

**PPA Food Law and Consumer (FLC) Committee
Minutes of the meeting 25 March 2025,
Teleconference**

<u>Participants:</u>		<u>Guest speakers</u>	
Catharine Hall	KP Snacks (Chair)	Chris Conder	Defra
Andrew Curtis	PPA (Secretariat)	Lucy Crapper	Company Shop Group
Vanessa Richardson	PPA (Secretariat)	Ahmed Ghelle	Defra
Michael Brown	Proper Snacks	Alistair Murray	Company Shop Group
Shane Green	McCain		
Darren Hewish	Tayto Group	<u>Apologies</u>	
Jyoty Modha	PepsiCo	Gillian Black	Taylor's Snacks
Charlotte Pick	McCain (online)	Yara Hamad	PepsiCo
Sara Stanley	Proper Snacks	Federica Tritschler	Lamb Weston
Stuart Williams	PepsiCo		

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 (14 November 2024) and any actions arising

The Committee confirmed that the minutes of the previous FLC meeting held on 14 November 2024 (FLC 011/25) were correct and proceeded to review the actions arising from the meeting. See slides for details. In addition, please note:

- **Feedback on the impact of the EU ban on smoke flavourings to the Food Standards Agency (FSA):** No feedback received from members. Will be marked as completed and removed.
- **Salt/sugar data collection for crisps, savoury snacks and processed potato products:** 2023-2024 exercise completed (partial results for crisps). The Secretariat will circulate a new call for data for the year 2024-2025 in May.
ACTION: Secretariat to reach out to members on annual salt data collection for crisps, savoury snacks, popcorn, nuts and processed potato products, as well as sugar in popcorn for the year 2024-2025 in May.25. [POST MEETING NOTE: Completed. An email was sent to members on 13 May, asking members to submit salt (sodium)/sugar data for the year 2024-2025 by 13 June (FLC 150/25)].
- **Department for the Environment, Food & Rural Affairs (Defra) visit:** At the last meeting, the Secretariat informed members that the new Defra labelling team was interested in visiting members' factories. Invite period has been extended.
ACTION: Members interested in hosting a factory visit for the new Defra labelling team to contact the Secretariat ASAP.
- **Bread and Flour Regulations (BFR) – folic acid fortification – labelling issues:** Members are advised to continue their discussions with their Local Authorities (LAs)/Primary Authorities (PAs) to agree on any necessary labelling derogations.
- **External speakers' suggestions:** Will mark item as complete and add it as a rolling request to members.

3) Invited Guest Speakers: Chris Conder and Ahmed Ghelle (Defra)

Chris Conder (CC) and Ahmed Ghelle (AG), Policy Advisers at the Defra Food Labelling Team, provided an update on food labelling developments in the UK. **[POST MEETING NOTE:** An additional written update was provided and circulated to members Please see 'Defra Labelling Team FLC Meeting Update 25.03.25' for details (FLC 099/25)].

AG started by reporting on the Food Strategy Advisory Board (FSAB), explaining that it has been launched to bring together senior leaders from across the food system to advise the government. AG noted that Defra Minister Daniel Zeichner will chair the FSAB and that meetings will be held monthly, with the first one scheduled for 26 March **[POST MEETING NOTE:** To date, there have been no updates following this meeting].

AG then moved on to discuss recycling labelling, explaining that as part of the Extended Producer Responsibility for packaging (pEPR) scheme, introduced in January 2025, provisions for mandatory labelling were temporarily removed. However, AG emphasised that the government remains committed to introducing mandatory labelling to help consumers recycle correctly. He indicated this would likely be achieved through amendments to the pEPR for legislation, with a consistent approach planned across all UK nations. AG mentioned that the team is also monitoring EU packaging legislation to ensure alignment and minimise complexity for businesses.

Regarding the BMG ADAS project on labelling costs, AG reported that they had received the penultimate draft, which is still undergoing peer review, with some details subject to change. AG confirmed that the final report will be shared with PPA once it is finalised.

ACTION: Secretariat to share preliminary papers of the BMG ADAS study on the Cost of Labelling. [POST MEETING NOTE: Completed 26 March (FLC 099/25). Please see 'Defra Labelling Team FLC Meeting Update 25.03.25' for details. Defra advises that the BMG ADAS paper is not yet ready for circulation, but the attachment contains some headlines from the draft paper as discussed. The paper also includes the link to the **Defra Agri-Food Bulletin.**].

AG continued with an update on food labelling guidance, acknowledging that some online guidance needs updating. He explained that they are collaborating with the Business Expert Group (BExG) on Food Standards and Labelling on improving and updating guidance and welcomed input from the group. The Secretariat explained that they have been working with the BExG on updating the 2008 FSA guidance on Clear Food Labelling, which would be shared with the group for comments/builds.

ACTION: Secretariat to share with members the 2008 FSA guidance on clear food labelling for review [POST MEETING NOTE: Completed 26 March (FLC 099/25)].

ACTION: Members to review 2008 FSA guidance on clear food labelling and send any comments/suggestions to the Secretariat by no later than 22 April.

