laid (Spring.25)

WG HFSS promo restrictions guidance (Spring.25)

SG Populational Health Framework (Spring.25)

NI Obesity Strategy consultation (Jul.25)

NI Obesity Strategy Consultation response (2025)

NI Obesity Strategy Framework (End 2025)

EU Childhood Obesity Action Plan Follow up (2025)

SG Good Food Nation Plan (2025)

EU study on food taxes DGTAXUD (2025)

SG Scottish Food Commission (2025)

WHO 'SHAKE' Technical Package Salt (2025)

US Dietary Guidelines Advisory Committee UPF Position (Nov.25)

WG response to consultation on HFSS (enforcement and draft regs) (Jan.25)

ANSES position UPF (Jan.25)

WHO guidelines salt substitutes (Jan.25)

WHO guidelines nutrition labelling policies (Early 2025)

WHO guidelines polyunsaturates (Early 2025)

NDNS urinary sodium analysis (2026)

WG HFSS promo comes into force (Spring.26)

SG HFSS promo restrictions info force (2026 TBC)

WHO Guidelines UPF consumption (2027 TBC)

TBC

OHID 2nd calorie reduction progress report

England proposals FDTF Health

OHID research healthier food secondary schools

OHID report on cost balanced diet

PHS research healthier food secondary schools

OHID report on salt targets

OHID research children's exposure to HFSS advertising

OHID report on Covid-19 excessive weight

FSS research price healthier diet

UK Govt. response FOPNL

DHSC response Vit D

DHSC Major Conditions Strategy

WHO global NPM nutrients of concern

OHID response 2018 NPM consultation

EU NPM review

EU Proposals FOPNL

EU study UPF consumption

WHO Food Systems-Based Dietary Guidelines

UK Diet and Nutrition calendar

Policy areas	Type of legislation	Consultation	Consultation response	Legislation/ guidelines due	Comes into force
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.: Dec.24 GUIDANCE: Dec.24	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 2 nd round – Feb.25	Oct.24 2 nd Round: Spring 2025	Spring 2025	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 – Jan.25 Guidance – Spring 2025	Spring 2025	Spring 2026
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:** [The Advertising \(Less Healthy Food Definitions and Exemptions\) Regulations 2024](#) published Dec.24 (FLC 457/24)
- **NEW:** [DHSC LHF category guidance](#) – published December 2024 (FLC 457/24)
- **NEW:** ASA/CAP [interim statement](#) on implementation guidance – 13 January (FLC 017/25)
- **NEW:** [ASA/CAP further consultation](#) implementation guidance – closed on 18 March (FLC 052/55)
 - Less certainty – assessment on a case-by-case basis
 - Identifiability test – ‘objective’ test based on perspective by the ‘average consumer’
 - Brand advertising – could be subject to restrictions, depending on ad context and product inventory – brand synonymity.
 - Branding – incl. “logos, livery, straplines, fonts, colour schemes, characters, audio cues and jingles”
- PPA response (FLC 089/25) – Main points:
 - PPA opposition
 - Not in line with policy intent – disincentivises reformulation, ‘conceptual factors’ vs. ‘identifiable product’
 - Undermines government advice on brand advertising – [2021](#) and [2024](#) government responses and [2021 H&C Bill debate](#) (+ [here](#))
 - Goldplates legislation – esp. regarding brand advertising, applicability to product listings (retailers’ websites – crossover promos)
 - Creates uncertainty – how is a range assessed, product portfolio threshold, what is a dominant product, how is it measured
 - Poorly structured – what weight is given to each element in the assessment, in which order?
 - PPA requesting change in legislation to explicitly exclude brand advertising and guidance to be revised.

NEXT STEPS:

- Final CAP/BCAP guidance exp. **May 2025**
- Regulation to come into force on **1 October 2025**



Promotion restrictions (England and DAs)

ENGLAND:

- No updates



NEXT STEPS:

- Volume promo restrictions to come into force on **1 October 2025**
- Transition period for on-pack volume promos until **30 September 2026**

WALES:

- **NEW:** [WG response to consultation on healthy food environment](#) – 13 January (FLC 018/25)
- **NEW:** [Draft The Food \(Promotion and Presentation\) \(Wales\) Regulations 2025](#) – 11 February (FLC 046/25)
 - largely consistent with the existing equivalent Regulations in England
 - Awaiting Senedd proceedings – March 2025
- Implementation guidance being finalised – no further consultation



NEXT STEPS:

- Legislation still exp. **imminently**
- Guidance also exp. **imminently**
- Implementation (12-month transition) **exp. March/April 2026**
- **NEW:** Healthy Weight : Healthy Wales Delivery Plan 2025-2027 – exp. April 2025
 - Additional restrictions (e.g. meal deals, TPRs, free-standing displays) may be considered in next HWHW delivery plan

Promotion restrictions (England and DAs)

SCOTLAND:



- Minister Jenni Minto [update on 23 Dec.24](#): “We will publish the independent analysis report of the consultation responses in early 2025, as well as next steps for the regulation of HFSS food and drink promotions.”

