

# **PPA Food Law and Consumer Committee Meeting**

**Chair: Catharine Hall**

1 July 2025

# Agenda

## 1) Welcome and anti-trust statement

## 2) Minutes/action list

- FLC Notes and Action list from 25 March 2025 (FLC 154/25)

## 3) Defra Food Strategy – Tobias Bruce-Jones (Defra)

## 4) Sustainability Update – Balwinder Dhoot (FDF)

## **BREAK**

## 5) Updates and discussions:

### • **Nutrition & Health**

- UK-wide HFSS/LHF advertising restrictions (incl. CAP update)
- England and DA update HFSS promotion restrictions
- 10-Year Health Plan, Food Strategy and FOPNL – update and discussion
- Other diet and nutrition updates, incl. FDF DHC and NUT updates

### • **Labelling and Composition**

- Bread and Flour Regulations (BFR) update
- UK-EU trade agreement
- Other labelling, composition and regulation updates, incl. FDF FLL updates

# Agenda cont.

- **Food Safety**
  - Acrylamide
  - 3-MCPD
  - Furans
  - PPP updates
  - Other food safety updates

## **BREAK**

- **Sustainability**
  - Packaging update
  - Deforestation update

## **6) Committee matters**

- FDF Associations meeting

## **7) Risk Matrix**

## **8) AOB**

## **9) Next meetings/Close**

# Matters arising - FLC 25 March 2025

Action	Status
<b>Secretariat</b> to reach out to members on annual <b>salt data collection for crisps, savoury snacks, popcorn, nuts and processed potato products, as well as sugar in popcorn</b> for the year <b>2024-2025</b> in <b>May.25</b>	COMPLETED
<b>Members</b> interested in <b>hosting a factory visit</b> for the <b>new Defra labelling team</b> to contact the Secretariat <b>ASAP</b> .	ONGOING
<b>Secretariat</b> to share preliminary papers of <b>the BMG ADAS study on the Cost of Labelling</b>	COMPLETED
<b>Secretariat</b> to share with members <b>Chris Conder's and Ahmed Ghelle's (Defra) contact details</b>	COMPLETED
<b>Secretariat</b> to share with members link to the weekly <b>Defra Agri-Food Bulletin</b>	COMPLETED
<b>Secretariat</b> to request an <b>update from Defra</b> on the state of play of <b>UK Food Risk Commodities Regulation</b>	TO BE COVERED TODAY
<b>Secretariat</b> to share with members <b>membership</b> details of <b>Company Shop Group</b>	COMPLETED
<b>Members</b> to confirm whether PPA should <b>respond to the Action on Salt article</b> published on The Grocer on 24 March on ' <a href="#">The snacking industry causes harm and needs regulating</a> ' by no later than <b>28 March</b>	COMPLETED
<b>Secretariat</b> to investigate compliance of <b>US Pharmacopoeia (USP) folic acid</b> for food fortification <b>in the EU</b>	TO BE COVERED TODAY
<b>Members</b> are encouraged to begin discussions on the <b>labelling challenge [flour fortification with folic acid]</b> with their <b>local/primary authorities</b> .	ONGOING

# Matters arising - FLC 25 March 2025

Action	Status
Members to provide <b>ANY glycoalkaloids occurrence data</b> relating to <b>raw potato ingredients</b> to <a href="mailto:andrew@esasnacks.eu">andrew@esasnacks.eu</a> and <a href="mailto:silvia@esasnacks.eu">silvia@esasnacks.eu</a> by no later than close of business on <b>6 June 2025</b>	COMPLETED
Members to confirm <b>intention to attend the next IN -PERSON FLC meeting</b> in <b>London, on 1 July.</b>	COMPLETED
Members to provide suggestions for <b>guest speakers</b> for <b>next FLC meeting.</b>	COMPLETED

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

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

# **Defra Food Strategy**

**Tobias Bruce-Jones**

**Department for Environment, Food & Rural Affairs (Defra)**



Department  
for Environment  
Food & Rural Affairs

# Food strategy stakeholder engagement pack

Spring 2025



Environment  
Agency



Forestry Commission



NATURAL  
ENGLAND

# Food Strategy Stakeholder Engagement

The Food Strategy is in its **first phase**, to July.

There will be more, as we move from vision and outcome setting through to driving actual change.

It's **not a blank sheet of paper**: we know the problems and have received a lot of evidence – we want to quickly get on to solutions.

This is a process of **targeted engagement** NOT a full public consultation.

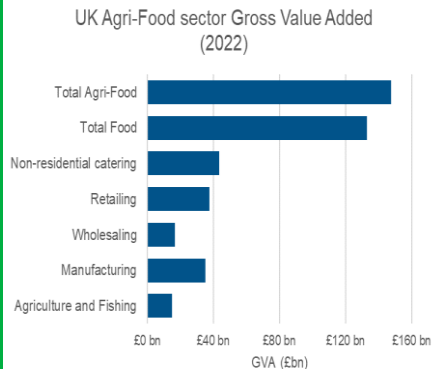
First, some **rationale**.....

# Our Food System Is a Source of National Pride



# The food system...

Provides economic value and has been shown to be resilient.



But many households face challenges accessing a healthy diet.

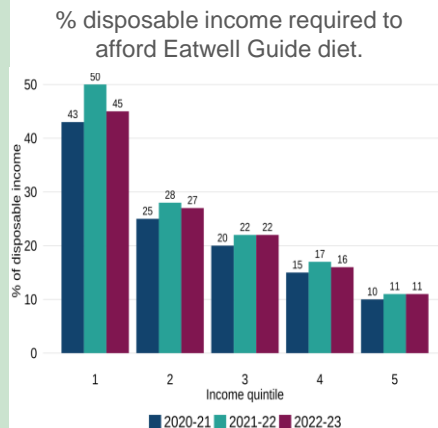


Photo courtesy of The Food Foundation Ambassador, Emma Loffler.

# The food system is complex!

In 2023, the production to supply ratio for food was 62% for all food. It was 75% for indigenous type food (things we can grow here).

Between January 2020 and April 2024, UK food prices increased by 30%, compared to 17% in the previous decade.

The proportion of food secure households declined from 92% in 2020 to 90% in 2023, with low-income and disabled groups at a disproportionately high risk of household food insecurity and its potential negative impacts.

Regionally, the lowest rate of food security was in North West England at 87% and East of England has the highest at 95%.

The agri-food sector added £148bn in Gross Value Added in 2022. It employs almost 4.2m workers in the UK. In 2023, 98.8% of the almost 22,830 UK agri-food businesses were SMEs.

Food and drink is the UK's largest manufacturing sector. It employs 400,000+ people. In 2022, it added £35.1bn in GVA. In 2023, business investment in manufacturing was £3.2bn, up 5.7% on 2022.

The UK's total factor agricultural productivity has risen by 67% since 1973.

The UK exported c.£1.9bn and imported c.£4.1bn of seafood in 2023.

Agriculture covers 70% of UK land and is one of the leading drivers of nature and biodiversity loss. 40% of waterbodies are impacted by pollution from agriculture and rural areas.

Our food production relies on ecosystem services provided by biodiversity, healthy soil and clean water. In 2022, the ONS estimated the value of the annual flow of ecosystem services to be more than £37bn, with an asset value of £1.3tn

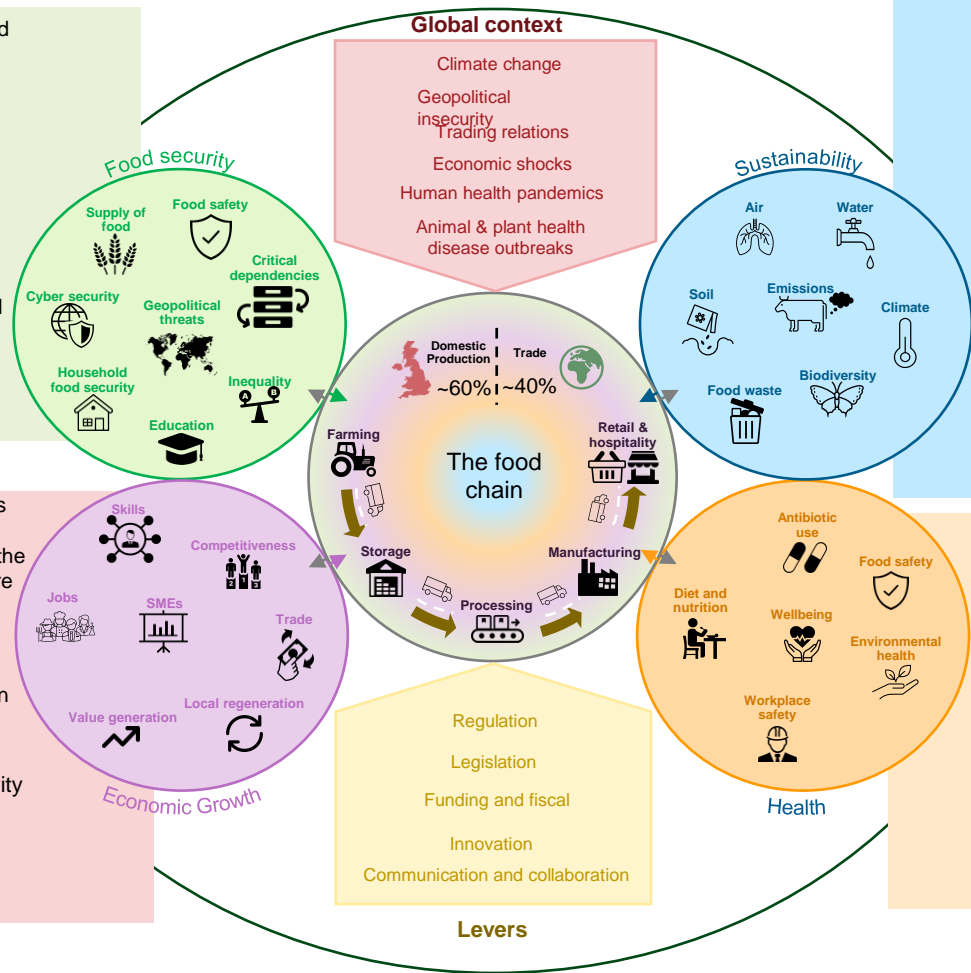
Agriculture accounts for 11.7% of total UK emissions, comprising carbon, methane, and nitrous oxide. 37% of emissions from the UK food system are from agriculture, 30% from imported food commodities, and 33% from the supply chain, consumer activity, and disposal.

8% (£18bn) of all UK healthcare spending in 2019 was on conditions related to overweight and obesity.

The combined cost of associated conditions was ~£74bn annually in the UK.

64% of adults in the UK are overweight or living with obesity. In 2022/23 10% of reception aged children were living with obesity in England and Scotland.

Children living in the most deprived areas in England are more than twice as likely to be living with obesity compared to those living in the least deprived areas.



# That work has begun, with lots more to do

## Strategic approach

- Considers the UK food system as a whole
- From farming inputs to public health outputs
- Build cross-government support for change
- Developed in partnership with the food system – the food sector, civil society and citizens

## Progress to date

- Launched at the end of last year
- Established cross government and external stakeholder engagement mechanisms, including:
  - Ministerial Food Strategy Group
  - Food Strategy Advisory Board
  - Stakeholder workshops
  - Engagement with academics, specific sectors, civil society and citizens
- Cross government work on the vision, outcomes and action plan

## Next steps

- Continued coordinated work across government and with food system stakeholders to develop:
  - Strategic vision for the food system
  - Priority outcomes needed for that vision to become a reality
  - Action plan for delivery of those outcomes

# Some simple (but challenging) aims

Vision

**A food system that grows the economy, feeds the nation, nourishes individuals, and protects the planet, now and in the future**

Outcomes

**Growth**

**Sustainability**

**Health**

**Security**

Action Plan

**From the 'junk food cycle' to a 'good food cycle'**

Cross cutting themes: celebrating UK food and food culture; fairness through the supply chain; building trust and empowering consumers through data and transparency; local and place-based initiatives.