The Secretariat asked CC if he had thoughts on priorities for future guidance updates. CC expressed appreciation for industry collaboration on guidance updates, particularly given Defra's resource constraints. CC highlighted that the 2008 FSA guidance on 'Fresh, pure and natural' claims, the 2006 FSA 'Guidance on the use of the terms 'vegetarian' and 'vegan' in food labelling' and guidance on business-to-business sales and import requirements (name and address details) were high up in the list. He emphasised the importance of partnership working with industry and trading standards given limited government resources.

The Secretariat asked if AG could provide information about the current structure of the food labelling team, noting there had been recent changes. AG explained that the team recently lost one colleague and now consists of 5 members. He mentioned that despite reduced resources they aim to continue working on the same portfolios, though they may need to prioritise or deprioritise different work streams based on

available resources. CC talked about the team structure, explaining that Davon Singh is the new Team Leader (replacing Tom Stafford). CC described how he and AG focus on stakeholder engagement, country of origin guidance, mechanically separated meat, Codex, and international issues such as occupied territories, Western Sahara, and Palestine. He mentioned that Oliver Dye and Jennifer Tunstall (formerly Jennifer Roll) focus on Owen's Law, EU reset, post-implementation reviews, correspondence, and allergens work. CC also noted they work closely with the Codex overall team, the compositional standards team (handling BFR, mineral waters, breakfast directives).

ACTION: Secretariat to share with members *Chris Conder's and Ahmed Ghelle's (Defra) contact details*

[POST MEETING NOTE: Chris Conder (christopher.conder@defra.gov.uk) and Ahmed Ghelle (ahmed.ghelle@defra.gov.uk)].

The Secretariat also expressed interest in learning more about Codex work and its increasing importance in the UK. AG explained that there is potential for Codex standards to facilitate alignment with the EU, as suggested by Steve Wearne, the former Codex chair from FSA, who has now completed his term. AG described how the Codex team is exploring ways to remain engaged with international work standards and explained that Codex committees are divided across government departments, including Defra, FSA, and the Department of Health and Social Care (DHSC). He mentioned that internal government meetings occur to identify opportunities and upcoming initiatives.

The Secretariat then opened the floor for questions.

A question asked about the status of deforestation controls and potential alignment with EU approaches. CC noted he had limited information on deforestation controls and offered to follow up via email.

ACTION: Secretariat to request an *update from Defra on the state of play of UK Forest Risk Commodities Regulation*

Another question was asked about when to expect action details from the National Food Strategy. CC mentioned that the FSAB had been announced but could not provide specific timelines. CC suggested signing up for the weekly newsletter for updates and acknowledged that balancing health and environmental priorities is complex, though both are important government concerns.

A final question on labelling requirements for snack products going to Northern Ireland (NI) under the Northern Ireland Retail Movement Scheme (NIRMS) was asked. The Secretariat added that not all products are exempt from product-level labelling, and therefore it is paramount to check the status of each commodity code for Phase 3 labelling, which becomes applicable from 1 July 2025, and will require certain composite products and other products in scope of the EU Official Controls Regulation to be labelled at product-level. It was noted that all goods moved to NI via NIRMS (green lane) need 'Not for EU' labels on outer cases, unless they have product-level labelling. It was also noted that goods moved via the Red Lane do not need to be labelled but are subject to further checks and documentation.

The group thanked CC and AG for their update and for attending the meeting, despite continuing reduced resources.

4) Invited Guest Speaker: Lucy Crapper and Alistair Murray (Company Shop Group)

Lucy Crapper (LC) and Alistair Murray (AM), from the Partnerships Team at the Company Shop Group (CSG) joined the meeting to share insights into their organisation's efforts to tackle food insecurity and food waste. See slides for more information.

LC began the presentation by outlining the organisation's work in the UK, focusing on their community shops and the support they offer. She explained that the organisation runs the UK's first social supermarket, which offers discounted food to those on the edge of food poverty. She highlighted that their company shops not only provide food at 60-70% of the usual retail prices but also offer free personal development programmes aimed at helping people get back on their feet.

LC then explained that in 2021, Biffa acquired CSG, which became part of Biffa plc, offering more financial opportunities to expand. She discussed their recent partnerships with Ocado, Heinz, Premier Foods and Nestle, and the benefits of company membership, which is open to approved FMCG, logistics and businesses and other essential services (e.g. NHS staff, fire services, armed forces). PPA members could therefore benefit from CSG membership, which is also free of charge. LC said that membership information would be sent to PPA to be distributed to PPA members.

ACTION: Secretariat to share with members *membership* details of *Company Shop Group*. [POST MEETING NOTE: Completed. Information sent on 4 April (FLC 113/25)].

AM elaborated on the business side of the operation. He explained that the organisation works closely with businesses and suppliers to ensure food that might otherwise go to waste is redirected to their community and company shops. AM highlighted the organisation's commitment to preventing food from ending up in landfill by clearing stock before it becomes a problem, such as fresh produce nearing the end of its shelf life or stock destined for failed export markets. By intervening early, they are able to redistribute food and reduce waste significantly.

The conversation then shifted to the broader challenges of managing food waste and food insecurity. AM emphasised the need for businesses to partner together to address these issues. He highlighted that while food insecurity and food waste are separate problems, their solutions are interconnected. The organisation's model aims to bridge the gap by providing a reliable and sustainable way to redirect surplus food, ultimately reducing both food waste and insecurity. CSG already works with McCain, and AM expressed an interest in working with the snacking sector.

