

PPA Food Law and Consumer Committee Meeting



Chair: Catharine Hall

12 November 2025

PPA Competition Law

- All PPA meetings are to be conducted in accordance with the relevant competition and antitrust laws.
- As a condition of membership, members of PPA acknowledge that membership is subject to the competition law rules and they agree to comply fully with those laws.
- In addition, members are reminded to:
 - not discuss current or future commercial strategy, or disclose or exchange any other commercially sensitive information, in particular specific, non-aggregated information regarding prices including discounts, increases, rebates, and reductions; customers; costs and costs components; conditions of sale; capacities; quantities; turnovers and sales volumes; market shares; confidential technologies and R&D efforts.
 - raise any concerns about competition law compliance during a PPA meeting, or in any further discussion, immediately. In such cases, the discussion/meeting will be paused until a competition lawyer is content it can progress.
 - enable their cameras for the duration of the virtual meeting unless otherwise agreed, to ensure transparency and engagement.
 - ensure any AI-powered notetaking or transcription tools (e.g., Otter.ai, Fireflies) are disabled, as they are strictly prohibited during PPA meetings, unless prior explicit consent has been obtained from all participants. This is to ensure compliance with data protection and privacy regulations, including the UK GDPR and relevant wiretap laws.
- Failure to follow these guidelines may bring with it serious consequences for you as an individual, your companies and PPA. Such consequences include heavy fines and in certain cases, under national laws, the imposition of criminal penalties and sentences.
- The full PPA Competition Law Statement can be found on the [PPA website](#).

Agenda

1) Welcome and anti-trust statement

2) Minutes/action list

- FLC Notes and Action list from 1 July 2025 (FLC 261/25)

3) UK savoury snacks market trends – Ilona Fleischmann (Senior Research Analyst, Euromonitor)

4) EU/UK - SPS agreement – Simon Dadd and Sam Faulkner (Food Standards Agency)

5) Updates and discussions:

• Nutrition & Health

- England and DA update HFSS promotion restrictions
- UK-wide LHF Advertising restrictions
- England Food Strategy and 10-Year Health Plan
- PPA Salt/Sugar Survey results 2024-2025 and UK NDNS Y12-15
- Other diet and nutrition updates, incl. FDF DHC and NUT updates

• Labelling. Composition and Regulation

- FSA Strategic Assessment Workshop – emerging priorities – discussion
- Review of FSA ‘Guidance on Clear Food Labelling’ – discussion
- Other labelling, composition and regulation updates, incl. FDF FLL updates

Agenda cont.

- **Food Safety**

- UK/EU SPS dynamic alignment – contaminants/PPPs
- Acrylamide, glycoalkaloids and 3-MCPD
- Precision Breeding/New Genomic Techniques
- Other food safety updates

- **Sustainability**

- Packaging update
- Deforestation update

6) Committee matters

- Issues of Concern to FLC – Risk Matrix – priorities

7) AOB

8) Next meetings/Close

Matters arising - FLC 1 July 2025

Action	Status
Members interested in hosting a factory visit for the new Defra labelling team to contact the Secretariat ASAP .	COMPLETED
Secretariat to contact Defra to express additional concerns about perceived disconnection between government departments and agencies and internally (e.g. Defra food strategy and farming teams) to be captured as part of the Defra Food Strategy work	COMPLETED
Secretariat to investigate remit of Veg Power's upcoming campaign ' Attack the Snack '.	COMPLETED (see more info here)
Secretariat to carry out an analysis of NDNS data once raw data is made available	ONGOING
Secretariat to confirm data from the Office for Health Improvement and Disparities' (OHID) report on ' Changes in food and drink purchasing behaviour and impact on diet and nutrition: 2021-2023) relating to salt contribution from crisps and savoury snacks purchases (see slide 30)	COMPLETED (FLC 215/25)
Members to provide salt data for crisps, savoury snacks, popcorn, nuts and processed potato products, as well as sugar in popcorn for the year 2024-2025 to the PPA Secretariat by 11 July	COMPLETED (FLC 258/25)
Members are encouraged to begin discussions on the labelling challenge [flour fortification with folic acid] with their local/primary authorities .	ONGOING
Members interested in speaking to the FSA about their experiences on allergen management to inform the PPA Secretariat.	COMPLETED

Matters arising - FLC 1 July 2025

Action	Status
Secretariat to investigate application of NL Precautionary Allergen Labelling (PAL) requirements on multi-lingual products .	TO BE DISCUSSED TODAY
Members interested in applying to FLC's vice-chair position to contact the PPA Secretariat.	ONGOING
Members to provide suggestions for guest speakers for next FLC meeting .	ONGOING

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

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

UK savoury snacks market trends

Ilona Fleischmann

Senior Research Analyst, Euromonitor

EU/UK - SPS agreement

Simon Dadd and Sam Faulkner
Food Standards Agency

NUTRITION & HEALTH

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 DHSC GUIDANCE: Dec.24 Secondary leg (brand advertising): Sep.25	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 nd round – Feb.25 3 rd round – Oct.25	Oct.24 2 nd round: N/A 3 rd round: End 2025 TBC	Nov.25 TBC	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	Legislation: Mar.25 Guidance: Jul.25	Mar.26
SG HFSS promo restrictions	Secondary legislation under Food Safety Act 1990	Main - July.22 2 nd – Feb.24	Main – May.23 2 nd – Jun.25	Legislation: Oct.25	Oct.26
NI Healthy Futures	TBC	Main strategy – Nov.23 Action plan – Dec.24	Main – Late 2024 Action plan – May.25	2025 TBC	TBC

Promotion restrictions (England and DAs)



ENGLAND:

- [Volume promotion](#) restrictions came into force on **1 October 2025**
- [University of Leeds/IGD study on impact of HFSS promo restrictions in England](#) – Aug.25 (FLC 276/25)

NEXT STEPS:

- Transition period for on-pack volume promos until **30 September 2026**



WALES:

- **NEW:** [WG implementation guidance](#) on HFSS promotion restrictions – Jul.25 (FLC 216/25)
- **NEW:** [Healthy Weight : Healthy Wales Delivery Plan 2025-2027](#) – 30 September (FLC 311/25)

NEXT STEPS:

- Regulations come into force **26 March 2026**

Promotion restrictions (England and DAs)



SCOTLAND:

- **NEW:** [The Food \(Promotion and Placement\) \(Scotland\) Regulations 2025](#) - 31 October (FLC 356/25)
 - 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
- **NEW:** [Proposed National Good Food Nation Plan](#) – 27 June (FLC 214/25)

NEXT STEPS:

- **NEW:** Regulations to come into force **1 October 2026**
- **NEW:** [Final Good Food Nation Plan](#) **exp. End 2025** - establishing the Scottish Food Commission.
- SG to publish SG Scottish Dietary Goals review **exp. End 2025**



NORTHERN IRELAND:

- **NEW:** FSA research project on the [implementation of nutritional standards for vending machines across three public sector pilot sites in NI](#) – 19 September
 - Meaningful improvements in the nutritional quality of products are achievable for drinks
 - Replacement snack products very different to the original products - leading to customer dissatisfaction and declines in sales and revenue
 - “reinforced the need for flexible, context-sensitive implementation models that accommodate operational realities and consumer preferences while balancing public health aims, and the need for better guidance and support from the FSA to vending operators.”

NEXT STEPS:

- **NEW:** NI Obesity Strategy Framework and action plan **exp. Autumn 2025**
- NI review on nutritional standards in vending in public sector buildings
- **timings TBC**

LHF advertising restrictions (UK-wide)

- **NEW:** [DHSC Consultation on brand advertising exemption](#) – closed 6 August (FLC 224/25 – PPA response FLC 249/25)
- **NEW:** [DHSC response](#) to consultation on brand advertising restrictions – 10 September (FLC 285/25)
- **NEW:** [The Advertising \(Less Healthy Food and Drink\) \(Brand Advertising Exemption\) Regulations 2025](#) – laid 10 September (FLC 285/25)
 - Brand exemption extended to ‘brand of a range of products’ – established before 16 July 2025
 - Logos and brand characters included as examples of ‘depiction’ and names appearing in logos included
 - ‘Realistic image’ defined to replace ‘photographic image’ and includes videos
- **NEW:** [CAP consultation](#) on implementation guidance – closed 9 October (FLC 297/25 – PPA response 318/25)
 - Requests to address overlap between LHF advertising and HFSS online promotion restrictions, IPTV framework, further examples and decision tree, definition of ‘influencer’ and contractual agreements qualifying advertising payment
- [Industry agreement](#) to adhere to the LHF advertising restrictions on a **voluntary basis** applicable from **1 October** – based on [2023 draft CAP guidance](#)
- [BRC guidance](#) on products in and out of scope (FLC 277/25)