NEXT STEPS:

- **NEW:** Consultation response **exp. Early 2025**
- **NEW:** First meeting to develop implementation guidance **exp. Early 2025**
- **NEW:** SG working on Population Health Framework **exp. Spring 2025**
- **NEW:** SG to publish SG Scottish Dietary Goals review **exp. End 2025**

NORTHERN IRELAND:



- Consultation on obesity strategy [Healthy Futures](#) closed on 1 March 2024.
- PPA response submitted 13 February 2024 (FLC 073/24)
- No new updates

NEXT STEPS:

- Consultation analysis on Obesity Strategic Framework **exp. imminently**
- **NEW:** NI Obesity Strategy consultation **exp. July 2025**
- **NEW:** NI Obesity Framework **exp. End 2025**
- **NEW:** NI Obesity Strategy consultation analysis **exp. 2025 TBC**

UPF developments

UPF

- SACN open meeting [draft rapid review](#) of UPF- 21 November 2024
- Imperial conference: [Tackling the harms of UPFs](#) - 21 November 2024
- Food Foundation [investor briefing on UPF](#) – December 2024
- UKRI/Sciencewise [12-month public dialogue on UPF \(report\)](#) – kick off January
- Government [response](#) to HoL report [Recipe for Health](#) - 30 January (FLC 034/25)
- ANSES Opinion on UPF – 31 January (FLC 041/25)
- EFFoST and IUFoST roundtable on food processing – 20 March

Upcoming

- HoL debate on [‘Recipe for Health: a plan to fix our broken food system’](#) report – 28 March
- SACN final conclusions on 2024 [rapid review](#) and review of [2023 statement](#) – exp. Spring.25
- DHSC response to SACN review on UPF – exp. 2 months of publication of SACN review
- PHW position statement on UPF – 2025 TBC
- Next SACN rapid review – Nov.25
- IGD position on UPF – TBC (awaiting Food Strategy)
- Output UKRI public dialogue on UPF – early 2026
- IARC review of UPF (2025-2029) – exp. 2027
- WHO guidance on consumption of UPF – exp. 2027 (earliest)
- EC study on impact of consumption of UPF and ‘Food Dialogue’ - TBC

OTHER DIET & NUTRITION

Defra Food Strategy

- Announced on 10 Dec.24
- Focus on four key areas; Food Security, Health, Environment, and Economy.
 - **Provide more easily accessible and affordable healthy food** to tackle diet-related ill health;
 - **Maintain food security by building resilience** in the face of climate shocks and geopolitical changes, strengthening the supply chain
 - **Reduce the impact of farming and food production on nature, biodiversity and climate,**
 - **Ensure growth is at the heart of our strategy**
- Defra led, but cross-government, including DAs.
- Likely to build on work by Henry Dimbleby, incl. FDTP :
 - Reporting (mandatory?) of HFSS portfolio, NPM, calories - still TBC
 - Reformulation incentives
 - FOPNL?
- Engagement only just started – [advisory board](#) (FSAB) announced 21 March
 - First meeting 26 March
- Most of the health policy to fall into the Food Strategy, but some of it will be in the DHSC part of the NHS 10 Year Strategy (now due in Summer)

OTHER DIET & NUTRITION

Action on Salt report on crisps, nuts, popcorn (FLC 086/25):

- Assessment against NPM, salt and calorie reduction targets.
- Press release more critical than report
- Very limited media coverage: The Daily Mail, The Independent, The Sun and Talking Retail – today covered on The Grocer
- Likely spotlight of [Salt Awareness Week 2025](#) (12-18 May)



MEMBERS: Further action?

FOPNL UK:

- No active work, but DHSC considering understanding and effectiveness
- 60% uptake in UK – DHSC interested in increase in usage
- FDF currently considering position on FOPNL



MEMBERS: PPA position?

Nutri Score:

- Unofficially dropped by EU - TBC

OTHER DIET & NUTRITION

SG Nutritional Standards Early Learning (FLC 015/25)

- Published end 2024 - SG exp. implementation from 1 August.2025
- Registered childcare providers in Scotland providing food/drink to 0-5 yo
- Most savoury snacks banned (exc. oatcakes, crackers, rice cakes and breadsticks)
- Fried foods, incl. chips, potato waffles, wedges and shapes should be limited to once/week.
- Oven baked/air fried preferred (warning pre-fried products)

FSA NI Research on nutritional standards in vending:

- Evaluate implementation of 2022 nutritional standards in vending in local councils and public sector sites in NI.
- Assess impact of nutritional standards on sales and nutrients sold and collect insights from consumers and other stakeholders.
- Report will inform review due Summer 2025.

UKRI Thriving project

- To develop a 'Nutrient and Environment Profiling Model' to categorise foods based on their nutritional content and environmental impact;

WHO guidelines on low-sodium salt substitutes – published 27 January (FLC 032/25)

- Sodium reduction fact sheet – published 7 February.

FOOD LABELLING, COMPOSITION & REGULATION

Bread and Flour Regulations

- **NEW:** [The Bread and Flour \(Amendment\) \(England\) Regulations 2024](#) published on 14 November 2024, amending the Bread and Flour Regulations 1998 (FLC 436/24)
 - Into force 13 December 2024
 - **24-month transition (13 December 2026)**
 - Enforcement note sent to LAs/PAs - risk-based and proportional enforcement during transition.
 - Labelling alignment approach to be agreed with LAs/PAs (in case of non-compliance)
 - Legislation also introduced in [NI](#), [Scotland](#) and [Wales](#).
- **NEW: PROVISIONAL IMPLEMENTATION now exp. early Sep.25** (FLC 092/25)
 - **Most flour compliant exp. end October 25**
 - Stakeholders' discussions with Defra to allow the use of USP folic acid “to be more consistent with general folic acid fortification, mitigate unnecessary costs and increase supply resilience (FLC 094/25)
- **NEW:** Draft Guidance shared with members (FLC 094/25), but not yet published
 - Covers scope, fortification requirements, labelling and enforcement
 - Labelling: multiple formats permitted (e.g. descending order, alphabetically)
 - **NEW:** Defra guidance now exp. before Easter 2025.



MEMBERS: Views on implementation?

OTHER LABELLING, COMP. and REGS.