The Secretariat asked a final question regarding the logistics of food stock management. AM clarified that while their organisation is able to handle most of the stock they receive, they do ensure that any items they take on are suitable for redistribution. He emphasised that partnerships with businesses are crucial to ensuring the sustainability of their model.

The PPA Secretariat and members thanked CP and AM for their inspirational presentation, for joining the meeting and answering questions.

5) Updates

a) Nutrition and Health

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

- **National Diet & Nutrition Survey (NDNS) years 12 to 15:** exp. May or June 2025 [POST MEETING NOTE: To date, the NDNS has not been published].
- **NI NDNS:** exp. 2025 TBC [POST MEETING NOTE: To date, the NI NDNS has not been published].
- **World Health Organization (WHO) guidelines on nutrition labelling policies:** [POST MEETING NOTE: To date, these have not been published].
- **WHO guidelines on polyunsaturated fatty acids:** exp. early 2025 [POST MEETING NOTE: To date, these have not been published].
- **British Nutrition Foundation (BNF) ‘Snack-tember’:** Will take place in September 2025 as part of the BNF’s Healthy Eating Week’. Aims to support schools and carers by providing information on healthier and more sustainable snacks for children and young people. It follows BNF’s ‘Great Snack Survey’ at the end of 2024, that looked into snacking habits of young people. PPA awaiting more information on plans.
- **Scientific Advisory Committee on Nutrition (SACN) statement on WHO guidelines on non-sugar sweeteners:** Exp. 2025 [POST MEETING NOTE: Published on 2 April (FLC 109/25)].
- **Scottish Government (SG) Good Food Nation Plan and Scottish Food Commission:** [POST MEETING NOTE: The SG’s Plan for Government 2025-26, published on 6 May, states that the draft Good Food Nation Plan will be laid by Summer 2025. They also pledge to establish the Scottish Food Commission].
- **Response from the Office for Health Improvement and Disparities (OHID) on call for evidence on how to improve the vitamin D status of the population in England:** work paused. [POST MEETING NOTE: SACN will commence consideration of vitamin D requirements for dark skin population groups in 2025].

i) Advertising restrictions of Less Healthy Foods (LHF) (UK-wide)

The Chair provided an update on the upcoming advertising restrictions of LHF. See slides for details.

Please also note:

- **Final Advertising Standards Authority (ASA)/Committee of Advertising Practice (CAP) guidance on LHF advertising:** [POST MEETING NOTE: To date, this has not been published. On 7 April, a written Ministerial Statement was published on the application of the upcoming advertising restrictions for LHF to brand advertising. It re-confirms the UK Government’s position that ‘pure brand advertising’ is out of scope (FLC 115/25). The UK Government is currently considering how to deliver the brand advertising exemption, and whether changes to the legislation (either primary or secondary legislation, are necessary. Government announcement exp. imminently.).

ii) HFSS (food and drink High in Fat, Sugar and Salt) Promotion restrictions (England and Devolved Administrations (DAs))

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

Wales:

- **Welsh Government (WG) HFSS promotions restrictions:** [POST MEETING NOTE: On 27 March, [The Food \(Promotion and Presentation\) \(Wales\) Regulations 2025](#) were published. They will enter into force on 26 March 2026. The Welsh Regulations are broadly aligned with the England Regulations (FLC 100/25). Government guidance is still outstanding].
- **Healthy Weight : Healthy Wales Delivery Plan 2025-2027:** [POST MEETING NOTE: To date, this has not been published].

England and Wales:

- [POST MEETING NOTE: The British Retail Consortium (BRC) has updated its [online guidance](#) on products in and out of scope of the England Regulations on promotion restrictions for HFSS foods. The updated document also applies to the Welsh Regulations].

Scotland:

- **Scottish Government (SG) HFSS promotion restrictions:** [POST MEETING NOTE: To date, this has not been published. The [SG's Plan for Government 2025-26](#), published on 6 May, makes reference to the regulations on HFSS promotion restrictions. The SG is expected to publish an independent analysis report of the consultation responses, as well as next steps for the regulation of HFSS promotion restrictions in the next few weeks].

Northern Ireland (NI):

- **NI Obesity Strategy:** [POST MEETING NOTE: To date, the consultation has not been published].

iii) Ultra-Processed Foods (UPF)

The Secretariat covered recent updates on UPF since the last meeting, particularly the House of Lords (HoL) Committee report titled '[A Recipe for Health](#)'. This report had proposed a set of recommendations for reforming the UK food system. Among these were calls for a salt and sugar reformulation tax, mandatory sales reporting for unhealthy food products by large companies, and even the exclusion of high-risk businesses from obesity policy discussions. The report also advocated for the FSA to be given broader powers to oversee the food system.

The Secretariat recapped that the Government's official response was delivered by DHSC on 30 January, and that it had been notably underwhelming in terms of detail. While it acknowledged the need for a comprehensive food strategy and greater stakeholder collaboration, it fell short of engaging with most of the Committee's recommendations.