# **Sustainability Update**

**Balwinder Dhoot**  
**Food & Drink Federation (FDF)**



**fdf | AMBITION  
2030**

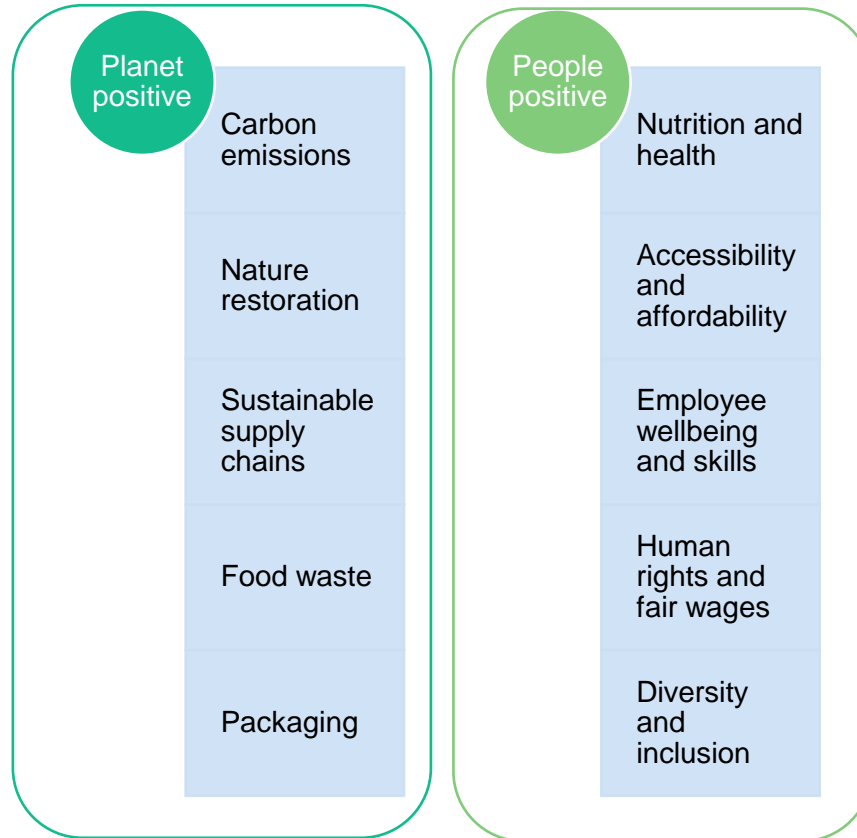
# **FDF Sustainability Introduction**

1 July 2025

Balwinder Dhoot. Director of  
Sustainability and Growth

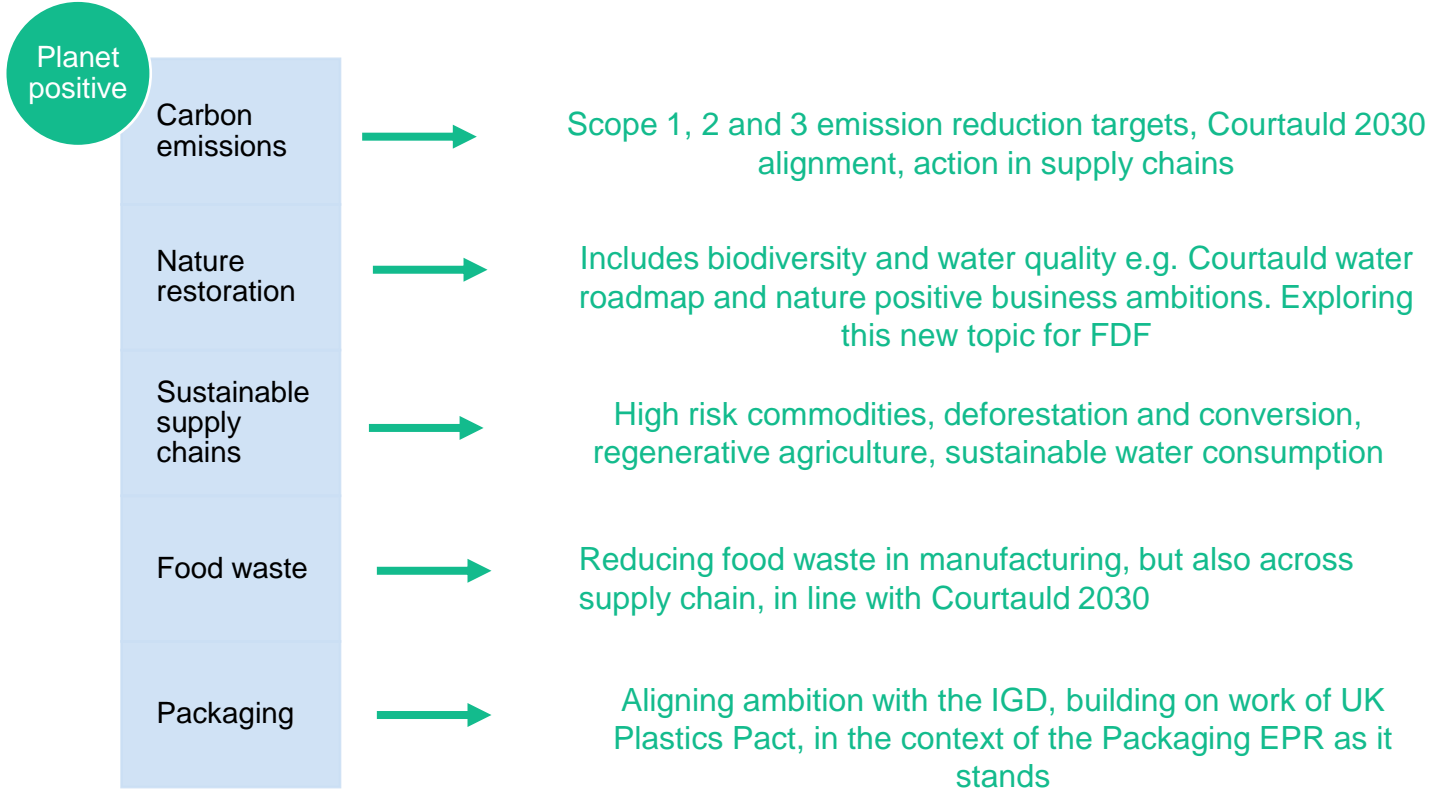
# How we are moving forward

**Focus of current strategy**



**To be developed through other FDF workstreams**

# Where we are focusing today



# Ambition 2030



## fdf | AMBITION 2030



PILLAR 1:

### Net Zero

**Ambition:**  
Contribute to a 50% reduction in emissions across the agrifood supply chain by 2030



PILLAR 2:

### Nature Restoration

**Ambition:**  
Build a 'Nature Positive' industry to halt and reverse nature loss by 2030



PILLAR 3:

### Sustainable Commodities

**Ambition:**  
Contribute to halting commodity-driven deforestation and conversion by 2030



PILLAR 4:

### Food Waste

**Ambition:**  
Halve per capita food waste by 2030, contributing to UN SDG 12.3 and the Courtauld 2030 commitment



PILLAR 5:

### Packaging

**Ambition:**  
Contribute to implementing a world-class packaging recycling system in the UK, reducing the environmental impact of packaging

# Maturity Curve Approach



- Actions that can be taken regardless of size/maturity of sustainability programme
- Provides practical steps for businesses to take.

# 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 FDTP health WG (Feb.24)

OHID calorie reduction report (Feb.24)

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

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

5th meeting FDTP 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)

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

WG HFSS promo restrictions legislation laid (Mar.25)

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

ANSES position UPF (Jan.25)

WHO guidelines salt substitutes (Jan.25)

SACN statement non-nutritive sweeteners (Apr.25)

SACN rapid evidence update on processed foods and health (Apr.25)

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

SACN review UPF (Oct.24)

SACN review non-nutritive sweeteners (Oct.24)

SG response consultation HFSS promos (Jun.25)

SG Populational Health Framework (Jun.25)

NI Obesity Strategy framework consultation analysis (May.25)

EU study on food taxes DGTAXUD (May.25)

NDNS Y12-15 (Jun.25)

Salt Awareness Week (May.25)

SG Good Food Nation Plan (Summer.25)

SG Scottish Food Commission (Summer.25)

NI Obesity Strategy Framework (Jul.25)

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

DHSC consultation on LHF advertising restrictions (excl. brand) (Jul.25)

Defra Food Strategy framework consultation (Jul.25)

DHSC 10-year Health Plan (Jul.25)

DHSC Reco on UPF (Jul.25 TBC)

HWHW Delivery Plan 2025-2027 (Summer.25)

WG HFSS promo restrictions guidance (Jul.25)

SG legislation HFSS promos (Autumn.25)

EU Childhood Obesity Action Plan Follow up (2025)

UK LHF Voluntary advertising restrictions applies (Oct.25)

Legislation amending implementation of UK LHF advertising restrictions (Sep.25 TBC)

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

BNF Snack-tomber (Sep.25)

PHW Position on UPF (2025)

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

SACN review UPF evidence (Nov.25)

WG guidance Healthy Eating Schools (Dec.25)

SG Scottish Dietary Goals review (End 2025)

UK LHF mandatory advertising restrictions into force (Jan.26)

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

NDNS urinary sodium analysis (2026)

WG HFSS promo comes into force (Mar.26)

WG Regulations Primary School Food (2026-2027)

SG HFSS promo restrictions info force (Autumn.26)

WHO Guidelines UPF consumption (2027 TBC)

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)

England review HFSS promotion regs (2027)

UK review LHF advertising regs (2030)

IARC review UPF (2027 TBC)

WHO Guidelines UPF consumption (2027 TBC)

### TBC

OHID 2nd calorie reduction progress report	OHID research children's exposure to HFSS advertising	OHID research healthier food secondary schools	OHID report on cost balanced diet
OHID report on salt targets	DHSC response Vit D	OHID report on Covid-19 excessive weight	PHS research healthier food secondary schools
UK Govt. response FOPNL	EU NPM review	DHSC Major Conditions Strategy	FSS research price healthier diet
OHID response 2018 NPM consultation	EU Proposals FOPNL	EU study UPF consumption	WHO global NPM nutrients of concern
WHO guidelines polyunsaturates	WHO guidelines nutrition Labelling policies	WHO 'SHAKE' Technical Package Salt	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 Secondary (brand exemption) – Sep.25	Health & Care Act: Apr. 22 Secondary leg.: Dec.24 GUIDANCE: Dec.24	Oct.25 (Voluntary) Jan.26 (Mandatory)
UK-wide LHF advertising restrictions - online		Main – Dec.20 Secondary/Enforcement – Dec.22 Secondary (brand exemption) – Jul.25			
ASA/CAP guidance LHF advertising (UK-wide)	N/A	Dec.23 2 <sup>nd</sup> round – Feb.25 3 <sup>rd</sup> round – Oct.25	Oct.24 2 <sup>nd</sup> round: N/A 3 <sup>rd</sup> round: End 2025 TBC	Jan.26	Oct.25 (Voluntary – 2023 draft guidance applies) Jan.26 (Mandatory)
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 – Jul.25 TBC	May.25	Mar.26
SG HFSS promo restrictions	Secondary legislation under Food Safety Act 1990	Main - July.22 2 <sup>nd</sup> – Feb.24	Main – May.23 2 <sup>nd</sup> – Jun.25	TBC	Autumn.26
NI Healthy Futures	TBC	Main strategy – Nov.23 Action plan – Dec.24	Main – Late 2024 Action plan – May.25	Jul.25 TBC	TBC