- **Allergen labelling - UK**
 - FDF position paper on PAL (FLC 016/25)
 - FDF Roundtable with FSA on 6 March
 - [FSA Guidance on Allergen Labelling for Non-Prepacked Food](#) – published 5 March
- **Allergen labelling – NL**
 - Dutch allergen policy notified via [TRIS system](#) – period for comments now closed (13 March)
 - FoodDrinkEurope comments submitted to TRIS system (FLC 079/25)
- **Contamination of garlic powder with peanuts**
 - 13 February FSA notified of peanut contamination of garlic powder from China (FLC 047/25):
 - 3 batches – 11 samples - No serious food safety concern
 - FBOs to carry out specific risk assessments
 - 17 February FSA 2nd alert (FLC 051/25) – level of peanut detected poses a risk to 1% peanut allergic population
 - 10 March: FSA 3rd alert (FLC 073/25): 21 incidents detected. Risk advice remains unchanged.
 - 24 March: FSA 4th alert (FLC 097/25): all batches Sofra Garlic Powder recalled.
 - FSAI taking different approach

OTHER LABELLING, COMP. and REGS.

- **‘Not for EU’ labelling - NIRMS**
 - Phase 3 labelling (product-level) apply from **1 July 2025**
 - [Labelling guidance](#) amended and new [list of commodity codes exempted from phase 3](#) (FLC 055/25)
 - Defra confirmation that HRFNAO will require labelling in phase 3
- **Regulated Products**
 - **NEW:** [Food and Feed \(Regulated Products\) \(Amendment, Revocation, Consequential and Transitional Provision\) Regulations 2025](#) – published 17 March 2025
 - Simplify authorisation of feed additives, smoke flavourings and GMOs:
 - Removes periodic renewals and need for specific legislation – official register
 - SI approved both houses 12 March - awaiting SI publication
 - Comes into force on **1 April 2025**
 - FSA developing registers and guidance
- **Smoke flavourings UK**
 - All 8 smoke flavourings [authorised](#) until 1 July 2025
 - Risk assessment ongoing
 - COT SFWG meetings throughout Feb/Mar to discuss genotoxicity - next meeting

OTHER LABELLING, COMP. and REGS.

- **HRFNAO**

- [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](#) – into force 18 December 2024
- New GB revision of official controls legislation on HRFNAO – live [consultation](#) – closes 9 April (FLC 083/25)
 - Groundnuts from Paraguay and nutmeg, mace and cardamom from India in Annex I.
 - Ginger, saffron, turmeric (Curcuma), thyme, bay leaves, curry, seeds of anise, badian, fennel, coriander, cumin or caraway; juniper berries and other spices (dried spices) from India in Annex II
 - Likely to come into force early 2026.

- **FSA Board Meeting – 26 March**

- Border Target Operating Model (BTOM)
- Foodborne Disease Monitoring
- LA cost-recovery review and proposals

- **Vegan/vegetarian/plant-based labelling**

- FSIFG opinion on the use of dairy terms for plant-based products – no news
- Final draft ISO International Standard on Plant-Based Foods (ISO 8700) agreed (FLC 086/25)
 - Publication date TBC

- **Environmental claims – UK**

- Digital Markets, Competition and Consumers Act – comes into force **6 April 2025**
 - Gives CMA further powers of enforcement of consumer rights
 - CMA to confirm priority areas in coming weeks, but possible focus on ‘greenwashing’.

- **Recycling labelling**

- Defra remains committed to mandatory UK-wide recycling labelling
- Exp. as amendment to EPR legislation in 2025
- UK observing EU approach

- **NSF White Paper on ‘[The future of food labelling in the UK](#)’**

- Published Jan.25

OTHER LABELLING, COMP. and REGS.

• Smoke flavourings EU

- [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 products (other than cheeses, meats and processed fish) **1 July 2026**
- DG SANTE published a [schematic representation of transition periods](#) and will publish Q&A (FLC 076/25)
- EFFA information letter on transition measures - on 5 March (FLC 077/25)
- EC comparative risk assessment conventional smoking vs. products containing smoke flavourings
 - EFSA scientific opinion conventional smoked products due in 2027

• [ECA report on food labelling \(FLC 449/24\)](#)

- Published 25 November 2024: Supports informed choices but contains many gaps: review of pending actions, COOL, enforcement (new labelling practices, e.g. greenwashing), monitoring of awareness.
- [EC response](#) 4 December 2024 (FLC 459/24)
 - By 2027: EC to address FIC and NHC, COOL, monitoring of new labelling practices, support EUMS guidance and monitoring, etc.

• [EC Vision for Agriculture and Food \(FLC 054/25\)](#)

- Published 19 February 2025
- Agriculture-focussed
- Reference to COOL, consumer protection and greenwashing, GIs, animal welfare, UPF and plant breeding
- Key elements of F2F and FOPNL omitted

• EU Directive on Green Claims

- First trilogue on 28 January 2025 – subsequent on 24 April and 10 June 2025
- EUMS have 24 months to transpose legislation – and provisions should apply within 36 months
- [Calls](#) to clarify, harmonise and simplify – and more proportionate and clear substantiation and verification
- [Directive \(EU\) 2024/825](#) (Empowering consumers for the green transition) amends UCPD applies from **27 September 2026**
 - Bans generic and partial environmental claims, and claims based on GHG offsetting

FOOD SAFETY

Draft Genetic Technology (Precision Breeding) Regulations 2025

LINK: <https://www.legislation.gov.uk/ukdsi/2025/9780348269123>

Laid in Parliament on 25 February 2025.

Secondary legislation is necessary to implement the main provisions of the Genetic Technology (Precision Breeding) Act 2023 for plants in England only.

Will come into force six months after the necessary parliamentary processes have been completed (expected to be Autumn 2025).