NEXT STEPS:

- **NEW:** Publication of CAP/BCAP implementation guidance – **Nov. TBC**
- Regulation comes into force on **5 January 2026**
- **NEW:** CAP ‘secondary guidance’ – timescales TBC

10-Year Plan

- 10-Year Health Plan '[Fit for the Future](#)' published 3 July (FLC 205/25)
- Policies include:
 - **Mandatory reporting of healthier food sales for all large food businesses** – by the end of parliamentary term
 - Possibly continuation work on FDTP
 - **Mandatory targets for industry, initially for large retailers** – next parliamentary term
 - **Update the 2004-05 NPM**
 - Response to 2018 NPM consultation and draft technical guidance expected by **end of 2025**
 - No consultation expected on the draft guidance – but “stakeholder engagement”
 - Consultation on application of 2018 NPM to HFSS/LHF promotion/advertising restrictions – **early 2026**
 - **Updating School Food Standards**
 - **Restrictions to ‘junk food’ advertising targeted at children**
- Long-term plan to replace volume price promotions and aisle placement restrictions with “smarter regulation focussed on outcomes” – no timescales
- FDF assessing impact of implementation of 2018 NPM on categories

Impact to categories

Category	Category (2004/5 pass rate)	Category (2018 NPM pass rate)
All fail (0% pass)		No added sugar juices and smoothies (0%) Ice cream and lollies (0%)
Largely Fail (<20% pass)	Ice cream and lollies (5%) Cakes and cupcakes (8%) Confectionery (11%) Sweet biscuits and bars (13%)	Cakes and cupcakes (1%) Confectionery (2%) Sweet biscuits and bars (7%) Savoury snacks (7%) Desserts and puddings (11%) Breakfast cereals (18%)
Some pass (20% – 79% pass)	Savoury snacks (43%) Pizza (50%)* Desserts and puddings (74%) Breakfast cereals (79%)	Pizza (25%)* Soft drinks (46%) Yogurt and fromage frais (47%) Morning goods (67%)*
High proportion pass (80% or more)	Soft drinks (81%) Morning Goods (83%)* Yogurt and fromage frais (85%) Ready meals, meal centres, breaded / battered products (98%) Potato Products (98%)	Ready meals, meal centres, breaded / battered products (89%) Potato products (94%)

*Based on limited data

Since the previous meeting, extra data has been received for categories in red

fdf



CONFIDENTIAL – please do not share.

Based on data received from members by the FDF

Food Strategy for England

- [‘Towards a Good Food Cycle’](#) framework published 15 July (FLC 223/25)
- High-level strategy - UK Government’s long-term vision to create a food system that is healthier, more affordable, sustainable and resilient – no policy announcements
- Based on [10 priority outcomes into 4 key areas](#):
 - **Healthier and more affordable food** – includes some of the work on the ‘10-year health plan’:
 - promotion/advertising restrictions HFSS foods, reformulation programmes and GBSF, School Food Standards, Eatwell Guide and FDTP.
 - **Good growth**
 - **Sustainable and resilient supply**
 - **Vibrant food cultures**
- [Defra/IGD 1st Food Strategy webinar](#) on 2 October
- Action plan **exp. Spring 2026**

PPA members' progress

Salt and Sugar Reduction Targets - SNACKS

Data analysis on information supplied by members on **sugar and salt** values in their products for the period **1 April 2024 – 31 March 2025**.

Crisps and snacks (salt):

- Standard crisps (provisional): SWA 1.16g/100g (↓0.08g/100g) – **meets 2024 targets** (1.25g/100g)
- Extruded snacks: SWA 1.34g/100g (↓0.05g/100g) – **meets 2024 targets** (1.61g/100g)
- Pelleted snacks: SWA 1.94g/100g (↓0.13g/100g) – **now meets 2024 targets** (2.03g/100g)
- Salt & Vinegar Products: SWA 1.81g/100g (↓0.05g per 100g) – **does not meet 2024 targets** (1.78g/100g)

Flavoured nuts and popcorn (salt):

- Flavoured nuts: SWA 1.33g/100g (↓0.05g/100g) – **does not meet 2024 targets** (1.00g/100g)
- Savoury Popcorn: SWA 1.04g/100g (↓0.26g/100g) – **now meets 2024 targets** (1.23g/100g)
- Sweet Popcorn (provisional): SWA 0.83g/100g (⚖ since 2022/23) – **does not meet 2024 targets** (0.76g/100g)

Popcorn (sugar):

- SWA 30.4g/100g (↓0.02g/100g) – **meets 2020 targets** (48.4g/100g)
- 100% of products meet 5% reduction targets (vs. 99.8% 2023-2024).
- **62.5% of products meet 20% reduction target** (vs. 62.2% 2023-2024).

Salt data 2025 – SNACKS (Provisional)

Product Category		FSA 2012 Targets	SNACMA April 2014 Status	SNACMA April 2015 Status	SNACMA April 2016 Status	PHE 2017 Targets	SNACMA April 2017 Status	SNACMA April 2018 Status	SNACMA April 2019 Status	SNACMA April 2020 Status	SNACMA April 2021 Status	SNACMA April 2022 Status	SNACMA April 2023 Status	PPA April 2024 Status	PPA April 2025 Status	PHE (OHID) 2024 Targets
Standard Crisps	Ave.	1.38	1.33	1.33	1.30	1.31	1.26	1.28	1.26	1.28	1.28	1.25	1.23	1.24	1.16 ^f	1.25
	Max	1.63	-	-	-	1.45	-	-	-	-	-	-	-	-	-	1.38
Extruded Snacks	Ave.	1.88	1.83	1.69	1.64	1.7	1.71	1.59	1.65	1.59	1.55	1.43 ^c	1.43	1.39 ^c	1.34 ^f	1.61
	Max	2.5	-	-	-	2.0	-	-	-	-	-	-	-	-	-	1.90
Pelleted Snacks	Ave.	2.25	2.10	2.10	2.11	2.13	2.10	2.05	2.06	2.12 ^a	2.14 ^b	2.01 ^c	1.90 ^c	2.07 ^d	1.94 ^f	2.03
	Max	No Max	-	-	-	2.88	-	-	-	-	-	-	-	-	-	2.73
Salt & Vinegar Products (all)	Ave.	2.13	1.98	1.98	1.97	1.88	1.98	2.03	1.94	1.99	1.90	1.83 ^c	1.83	1.86 ^e	1.81 ^f	1.78
	Max	3.0	-	-	-	2.5	-	-	-	-	-	-	-	-	-	2.25

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

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

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

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

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

^f Decrease largely related to reduction of sodium in products or introduction of new lower sodium products.

PHE (OHID) 2024 salt reduction targets:

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

Salt data 2025 – Popcorn (Provisional) and Nuts

Product		SNACMA April 2020 Status	SNACMA April 2021 Status	SNACMA April 2022 Status	SNACMA April 2023 Status	PPA April 2024 Status	PPA April 2025 Status	PHE (OHID) 2024 Targets
Flavoured Nuts	Ave.	1.54	1.54	1.50	1.39	1.38 ^c	1.33 ^e	1.00
	Max	-	-	-	-	-	-	1.20
Savoury Popcorn	Ave.	1.76	1.52	1.50	1.27 ^c	1.30 ^d	1.04 ^c	1.23
	Max	-	-	-	-	-	-	1.44
Sweet Popcorn	Ave.	0.77	0.80 ^a	0.88 ^b	0.83 ^c	0.83	0.83	0.76
	Max	-	-	-	-	-	-	1.00

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

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

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

^d Increase due to large increase in sales.

^e Decrease due to introduction of lower salt product and decrease in sales.

PHE (OHID) 2024 salt reduction targets:

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

Sugar data 2025 – Popcorn (Final)

Year	PHE Sales Weighted average (g per 100g)	Target 5% reduction (g per 100g)	Target 20% reduction (g per 100g)	SNACMA Sales Weighted Average (G per100g)	SNACMA Minimum (g per 100g)	SNACMA Max (g per 100g)
2017	60.6	57.5	48.4	38.0	15.9	64.0
2018-2019	60.6	57.5	48.4	34.8	1.0	64.3
2019-2020	60.6	57.5	48.4	36.6	1.0	64.0
2020-2021	60.6	57.5	48.4	35.1	1.0	64.0
2021-2022	60.6	57.5	48.4	33.8	1.1	64.0
2022-2023	60.6	57.5	48.4	30.4 ^a	1.0	64.0
2023-2024	60.6	57.5	48.4	30.6 ^b	1.0	65.4
2024-2025	60.6	57.5	48.4	30.4^c	1.0	53.0

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

^b Increase primarily due to an increase in sales.