Of note, DHSC firmly rejected the idea of excluding industry from policy dialogues, reiterating instead a preference for incentivising reformulation through a blend of mandatory and voluntary measures. They maintained that reformulation programmes already underway were a success and deserved to be continued. On reporting requirements, DHSC acknowledged the practical challenges of implementation (especially the need to define clear targets) and indicated it was not yet ready to mandate such reporting.

Regarding taxation, the DHSC stated that all taxes would remain under review, with any decisions ultimately reserved for the Chancellor. They also committed to continuing their review of the impact of advertising LHF to children and mentioned ongoing research on Front-of-Pack Nutritional Labelling

(FOPNL). Updates to the Nutrient Profiling Model (NPM), they said, would follow future dietary recommendations from SACN.

The Secretariat observed that the response made reference to the Government's broader 'Health mission' tied to the NHS's ten-year plan and the wider Food Strategy (exp. in the Summer 2025) but lacked any tangible detail. It was noted that UPF was mentioned only in passing and would be considered in the development of these missions. Unsurprisingly, the vagueness of the response had attracted criticism. A Parliamentary debate on the DHSC's reply was scheduled for 28 March, which might yield further clarity **[POST MEETING NOTE: On 28 March, the HoL Food, Diet and Obesity Committee debated the report. They highly criticised the UK Government's response to the report, in particular the progress on the Food Strategy and the constitution of the FSAB].**

The Secretariat then covered updates from SACN, noting that although an open meeting had taken place on 21 November, the second report on UPF had yet to be published. The draft version seen by the Food and Drink Federation (FDF) was not expected to change significantly, and the final report was anticipated in the Spring. SACN also planned to revisit its 2023 position statement based on new evidence **[POST MEETING NOTE: On 2 April, SACN published a rapid evidence update on Processed Foods and Health. Whilst the updated rapid evidence is in line with the 2023 position statement, it contains several recommendations for the government for further action, including government support for industry shared data on food processing and the use of certain additives such as emulsifiers and sweeteners, and consumption monitoring through the NDNS].** Once the report is released, DHSC would have two months to respond.

The Secretariat then introduced an initiative by UK Research and Innovation (UKRI) and Sciencewise, which launched in January. This project, funded by the UK Government, aims to support policymakers through public dialogue about UPF. It follows an earlier evidence review of public perceptions of UPF from 2024, examining a range of consumer surveys and studies.

Kate Halliwell (KH), the FDF's Chief Scientific Officer, had joined the project's oversight group, which also includes academics, NGOs and government officials, though relatively few industry representatives. KH was clear that this work is not intended to directly influence policy or the National Food Strategy but is expected to feed into ongoing strategic development. The final report from UKRI is expected early 2026.

Finally, the Secretariat covered the recently published opinion from the French Food Safety Authority (ANSES). Although finalised in November, the report was released publicly in January. It concluded that the NOVA 4 category used to define UPF was overly broad and did not meaningfully distinguish between unhealthy and potentially nutritious foods. While it acknowledged some existing evidence on UPF, the report called for further research to understand the mechanisms by which processing might affect health. It also examined a wide range of factors, from nutrients and additives to contaminants such as acrylamide and packaging residues.

See slides for further detail and references.

iv. Other Diet & Nutrition updates

- **Defra Food Strategy**

The Secretariat then covered the Defra Food Strategy, which was announced on 10 December. See slides for further detail. In addition:

- Health identified as a central pillar of Food Strategy.
- Ministerial assurance that of importance of industry and stakeholder collaboration throughout the development process.
- Under the health pillar, the strategy aims to increase the availability of healthier food options and improve access to these foods as part of a wider approach to tackling obesity.
- FSAB now established. Chaired by Defra Minister Daniel Zeichner and comprises a broad range of members, including Professor Chris Whitty, Emily Miles, Prof Susan Jebb and representatives from organisations including the Food Foundation and NESTA.
- First meeting of FSAB on 26 March **[POST MEETING NOTE: See [Grocer article](#) for information]**.

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

The Secretariat introduced the recent Action on Salt report focusing on crisps, nuts, and popcorn. See slides for details. In addition:

- Despite limited media coverage (and, as agreed with members, no formal response had been issued by PPA), [The Grocer](#) had published a piece, prompting consideration of a potential response.
- It was mentioned that the report was expected to feature as part of Salt Awareness Week, from 12-18 May. **[POST MEETING NOTE: The focus of Salt Awareness Week 2025 was on ready meals]**
- Group views were sought as to whether PPA should issue a response to Action on Salt, either publicly or in confidence. Most felt that this should be a question for their Public Affairs colleagues.
- It was agreed that the Secretariat would share with members a copy of The Grocer article, to be shared with Public Affairs colleagues for input. **[POST MEETING NOTE: Completed 26 March (FLC 099/25)]**

ACTION: Members to confirm whether PPA should respond to the Action on Salt article published on The Grocer on 24 March on 'The snacking industry causes harm and needs regulating' by no later than 28 March. Members to advise whether PPA should a) respond to the Grocer article highlighting PPA members' views, the progress done on salt reduction so far and the limitations of the Action on Salt research, b) contact Action on Salt in writing c) informally contact Action on Salt or d) do nothing. [POST MEETING NOTE: Limited feedback received, but general lack of support for a PPA response].