# LHF advertising restrictions (UK-wide)



- [ASA/CAP interim statement](#) on implementation guidance – 13 January (FLC 017/25)
- [ASA/CAP further consultation](#) implementation guidance – closed on 18 March (FLC 052/55)
- **NEW:** [Ministerial Statement](#) - “pure brand advertising” out of scope – 7 April (FLC 115/25)
- **NEW:** [Ministerial statement](#) - published 22 May (FLC 165/25)
  - Secondary legislation to explicitly exempt ‘brand advertising’ from restrictions – subject to consultation
  - Delay the implementation date **until 5 January 2026**.
  - [Industry agreement](#) to adhere to the new rules on a **voluntary basis** from **1 October 2025**
- **NEW:** [The Communications Act 2003 \(Restrictions on the Advertising of Less Healthy Food\) \(Effective Date\) \(Amendment\) Regulations 2025](#) – laid 3 June – officially delays implementation LHF advertising restrictions (FLC 177/25)
- **NEW:** [ASA/CAP update](#) on [ASA/CAP further consultation](#) on implementation guidance – work paused - 11 June (FLC 186/25)
- PPA catch up CAP on 12 June:
  - CAP working on implementation guidance – cannot publish until DHSC publishes legislation
  - ASA unable to enforce advertising restrictions until 5 January 2026 – but NGO scrutiny from 1 October 2025
  - Informal advice - [2023 draft guidance](#) for ads from 1 October 2025.
  - CAP advice – avoid depicting or naming LHF products on TV

## NEXT STEPS:

- DHSC consultation on SI exempting ‘brand advertising’ **exp. imminently**
- Secondary legislation on ‘brand advertising’ exemption exp. **Sep.25 TBC**
- CAP/BCAP consultation on implementation guidance exp. **earliest Sep.25 TBC**
- Voluntary application of LHF advertising restriction from **1 October 2025**
- Publication of CAP/BCAP implementation guidance - **TBC**
- Regulation comes into force on **5 January 2026**

# 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:** [The Food \(Promotion and Presentation\) \(Wales\) Regulations 2025](#) - 27 March (FLC 100/25)
  - Consistent with the existing equivalent Regulations in England
    - Differences aisle end, some definitions and 'on-pack' promos – no transition period!
- Implementation guidance being finalised – no further consultation

## **NEXT STEPS:**

- Guidance also exp. **imminently**
- Regulations come into force **26 March 2026**
- **NEW:** Healthy Weight : Healthy Wales Delivery Plan 2025-2027 – exp. Summer 2025
  - Additional restrictions (e.g. meal deals, TPRs, free-standing displays) may be considered in next HWHW delivery plan TBC

**NEW:** Updated [BRC food category guidance](#) in England/Wales (FLC 130/25)

# Promotion restrictions (England and DAs)



## **SCOTLAND:**

- **NEW:** [SG response to consultation on HFSS promotions restrictions](#) and [consultation analysis](#) - 17 June (FLC 192/25)
  - Consistent with restrictions in England and Wales
  - Does not include meal deals, TPRs or free-standing units
  - Same 2-tier approach: categories in scope followed by 2004/05 NPM
  - Food categories set to align with England and Wales as much as possible
- **NEW:** [SG's Population Health Framework](#) – 17 June (FLC 193/25)

## **NEXT STEPS:**

- **NEW:** Regulations **exp. Autumn 2025**
- **NEW:** Regulations to come into force **exp. Autumn 2026** (12-month implementation)
- **NEW:** [Draft Good Food Nation Plan](#) **by Summer 2025** - establishing the Scottish Food Commission.
- SG to publish SG Scottish Dietary Goals review **exp. End 2025**



## **NORTHERN IRELAND:**

- **NEW:** [Consultation analysis](#) of '[Healthy Futures](#)' Strategy – published 21 May (FLC 163/25)
  - Strong support for early years interventions, healthier food environments, and cross-sector collaboration.
  - Calls for:
    - Stricter regulations on marketing of unhealthy foods, especially to children
    - Clearer food labelling to aid consumer understanding
    - Stricter regulations and alignment with the EU
    - implementation of (mandatory) nutritional standards across all Health and Social Care (HSC) trusts and catering facilities
    - Industry/government collaboration for reformulation – fiscal measures for 'unhealthy' foods to fund subsidies for healthier options.

## **NEXT STEPS:**

- **NEW:** NI Obesity Strategy Framework and action plan **exp. July.25**

# Devolved Nations Obesity Policy



	Wales	Scotland	Northern Ireland
Obesity Policy	Healthy Weight Healthy Wales Delivery Plan 2025-2027 due to be published in the summer	<p>A broad 'Population Health Framework' to be published in the summer</p> <p>A Healthier Future will also be updated (late 2025 / early 2026)</p>	<p>Healthy Futures consultation - analysis of responses now published</p> <p>Final strategy framework and action plan due July</p>
HFSS Promotional Restrictions	<p>Alignment with England on products, locations and mechanisms in scope</p> <p>Guidance – June 2025</p> <p>Implementation - March 2026</p>	<p>Alignment with England on products, locations and mechanisms in scope</p> <p>Regulations – exp. Autumn 2025</p> <p>Guidance – TBC</p> <p>Implementation – exp. Autumn 2026</p>	Restrictions likely but not yet announced
Other	Consultation on Healthy Eating in Schools Regulation (until 21 July) - to be implemented 2026		

Source: FDF (amended by PPA re. Scotland)

# 10-Year Health Plan

- [Announced](#) 29 July (FLC 201/25) – high-level plans **exp. 3 July**
- Part of the ‘Plan for Change’ to reform public health
- Focus on prevention, including tackling obesity
- Businesses must “make the healthy choice, the easy choice”
- Plans to be developed in partnership with industry
- Policies include:
  - **Mandatory reporting of healthier food sales for all large food businesses** (including manufacturing, retail and OOH) – by the end of parliamentary term
    - Possibly in line with FDTP discussions: metrics still TBC
  - **Mandatory targets for industry, initially for large retailers** – next parliamentary term
    - Flexibility: reformulating, promotions, stocking of different items
- See - [Nesta Blueprint to Halve Obesity](#)
- Refining may happen through Food Strategy
- Timeframes TBC
- Discussions about revising the 2004/05 NPM – government considering

# 10-Year Plan/Food Strategy

## NGO Asks for the Health Pillar

fdf

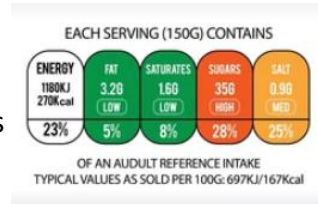
- Fiscal levers / sugar and salt tax<sup>1,2,3,4,6,7,8</sup>
- Mandatory data reporting via the FDTP<sup>1,2,5,6,7,8</sup>
- Restrict advertising of less healthy foods including online, on TV and public transport<sup>1,2,3,8</sup>
- Extend the SDIL to milk-based drinks<sup>1,2,3,6</sup>
- Expand the healthy start scheme / fruit and veg vouchers<sup>2,3,5,6</sup>
- Mandatory front of pack labelling<sup>1,4,8</sup>
- Restrict price promotions for less healthy foods<sup>1,2,4</sup>
- Food industry lobbying controls<sup>2,4,5</sup>
- Local partnerships to support healthier diets for **low income** families in the community<sup>2,4,6</sup>
- Make healthier and sustainable foods more affordable<sup>2,3,6</sup>
- Launch a horticulture growth plan to support domestic growth of healthier foods<sup>2,3,5</sup>
- Government statutory target for health outcomes<sup>2,6</sup>
- Restrict packaging of appeal to children / cartoon characters on pack<sup>4,8</sup>
- Ban sale of energy drinks to children<sup>3,4</sup>
- Fund advertising for healthy foods such as fruit and vegetables<sup>2</sup>
- Remove VAT on healthy foods<sup>2</sup>
- UPF target for children's diets<sup>5</sup>
- Update the EatWell Guide<sup>2</sup>

1. Nesta
2. The Food Foundation
3. Sustain
4. Obesity Health Alliance
5. Soil Association
6. Henry Dimbleby
7. Action on Salt / Sugar
8. BiteBack

in Makinwa

## FDF position FOPNL:

- Support for FOPNL with a preference for MPL over Nutriscore as a system.
- Not oppose to mandation – consider pros and cons.



## FDTP DRAFT METRICS (FLC 233/24)

### 3 priority:

- Sales-weighted (tonnage) NPM score
- % of total food and drink sales (tonnage) from HFSS products
- Sales-weighted (tonnage) calories content per/100g

+ additional metrics (to help demonstrate progress)

## PPA Position – for discussion



## MEMBERS:

- Are there any proposals that PPA should support?
- On FOPNL- should PPA develop a position?

# OTHER DIET & NUTRITION

## NDNS Y12-15 (2019-2023) (FLC 183/25) – published 11 June

- Average intakes exceeded recommendation of saturated fats.
- Only 9% children and 19% adults meet recommendation on free sugars.
- Most people don't meet fibre recommendations
- Change in methodology from paper diary to Intake24 – not possible to compare consumption and nutrient intakes
- Raw data available in **July** – PPA to carry out full analysis

## OHID Changes in food and drink purchasing behaviour and impact on diet and nutrition: 2021-2023 (FLC 180/25) – published 5 June

- Increase in calories purchased (+1.4%), saturated fat (+3.1%) and salt (+1.4) but decrease in sugar (-0.7%) - driven mainly by OOH sector
- Increase in calories, salt and saturated fat greater than increase in volume – diets higher in calories, fat and salt
- For take home Discretionary Foods highest share of calories (24.8%), but biggest increase in Starchy Carbohydrates (+0.4%).
- Salt:
  - Increase in salt for take home and OOH combined (1.4%) greater than increase in volume (0.6%), indicating that people's diets contained proportionally more salt.
  - Discretionary foods biggest contributor to salt purchases (29.2%), but 0.7% decrease (vs. pizzas/ready meals increase 0.5%)
  - Crisps and savoury snacks account for less than 1% of total volume taken into the home, but 3.3% of salt.
  - Purchases of HFSS foods taken into home fell over 4% since 2021 – most notably pizzas soft drinks, crisps and savoury snacks (over 5%) and breakfast cereals.