^c Reduction mainly due to removal of sugar.

Total 16 products, of which:

- 100% of volume meet PHE SWA baseline
- 100% of volume meet PHE's 5% reduction targets
- **62.5% of volume meet PHE's 20% reduction targets**

PHE 2020 sugar reduction targets:

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

PPA members' progress

Salt and Sugar Reduction Targets - POTATO

Data analysis on information supplied by members on **salt** values in their products for the period **1 April 2024 – 31 March 2025**.

Processed potato products - (SWA for entire category 0.39g/100g)

- Chips with coatings: SWA 0.28g/100g (↓ 0.03g/100g) – **meets 2024 targets**
- Waffles, shapes and hash browns: SWA 0.48g/100g (↓ 0.04g/100g) – **still above 2017 targets (0.46g/100g)**
- Wedges, mash and others: SWA 0.52g/100g (↑ 0.18g/100g) – **now above 2017 targets (0.46g/100g)**
- All processed potato products (except dehydrated mash): SWA 0.32g/100g (↓ 0.01g/100g) – **meets 2024 targets**

Collectively, the category 'All processed potato products (except dehydrated mash)' continues to meet 2024 targets.

Processed Potato Products 2025 – Salt (Final)

Product Category		FSA (DH) 2012 targets	SNACMA April 2013 Status	SNACMA April 2014 Status	SNACMA April 2015 Status	SNACMA April 2016 Status	PHE 2017 targets	SNACMA April 2017 Status	SNACMA April 2018 Status	SNACMA April 2020 Status	SNACMA April 2021 Status	SNACMA April 2022 Status	SNACMA April 2023 Status	PPA April 2024 Status	PPA April 2025 Status	PHE (OHID) 2024 Targets
Chips with Coatings	Ave .	0.49	-	-	-	-	0.46	-	0.43	0.41	0.29	0.29	0.29	0.31 ^a	0.28 ^b	0.39
	Max	0.75	-	-	-	-	0.69	-	-	-	-	-	-	-	-	0.65
Waffles, Shapes & Hash Browns	Ave .	0.49	-	-	-	-	0.46	-	0.65	0.63	0.69	0.62	0.57	0.52 ^b	0.48 ^b	0.39
	Max	0.75	-	-	-	-	0.69	-	-	-	-	-	-	-	-	0.65
Wedges, Mash & Others	Ave .	0.49	-	-	-	-	0.46	-	0.57	0.41	0.47	0.40	0.36	0.34 ^c	0.52 ^d	0.39
	Max	0.75	-	-	-	-	0.69	-	-	-	-	-	-	-	-	0.65
Processed Potato Products (all*)	Ave .	0.49	-	-	-	-	0.46	-	0.47	0.43	0.33	0.33	0.33	0.33	0.32	0.39
	Max	0.75	-	-	-	-	0.69	-	-	-	-	-	-	-	-	0.65

* Except dehydrated instant mash.

^a Increase mainly due to an increase in sales.

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

^c Decrease due to a reduction in sales.

^d Increase due to a combination of sharp increase in sales and addition of new lines with higher salt content.

PHE (OHID) 2024 salt reduction targets:

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

NDNS Y12-15

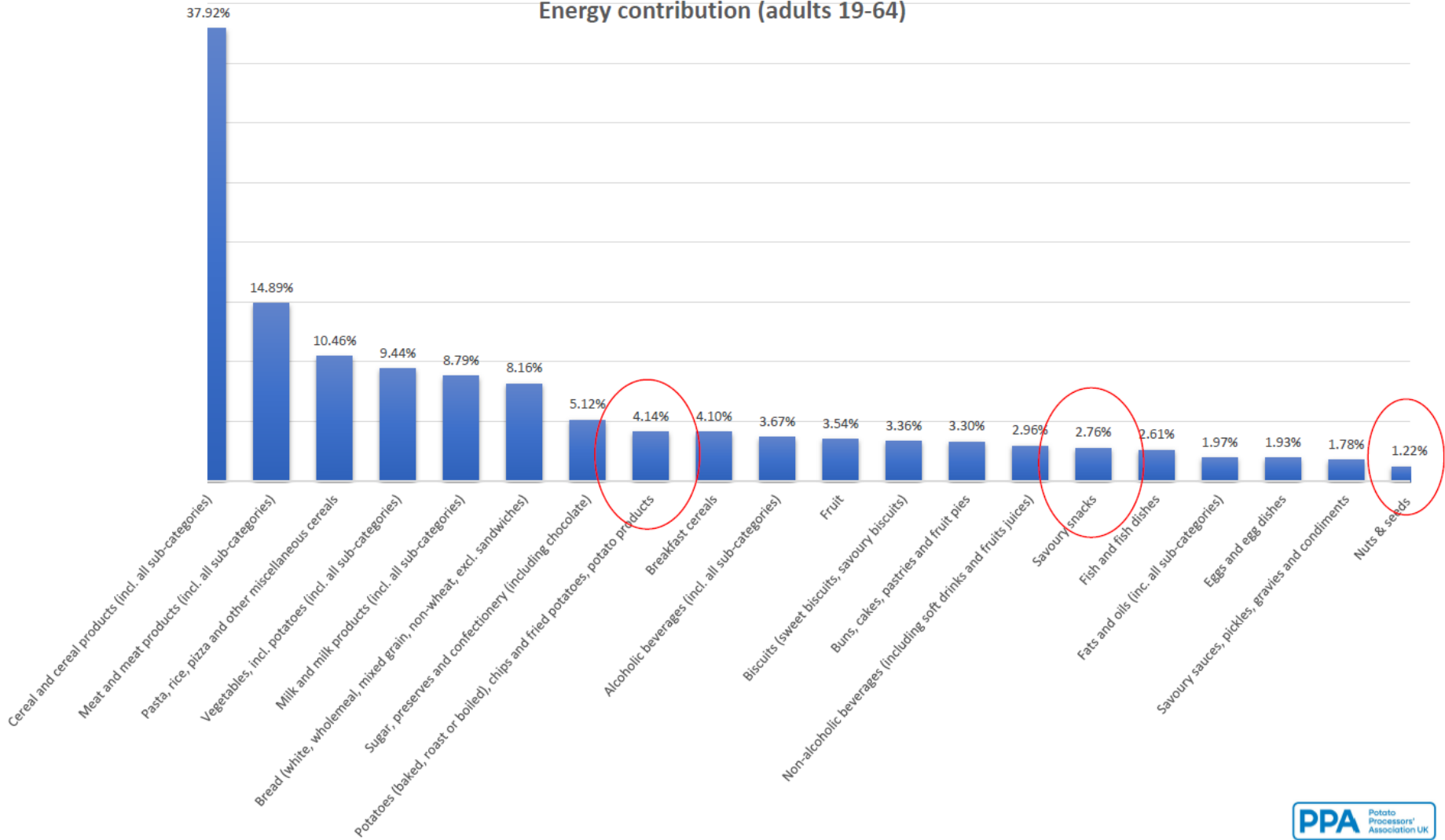
- Published June 2025 (FLC 183/25) - [National Diet and Nutrition Survey \(NDNS\) for years 12-15 \(2019-2023\)](#)
- Nutrition (energy, total fat, saturates and sodium) contribution analysis by PPA in October (FLC 328/25)
- Members' product categories generally low contributors to energy, and saturate intakes
- Snacks higher contributors towards children's intakes of sodium and total fats – much less significant contributions for adults
- Still waiting for OHID response on consumption data

Nutrient contribution adults 19-64			
	Savoury snacks	Nuts and seeds	Potatoes*
Energy	15 th (2.76%)	20 th (1.22%)	8 th (4.14%)
Fat	8 th (4.10%)	16 th (2.63%)	10 th (3.86%)
Saturated fats	18 th (1.33%)	15 th (1.50%)	12 th (2.45%)
Sodium	9 th (2.82%)	22 nd (0.25%)	16 th (1.16%)