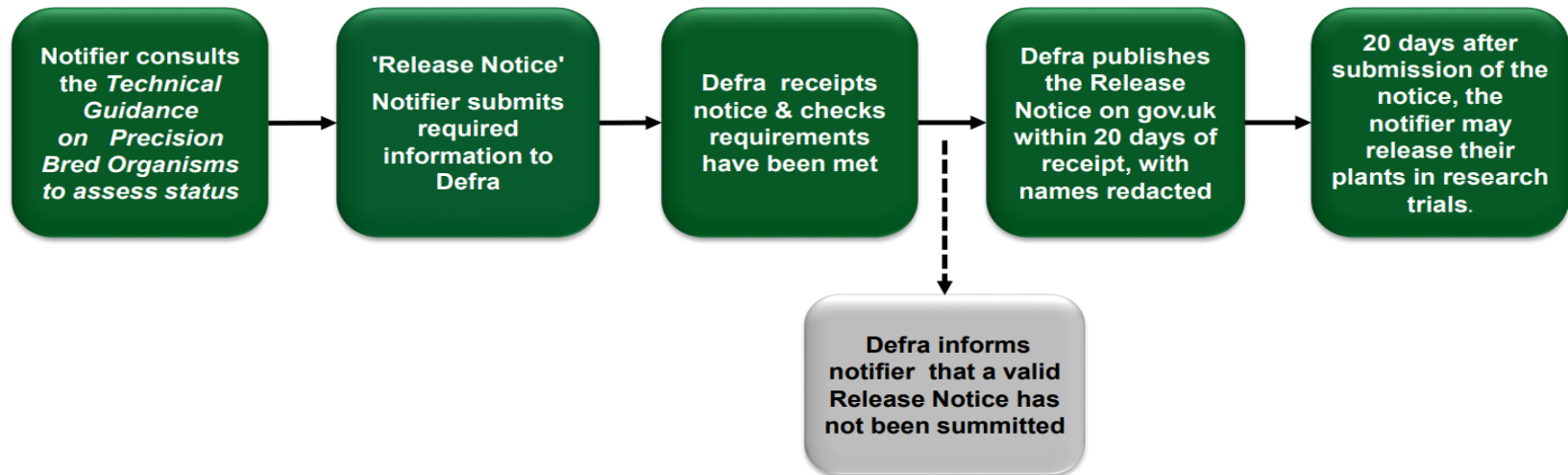
Legislation covers

- The release and marketing of PB plants;
- Revocation of a PB authorisation (by SOS);
- Review and appeals processes;
- Defra's register of PB plants authorised for food and feed;
- Enforcement;
- Consequential amendments to other legislation (e.g., GMO Traceability and Labelling Regulations will not apply to PB plants).

The regulations DO NOT make any amendments to organic legislation.

Draft Advisory Committee on Releases to the Environment (ACRE) guidance on release notices for precision bred organisms (PBOs)

Release Notices



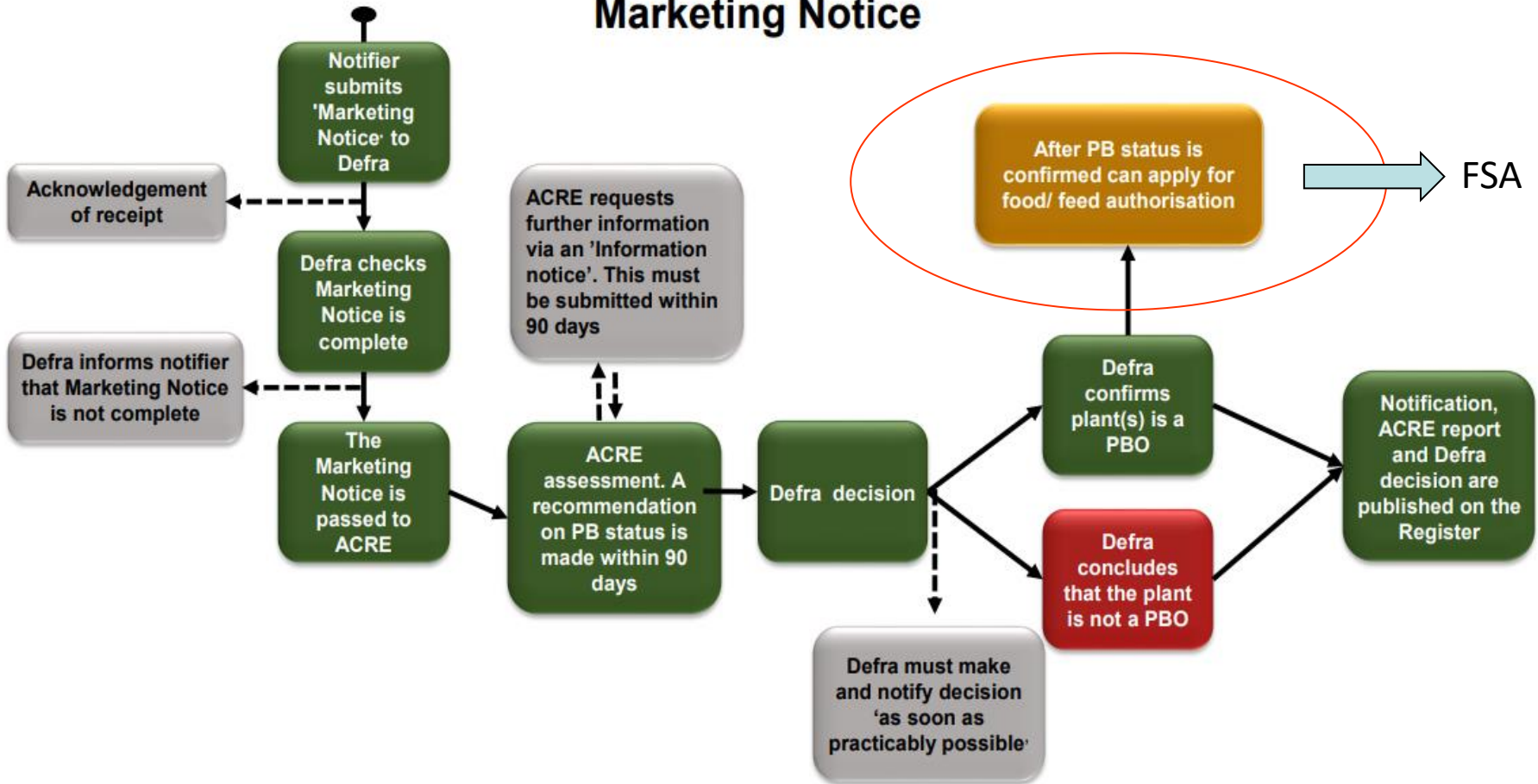
LINK: <https://www.gov.uk/government/publications/acre-draft-guidance-on-release-and-marketing-of-precision-bred-organisms/acre-guidance-release-notices-for-precision-bred-organisms>