# OTHER DIET & NUTRITION

PPA Salt/Sugar call for data 2024-25 (FLC 191/25)



**MEMBERS: Please submit data by 4 July**

SACN rapid evidence update on Processed Foods and Health – published 2 April (FLC 109/25)

- Only NOVA studies considered
- “Significant limitations” in evidence base continue – unclear if observations relate to nutritional factors
- Concerns on NOVA category remain – potential to develop subcategories based on nutritional composition
- Recommendations to Government include:
  - Consideration on strategies and actions to implement SACN’s recommendations
  - Consideration on whether messaging on processing improves dietary intakes - particularly for saturated fat, salt and sugar - without unintended adverse consequences
  - Compelling industry to make processing data publicly available for monitoring and research on additives, incl. emulsifiers and sweeteners, and the specific processing methods used
  - Monitoring consumption of additives, incl. emulsifiers and NSS in the UK diet, esp. among high consuming and vulnerable groups
  - Continuing to review opportunities to monitor consumption of processed foods using the NDNS
- Next update **exp. Nov.25**
- SACN’s statement on WHO guidelines on non-sugar sweeteners (NSS) - also published 2 April
  - Recommendations to minimise use of NSS and industry to make data available

# OTHER DIET & NUTRITION

## England School Food (FLC 140/25)

- DfE new [nutrition guidance for early years providers in England](#) - 0 to 5 years.
- includes reference to traffic light food labels, portion size for children aged 1 to 5 years
- Will apply from **September 2025**
- Contains restrictions on the provision of chips and crisps to children between 1-5

## WG consultation on Healthy Eating in Schools (FLC 166/25)

- Will inform changes to:
  - **Primary schools: New proposals for food and drink:** regulations will start in 2026 to 2027.
  - **Healthy eating promotion:** Clearer guidance on responsibilities - coming December 2025.
  - **Secondary schools:** A call for evidence about current food and drink
- Contains guidance on serving potatoes cooked in oil, deep fried foods, including portion sizes
- Savoury snacks are prohibited
- Consultation closes 29 July – no plans for PPA response



**MEMBERS: Would you like PPA to respond?**

# OTHER DIET & NUTRITION

## EU updates (FLC 155/25)

- No timescales for production of study on consumption of UPF in [Vision for Agriculture and Food](#), (FLC 054/25)
- Cardiovascular health plan – likely to include measures to tackle NCDs
- No timescales FIC review and IA on hold – EC continuing to support mutual recognition amongst EUMS
- EC has no intentions to review NHC Regulations (to support reformulation efforts)

## DG TAXUD study on ‘health taxes’ (FLC 161/25):

- Find best practice cases in EUMS – esp. revenue generation, consumer behavioural change, health impacts, redistributive effects, and internal market aspects.
- Fill in data gap and provide the EC evidence to analyse the performance of **existing taxes across the EU on HFSS food products and SSBs**, with a focus on excise duty.
- Taxation sits with EUMS – EC can only provide recommendations for national policy development
- Consumption of taxed products declines in most countries post-implementation, particularly where taxes are tiered or significant.
- Reformulation has occurred in response to tax signals, particularly in beverage markets.
- Substitution toward untaxed or lower-sugar products is common, contributing to a shift in dietary patterns.
- Modelling suggests measurable health impacts, including reductions in average BMI and incidence of diabetes and cardiovascular disease, particularly among lower-income populations.

# OTHER DIET & NUTRITION

## **Nutriscore** (FLC 108/25)

- Update to Nutriscore algorithm in Mar.25
- France stressed need for continuous assessment of the algorithm to avoid negative impact on GIs and traditional products
- No news on EC position on Nutriscore – EC aware of diverging views and challenges of harmonisation

## **EU discussions on max. levels for vitamins and minerals in food**

- Leaked proposal early 2025
- No MLs for certain nutrients - vitamins B1, B2, B12, biotin, and pantothenic acid – no safety concerns
- General bans for several minerals, incl. zinc, iron, copper, manganese, and sodium/sodium chloride, with some exceptions (only for products intended for children)
- Some MLs very low (<15%/ 7.5% NRV) – would require reformulation of many products.
- Awaiting publication of a call for evidence (4-week consultation) – unlikely before Summer break.
- EC acknowledged that reformulation and re-labelling would entail a one-off cost but maintained that the long-term benefits of harmonisation outweigh these burdens.

# FOOD LABELLING, COMPOSITION & REGULATION

# Bread and Flour Regulations

- **NEW:** UKFM updated position paper on BFR – April
  - Fortificant mix with folic acid due to be ready at scale by August 2025
  - Transition to folic acid fortification **exp. September 2025**
    - Majority of non-wholemeal flour in line with amended BFR **exp. October 2025**
  - Defra confirmation BP-compliant folic acid is required
    - Defra understanding BP-compliant folic acid stocks secured by millers – costs lower than initially expected.
- **NEW:** [BFR guidance](#) published on gov.uk (FLC 128/25)
  - Confirmation of alphabetical order and descending order of weight
  - Ongoing topic of discussion Local/Primary Authorities
  - FIC rules apply – any derogations must be agreed with LAs/PAs.



## **MEMBERS: Concerns on implementation?**

- **NEW:** FSAI position - no over or under declaration allowed - labels should be managed by manufacturers (see [FD Ireland](#))
- FD Ireland formal discussion with Irish Dept of Health
  - Focussed on health impact, but covering issues on labelling
- Irish Dept of Agriculture informed of this issue more open to discussion – but FSAI food enforcement policy
- Upcoming meeting FSAI, UKFM and Dept. Of Agriculture - authorities seem to be more open for engagement and constructive conversation

# UK/EU Trade Agreement

- **NEW:** UK-EU Summit on 19 May 2025
  - UK and EU [Common Understanding](#) on working towards ‘SPS Agreement’
  - Details of agreement yet to be discussed and agreed over the coming months via detailed technical discussions with the EU
  - Will cover sanitary, phytosanitary, food safety, consumer protection, marketing standards and composition
  - Application of rules based on ‘dynamic alignment’ subject to optional provisions or derogations – pending further decisions
  - Timings are still subject to agreement – no timeframe
  - Priority for Government in other areas (e.g. energy, security) but food may not be prioritised
  - Defra working with FSA (Wales and NI) and FSS to assess necessary changes
  - Businesses must continue to comply with all applicable GB, NI and EU requirements until further notice.

# OTHER LABELLING, COMP. and REGS.

- **'Not for EU' labelling - NIRMS**

- Phase 3 labelling (product-level) apply from **1 July 2025** as normal (FLC 164/25)
- [Labelling guidance](#) amended again – caution on wording on snacks exemptions (FLC 156/25)
- [List of commodity codes exempted from phase 3](#)
- Defra confirmation that HRFNAO will require labelling in phase 3
  - **NEW:** Defra clarification on HRFNAO - 'Not for EU' labelling only required to products under CN codes in the annexes to [Commission Implementing Regulation \(EU\) 2019/1793](#) from specified origins (FLC 156/25)
  - Processing may change the country of origin and take a good out of scope:
    - *If HRFNAO listed within EU 2019/1793 was subject to 'economically justifiable processing' i.e. processing which is not just taken for the purposes of avoiding controls, then said products origin would be considered the country of processing and thus fall outside of scope of EU 2019/1793.*
    - *definition of processing: Art 2(1)(m) of Reg 852/2004: "‘processing’ means any action that substantially alters the initial product, including heating, smoking, curing, maturing, drying, marinating, extraction, extrusion or a combination of those processes."*

- **NEW: [The Marking of Retail Goods Regulations 2025](#)** – into force 1 July (FLC 176/25)

- Empowers the Defra Secretary of State to introduce GB-wide 'Not for EU' labelling by commodity, where likelihood of availability in NI will be "seriously adversely affected" by goods being delisted.
- [Guidance](#) has also been published.

- **'Fairer Food Labelling' consultation response** (FLC 187/25)

- COOL and method of production (animal welfare) labelling
- Strong support for changes, but focus on POAO
- Government to consider next steps as part of Food Strategy

# OTHER LABELLING, COMP. and REGS.

- **BMG/ADAS project**
  - BMG ADAS paper still not yet ready for circulation – draft findings shared in March (FLC 099/25)
  - Publication **exp. Autumn 2025** – possible stakeholder engagement Summer 2025.
  - FDF finalising ‘Explainer on UK Label Change Process and its Industry Resource and Costs’ document – to be shared with Defra labelling team
- **DBT/OPSS auditing gov.uk**
  - DBT/OPSS refreshing and auditing all [gov.uk](https://www.gov.uk) content to make it more accessible
  - Future resources:
    - UK ODRS (‘Open Regulatory Document standard’) – for use by all UK Regulators
    - FBR (‘Find Business Regulations’) web portal - search tool/database for trade associations and research organisations to advise businesses.
    - [Beta test](#) currently for construction regulation only – but to be rolled out to other sectors systematically (no timelines for this)
- **Vegan/vegetarian/plant-based labelling**
  - ISO International Standard on Plant-Based Foods (ISO 8700) **exp. imminently**
  - UK abstained from vote due to lack of support by most trade associations so unsure as to whether it will apply in the UK
- **Defra update on recycling labelling**
  - Awaiting developments in the EU – Government considering if/how far to align

# OTHER LABELLING, COMP. and REGS.

- **Regulated Products**

- [Food and Feed \(Regulated Products\) \(Amendment, Revocation, Consequential and Transitional Provision\) Regulations 2025](#) – applicable from **1 April 2025**
- Simplify authorisation of feed additives, smoke flavourings and GMOs:
  - Removes periodic renewals and need for specific legislation – official register
  - Also new [GB registers](#) for flavourings, enzymes and food additives.
- [FSA Proposals](#) for further reform considered in June FSA Board meeting
  - Consultations on further reform unlikely to progress anytime soon due to discussions on future UK/EU SPS agreement.
- New [Market Authorisations Newsletter](#)

- **Smoke flavourings UK**

- 8 smoke flavourings approved for use in the UK now listed in the [GB Register](#).
- Risk assessment ongoing:
  - Genotoxicity assessment now complete. Studies ongoing peer review. Outcome **exp. Summer 2025**

# OTHER LABELLING, COMP. and REGS.

- **Smoke flavourings EU**
  - [Schedule](#) on the phase-out measures has been shared on the Commission website.
  - New EC Q&A document on phase-out measures being finalised (FLC 169/25).
  - Foods smoked with the use of conventional smoking processes (FLC 143/25)
    - Draft recommendation almost finalised
    - EFSA completing literature research on other substances/contaminants of potential relevance - to be added to the recommendation
    - EFSA mandate on products smoked with the use of conventional smoking processes - deadline **June 2027**
- **EU discussions on labelling of enzymes**
  - No obligations to set labelling requirements, but Union list to set specific names and functions for enzymes – some already regulated as food additives
  - Initial discussions CWG– enzymes as ingredients, additives or processing aids
  - Meeting DGSANTE/FoodDrinkEurope/AMFEP
  - UL unlikely to be finalised before 2028 so no immediate concerns
  - Next CWG meeting October 2025.
- **JRC consultation on waste sorting label – closed 16 June**
  - Proposals for EU harmonised system under PPWR – will apply from August 2026
  - Feedback on visual designs of labels, application of rules and labelling system features.
  - Final report exp. Summer 2025 – JRC to finalise labelling scheme and guidelines and submit work to DG ENVIRO
- **EU Directive on Green Claims**
  - Final trilogue on 23 June cancelled
  - EC statement on withdrawal of Green Claims Directive (FLC 194/25) retracted
  - Polish/Danish Council presidency to consult EUMSs
  - EP remains split
  - Future uncertain

# OTHER LABELLING, COMP. and REGS.

- **Codex consultation on Food Labelling in Emergencies – closed 15 June**
  - Key considerations: What is an emergency, simplified info, origin, FOPNL - to be considered in terms of flexibility?
  - FoodDrinkEurope response – FDF support
  - FDF to express support to Defra
- **Codex consultation on PAL – closed 7 May (FLC 139/25)**
  - 1<sup>st</sup> of 2 consultations – Guidelines for the use of Precautionary Allergen Labelling (PAL)
  - FoodDrinkEurope response:
    - Support for less prescriptive approach on PAL at Codex level
    - Support for risk-based/harmonised approach of PAL as a mitigation tool for unintended presence
    - Use of separate ‘may contain’ statement
    - Comments on reference doses for cereals containing gluten or gluten
  - FAO/WHO to develop guidance on qualitative risk assessment and reco on reference dose for cereals containing gluten or gluten – to be considered in CCFL 2<sup>nd</sup> consultation on PAL.