- **Other topics (incl.**

The Secretariat provided several other updates under this agenda item. Please see slides for details.

b) Food Labelling, Composition & Regulation

i. Bread and Flour Regulations (BFR)

The FLC Chair gave an update on the recent developments the amendments to the BFR, which, amongst other requirements, will require fortification of non-wholemeal wheat flour intended for the UK market with folic acid. See slides for further details. In addition:

- The UK Flour Millers (UKFM) announced that flour fortification with folic acid will be delayed to early September, with full compliance anticipated by the end of October (FLC 092/95).
- Delays caused stems from an issue with the specification of folic acid — the supplier had sourced a US food-grade version rather than the required British Pharmacopoeia (BP) pharmaceutical-grade standard set out in the BFR.
- The BP-grade version is significantly more expensive and harder to source, prompting industry discussions about whether Defra could approve a derogation to allow the US standard or, alternatively, amend the legislation.
- Members noted that the US version is already widely used for folic acid fortification in food products in the UK outside of bread and flour, suggesting the UK standard is rarely used. Supply resilience is also a concern, given only two suppliers currently produce the BP-compliant version.
- The Secretariat agreed to investigate compliance of US Pharmacopoeia (USP) folic acid for food fortification in the EU.
[POST MEETING NOTE: Defra has shared that the regulations require the use of BP compliant folic acid, and that a supply of BP compliant folic acid has been secured for millers to begin transitioning to the new premix from September. They also understand that the costs are lower than initially anticipated].
- Member highlighted that different approaches are being taken in terms of labelling, with some businesses already making label changes which will result in over-declaration of folic acid, whereas others are waiting until there is more certainty on the next steps.
- Guidance: **[POST MEETING NOTE: On 23 April, Defra published its labelling and composition guidance (FLC 128/25)].**

ACTION: Secretariat to investigate compliance of US Pharmacopoeia (USP) folic acid for food fortification in the EU [POST MEETING NOTE: Action no longer required due to Defra update noted above].

ACTION: Members are encouraged to begin discussions on the labelling challenge [flour fortification with folic acid] with their local/primary authorities.

ii. Other Labelling, Composition and Regs.

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

- **Allergen Labelling UK:** FDF developing an industry position on Precautionary Allergen Labelling (PAL). This position supports a clear and robust PAL policy backed by the FSA and underpinned by a dual allergen risk assessment framework: a quantitative assessment using set reference doses, and a qualitative assessment grounded in good manufacturing practice. It supports the use of 'may contain' statements and the use of ED05-based reference doses as a baseline, whilst acknowledging that individual companies may sometimes need to diverge from this approach, even when allergen presence is at or below the ED05 threshold. The position was shared with stakeholders in January, and in February a roundtable discussion was held with the FSA. While no formal outcomes emerged from the meeting, it was an opportunity for industry to present concerns and explain the key drivers influencing PAL decisions, whether these were based on Codex guidance, VITAL (Voluntary Incidental Trace Allergen Labelling), or retailer-led policies. The FSA is concerned about ensuring that a shift to ED05 thresholds would not pose a food safety risk [**POST MEETING NOTE:** FSA are keen to speak directly to businesses on a 1-to-1 basis to understand current practices and thresholds currently being used for PAL. If you are interested in speaking to the FSA about this, please inform the PPA Secretariat, or can contact Kara Thomas at the FSA directly (kara.thomas@food.gov.uk). Also, please note that the Codex Committee on Food Labelling (CCFL) has released the first of two consultation rounds prior to CCFL49 seeking comments on the Guidelines for the use of Precautionary Allergen Labelling (PAL). The FSA has circulated this consultation, which is now closed].
- **Contamination of garlic powder with peanuts (UK):** [**POST MEETING NOTE:** There have been no further updates].
- **'Not for EU' labelling – NIRMS:** Members were advised to consult the updated guidance available on gov.uk. However, it was noted that the guidance is not comprehensive and must be read carefully alongside the linked commodity code spreadsheet. Businesses must examine individual snack products to determine whether they are in scope, based on whether they are composite products and whether they fall under exempt commodity codes. Only composite products exempt from EU border control checks are exempt from product-level labelling. The Chair noted that Defra has confirmed that High-Risk Food Not of Animal Origin (HRFNAO) will also require labelling in phase three. Members noted the added burden of having to provide additional information to retailers regarding compliance plans. [**POST MEETING NOTE:** The [Defra NIRMS labelling guidance](#) has been updated again on 9 May].
- **GB Regulated Products:** [**POST MEETING NOTE:** [The Food and Feed \(Regulated Products\) \(Amendment, Revocation, Consequential and Transitional Provision\) Regulations 2025](#) came into effect on 1 April. The Regulations establish new official registers as the main reference for regulated product authorisations in Great Britain (GB), which include food and feed additives, flavourings and smoke flavourings, Genetically Modified Organisms (GMOs), Novel Food and Radiological Contaminants. [Updated guidance](#) has also been issued to support implementation of the changes].
- **GB Smoke Flavourings:** [**POST MEETING NOTE:** The 8 smoke flavourings approved for use in GB are now listed in the [GB Register](#). Risk assessment ongoing. Genotoxicity assessment now complete. Studies ongoing peer review. Outcome exp. Summer 2025].
- **GB HRFNAO consultation:** [**POST MEETING NOTE:** The [Consultation on the GB revision of official controls legislation on HRFNAO](#) is now closed. Summary of responses exp. TBC].