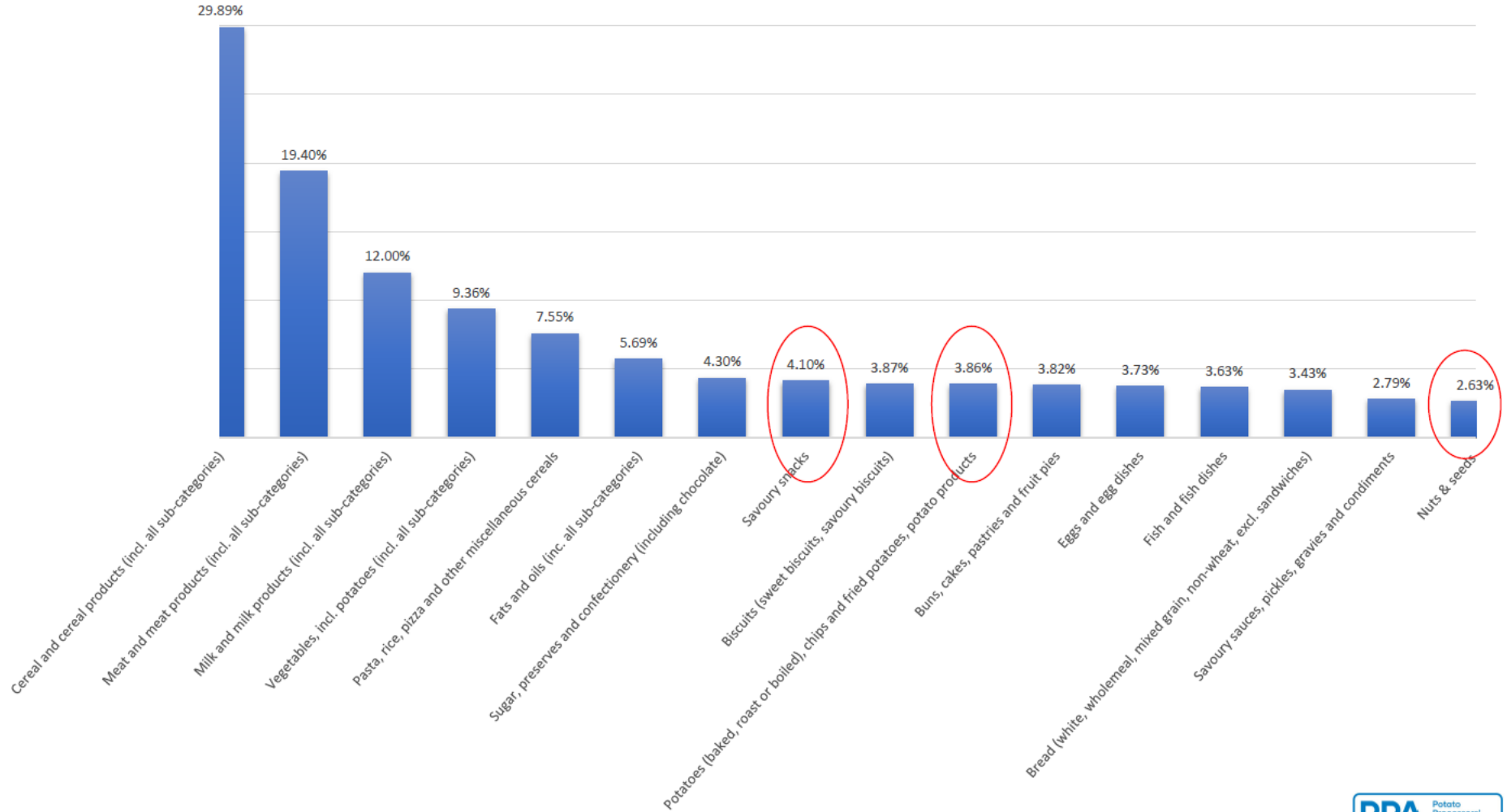
*Incl. baked, roast or boiled, chips and fried potatoes, potato products



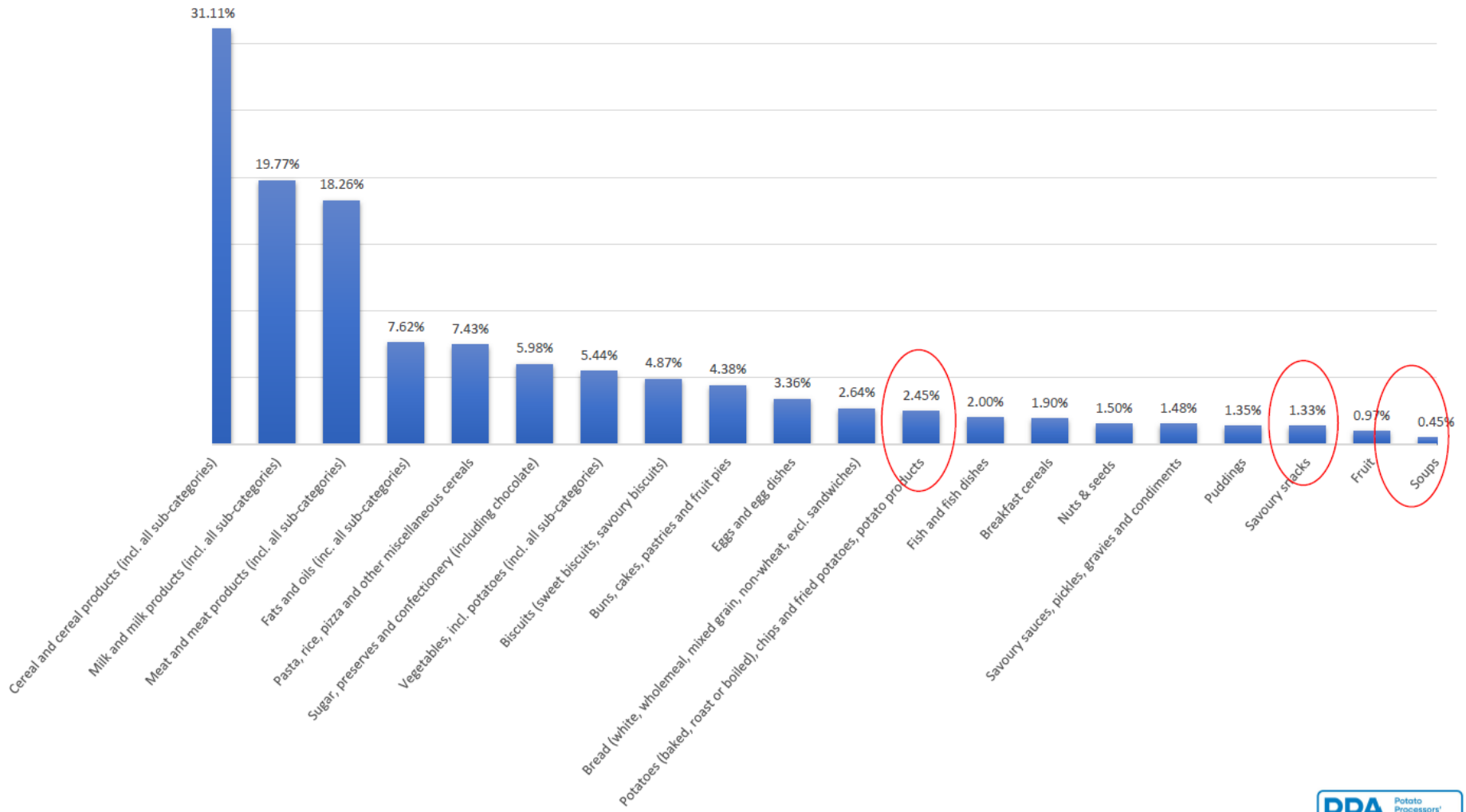
Energy contribution (adults 19-64)