# OTHER LABELLING, COMP. and REGS.

- **Allergen labelling - UK**
  - FSA interviews with businesses on PAL usage (FLC 139/25)
- **Allergen labelling – NL**
  - NL authorities responding to comments raised by MS
  - Unsure if EC can respond
  - Regulation likely to progress – applies from Jan.26
  - Statement from NL State Secretary - reflecting on enforcement
  - Understanding that rules will apply to products which are labelled in Dutch for the NL market - may be treated differently if multiple languages – TBC
- **Allergen Labelling – WAO statement**
  - Consultation closed 15 June
  - Critique of FAO/WHO Expert consultation – support recommendations
  - Support mandatory use of PAL based on formal risk-assessment
    - Pref. quantitative, ideally based on ED05 over ED01
    - High level of support on information on residual risk (< RfD), but no consensus on how
    - No PAL use with a 'free-from' claim for the same allergen
  - FoodDrinkEurope response – limited input from industry and defensive use of PAL by manufacturers.

# FOOD SAFETY

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# Acrylamide

**Latest discussion: FDE meeting, 6 May and Commission Working Group on Environmental contaminants, 7 May 2025.**

Frans Verstraete (DG Sante) attended the FDE CONTAM meeting on 6 May 2025.

- Presented an 'Update on certain topics in order of priority'. Acrylamide was 7th out of 11th listed topics (MCPD and Furan were 1<sup>st</sup> and 2<sup>nd</sup> topics respectively).
- Stated that he 'hopes to finish technical discussions on acrylamide maximum levels by the end of the year', so once again it looks like the timing has been pushed back.
- Confirmed that discussion includes whether or not the existing mitigation measures need to be updated/strengthened.

Netherlands' note of Commission Working group meeting on 7 May, circulated on 26 June 2025. Entry for AA very short:

- Last formal item on agenda "Acrylamide: discussion on the review of existing benchmark levels, new benchmark levels for certain foods and maximum levels for certain foods".
  - *COM shared a document with monitoring data from the years 2019-2023.*
  - *Based on this data, no major changes are expected for concept MLs compared to the levels that were shared a few years ago during the stakeholder consultation.*
  - *COM will come up with a concrete proposal and proposes to organize a virtual WG meeting to further elaborate the proposal together.*

# Acrylamide

## Actions by EU trade associations

ESA call for data has finished (deadline(s) 31 March 2025 (crisps/chips), 30 April 2025 (snacks)).

- Dr Steve Powers is currently working through the data.
- Reports on potato crisps and on potato lattice/stick products issued (see following slides)
- Reports on veg crisps and dough based snacks will be circulated in due course.
- Data on potato crisps have been submitted to EFSA as in previous years (8,004 data points as of 20 June 2025).
- No data has been formally requested by ESA this year on nuts: As part of the latest ECR meeting (27 May 2025) it was agreed that a call for data would be issued.

EUPPA call for data has also finished: EUPPA submitted several hundred data points to EFSA but was finding it difficult to finalise some of the data due to problems with the EFSA online systems.

EUPPA has finalised a position paper on acrylamide (See FLC 117/25, PPTC 078/25).

- ESA and other supply chain partners were asked whether they would like to co-sign.
- ESA and other supply chain partners did not co-sign due to the document being very specific to production of fries and specialty processed potato products (fresh and frozen).
- EUPPA now planning to engage with Commission and MS using the position paper.

Revision of FDE Toolbox: deadline for initial comments was 28 February: first draft expected imminently. Nothing issued as of 30 June 2025.

# Acrylamide

## Other developments

European Standards Committee CEN/TC 275/WG 13 "Process contaminants", which developed the CEN standards on acrylamide and furan met on 10 April 2025. Minutes not yet available.

WG 13 proposed to prioritize three standardization projects, including: Acrylamide determination in foods for infants, young children, and cereals.

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

- FDE response, highlighting Toolbox approach, was submitted 29 October 2024.
- Revised discussion paper (CX/CF 25/18/12) was anticipated. Nothing circulated via FDE as of 30 June 2025.
- Neither formal report nor informal report of CCCF meeting yet available.

# Acrylamide in potato crisps data 2002-2024

Year	Mean	SE	n	Q85	Q90	Q95	Min	Max
2002	763.4	91.05	42	1306.0	1581.0	2080	70.00	2500
2003	573.0	27.31	136	883.0	976.0	1118	160.00	2080
2004	624.1	26.60	321	940.0	1168.0	1580	130.00	4450
2005	620.7	21.25	230	980.0	1085.0	1210	100.00	1780
2006	577.2	11.93	1151	910.0	1100.0	1350	22.00	2830
2007	569.6	7.00	3206	880.0	1000.0	1270	30.00	5900
2008	471.6	5.05	5692	770.0	903.3	1170	30.00	4300
2009	500.0	5.76	6493	861.1	1037.0	1400	40.00	6000
2010	435.2	4.07	10971	659.0	780.0	1020	26.60	12000
2011	357.9	2.47	12213	573.0	680.0	870	17.20	3090
2012	414.8	3.33	8656	645.1	784.0	1020	17.00	4500
2013	423.4	4.37	5371	690.0	830.0	1090	15.40	2635
2014	396.9	3.41	5710	630.0	740.0	920	10.00	2049
2015	422.4	3.75	6407	660.0	790.0	1020	10.00	2600
2016	411.9	3.81	7264	640.0	770.0	1018	10.00	3400
2017	361.6	3.18	7263	558.0	651.2	863	20.00	4100
2018	352.6	2.68	8829	561.0	654.0	819	30.00	3600
2019	371.9	2.56	9749	586.0	690.0	859	10.00	3000
2020	364.2	2.82	8900	582.0	682.0	851	20.00	3432
2021	362.9	2.62	9422	569.0	666.0	824	11.00	5100
<b>2022</b>	<b>336.6</b>	<b>2.44</b>	<b>8429</b>	<b>530.0</b>	<b>620.0</b>	<b>770</b>	<b>35.00</b>	<b>2338</b>
2023	360.0	2.57	9592	550.0	645.0	809	40.00	4300
<b>2024</b>	<b>355.1</b>	<b>2.50</b>	<b>7794</b>	<b>564.0</b>	<b>656.0</b>	<b>800</b>	<b>34.00</b>	<b>2300</b>

Means, SEs, 85th, 90th and 95th quantiles

There were 7794 observations (11 producers) for 2024 with a mean of  $355.1 \pm 2.50$  ppb [NB: further data was received after this report was finalised]

6.5% of observations were greater than the Benchmark Level (750 ppb) in 2024.

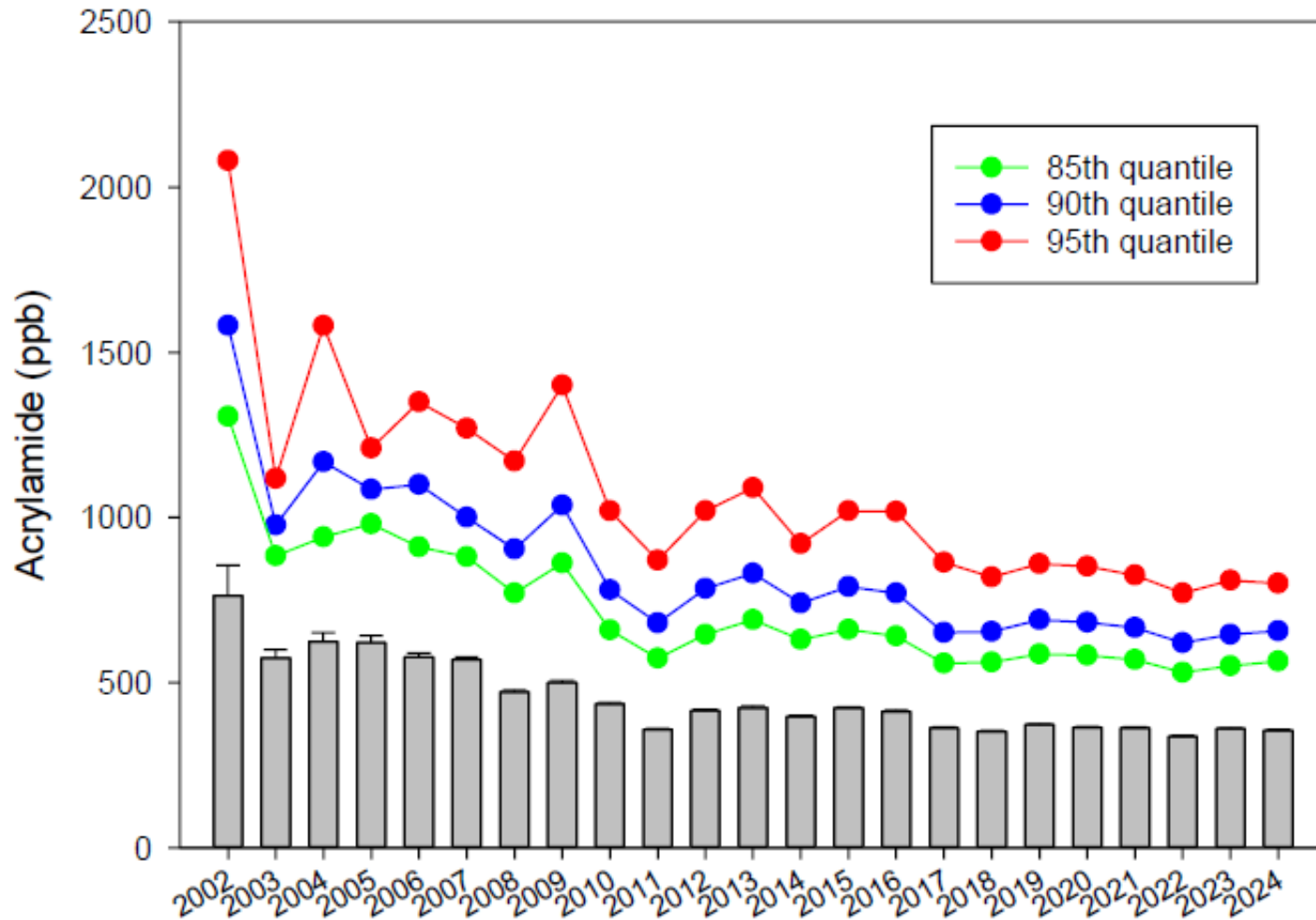
The mean of these observations greater than 750 ppb was  $933 \pm 8.77$  ppb.

1.5% of observations (120 out of 7794) were greater than 1000 ppb.