Provides developers with more detail on what information is expected under requirements in Schedule 1 and 3 of the Genetic Technology (Precision Breeding) Regulations 2025 for the 'Release Notice' for PB plants which developers must submit to Defra at least 20 days before the field trials take place.

Defra must confirm that a plant is a precision bred organism before it can be marketed.

This decision is based on information provided by developers in a 'Marketing Notice'. Schedules in the SI set out information required in these notices.

Marketing Notice



Draft guidance from the FSA to applicants for the authorisation of PBOs

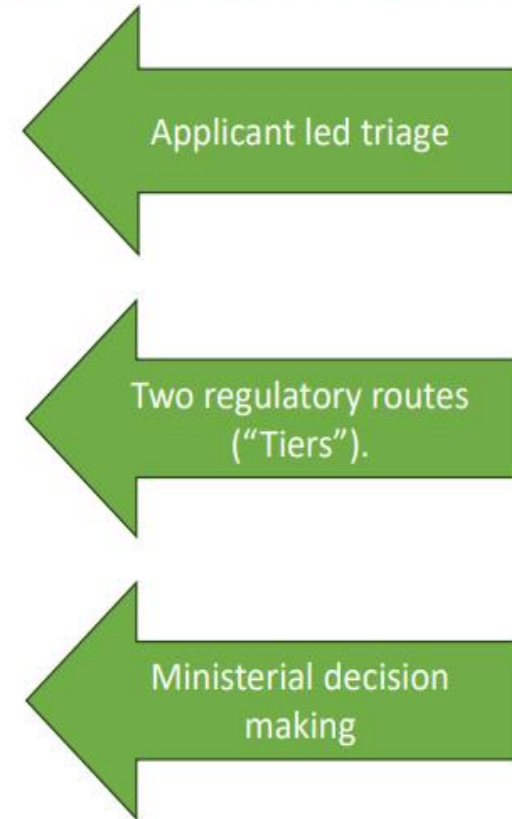
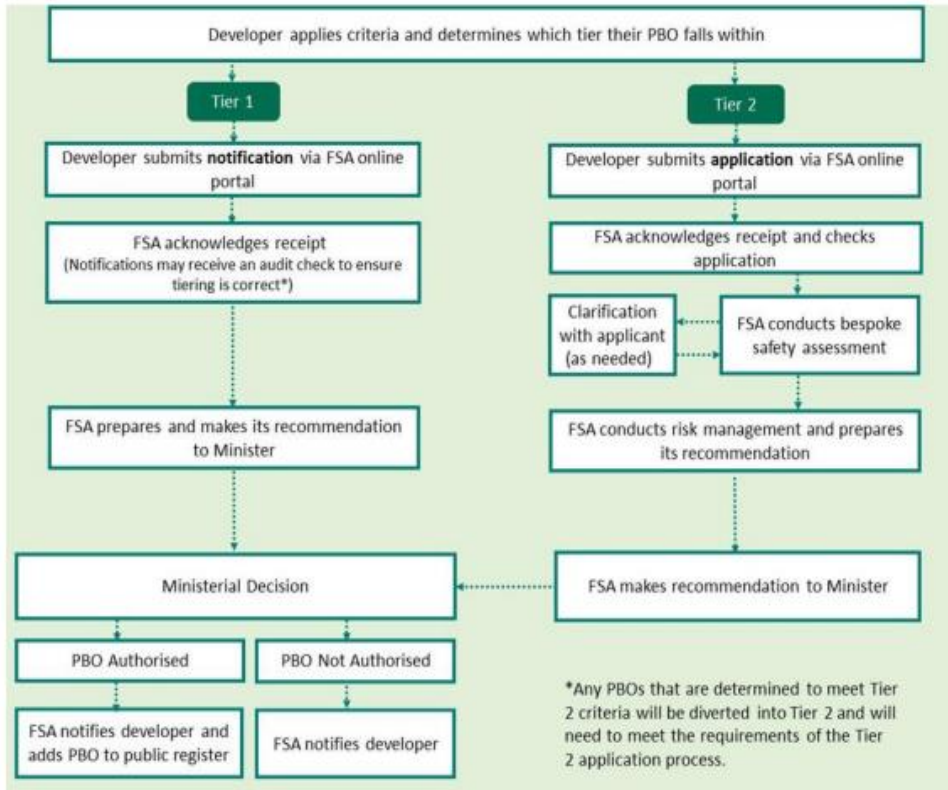
LINK:

https://www.food.gov.uk/sites/default/files/media/document/Edited%20DRAFT%20Technical%20guidance%20to%20applicants%20for%20the%20authorisation%20of%20Precision%20Bred%20Organisms%20for%20food%20and%20feed_0.pdf

Describes the scientific considerations required for evaluating the safety and nutritional aspects of PBOs **when seeking marketing authorisation for use in the production of food and feed.**

- **Part 1:** Outlines the scope and the technical aspects of the safety assessment of PBOs including general, compositional and specific considerations for all applications.
- **Part 2:** Guides applicants through the Tier 1 safety assessment and the triage process for determining whether a Tier 1 safety assessment is sufficient (Regulation 20 application) or a Tier 2 FSA safety assessment is required (Regulation 22 application).
- **Part 3:** Identifies the information required for all applications under both Regulation 20 and Regulation 22.
- **Part 4:** Details additional information to include when applying for a Tier 2 FSA safety assessment as well as what may be requested during the FSA safety assessment.