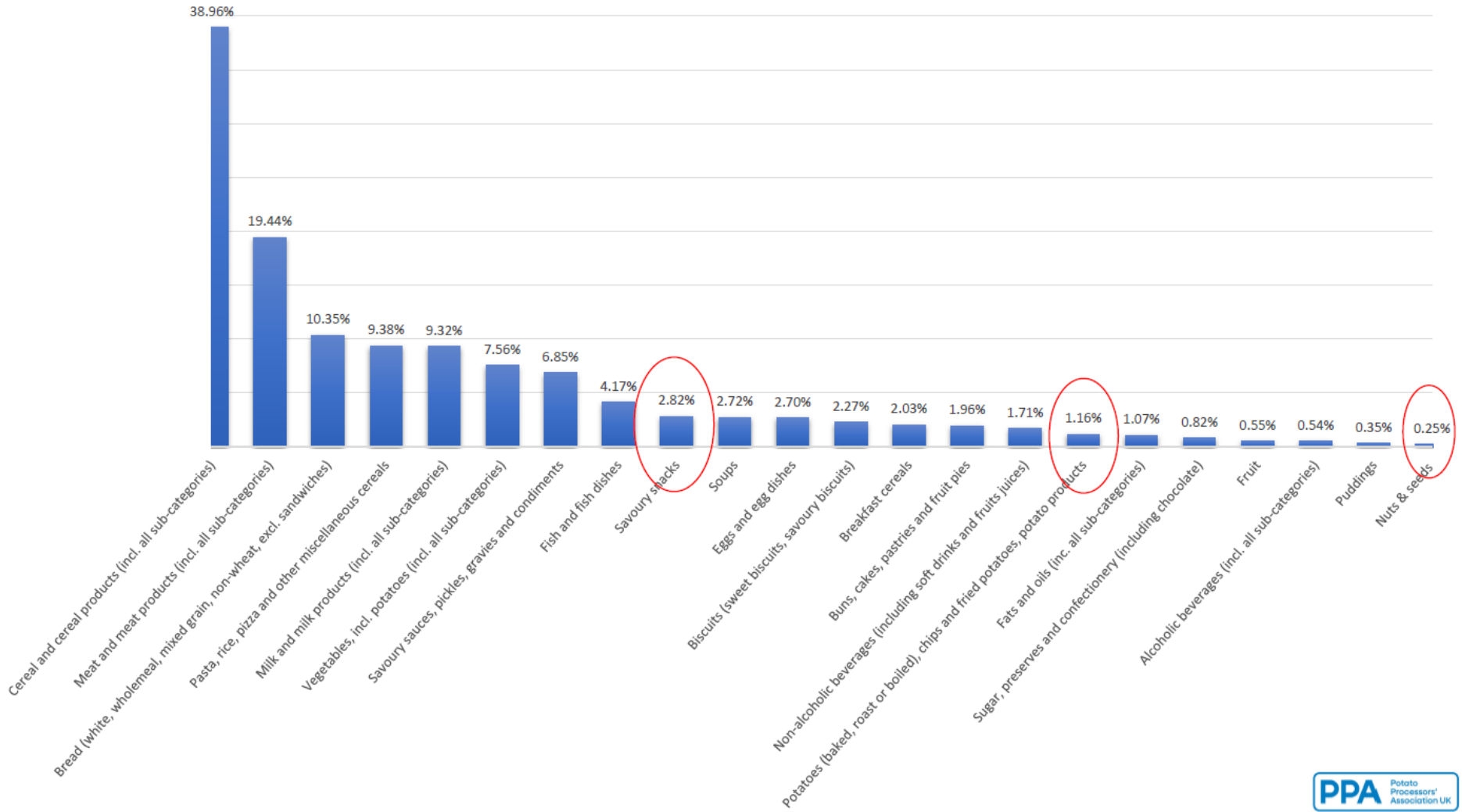
Total Fat (adults 19-64)



Saturates (adults 19-64)



Sodium (adults 19-64)



OTHER DIET & NUTRITION

National Child Measurement Programme (NCMP) for 2024/25

- Highest prevalence of obesity in reception (ages 4-5) since NCPM began (2006/07) (excluding Covid-19) – 10.5% - affecting both the most and the least deprived areas
- Obesity prevalence in year 6 (ages 10-11) (22.2%) more than twice as high as in reception (10.5%), but similar to last year
- Severe obesity prevalence in year 6 (5.6%) was higher than in reception (2.9%)
- Large differences in prevalence remain between ethnic groups and levels of deprivation
- Regional/local obesity prevalence mostly driven by persistent inequalities by ethnic group and deprivation.
- [Government response](#) – improve ‘out-of-date’ NPM, reporting of less healthy food sales by large businesses and targets

WG summary of responses to consultation on Healthy Eating in Schools (FLC 313/25)

- Ambition to update [Healthy Eating in Schools \(Nutritional Standards and Requirements\) \(Wales\) Regulations 2013 by 2030](#)
- WG will now review all responses and make any necessary changes to the draft legislation
- WG will assess the evidence submitted concerning secondary school learners, with the findings informing future policy decisions
- No further information has been provided regarding the timeline for next steps

OTHER DIET & NUTRITION

HoC Health and Social Care Select Committee inquiry (FLC 225/25)

- Public health interventions most effective at reducing obesity and the consumption of LHF and failures of existing policies in reducing obesity.
- Call for evidence – closed August
 - FDF response (FLC 257/25)
- Inquiry ongoing – oral evidence sessions on 15 October and 5 November
 - Next session **3 December – FDF to give oral evidence**

UPF:

- 2025 EAT-Lancet Commission on healthy, sustainable, and just food systems (FLC 314/25):
 - *Healthy diet – Planetary Healthy Diet - mostly plant-based, modest amounts of animal-sourced foods, and minimal added sugar, saturated fat, and salt.*
 - *UPF processes: “Processes that destroy the structure of whole foods, chemically alter their components, and assemble them with various sensory-related additives into products that are liable to displace unprocessed or minimally processed foods and freshly prepared dishes and meals, are considered ultra-processing”*
- Lancet Series on UPF and Human Health - event 18-19 November – 3 paper series
- Follow-up SACN review exp. 2026
- UKRI report on public perceptions on UPF – exp. early 2026
 - No plans for regulatory action at this stage
- EU study on consumption of UPF in Vision for Agriculture and Food (FLC 054/25) – 2026 the earliest
- IARC report on UPF – October 2026 (the earliest)
- WHO guidelines on UPF – exp. 2027

OTHER DIET & NUTRITION

EU Cardiovascular Plan

- EU Cardiovascular plan: **Exp. December 2025** – highlights unhealthy diets as a concern
 - Likely to include measures to tackle NCDs
- FILERED conference – 04-05 November – joint declaration to tackle harms of tobacco, nicotine, alcohol and unhealthy food
 - Recommendations include FOPNL and/or health warnings, bans and restrictions to promotion, sponsorship and advertising and lobbying controls on industry.

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

- Work delayed – publication no longer expected in 2025
- Call for evidence – timings TBC.

FOOD LABELLING, COMPOSITION & REGULATION

FSA Food Strategy Workshop (FLC 358/25)

- PPA invited to join workshop on FSA Food System Strategic Assessment 2025 – **19 November**
- Aim is to **steer FSA's work** (and other government departments/agencies) over the **next 10 years**.
- Identify and prioritise emerging issues that could change the **food safety, food security, and the regulatory system**
 - *Which emerging societal, economic, technological and environmental issues will impact the UK food system and how (i.e. benefits, opportunities and threats)?*
 - *How will those changes impact FSA's ability to deliver its mission (i.e. opportunities, challenges)?*
- Final assessment exp. **mid-2026**

Horizon Scanning of UK's food system

Potential weak signals of
emerging issues for the
food system
October 2025



MEMBERS: Priority themes for consideration?

Social:

3. Upward trend in food business hygiene compliance
12. Rural economies recognised as the most vulnerable to climate change impacts
13. Inequality risks from differing farmer capacities to diversify, adapt and be part of the Net Zero transition
15. Healthy foods identified as more expensive and less accessible to consumers, particularly compared to HFSS products
18. Increasing consumer understanding of food, environment and health, and concern for sourcing and production
19. High sugar and salt content in food products remain concerns, with calls for more government action, particularly around advertising of HFSS products
20. Opportunity for food fortification to improve food security and nutritional intake via 'agronomic biofortification'
21. Opportunity to standardise health and environment labels on food products
25. Increasing public concern about foods for babies, toddlers and children (unhealthy and with misleading information)
26. Increasing consumer awareness of and concern about ultra-processed foods (UPFs)

Environment:

31. Risks of food insecurity and desire for greater self-sufficiency in the UK
 32. Continued increase in pressure on natural resources, with cascading effects and risks for the food system
 35. Continued increase in greenhouse gas emissions and global warming
 36. Continued dependence on fossil fuels in the food sector
 37. Rising threats to food security from pests and disease
 42. Water insecurity in the food supply chain
 44. Increasing scrutiny on industrial / factory farming practices in the UK
 45. Increasing crop diversification in UK farming
 48. Rise of regenerative agriculture and agro-ecological approaches - KEY ISSUE
- ## Politics:
49. The changing domestic political landscape
 50. Food security as national security
 51. UK government launched new food strategy for England to create a "Good Food Cycle"
 52. Rising cost of public health spending and efforts to curb obesity-related illnesses
 53. Impact of new fiscal policies on farmers' livelihoods and farm viability
 54. Erosion of trust between farmers and government - KEY ISSUE
 55. Labour shortages for skilled farmwork threaten resilience
 56. Government aims to reduce reliance on seasonal migrant workers
 58. Rise of misinformation on social media - KEY ISSUE
 59. Growing interest in governance of supply chain sustainability risks

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58. Rise of misinformation on social media - KEY ISSUE
59. Growing interest in governance of supply chain sustainability risks
60. Geopolitical risks may impact global supply chains
61. Growing concern for fairness in the supply chain
62. Government commitment to farming, food security, and nature recovery in Spending Review - KEY ISSUE
67. Increased policy consideration for how to optimise land use
69. Public sector procurement as a means to drive food system change
70. Lack of public trust in food companies to prioritise health over profits without government regulation
71. Post-Brexit trading relationships continuing to reshape food markets