- **March FSA Board Meeting:** [POST MEETING NOTE: A recording of the meeting can be viewed [here](#). The next FSA Board meeting will take place on 18 June].
- **Environmental claims – UK:** Enhanced powers now granted to the Competition and Markets Authority (CMA) through the Digital Markets, Competition and Consumers Act, which comes into force on 6 May. The CMA will have new legislative powers enabling it to take direct enforcement action against companies it considers to be in breach of consumer protection law. Significantly, the CMA will be able to impose fines of up to 10% of a company's global turnover without having to go through the courts. There has been considerable media speculation suggesting that the CMA will target misleading environmental claims and 'greenwashing' as part of its enforcement efforts. While the CMA has not yet confirmed the specific focus areas, it is expected to outline its priorities in the coming weeks. However, it has also sought to reassure businesses by stating that its approach will be proportionate [POST MEETING NOTE: There have been no further updates on priority areas for the CMA].
- **Recycling labelling:** [POST MEETING NOTE: Amendment legislation on pEPR exp. in November (FLC 147/25)].

c) Food Safety

The Secretariat gave an update on recent relevant developments on the draft UK Regulation on Genetic Technology and discussions at EU level, chlorpropham (CIPC), acrylamide, 3-monochloropropanediol (3-MCPD) and glycidyl esters, Mineral Oil Hydrocarbons (MOHs), furan and glycoalkaloids. See slides for details. Please also note the following:

i) Precision Breeding/New Genomic Techniques (NGTs)

• UK:

- Draft Genetic Technology (Precision Breeding) Regulations 2025 currently progressing through Parliament (primarily via committee stages rather than full debate) and addresses matters specifically related to the release and marketing of precision-bred (PB) plants in England. **[POST MEETING NOTE: Legislation signed by Defra Minister Daniel Zeichner on 13 May. Following a 6-month implementation period by the World Trade Organization (WTO), the new regulatory framework is expected to come into force on 14 November 2025 (FLC 152/25)].**
- In parallel, two key consultations are ongoing: one by ACRE (the Advisory Committee on Releases to the Environment), focused on the guidance for issuing release notices for field trials, and the other by the FSA, concerning guidance on marketing authorisations. The release procedure requires applicants to submit a notification to Defra, which then undergoes an assessment to confirm that the product qualifies as PB. If approved, a release notice is published on the government website within 20 days, allowing trials to proceed.
- The FSA's marketing authorisation guidance is reported to be clearer than the legislative documents and outlines a four-step process involving tiered assessments. Tier 1 applies to products with minimal changes and no safety concerns, while Tier 2 is closer to Genetic Modification (GM) regulation in complexity and stringency, though few applications are expected to fall into this latter category. Once products pass the marketing stage, they will undergo further evaluation by the FSA to determine suitability for human consumption.
- In addition to the above, a separate consultation is underway on plant varieties and seeds. Although not specific to PB, it includes relevant implications, such as future access to EU variety lists and the marketing of precision-bred seeds. Meetings facilitated by Defra's seed team have included discussion around labelling and the interplay between England-only PB rules and the UK internal market. Concerns remain regarding how Scotland, Wales, and NI will handle the marketing of PB products, particularly when such products may be legally grown in England but not elsewhere. A meeting late March involving the British Potato Trade Association (BPTA) was expected to address these issues further **[POST MEETING NOTE: At the roundtable, the SG appeared concerned about Scotland lagging behind on the potential technical improvements. No timescales were discussed, but labelling came up as a further issue which will need addressing].**
- These developments are currently being managed through the Primary Production Technical Committee (PPTC), with updates to be shared as appropriate to ensure stakeholders remain informed.

• EU:

- EU is pursuing a parallel, but not identical approach.
- A new NGT regulation had been proposed prior to the last European parliamentary elections but was delayed due to complexities, particularly around patentability issues for NGT plants.
- The EU proposal distinguishes between two categories: NGT-1 (basic modifications, more akin to PB) and NGT-2 (those with more extensive modifications, verging on GMO status and potentially not approvable due to environmental or health concerns).

- The UK and EU approaches are similar in structure, but regulatory misalignment remains a risk (especially for UK exporters) if the EU progresses more slowly or enforces more restrictive rules.
- Progress resumed under the Polish EU Council Presidency, which has prioritised food safety and sustainability more than the preceding Hungarian Presidency.
- As a result, Coreper (the Committee of Permanent Representatives) has agreed a Council mandate, enabling interinstitutional negotiations to begin between the Council and the European Parliament. This marks a significant step forward.
- Specific points of concern were highlighted, particularly around the definition of NGT-1 materials. These are limited to 20 genetic modifications per monoploid genome, which may pose practical challenges for crops like potatoes that are tetraploid requiring multiple edits per gene to achieve the desired traits. In addition, the exclusion of herbicide-tolerance traits from the scope of NGT-1 was noted. This marks a deliberate divergence from historical GMO trends and could limit the scope of future innovations.
- Negotiations are expected to continue into the next EU Council Presidency, which will be led by Denmark from 1 July. Updates will be shared as the legislative discussions develop.