Overview of the FSA PBO Regulatory Process



Defra consultation on plant varieties and seeds framework for precision bred plant varieties in England

LINK: <https://consult.defra.gov.uk/defra-aphw-plants-varieties-and-seeds/precision-bred-plant-varieties-and-seeds-framework/>

Defra plans to make amendments to legislation applying to the National Listing of PB plant varieties in a separate SI.

- A Precision Bred Plant Variety List for England is proposed **in addition** to the existing variety lists to facilitate the marketing of seed of PB plant varieties.
- Wants to ensure that there is accessible information on PB plant varieties available to those that require it e.g., farmers who wish to grow non-PB varieties only.
- Exploring methods and tools to communicate information on the PB status of plant varieties that do not require legislative changes, such as industry-led PB plant variety registers, existing industry lists of recommended varieties, and the official Plant Varieties and Seeds Gazette.
- Also interested in **exploring the mandatory inclusion** of PB status in labels for PB seed and other plant reproductive material and understanding what impact this would have on businesses.

To note: Scottish Government will also hold a meeting on precision breeding this week. The discussion will focus on the potential implications if Scotland does not allow the use of this technology. However, internal market rules may prevent Scotland from restricting the sale of products developed using precision breeding, even if its use is not permitted within the country. BPTA will attend and report back.

EU New genomic techniques

COREPER discussions

On 14 March, the Committee of the Permanent Representatives of the Governments of the Member States to the European Union I (Coreper I) met and agreed the Council's mandate for negotiations with the European Parliament on the NGT proposal.

Most relevant points from the Council's position:

- NGT-1 products that would be exempted from rules set out in the current overarching EU GMO legislation would not be labelled.
- However, labelling would be foreseen for seeds under NGT-1.
- For NGT-2 plants, the current GMO legislation would still apply and labelling would apply.
- The Commission would create a publicly available database listing all NGT plants having an NGT-1 status.
- Applicants for an NGT-1 plant would need to submit any information on all existing or pending patents.
- An expert group on the effects of patents on NGT plants would be set up by the Commission with experts from MS and the European Patent Office.
- The Council would exclude the herbicide tolerance trait from the scope of the NGT regulation, meaning any NGT-derived plant with such a trait would still be under the scope of the current GMO legislation (as for NGT-2 plants more generally).
- The maximum number of genetic modifications allowed for a plant to be considered under the NGT-1 category would be of 20 per monoploid genome.

The agreement on the Council's negotiating mandate allows its presidency to begin negotiations with the European Parliament on the final text of the regulation.

The final text must be formally adopted by the Council and the EP before the regulation can enter into force.

CIPC Residues Management Group

Chlorpropham (CIPC, sprout suppressant previously authorised for use on potatoes).

Last CRMG meeting was held on 13 March 2025.

PPA continues to support the CRMG through provision of secretariat function. Will be reviewed in June 2025. GB potatoes now funding CRMG activities.

Since last FLC, a meeting was held between CRMG and CRD (11 February 2025) to discuss CRD recommendations on CRMG report for 2023/2024. Extension for additions/amends has been granted until 10 May 2025.

CRMG has updated guidance on cleaning (on GB Potatoes website), and media communication (further amends to cleaning guidance infographic expected end of year).

CRMG has launched call for data (updated template) – deadline for submission 31 May 2025

At an EU Level:

- In September 2024 *Draft Commission Regulation amending Annexes II, III and V to Regulation (EC) No. 396/2005 of the European Parliament and of the Council as regards maximum residue levels for chlorpropham, fuberidazole, ipconazole, methoxyfenozide, S-metolachlor and triflusulfuron in or on certain products sent to WTO (deadline 14 February 2025)*
- Proposal is to move tMRL to 0.20mg/kg. PVC would also be expected to report data every two years instead of annually.
- Vote on tMRL amend was expected at Standing Committee on 17-18 February 2025. No minutes available
- PVC's report for 2023/2024 was submitted to Commission on 20 December 2024. Results not yet discussed by EU Member States.
- PVC annual call for data also launched.

Acrylamide

Acrylamide (EU). Latest discussion: Commission Working Group on Environmental contaminants, 12-13 December 2024.

- Acknowledgement of complexity of determining BMLs and MLs for composite foods.
- Commission sees no alternative approach because the contaminant is formed during the production process.
- Proposal is to look at the EFSA data from 2019-2023.
- Once the data processing has been completed, the Commission will draw up a draft proposal for BMLs and MLs.
- This will be followed by a separate online WG meeting, only about acrylamide.
- MLs will apply to food 'as placed on the market' (relevant for frozen and chilled).

EFSA Annual call for continuous collection of chemical contaminants occurrence data in food and feed launched.
LINK: <https://www.efsa.europa.eu/en/call/annual-call-continuous-collection-chemical-contaminants-occurrence-data-food-and-feed-0>

ESA call for data launched in January 2025: **deadline(s) 31 March 2025 (crisps), 30 April 2025 (snacks).**

EUPPA finalising a position paper on acrylamide (next meeting W/C **31 March 2025 [AMENDED POST-MEETING]**).