Legal:

72. UK-EU reset deal and SPS agreement
 73. European Union Deforestation Regulation (EUDR) reshaping supply chains, procurement, and legal accountability across borders
 74. PPWR: A New Era in EU Packaging Circularity
 75. England diverges on gene editing regulation
 76. UK precision breeding progress may be delayed by new UK-EU SPS Agreement
 77. Legal action on river pollution highlights growing scrutiny of agricultural practices
 80. Emerging legal challenges to Ultra-Processed Foods
 82. Defra consults on making food labelling clearer
 84. EU food law increasingly emphasising preventative and risk-based approaches to foodborne bacteria
- ## Economy:
87. Global food system facing rising inequalities and emissions risks
 88. Geopolitical pressure on food production
 89. UK-EU trade reset: implications for food prices and the economy
 90. Impacts of the UK Extended Producer Responsibility (EPR) Scheme on the food system - KEY ISSUE
 91. Fragility of global fertiliser markets
 94. Long-term destabilisation of UK’s rural communities and food system
 97. From ultra-processing to nutrient fortification: redefining UK food manufacturing

Technology:

101. Smart QR codes will replace traditional ones in five years
103. Packaging transitions from container to multi-functional interface
110. UK Launches On-Farm Gene-Edited Crop Trials
113. Sustainable processing technologies gain industry attention
123. Plant-cell culture technology emerges for high-value crops
126. Digital technologies transform food logistics systems
127. AI-driven food safety monitoring gains industry traction

FSA Guidance on Clear Food Labelling (FLC 343/25)

- Work conducted by the BExG Food Standards and Labelling sub-group
- Sub-group convened following discussions with Defra: incl. PPA, BRC, NFU, PTF, CRN UK, Dairy UK,
- Input from RNIB re. legibility
- Badging of document TBC – Defra/FSA?
- Questions for consideration:
 - How useful is this piece of guidance?
 - RNIB: “Manufacturers are increasingly using packaging to communicate directly to the public, such as allergen and recycling details. In RNIB’s view, this is the provision of a service/ facility to the public and manufacturers are therefore required by the Equality Act 2010 to make this information accessible”. Keep it?

- Grouping of labelling information:

Wherever possible, the mandatory information should be grouped together on any single face of the pack, or in the same field of vision on the pack. However, it is recognised that the size and shape of the packaging can impact grouping of the information.

Where grouping together is not possible, consideration should be given to how the consumer uses the information. As a general guide:

They should know what the product is: Thus, it is recommended that where possible, the legal name, ingredients declaration and PAL information be displayed together.

They should be able to understand how to use the product: Thus, it is recommended that where possible, any warnings, storage instructions and usage instructions be displayed together.

- Section on Accessible QR Codes? Any objections?
- What other pieces of guidance would you like the BExG to consider?

OTHER LABELLING, COMP. and REGS.

- **Bread and Flour Regulations – folic acid implementation**
 - UKFM: Most UK flour now fortified, with some still implementing/to implement (FLC 334/25)
 - [FSA consumer-facing guidance](#) – published 8 October (FLC 334/25)
 - [FSAI guidance to Irish businesses](#) sourcing UK flour – pragmatic solutions, incl. overstickering, to be agreed on a case-by-case basis (FLC 339/25)
 - [EC support](#) for “pragmatic and proportionate approach that does not undermine consumer protection and public health.”
- **BMG/ADAS project**
 - BMG ADAS paper ‘Food Labelling: Costs requirements relative to prospective benefits’ due in **Autumn 2025**
Webinar on 23 October (FLC 364/25)
 - Average total cost per label change estimated at £8,351
 - “hidden costs” need to be identified by businesses and incorporated into IA.
 - Several policy recos, incl. phased transition periods, financial support for SMEs, digital labelling alternatives and regulatory guidance and collaboration
 - [FDF 'Changing Food and Drink Labels' explainer](#) resource now available (FLC 273/25)
- **Defra Agri-Food Chain Directorate changes (FLC 360/25)**
 - Came into effect 3 November
 - 5 core divisions aligned with outcome of Food Strategy: Strategy and Coordination; Growth, Technology & Trade, Environmental Sustainability, Food Security and Supply Chain and Food and Farming Evidence
 - Food labelling and compositional standards teams under Growth, Technology & Trade and now includes marketing standards and SPS coordination.

OTHER LABELLING, COMP. and REGS.

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

- ISO International Standard on Plant-Based Foods ([ISO 8700:2025](#)) **published**
- PAS 224:2020 on '[100% plant-based foods](#)' – revision **exp. 2026**
- No update on FSIFG opinion on dairy descriptors for plant-based products.

- **Allergen labelling - UK**

- No updates – update on Dec.25 FSA Board meeting
- Briefing paper from UKFM on adventitious contamination of wheat flour with non-wheat cereals (FLC 359/25)

- **Smoke flavourings UK**

- 8 smoke flavourings approved for use in the UK now listed in the [GB Register](#).
- Risk assessment ongoing – now **exp. end of 2025**

OTHER LABELLING, COMP. and REGS.

- **Smoke flavourings EU**
 - [Schedule](#) on the phase-out measures has been shared on the Commission website.
 - New [EC working document and Q&A](#) on phase-out measures published July (FLC 236/25).
- **EU enzymes - review**
 - EFSA's evaluation of 78 enzyme dossiers is still ongoing
 - Union list **exp. 2028**
 - Transitional measures still being debated – AMFEP proposal 36 months.
 - Labelling framework TBC
- **EU Simplification omnibus**
 - EC plans to simplify EU food and feed safety legislation – Vision for the Future of Agriculture
 - [Omnibus consultation](#) incl. PPPs and biocides, digital labelling, hygiene, official controls, laboratories, fermentation products and GMMs – closed 14 October
 - FoodDrinkEurope reco incl. review of labelling, incl. digital, FCMs, contaminants, PPPs, official controls, etc.
 - EC: No plans to progress on general food labelling or NHC – but plans on PAL
 - **Exp. Q4 2025**
- **[Meeting Expert Group FIC Regulation](#) – 21 October**
 - Reconvened first time since 2023
 - Purpose to follow up ECA report '[Food labelling in the EU: Consumers can get lost in the maze of labels](#)'
 - EC confirmed all recos accepted and scheduled for implementation by end of 2027.
 - recommendations on PAL, COOL, labelling of alcoholic beverages, analysis of labelling practices, monitoring of consumer needs /consumer understanding of food information, and improvement of consumer understanding of food labelling.
 - JRC presentation on plans for research of food labelling practices within the EU market
 - NL PAL legislation

OTHER LABELLING, COMP. and REGS.

• EU CMO Review

- [EC proposal on CMO Regulation \(Regulation \(EC\) 1308/2013\) Review](#) - July
- Bans 29 meat terms for plant-based products, incl. 'beef', 'chicken', 'bacon'
- [EP adopted its position](#) on 7 October – also bans 'steak', 'sausage' and 'burger', and others.
- Ongoing - next trilogue **12 November**
 - **Plan to finalise negotiations end 2025 –plenary vote January 2026.**
- ESA proposal for explicit exemption for non-meat-substitutes categories —including savoury snacks, flavourings, seasonings, and condiments
- Also [2024 proposal](#) – awaiting decision from EP

• EU SAPP labelling (NL) (FLC 355/25)

- New EUPPA dossier on SAPP (E450i) status as a carry over additive – Oct.25
- Only covers whole, sliced and cut potato products – other products not covered by [Pfanni ruling](#) need to be assessed on a case-by-case basis.
- Follows ongoing legal challenge in NL

• EU recycling labelling/PPWR

- Proposals for EU harmonised system under PPWR – will apply from August 2026
- JRC final report **exp. end of November.**
- EC (DG ENV) to draft proposal and submit to EUMSs by **end of 2025/early 2026.**
- Consultancy commissioned to work labels and specifications under Art.12 PPWR
 - Reusable packaging, DRS subject packaging, recycled plastic content and bio-based plastic content
 - Digital label specs for reusable packaging (closed loop systems), bio-based and recycled content, and to inform consumers and operators about substances of concern
- FoodDrinkEurope providing input – flexibility of choice, technical feasibility, consumer education, design, colour, placement, existing labels and digital labels.

OTHER LABELLING, COMP. and REGS.