ii) CIPC

• UK

- An update was provided on CIPC, focusing on the work of the CIPC Residues Management Group (CRMG), which remains under the current Secretariat's oversight until the end of June. The group is expected to transition to GB Potatoes, a new umbrella organisation for the UK potato sector, which will assume the Secretariat function.
- The Secretariat reported on a meeting held with Chemicals Regulation Division (CRD) of the Health and Safety Executive (HSE) in February, alongside the group Chair, Adrian Cunningham. The meeting reviewed the initial report submitted last year and discussed CRD's extensive feedback.
- While CRD had suggested various additions, some were considered not particularly relevant or appropriate given the limited UK data set. Unlike the more comprehensive European report by Arvalis, which spans multiple years and includes extensive graphical analysis, the UK version is based on just 104 data points, limiting its scope and the robustness of its conclusions. Nevertheless, a number of amendments have been adopted or are in progress.
- Guidance on cleaning procedures has been updated and published on the GB Potatoes website, accompanied by further communications through industry channels. A broader media campaign is also under way, and further guidance amendments are expected toward the end of the year (timed after the main storage season).
- The CRMG has issued the annual call for data using an updated submission template. Expectations are that submissions from PPA members will match last year's volume, with hopes of expanding coverage (especially among the fresh and chip shop sectors, which were underrepresented previously).
- The target remains 125 samples for this season, with a report anticipated by the end of August. In the meantime, the current report will be finalised and submitted by the end of May.

• EU

- At EU level, the European Commission (EC) has voted to amend the temporary Maximum Residue Level (MRL) for CIPC from 0.35 mg/kg to 0.20 mg/kg.
- The draft regulation has been submitted to the WTO and awaits formal publication. Once adopted, the change will take effect approximately six months later, potentially October or November.
- The Regulation also includes a change in reporting frequency: industry will now be required to submit monitoring reports every two years instead of annually. How this will be

managed in practice remains uncertain, particularly whether data should still be collected annually and compiled biennially, or if collection itself will become less frequent. There are concerns that the latter could reduce participation and overall data quality.

- Although the most recent annual report has not yet been discussed formally by the EC, it does suggest that CIPC levels could be reduced further in future years. It remains possible that the EC will reinitiate discussions to lower the MRL again by the end of 2025.

iii) Acrylamide

- **EU**

- It was noted that there had been minimal development since the previous meeting. The main point of discussion was the EU Environmental Contaminants Working Group meeting held on 12–13 December.

The EC now intends to analyse data from the European Food Safety Authority (EFSA) covering the period from 2019 to 2023, which aligns with previous updates. However, EFSA had encountered issues with the way this data was coded, complicating the EC's ability to conduct a suitable analysis. Once those challenges are resolved, it is expected that new Benchmark Levels (BMLs) and Maximum Levels (MLs) will be proposed likely differing in detail from existing thresholds, though following similar categories and product groupings. **[POST MEETING NOTE: The EC now hopes to conclude technical discussions on acrylamide MLs by the end of 2025 (FLC 143/25)].**

- One helpful clarification was that the proposed MLs will apply only to foods as placed on the market, as defined under Regulation (EC) No 178/2004. This means frozen and chilled products will be assessed at the point of sale to consumers or food businesses, and not post-processing. For example, a frozen product sold to a supermarket or food service provider would be the subject of testing, rather than the finished item as served (e.g. fries at a restaurant).

- **UK**

- There was relatively limited activity around acrylamide regulation at present.
- It was confirmed that an FSA call for data on acrylamide is imminent, expected to be issued sometime in Q1 or Q2. Stakeholders are being encouraged to submit data as part of this upcoming process. **[POST MEETING NOTE: To date, the call for data has not been launched].**
- Fera also outlined the wide scope of work currently being undertaken by FSA, spanning a range of contaminants and food safety topics.
- Of particular relevance was the FSA's focus on furan and methylfurans, with an ongoing survey that includes specific attention to vegetable crisps. Two slides from the meeting presentation highlighted this area of interest.
- The emphasis placed on vegetable crisps suggests that the FSA views these products as a potential concern in relation to furan levels—something the industry may need to monitor more closely and prepare to address in terms of possible regulatory action or mitigation strategies.

iv) 3-MCPD and glycidyl esters

- **EU**

- For broader composite products, the debate has centred on whether existing MLs for oils are sufficient or if additional limits are needed.
- The industry-supported argument, i.e. using oil content to calculate levels in composite products, has been favourably received.
- **[POST MEETING NOTE: In April, the EC launched a targeted consultation on MLs for the sum of 3-MCPD and 3-MCPD esters and of glycidyl esters in other compound food**

containing more than 5 % fat, and containing vegetable oils and fats and/or fish oils and/or oils from other marine organisms, noting that MLs for the sum of 3-MCPD and 3-MCPD esters, expressed 3-MCPD and glycidyl esters, have been established by Commission Regulation (EU) 2023/915 for vegetable oils, fish oils and oils from other marine organisms. MLs have also been established for infant formulae, follow-on formulae and food for special medical purposes intended for infants and young children and young child formulae. MLs for processed cereal-based foods for infants and young children and baby food are currently under finalisation (FLC 121/25). FoodDrinkEurope and the European Snacks Association (ESA) have both responded to the consultation (FLC 142/25)].