EUPPA call for data launched in March: **deadline 30 April 2025 [AMENDED POST-MEETING]** (processed potato products).

Revision of FDE Toolbox: deadline for initial comments was 28 February: first draft expected imminently.

FDE contributing to the Codex work to review the code of practice (COP): next Codex CCCF 23-27 June 2025.

Acrylamide

Acrylamide (GB)

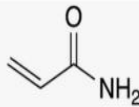
Anticipated that FSA will issue a call for acrylamide occurrence data in Q1-Q2 2025.

FSA (Mark Willis) expected to join next FDF Residues and Contaminants meeting on 4 June 2025 and to cover acrylamide in detail.

Fera attended the FDF Residues and Contaminants meeting on 19 February 2025.

- Fera confirmed that FSA acrylamide data call is 'imminent'.
- Highlighted the work that Fera had undertaken for FSA in its 2020-21 survey and in particular results for vegetable crisps (including furan).

Acrylamide and furan survey 2020-2021



Description	Sampling year	Samples	Acrylamide mean	Acrylamide min	Acrylamide max	Acrylamide BML	Acrylamide n>BML
Vegetable Crisps	2020	11	1154	<30	2634	-	-
Vegetable Crisps	2021	13	941	<30	2464	-	-
Vegetable Fries/Chips	2020	8	205	<30	433	-	-
Vegetable Fries/Chips	2021	7	45.05	<30	58.6	-	-

Highest levels measured in both years were in vegetable crisps and an extruded vegetable snack (same products in 2020 and 2021).

Vegetable 'chips' made from same vegetables contained lower concentrations

[Acrylamide and Furans Survey Summary | Food Standards Agency](#)



Acrylamide and furan survey 2020-2021



Summary of samples with BML exceedances

Description	Sampling year	Samples	Acrylamide mean	Acrylamide min	Acrylamide max	Acrylamide BML	Acrylamide n>BML
Wheat based bread	2020	11	83.4	<30	88.5	50	2
Wheat based bread	2021	7	62.6	<30	94	50	3
Instant coffee	2020	4	767	646	884	850	1
Biscuits and rusks for infants and young children	2021	5	256	<30	276	150	3
Cereal Snacks (for example, Rice Cakes)	2020	7	204	89.8	414	350	1
Processed cereal based snacks intended for infants and young children (0-3 yrs) excluding biscuits and rusks	2020	14	106	<30	182	40*	5
Processed cereal based snacks	2021	14	87	<30	140	40*	5

* BML does not apply to all products within this category

- Other products with acrylamide at relatively high concentrations were dried apricots and black olives in brine (no BML)
- FSA call for data will open soon, FSA will use for GB risk assessment
- Samples also analysed for furan and alkylfurans. Highest levels of furan and 2-methyl furan found in coffee, highest levels of pentyl furan in veg crisps. No MLs or BMLs for furans.
- All data was submitted to EFSA.

3-MCPD-esters

3-MCPD-esters and glycidyl esters (EU only) – no GB update

Latest discussions: Commission Working Group on Environmental contaminants, 12-13 December 2024 (was also expected to have been discussed at meeting on 18 February 2025).

- MLs for baby food and processed cereal-based foods for infants and toddlers were proposed WG in June 2024. Commission will now issue an official proposal for the adoption of these MLs.
- Initial proposal was to set MLs for other composite foods. However, Commission now considers that to do so an endless list of product categories would be required.
- Additionally, there are differences in fat content within the same product category, which means that an ML would be strict for some products and too high for others.
- Lastly, there is limited monitoring data available per product group.
- Noted that there may also be some (additional) formation during production/preparation process, and it is not known to what extent this contributes.
- Netherlands has proposed to extend the existing MLs for vegetable fats and oils to extracted fats from composite products. The analysis of GE and 3-MCPD takes place in the extracted fat of a product anyway, so that these measured values can be compared directly with the MLs.
- Another option has been submitted by a National Reference Lab: proposes to calculate MLs in composite products by converting the ML for GE and 3-MCPD using the fat content declared on the packaging (possibly only apply this to products with more than 10% fat).

EFSA Annual call for continuous collection of chemical contaminants occurrence data in food and feed launched.

LINK: <https://www.efsa.europa.eu/en/call/annual-call-continuous-collection-chemical-contaminants-occurrence-data-food-and-feed-0>

Mineral Oil Hydrocarbons

MOSH/MOAH (EU)

Latest discussions: Commission Working Group on Environmental contaminants, 12-13 December 2024 (was also expected to have been discussed at meeting on 18 February 2025).

Draft Regulation on MLs for MOAH in food.

- Favoured approach is to set MLs for raw/unprocessed products, with some MLs also set for a limited number of processed products or semi-finished products (such as cocoa butter).
- As with MCPD, Commission now believes it is too complicated to establish MLs for most categories of processed and composite products. When more data are available at a later stage, further discussion can be held about MLs in processed and composite products.
- For commodities to which 'Indicative levels' apply (see recommendation), the detection limit must be used.
- **Propose to postpone enforcement until 1 January 2027** (some MS in favour of a longer implementation date) .

Draft Recommendation on the monitoring of MOHs in food.

- Indicative levels are intended for investigating the source of contamination.
- Based upon 90th percentile of the monitoring data.
- If the proposed detection limits cannot be met (e.g. due to endogenous interference), a detection limit as low as reasonably possible can be used.

Draft Regulation on the methods for the sampling and analysis of MOHs in food.

[Not discussed in December due to lack of time].

Lastly Commission is working on a ML for additives (emulsifiers and dyes can also contain MOAH. At the same time, e.g. paprika extract or turmeric can cause interference in the analysis).