- **EU Green claims**
 - Future still uncertain
 - Danish presidency trying to reach agreement with Council and conclude negotiations with EP by end 2025.
 - Trilogues will only be resumed if consensus within Council
- **EU Empowering Consumers for the Green Transition (EmpCo)**
 - Better information on durability, repairability and legal guarantee rights at point of sale.
 - Strengthen rules against greenwashing and environmental claims
 - Unclear and generic environmental claims banned (e.g. *environmentally friendly*”, “*eco-friendly*”, “*green*”)
 - Significant penalties for non-compliance (4% annual turnover)
 - Directive must be transposed by EUMSs by 27 March 2026 and **apply from 27 September 2026**.
 - No exemption for products placed on the market before application date
 - Companies will need to over-sticker or withdraw products from the market
 - FoodDrinkEurope meeting with DG Just on 5 November:
 - DG Just seem to understand issues caused by lack of exhaustion of stocks clause - investigating
 - FoodDrinkEurope gathering evidence for DG Just
 - FoodDrinkEurope emphasising issues on lack of proportionality (enshrined in food law), cost and environmental implications and delays to FAQs causing uncertainty.
 - FoodDrinkEurope pushing for grandfathering/exhaustion of stocks clause and inclusion of this transition period in guidance.

OTHER LABELLING, COMP. and REGS.

- **Allergen labelling – NL**

- [NL Regulation on cross-contamination and PAL](#) will apply from **1 January 26**
- [Q&A document](#) (Dutch only) now issued by Dutch authorities (FLC 345/25)
 - Also see [NVWA page](#) and [news link](#)
- Understanding that rules WILL apply to all products sold in NL, including imports:
 - “Question: If products are produced abroad, must they comply with Dutch policy, or does mutual recognition apply here?
Answer: "Mutual recognition is indeed applicable. This means that the wording of a PAL, the justification for the PAL, and the risk assessment during production in another Member State may differ from Dutch policy. The Dutch government can analyze consumer products on the Dutch market, even if they are produced abroad. Foods without a PAL that still contain excessive levels of allergens are considered harmful. This is the case when analysis shows that the amount of allergen exceeds the action limit and the label does not mention the allergen (neither in the ingredients list nor via a PAL). See also the table above.
For products produced abroad for a brand owner in the Netherlands (private label), the use of a PAL must be substantiated with information from the foreign producer.
To determine whether a PAL is used on valid grounds, an assessment of the production process is necessary. The NVWA cannot assess whether products produced outside Dutch territory do or do not require a PAL according to the Dutch Precautionary Allergen Labelling Policy.”
- [FNLI training course](#) on 20 November

- **Allergen Labelling – EU**

- EU intention to proceed with work on PAL once Codex work is complete
- NL presentation at [EU Expert Group on Consumer Information meeting on 21 October](#)
- DG Sante: consensus amongst EUMS that EU level action is required.
 - EUMS raised comments around thresholds, two different wording proposals, exemptions for handcrafted foods and methods of analysis.

OTHER LABELLING, COMP. and REGS.

- **Allergen labelling - Codex**
 - FAO/WHO Recommendations on food allergen risk management – [summary and conclusions](#) published 16 July (FLC 238/25)
 - Detailed food allergen risk assessment framework will be published in the final report – **timings** **TBC.**
- **Food labelling in emergencies - Codex**
 - 2nd consultation paper – closes on 30 November
 - FoodDrinkEurope support for sharpening of definition of emergency, extension of expiry dates to prevent waste, simplified labelling format for emergency relief, flexibility on COOL and producer information, flexibilities in scope (e.g. FOP, composition, nutrition, guidance and timeframes)
 - FDF expressed support of FoodDrinkEurope submission to Defra.
- **GSLPF joint presentation and multipack format – Codex (FLC 299/25)**
 - 2nd consultation - closed 27 October
 - Comments at Step 3 for consideration at CCFL49 – 10-15 May 2026
 - FoodDrinkEurope comments (FLC 299/25) – GSLPF provisions sufficient – no need for further guidance (e.g. number of units. Support for guidance on date marking (earliest expiry date of individual units), separate lists of ingredients + allergens for each type of product (for multipacks of different products). Guidance on labelling of inner packages out of scope.

FOOD SAFETY

Acrylamide EU Regulatory discussions

Latest discussion: Commission Working Group on Environmental contaminants, 6-7 May 2025.

- 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 the MLs that were shared a few years ago during the stakeholder consultation.
 - COM will develop a formal proposal and will organise a virtual WG meeting to further elaborate this.
 - COM aims to finish technical discussions on MLs ‘by the end of the year’ [next WG discussion expected on 25 November 2025].

EUPPA meeting with Frans Verstraete (DG Sanco) 29 September 2025 – covered AA and GA

- Meeting followed the completion of an EUPPA position paper and update of the Code of Practice for French Fries.
 - Felt to have been a positive meeting, with FV sympathetic and knowledgeable about the issues for potato products.
 - Confirmed that BMLs for AA may be revised in the future if consistent mitigation trends are observed, but no urgency has been raised by EU MS at this stage.
 - The possibility of introducing MLs for AA was discussed. If introduced, MLs would apply to final products as placed on the market (e.g., potato crisps) may be impacted as RTE products, while frozen potato products would likely be excluded.
 - Discussions with EU Member States will resume this Autumn, focusing on AA data from 2019–2024.

Acrylamide data collection (1)

UK Food Standard Agency (FSA) call for data

- The UK FSA (and Food Standard Scotland) published a call for AA data on 30 July 2025.
LINK: <https://www.food.gov.uk/news-alerts/consultations/call-for-data-acrylamide-in-food>
- FSA/FSS is looking for data for all food categories where AA may form, and that is representative of the levels found in a range of products, including non-detects and high values. Data collected will be published as aggregated data and not attributed to an individual, business, trade body or organisation.
- Following consultation with ESA members, no objections were raised, and the secretariat has submitted the exact same information with FSA/FSS that is shared annually with EFSA (sliced potato crisp data only: 2020-2024).
- PPA asked EUPPA to share its data with FSA. Decision is pending (permission being sought from companies who supplied data).
POST MEETING NOTE: EUPPA has agreed to PPA sharing EUPPA's data with the FSA.

ESA Annual Data Collection Activity

As in previous years, ESA issued a call for AA occurrence data in a range of potato crisp and savoury snacks products. Dr Steve Powers (an independent statistician) has reviewed most of the data and has prepared a series of reports reviewing trends.

The following reports have already been issued:

- Report on ESA data on acrylamide in sliced potato crisps, updated with 2024 data (ECR 117/25)
- Report on ESA data on acrylamide levels in potato sticks and lattice type crisps, updated with 2024 data (ECR 140/25)
- Report on ESA data on acrylamide in vegetable crisps, updated with 2024 data (ECR 187/25)
- A further report on other savoury snacks (e.g., for dough based (formed) potato snacks, cereal snacks,) is awaiting finalisation.
- A request was also issued over the summer for data on processed nuts (close 3 October 2025, NPWG 136/25). Limited response received: Secretariat will discuss reporting options with Steve Powers.
- ESA has submitted a public access to data (PAD) request to EFSA for all occurrence data for AA in savoury snacks and nuts.

Acrylamide data collection (2)

Submission of AA data to EFSA

- ESA completed the annual submission of acrylamide data to EFSA in August. This year there were a total of 7,794 observations received from 11 producers of sliced potato crisps across Europe.
- EUPPA also completed its annual submission of acrylamide data to EFSA in August. This year there were a total of 836 observations.
 - Broadly stable between 2024 and 2025: limited data for some sub-categories.

Product	2025							2024			
	Number Samples	Samples Above Threshold	Mean (µg/kg)	Median (µg/kg)	Std Dev (µg/kg)	Min (µg/kg)	Max (µg/kg)	Number Samples	Samples Above Threshold	Mean (µg/kg)	Median (µg/kg)
French fries (500 µg/kg)	598	24 (4%)	155	103	159	10	1200	406	6 (1%)	137	95
Pancakes (750 µg/kg)	5	0	266	180	146	140	470				
Potato based dishes (750 µg/kg)	26	0	214	220	100	68	460				
Potato croquette (300 µg/kg)	68	7 (10%)	189	127	209	10	1200	43	1 (2%)	129	120
Rösti (800 µg/kg)	139	2 (1%)	222	200	143	56	1100	85	0	236	207
Overall	836	33 (4%)	171	130	162	10	1200	534	7 (1%)	152	118

Acrylamide: Guidance

Review of the FoodDrinkEurope AA Toolbox

- Over the summer FoodDrinkEurope issued a review of the introduction section of the AA Toolbox for comment (FLC 252/25, PPTC 169/25). A draft text of the toolbox is still anticipated later this year.