- **UK**

- Although there have been no active developments in the UK, the FSA still lists 3-MCPD esters as a priority area, so future action remains possible.

v) MOHs

- **EU**

- MOH contamination remains a challenge through global supply chains (e.g. use of jute sacks in India, Africa, Americas).
- Following consultations and forums, the EC now plans to simplify its approach.
- Discussions on this were scheduled for February, but the meeting report is still pending [**POST MEETING NOTE:** To date, this has not been published].

- **UK**

- There are no UK developments on MOH at present [**POST MEETING NOTE:** To date, there have been no further updates on MOHs in the UK].

vi) Furan

- **EU**

- [**POST MEETING NOTE:** EC recommendation for monitoring of furan-2(5H)-one and benzene-1,2-diol in conventionally smoked foods has not yet been published. The International of Life Sciences Institute (ILSI) is now looking to apply for funding for a FURAN COST action proposal (FLC 145/25)].

- **UK**

- See content under 'acrylamide' above re. Fera activity [**POST MEETING NOTE:** To date, there have been no further updates on Furans in the UK].

vii) Glycoalkaloids

- **EU**

- [**POST MEETING NOTE:** ESA has now launched a call for data on glycoalkaloids on raw potato ingredients (FLC 144/25)].

ACTION: Members to provide ANY glycoalkaloids occurrence data relating to raw potato ingredients to andrew@esasnacks.eu and silvia@esasnacks.eu by no later than close of business on 6 June 2025 (FLC 144/25)

- **UK**

- No UK-specific activity was noted [**POST MEETING NOTE:** There have been no further updates on glycoalkaloids in the UK].

d) Sustainability

The Secretariat provided a brief update on recent relevant developments on pEPR and the UK and EU Deforestation Regulations. See slides for further details. Please also note the following:

i) Extended Producer Responsibility (EPR):

- **[POST MEETING NOTE:** Defra announced that amending legislation on pEPR will be laid in Parliament in November. Amendments include the appointment of a Producer Responsibility Organisation (PRO), extending closed-loop offsetting provisions to food grade plastic and other operability changes. Provisions relating to street binned and littered packaging waste payments are not set to be included. Separately, on 28 April, PackUK published an updated version of the Recycling Assessment Methodology (RAM) (FLC 147/25)].

ii) Deforestation:

- **EU**
 - **[POST MEETING NOTE:** At the end of April, the EC published several key documents related to the implementation of the EU Deforestation Regulation (EUDR). It includes the fourth iteration of FAQs, an updated Commission Guidance document as well as a Draft Delegated Act amending Annex I of the EUDR. Please see the press release for further detail].
- **UK**
 - **[POST MEETING NOTE:** There have been no further updates on the UK Forest Risk Commodities Regulations].

6) Committee matters

AC updated members on developments related to the FDF AAG (Association Advisory Group) including his new role as Chair, which grants AC directorship at FDF. This allows AC to attend FDF Council and Presidents' meetings, thereby increasing the PPA's ability to drive the agenda. AC intends to hand over his Secretariat responsibilities of the CMRG to GB Potatoes in June, to free up more time for his new AAG commitments.

[POST MEETING NOTE: Minutes for the March 2025 AAG meeting have now been published. Priorities include EU/UK/GB regulatory divergence, acrylamide, UPF, glyphosate, BFR, pesticide MRLs, Action on Salt activity and 3-MCPD. The minutes of the December 2024 AAG were also published at the end of March].

7) Risk matrix

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

- Added 'Precision Breeding (England)' as a new item under 'future issue' x 'moderate impact'.
- Changed 'Bread and Flour Regulations Review' to 'Bread and Flour Regulations implementation', under 'current issue' x 'moderate impact'.
- Added 'UK Deforestation' as a new item under 'future issue' x 'moderate impact'.
- Added 'England Food Strategy (incl. FDTP Health)' as a new item under 'future issue' x 'moderate impact'. Marked as a high media profile item.
- Removed 'FDTP Health workstream' as a standalone item.
- Replaced 'Smoked Ingredients' with 'EU Smoked Ingredients' and 'UK Smoked Ingredients' as new items under 'future issue' x 'moderate impact'.

- Renamed 'UK Obesity Strategies' with 'DAs Obesity Strategies' and moved it from 'current issue' x 'moderate impact' to 'future issue' x 'moderate impact'.
- Renamed 'HFSS Advertising/Promotions restrictions' to HFSS/LHF Advertising/Promotions restrictions' under 'current issue' x 'big impact'.

8) AOB

No further items were discussed.

9) Next meeting dates

The next 2025 FLC meeting will take place on 1 July in London, starting at 11am. This will be an in-person meeting at the FDF offices. A light lunch will be served. Members were reminded to confirm intention to attend the meeting.

ACTION: Members to confirm intention to attend the next IN -PERSON FLC meeting in London, on 1 July.

The last FLC meeting of 2025 will be online, on 12 November (1:30pm start).

There was a brief discussion about future speaker suggestions. Members were asked for speaker suggestions for the 2025 meetings.

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, fumonisings, 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