Furan

Furan (EU) – Furan is not currently on the FSA priority list

Furan in baby food – Finalisation of the discussion on MLs

- Commission has updated the analysis of the monitoring data on furans (furan, 2- and 3- methylfuran) in baby food, which now also includes data from 2023.
- Data indicate that it is necessary to establish an ML.
- Recognition that furan is volatile and can be formed during the analysis – but concentrations are felt to be very high.
- Further discussion expected in whether MLs should be set for furan or for the sum of furans (i.e. incl. 2- and 3-methylfuran).

Monitoring of furan-2(5H)-one and benzene-1,2-diol in smoked meat and meat products, cheese and fish and other relevant commodities.

- A monitoring recommendation has been drawn up by the Commission for furan-2(5H)-one, benzene-1,2-diol (catechol), styrene and benzofuran in conventional smoked foods.
- The monitoring recommendation will last 3 years: 2025 – 2027.
- Commission was aiming to finalise the recommendation in February.

FDE is finalizing a follow-up to the paper “Furan and Methylfurans in Foods: An Update on Occurrence, Mitigation, and Risk Assessment, Kettlitz et al. Comprehensive Reviews in Food Science and Food Safety. Vol.18,2019.”

ESA has recently received all of the EFSA held data on furan and furan analogues submitted under the existing monitoring recommendation: analysis will follow as appropriate.

Glycoalkaloids

As a follow-up to the event on 13 March 2024, the Potato Value Chain prepared a summary statement on glycoalkaloids in potatoes and potato products – after significant delay this was eventually finalised and shared with the Commission in November 2024.

Statement was then discussed/mentioned as part of the 4 March 2025 Commission Working group meeting.

- Industry states that there are no 'good' standards for the analysis of glycoalkaloids in potatoes.
- EURL notes that commercial standards are available, but no isotope standards.

EUPPA has prepared a draft position paper on glycoalkaloids. Input from members is welcomed. The next EUPPA Glycoalkaloids task force is scheduled for 31 March 2025.

Minglyka project meeting was held on 24 March 2025 (PPA did not attend).

- MRI's researchers presented the results on crisps and informed that they will publish the first set of data on Crisps as soon as possible (content unknown).
- Data and results of the research on French Fries will be published during summer.
- Final Minglyka project meeting will be held in September.

SUSTAINABILITY

Packaging (GB)

Producer Responsibility Obligations (PRO)

In October, an open letter was shared from the four UK ministers, confirming their intention to push ahead with a PRO that will result in legislative confirmation of the PRO and its role.

This is the clearest steer to date from ministers that a producer-led PRO will be an integral part of the design of EPR from 2025.

- FDF is facilitating a PRO Steering Group, now including non-food sectors.
- An outline report is being drafted with PwC on next steps for setting up the PRO, to understand what outcomes a PRO in the UK needs to achieve and the benefits that producers want and need over a long-term timeline.

EPR Advocacy

FDF has been advocating for the food sector in relation to EPR, including asking DEFRA to explain how the latest fees have been calculated, and ensuring that final fees for producers are published as early as possible to ensure businesses can add accurate figures into mid-year budget cycles.

FDF is also advocating around the topic of cumulative burden and impact of the Packaging reforms on food inflation as part of wider strategy.

Deforestation

UK Forest Risk Commodities Regulations

- Defra are yet to receive a ministerial steer on the FRC policy.
- Defra are also not able to provide a timetable for laying legislation, nor whether there would be any amendments from the previous government's proposals.

EU Deforestation Regulations (EUDR) – (FLC 006/25)

- Application of EUDR officially postponed until 30 December 2025 (except timber)
- [Regulation \(EU\) 2024/3234](#), amending the EUDR ([Regulation \(EU\) 2023/1115](#)), published on 23 December 2024.
- Will apply from **30 December 2025** for **large operators and traders** and **30 June 2026** for **micro- and small enterprises**.
- No changes in terms of substance – proposals from the EP dropped
 - EC Guidance: https://green-business.ec.europa.eu/deforestation-regulation-implementation_en
 - EU FAQs: <https://circabc.europa.eu/ui/group/34861680-e799-4d7c-bbad-da83c45da458/library/e126f816-844b-41a9-89ef-cb2a33b6aa56/details>

COMMITTEE MATTERS

Committee Matters



FDF ASSOCIATIONS ADVISORY GROUP MEETING

- **Meeting 9 December 2024 – priorities:**
 - Pending
 - **Andrew Curtis now Chair of AAG**
-
- **Next meeting: 31 March**

Risk Matrix

Food Issues Risk Matrix (November 2024)

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 Portion Size/Calories CIPC tMRL monitoring EU/UK Devolved regulatory divergence Packaging waste/Taxation/EPR Ultra-Processed Foods	Food taxation FDTP Health workstream FOPNL developments Salt/Sodium reduction (2024 targets) 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 UK Border Target Operating Model (BTOM) UK Obesity Strategies NIRMS/'Not for EU' labelling UK Deforestation	Eco-labelling/FDTP Environment workstream Nutrient Profiling (EU F2F Strategy) DHSC 10-year NHS reform plan Glycoalkaloids EU Deforestation GB Smoke flavourings review Smoked ingredients	EU Smoke flavourings
Small Impact Cost Materials Change	EU Flavourings reviews Sugars (popcorn) EU MOAH/MOSH	UK Recycling labelling EU PFAS GBSF/CQUIN Plant-based/vegan and vegetarian definitions	

New issue
 Changed priority
 Identified as a potential high-profile media issue

Decreasing impact on business

AOB

Dates of next 2025 meetings

- **In-person:** 01 July – 11am start – Food and Drink Federation (FDF) offices
- **Online:** 12 November– 1:30pm start



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*
- *FDF general*
- *BRC general*

Thank you



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