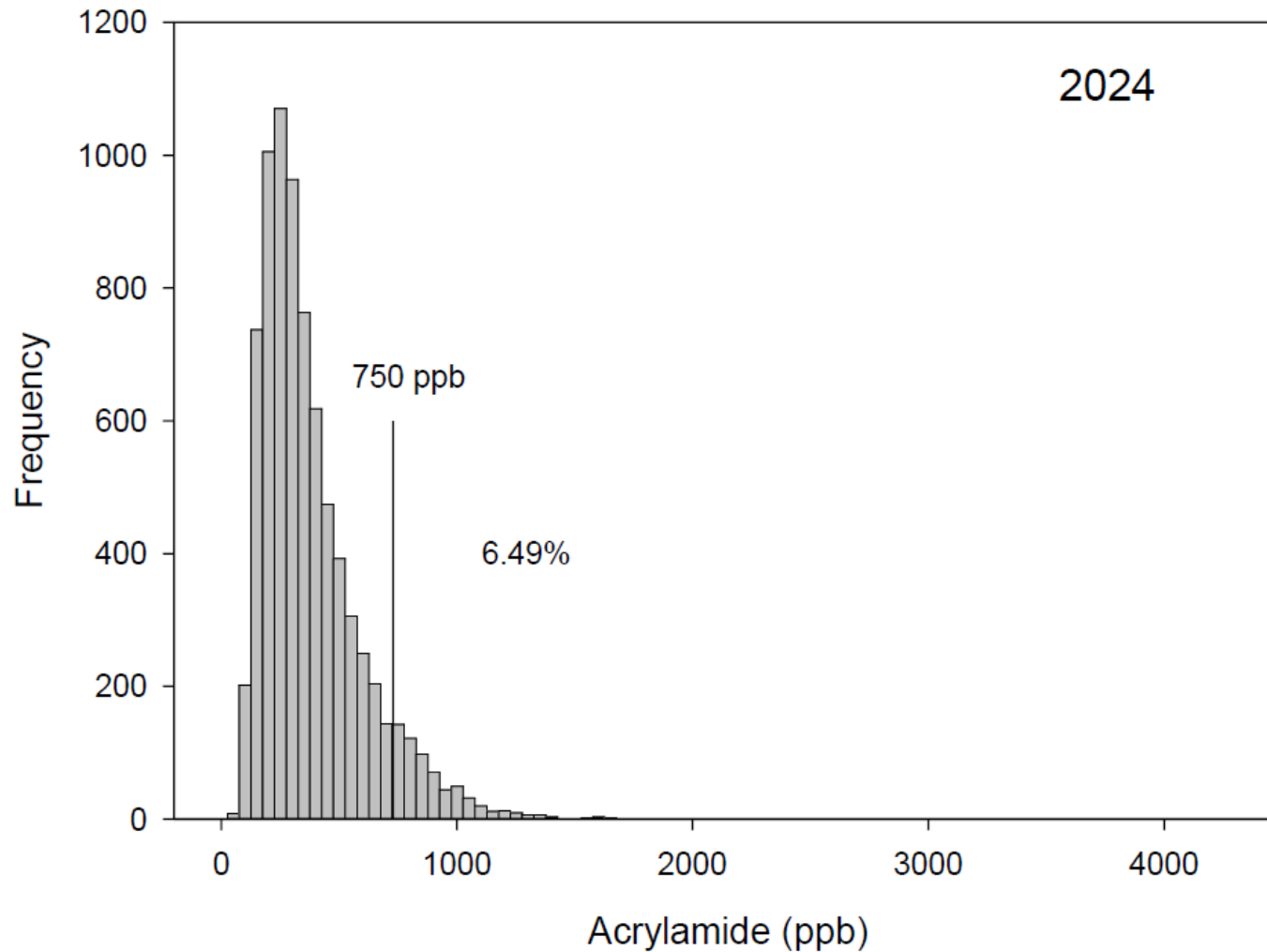
0.03% of observations (2/7794) were greater than 2000 ppb in 2024.

The Q85 was 564 ppb  
The Q90 was 656 ppb  
The Q95 was 800 ppb (6.67% above the Benchmark Level (750 ppb)).

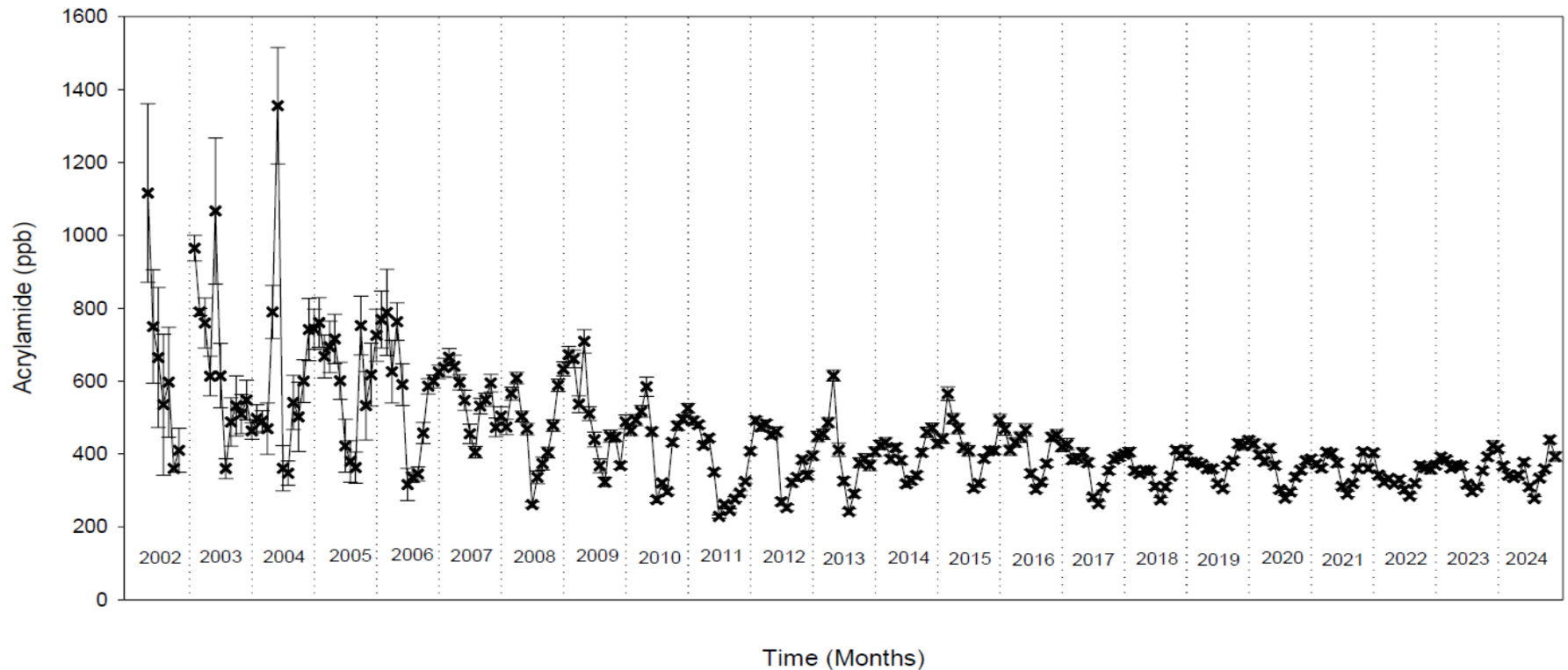
# Acrylamide in potato crisps data 2002-2024



# Acrylamide in potato crisps data 2002-2024

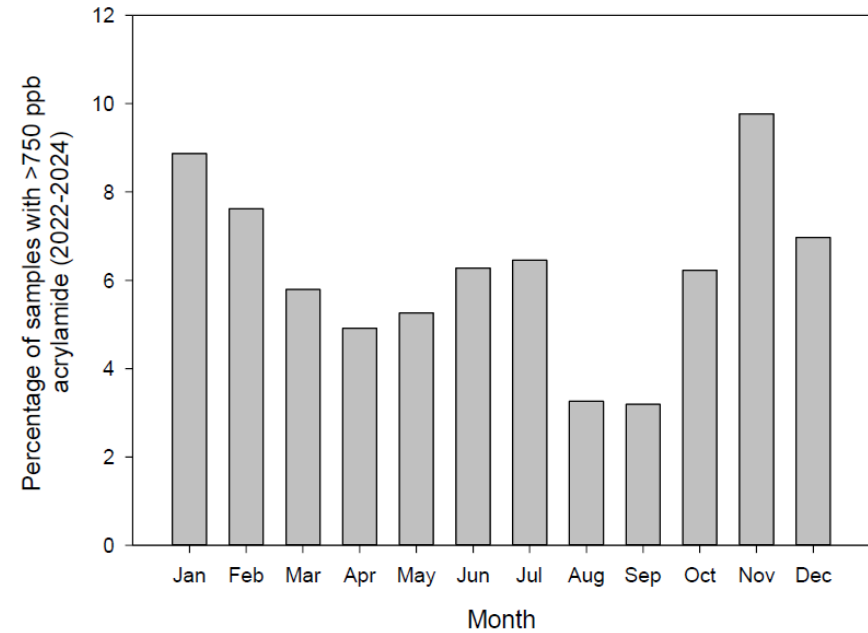
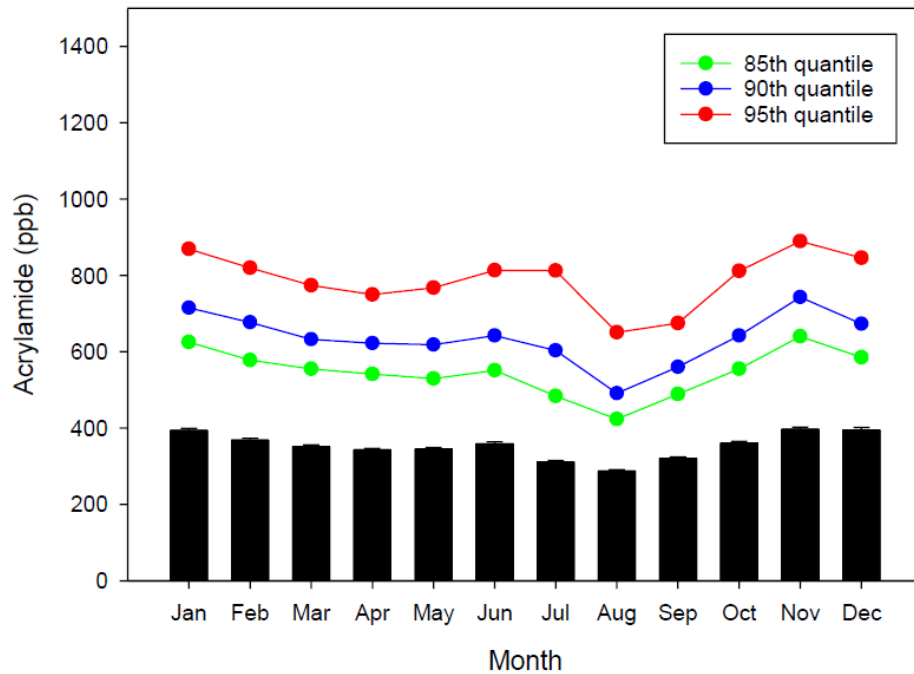


# Acrylamide in potato crisps data 2002-2024



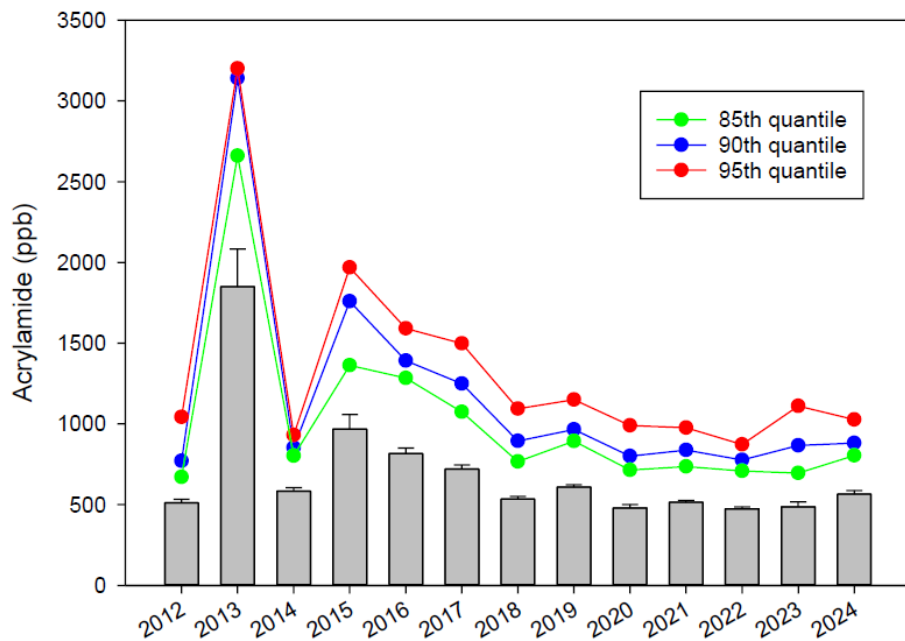
# Acrylamide in potato crisps data 2002-2024

Seasonality 2022-2024: months



# Acrylamide in potato sticks data 2012-2024

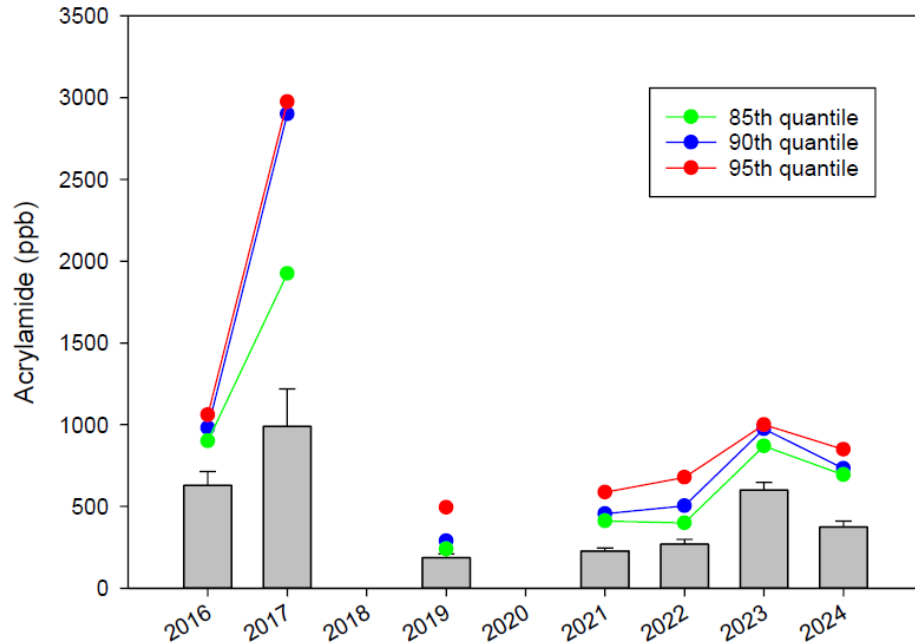
Potato Sticks: Means, SEs, 85th, 90th and 95th quantiles



	Mean	SE	n	Q85	Q90	Q95	Min	Max
<b>ar</b>								
12	510.6	22.48	259	670	770	1042	100.0	2800
13	1849.4	232.21	16	2660	3140	3200	430.0	3200
14	582.5	21.58	83	802	852	931	110.0	1240
15	966.2	91.07	26	1362	1759	1968	450.0	2200
16	815.3	34.20	168	1282	1391	1591	180.0	3000
17	720.1	25.16	253	1073	1248	1498	41.0	2270
18	533.7	16.50	326	766	894	1093	90.0	1902
19	607.6	15.16	412	893	965	1149	105.0	2200
20	478.7	21.68	157	714	799	990	90.0	1959
21	514.6	11.01	509	735	838	975	60.0	1700
22	473.7	12.41	295	708	776	872	100.0	1310
23	486.9	29.00	82	695	866	1110	150.0	1357
<b>24</b>	<b>565.0</b>	<b>22.33</b>	<b>132</b>	<b>803</b>	<b>880</b>	<b>1026</b>	<b>108.0</b>	<b>1800</b>

# Acrylamide in lattice cuts data 2016-2024

Lattice type: Means, SEs, 85th, 90th and 95th quantiles



Year	Mean	SE	n	Q85	Q90	Q95	Min	Max
2016	630.0	84.37	10	900.0	980	1060	240.0	1060
2017	990.7	228.04	15	1925.0	2900	2975	370.0	3000
2019	187.2	25.00	41	239.2	290	495	63.0	924
2021	228.0	19.32	59	411.6	456	588	52.0	669
2022	270.6	28.34	38	399.2	504	678	105.0	910
2023	600.3	46.92	30	870.0	975	1000	180.0	1050
<b>2024</b>	<b>374.9</b>	<b>36.18</b>	<b>47</b>	<b>694.5</b>	<b>733</b>	<b>849</b>	<b>101.0</b>	<b>1000</b>

# 3-MCPD-esters

**Targeted stakeholder consultation on MLs for the sum of 3-MCPD and 3-MCPD esters and of glycidyl esters issued on 11 April 2025.**

- Consultation relates to 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. (MLs for processed cereal-based foods for infants and young children and baby food are currently under finalisation).
- Proposals are significantly different from the previous consultation (December 2021), which included specific MLs for ‘Crackers (cereal based- sticks salty)’, ‘Potato crisps / vegetable crisps’, and ‘French fries’.

ESA and FDE responded to the consultation. EUPPA did not respond separately:

- Commented on the introduction of dual regulation (finished products and raw materials) AND conflict with the provisions under Article 2 of Regulation (EU) 2023/915 (compound foods already need to meet the proportionate MLs for oil).
- Commented on the absence of any EFSA re-assessment of exposure (original EFSA report, which was published prior to the setting of MLs for oils, suggested only a slight exceedance of the TDI in ‘high consumers’ of the younger age groups and for infants receiving formula only).
- Commented on lack of correlation between MLs for finished product and existing MLs for oils.

# 3-MCPD-esters

**Latest discussion: Commission Working Group on Environmental contaminants, 7 May 2025.**

Item 6 (of 9) on agenda “*Finalisation of the technical discussion, taking into account the stakeholder comments, of the establishment of maximum levels for 3-MCPD esters and glycidyl esters in foods other than the foods for which a maximum level is already established in Regulation (EU) 2023/915.*”

- Netherlands’ note of meeting issued 26 June 2025.
- Previously, consideration was given to proposing MLs for specific product groups, but that is becoming complex. COM therefore proposes to establish MLs based on fat content.
- COM proposes to remove ML for category 5.3.5.3 (compound food with a mixture of oils and fats).
- COM will clarify that MLs cover products to which oil has been added.
- *Limited transition period for compound foods, except for baby food and processed cereal-based foods for infants and young children (longer p[eriod anticipated).*
- *The proposal is expected to be discussed in the September SCoPAFF.*

# Furans

## European developments

Current EU Monitoring Recommendation ([COMMISSION RECOMMENDATION \(EU\) 2022/495 of 25 March 2022 on monitoring the presence of furan and alkylfurans in food](#)) states that “Member States should, with the active involvement of food business operators, monitor furan, 2-methylfuran and 3-methylfuran in food, in particular in coffee, jarred baby food (including baby food in containers, tubes and pouches), ready-to-eat soup, **potato-based crisps**, fruit juices, breakfast cereals, biscuits, crackers and crispbread”.

- ESA obtained EFSA data using a freedom of information request and a review was carried out by Dr S Powers (see following slides).

ESA has met with ILSI to discuss a possible COST Action programme on furan, to include crisps and savoury snacks.

- ESA Board has approved funding towards an application for an ILSI-led COST Action programme on furan.

Peer review paper ‘Furan and Alkylfurans in Food: Recent Scientific Developments, Occurrence Data across Product Categories and Practical Risk Management Measures’ in pre-publication (Nestlé-led update; follow up to B Kettlitz paper from 2019).

EUPPA has not discussed furan recently and it is not currently perceived as a priority issue for the sector.

# FURAN levels – EFSA Data

## Accredited laboratories only

### Considering overall level of furan over time

Furan data (2004-2023): Accredited laboratories only (529 observations)

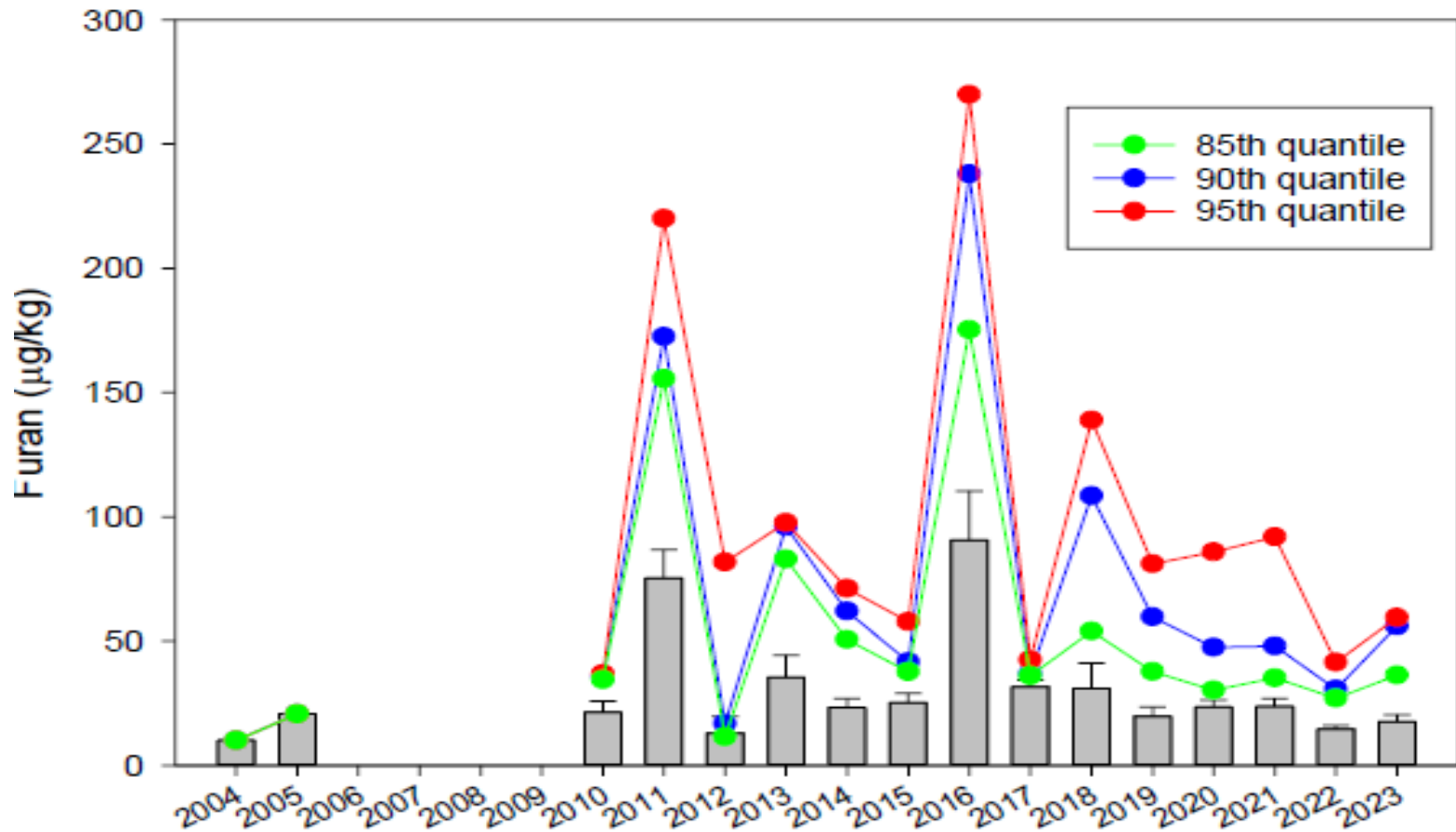
The overall yearly summary statistics show the trends in the furan ( $\mu\text{g}/\text{kg}$ ) data from accredited laboratories.

Year	Mean	SE	n	Q85	Q90	Q95	Min	Max
2004	10.00	*	1	10.00	10.00	10.00	10.000	10.0
2005	20.70	*	1	20.70	20.70	20.70	20.700	20.7
2009	*	*	0	*	*	*	*	*
2010	21.27	4.619	6	34.40	35.60	36.00	7.600	36.0
2011	75.32	11.323	34	155.61	172.50	220.00	0.700	233.0
2012	12.89	6.780	19	11.50	16.80	81.77	2.900	133.9
2013	35.39	8.979	12	82.91	96.08	97.66	3.800	97.9
2014	23.24	3.626	46	50.60	62.00	71.20	5.000	120.0
2015	25.26	3.731	19	37.65	41.60	57.75	5.000	69.0
<b>2016</b>	<b>90.62</b>	<b>19.714</b>	<b>17</b>	<b>175.35</b>	<b>238.00</b>	<b>269.90</b>	<b>2.900</b>	<b>279.0</b>
2017	31.64	2.759	14	36.00	36.80	42.40	13.000	44.0
2018	30.85	10.293	17	53.95	108.40	138.90	4.000	148.0
<b>2019</b>	<b>19.76</b>	<b>3.620</b>	<b>48</b>	<b>37.70</b>	<b>59.70</b>	<b>81.10</b>	<b>1.000</b>	<b>110.0</b>
<b>2020</b>	<b>23.42</b>	<b>2.813</b>	<b>85</b>	<b>30.25</b>	<b>47.50</b>	<b>85.80</b>	<b>0.200</b>	<b>141.0</b>
<b>2021</b>	<b>23.66</b>	<b>3.299</b>	<b>76</b>	<b>35.20</b>	<b>48.00</b>	<b>91.90</b>	<b>1.800</b>	<b>160.0</b>
<b>2022</b>	<b>14.57</b>	<b>1.467</b>	<b>89</b>	<b>27.00</b>	<b>30.60</b>	<b>41.42</b>	<b>0.500</b>	<b>88.8</b>
<b>2023</b>	<b>17.68</b>	<b>2.687</b>	<b>45</b>	<b>36.33</b>	<b>56.00</b>	<b>59.50</b>	<b>3.000</b>	<b>71.3</b>

The peak in furan for accredited laboratories was seen in 2016, and since 2019 the overall levels have fallen to around 14.5-23.7  $\mu\text{g}/\text{kg}$  annually with Q90 at 30.6-59.7  $\mu\text{g}/\text{kg}$  with the means in 2022 and 2023 being the smallest seen since the 2016 peak.

# FURAN levels – EFSA Data

Furan Means, SEs, 85th, 90th and 95th quantile  
(data from accredited laboratories only)



# FURAN levels – EFSA Data 2023 by sub-group

	Year	2023		
		Mean	SE	n
<b>Food Type Grouping</b>				
Chips/crisps		20.80	10.920	5
<b>Corn chips</b>		<b>61.35</b>	<b>9.950</b>	<b>2</b>
Popped cereals		17.60	*	1
Potato crisps from dough		60.00	1.000	2
Potato crisps from potato slices		11.01	1.102	32
Potato crisps or sticks		9.00	*	1
Rice, popped		13.10	*	1
Snacks other than chips and similar		56.90	*	1

# Glycolkaloids

## MinGlyKa project (Germany)

Latest MinGlyKa project meeting held on 24 March 2025. EUPPA and BDSI are participating in work.

- Work on potato crisps has now been completed – generally speaking positive outcomes.
- Peer review paper ‘Glycoalkaloids in potatoes and potato crisps: The role of postharvest stress and processing’ in process of being finalised.
- Overall work confirms that processing potatoes into crisps significantly reduces GA levels.
- Confirms the importance of variety selection, and storage.

Further project meeting expected in summer, with finalization of work on fries expected by October 2025.

EUPPA has collated and submitted data on GA in raw materials /finished products and submitted to EFSA in response to its call for data.

ESA has not submitted any data to EFSA. BDSI/LCI has collated data from German work on raw materials/potato crisps and submitted to EFSA.

# Chlorpropham (CIPC)

## GB: CIPC Residues Management Group (CRMG)

Updated report on 2023-24 storage season was submitted to HSE on 30 April 2025

Data collection for 2024-25 storage season ongoing (by end July)

- Last CRMG meeting reported 78 samples total (including 21 from chips shops). Target is 125 samples.
- Several PPA members still to submit data (correct as of 20 June 2025)
- Fresh sector still to provide data: Branston, Manor Fresh, Albert Bartlett and Greenvale can help close the gap.

Next CRMG meeting 9 July 2025.

PPA intends to step back from secretariat role in favour of GB Potatoes.

## European developments

Commission Regulation (EU) 2025/1163 of 13 June 2025 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 triflusaluron in or on certain products

- Amends the tMRL from 0.35 to 0.2 ppb (from 6 January 2026).
- Monitoring data to be submitted every two years instead of annually.

Arvalis still collecting data for 2024-25 storage season (GB data no longer formally requested - because of CRMG work).

# Mancozeb

**Mancozeb (fungicide used to control late blight in potatoes).**

**Mancozeb Summit, 3-4 June 2025, Rothamsted Research, Harpenden**

- VR attended a UPL organised two-day workshop focused on discussing the agricultural benefits and importance of the broad-spectrum fungicide mancozeb.
- Format: Presentations and panel discussions with academic, industry, and government experts, as well as breakout sessions and field trips.
- Anticipated outcome: A consensus statement/white paper to capture the importance of mancozeb as a disease management tool.

Following the event, PPA was asked to co-sign the white paper. However, following a very brief consultation with PPTC it appears that there was limited support for PPA to co-sign. However, GB Potatoes has co-signed (NB: PPA is a member of GB Potatoes)

EU: Appeal against the Commissions' removal of mancozeb from the approved list - UPL still awaiting outcome the general court's decision on whether the Commission's decision to refuse renewal still stands.

- Hearing will take place on 1 July 2025 in Luxembourg
- Should the EC lose the case, the legislation prohibiting Mancozeb's renewal may be annulled, potentially reauthorising its use in the EU and requiring risk assessments to be restarted.
- This ruling will not directly affect the UK, where a decision not to renew Mancozeb was made in 2023.

Bayer/EUROPATAT organized a related virtual webinar on late blight control 1 July AM.

# SUSTAINABILITY

# Packaging (GB)

## Amended packaging waste regulations (SI 2024 No. 1332) published and other announcements

Exemptions from fees for materials handled by closed-loop schemes.

Exclusion of street-binned waste and litter from EPR payments.

Written commitment to consult on reforming the PRN system.

Consulting on additional measures that can be applied to poorly performing LAs to drive up recycling rates.

Government will seek a solution to the problem of double-charging for non-household waste.

Confirmation that mass balance accounting will be brought forward to Spring 2027.

Extended Producer Responsibility for Packaging: 2025 base fees published (last update 30/06/25)

LINK: <https://www.gov.uk/government/publications/extended-producer-responsibility-for-packaging-2025-base-fees>

Invoices to be sent to producers in October 2025.

## Establishing a Producer Responsibility Organisation (PRO)

DEFRA opened an appointment process for a not-for profit PRO (expressions of interest closed 10 June).

- Understood that some compliance schemes have submitted applications to become the PRO, including Valpak.
- FDF-led proposal (representing 90% of the total amount of packaging placed on the market) was due to be submitted in June.
- Formal appointment process by PackUK (the scheme administrator) in Autumn 2025.
- PRO expected to be appointed in March 2026.

# Deforestation

## UK Forest Risk Commodities Regulations

- Defra are yet to receive a ministerial steer on the FRC policy.
- Pending UK/EU discussions.

## **EU Deforestation Regulations (EUDR)**

- [Updated FAQs](#) – 4<sup>th</sup> iteration
- [Updated EC Guidance](#)
- Made [simplifications](#) – incl. due diligence process
- A [Draft Delegated Act](#) amending Annex I of the EUDR- Consultation closed 15 May
- EC still finalising country benchmarking system through an Implementing Act
- Will apply from **30 December 2025** for **large operators and traders** and **30 June 2026** for **micro- and small enterprises**.
- [EC Information System of the Deforestation Regulation](#) now live – streamlines creation of [due diligence](#) statements
  - <https://eudr.webcloud.ec.europa.eu/tracesnt/>

# COMMITTEE MATTERS

# Committee Matters



## FDF ASSOCIATIONS ADVISORY GROUP MEETING

### Last meeting 31 March – priorities incl.:

- Bio Active into dietary guidance
- Residues and contaminants
- Divergence between EU and GB, especially on MRL for pesticides
- Tariffs
- Acrylamide
- Sustainability: energy intense sectors
- Coeliac UK: Cost Report / Technical issues being discussed / availability
- T-2 & HT-2
- Food and Mouth
- Composite Products
- UPF
- Glyphosate, *MRL / delayed*
- import Controls
- BFR
- Lack of skilled workers & worries in employment law changes
- Pesticides MRL / National Action Plan
- Action on Sugar / Salt: Savoury snacks report
- 3-MCPD-Esters maximum limits

- **Next meeting: 8 July**

# Committee Matters

## FLC vice-chair position still vacant



**Members: If you would like to help steer the work of the FLC Committee, please contact the PPA Secretariat!**



# Risk Matrix

## Food Issues Risk Matrix (March 2025)

Risk Analysis	Current Issue Actions in hand Dynamic situation	Future Issue Plans in preparation	Managed issue Controlled/monitored Could reoccur Outstanding actions
<b>Big Company Impact</b> <b>Cost</b> <b>Reputation</b> <b>Media</b>	Acrylamide 3-MCPD/Glycidyl-Esters HFSS/LHF Advertising/Promotions restrictions Portion Size/Calories CIPC tMRL monitoring EU/UK Devolved regulatory divergence Packaging waste/Taxation/EPR Ultra-Processed Foods	Food taxation FOPNL developments Salt/Sodium reduction (2024 targets) Nutrient profiling (Ofcom model review UK)	
<b>Moderate Impact</b> <b>Cost</b> <b>Material availability</b> <b>Working practice</b>	Environment Act (implementation)/EU Farm to Fork Strategy Food waste Allergens (precautionary labels/vegan) Bread and Flour Regulations implementation UK Border Target Operating Model (BTOM) 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 UK Deforestation GB Smoke flavourings review Precision Breeding (England) England Food Strategy (incl. FDTP Health) EU Smoked Ingredients UK Smoked Ingredients DAs Obesity Strategies	EU Smoke flavourings
<b>Small Impact</b> <b>Cost</b> <b>Materials</b> <b>Change</b>	EU Flavourings reviews Sugars (popcorn) EU MOAH/MOSH	UK Recycling labelling EU PFAS GBSF/CQUIN Plant-based/vegan and vegetarian definitions	

Decreasing impact on business



New issue

Changed priority

Identified as a potential high-profile media issue

AOB

# Dates of next 2025 meetings

- **Online:** Wednesday, 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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