Draft ESA guide on managing AA in vegetable crisps

- ESA has circulated a draft guidance document for managing AA formation in sliced vegetable crisps, for members' input, builds and comments.
- The text was aligned with the format ESA developed in 2016 for potato crisps and dough-based snacks.
- It was also aligned with the existing requirements within the EU regulation on AA, recognising that the COM has previously proposed to set BMLs for these products and has proposed that they utilise the existing mitigation tools for potatoes.
- Three drafts have been circulated for comment (most recently draft with a deadline 31 October). A final text will be presented to ECR for endorsement before circulation to the ESA Board.

Codex Alimentarius

- In April 2024, Codex agreed to start work on a revised version of the Codex Alimentarius “Code of Practice for the Reduction of Acrylamide in Foods” (CAC/RCP 67-2009).
- A discussion paper was reviewed as part of the 18th Session of the Codex Committee on Food Contaminants, on 23-27 June 2025.
- The session agreed that more time was needed to develop the discussion paper, and to identify more information on mitigation strategies⁵¹ that could be included in the updated Code of Practice.

Glycoalkaloids: EU developments

EUPPA meeting with Frans Verstraete (DG Sanco) 29 September 2025 – covered AA and GA

The COM will continue analysing EFSA data as part of the monitoring process of GAs in potatoes.

- EC to assess reporting, analysis methods & potential induced gaps in the 2024 GAs data (2025 data collection submission).
- No regulatory steps are envisaged at this stage for the establishment of Benchmark or Maximum Levels for GAs.

EC works in close collaboration with the EURL (European Union Reference Laboratories) network to discuss matters related to analytical methods.

FV advised against using the term “compliant” in any reporting of GA data collection, as the current levels are indicative and could misleadingly suggest that formal maximum limits are in place.

MinGlyKa project

Monitor glycoalkaloid (GA) formation in processing potatoes due to post-harvest and storage conditions.

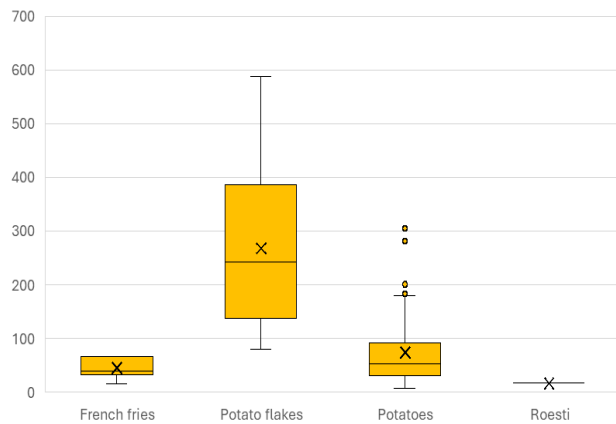
Assess GA degradation during manufacturing, including alkaloid degradation products.

Improve analytical methods (e.g., HPTLC) to detect GA derivatives like Solanidine, β/γ -Solanine, and Chaconine.

- Confirms: Raw material selection is key-low GA formation potential is crucial; Light exclusion significantly reduces GA; mechanical damage and warm storage had minimal impact.
- GA reduction during processing: French fries: up to 97% (fat-free dry matter basis); Potato crisps: up to 87%, but lower on fresh matter due to frying concentration effect. Highest GA levels found in products with peel.

Glycoalkaloids: EUPPA data collection

Distribution of GA levels per product category



Product (monitoring level 100 mg/kg)	Number of Samples	Samples Above Threshold	Mean (mg/kg)	Median (mg/kg)	Std Dev (mg/kg)	Min (mg/kg)	Max (mg/kg)
French fries	10	0	45	39	17	16	67
Potato flakes	13	11 (85%)	268	242	156	80	588
Potatoes	35	15 (43%)	102	82	72	16	305
Potatoes with peel	30	3 (10%)	49	37	42	8	187
Potatoes without peel	10	0	51	61	19	22	70
All potatoes	75	18 (24%)	74	53	62	8	305
Overall	99	29 (29%)	96 (excl. Flakes: 64)	62	104	8	588

- Levels varied significantly across product categories, **with potato flakes showing the highest concentrations and exceedance rates.**
 - Flakes in a dual capacity: ingredient and private label products in retail.
- Most French fries and peeled potato samples remained well below the 100 mg/kg threshold, indicating lower risk for these products.
- While the data shows **encouraging trends**, the **low number of samples may limit representativity.**

2025								2024			
Product (monitoring level 100 mg/kg)	Number Samples	Samples Above Threshold	Mean (mg/kg)	Median (mg/kg)	Std Dev (mg/kg)	Min (mg/kg)	Max (mg/kg)	Number Samples	Samples Above Threshold	Mean (mg/kg)	Median (mg/kg)
French fries	10	0	45	39	17	16	67	23	1 (4%)	40	33
Potato flakes	13	11 (85%)	268	242	156	80	588	5	5 (100%)	232	245
Potatoes	35	15 (43%)	102	82	72	16	305				
Potatoes with peel	30	3 (10%)	49	37	42	8	187				
Potatoes without peel	10	0	51	61	19	22	70				
All potatoes	75	18 (24%)	74	53	62	8	305	82	25 (30%)	79	56
Overall	99	29 (29%)	96 (excl. Flakes: 64)	62	104	8	588	110	31 (28%)	77	46

- Pretty consistent levels year-to-year, with no exceedances in French fries and similar mean values across most potato categories.
- **Potato flakes continued to show the highest concentrations and exceedance rates in both years, with a slight increase in mean and maximum values in 2025.**
- Potatoes showed a small increase in mean GAs levels and exceedance rate in 2025, perhaps due to a slightly higher variability in raw material.
 - Potatoes with and without peel remained below threshold in most cases, but variability persisted, especially in peeled samples.

3-MCPD-esters and Glycidyl-esters: EU developments

3-MCPD-esters and glycidyl 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 were 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.

- 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.

PPPs: Mancozeb

(fungicide used to control late blight in potatoes).

Mancozeb Summit, 3-4 June 2025, Rothamsted Research, Harpenden, United Kingdom

- UPL held a two-day workshop focused on discussing the agricultural benefits and importance of the mancozeb, including its legal status both in the EU and in the UK.
- The outcome was a 'white paper' which highlighted the importance of mancozeb as a disease management tool – a copy was then sent to UK Government.
 - PPA did not co-sign this document as there was no support indicated by members.
- A further letter was drafted over the summer asking UK Government to delay withdrawal of the mancozeb whilst the EU Court Case (below) was still being resolved.
 - Again, PPA did not co-sign this document as there was no support indicated by members.
- Ministerial response at start of October informed that the reasons for the GB decision were separate from the EU decision (and therefore the subject of the ECJ ruling).
- Informal discussion between GB Potatoes and HSE on possibility of emergency authorisation in future seasons.

EC Court case

- The EC withdrew authorisation for mancozeb in 2020, under Article 21. However, in 2024 the ECJ ruled that the EC had not followed the correct legal procedure
- On 1 July 2025, a further ECJ hearing took place. A final judgment was delivered in open court on 29 October 2025 in Luxembourg.
- The EU General Court agreed that the Commission did make errors in the evidence it used as regards reproductive toxicity. However the ban was upheld, as other issues with environmental safety and endocrine disruption were not resolved. UPL still has an opportunity to appeal.

Precision Breeding

Precision Breeding (England)

Summary of the responses to the Defra consultation carried out earlier this year (17 February 2025 and 14 April 2025) LINK:

<https://www.gov.uk/government/consultations/plant-varieties-and-seeds-framework-for-precision-bred-plant-varieties-in-england>

The consultation sought feedback on the proposed framework, including the proposed Precision Bred Plant Variety List for England, and the provision of information on precision bred seed and other plant reproductive material.

Key findings:

- Organic businesses were concerned about the implications for certification, citing the need for robust systems to identify and exclude PBOs.
- Concerns about negative impacts of the proposed variety list were most common among organic businesses and individuals.
- There was strong support for publishing the proposed Precision Bred Plant Variety List for England in the Plant Varieties and Seeds Gazette, but many respondents, particularly individuals and organic businesses, stressed that this should not be the only communication channel.
- Strong support for a central searchable register
- Businesses favoured clear labelling and inclusion in marketing materials.
- Individuals emphasised visibility at the point of sale.

The Genetic Technology (Precision Breeding) Regulations 2025 will come into force on 13 November, and the FSA has published draft technical and administrative guidance for applicants. Unsure how the UK-EU SPS agreement will impact upon this work.

SUSTAINABILITY

pEPR: Amending Regulations

Amendments laid in Parliament on 3 November 2025. Intended to come into force on 1 January 2026.

LINK: <https://statutoryinstruments.parliament.uk/instrument/WpL3Q7Hj>

LINK: https://www.legislation.gov.uk/ukdsi/2025/9780348276176/pdfs/ukdsi_9780348276176_en.pdf

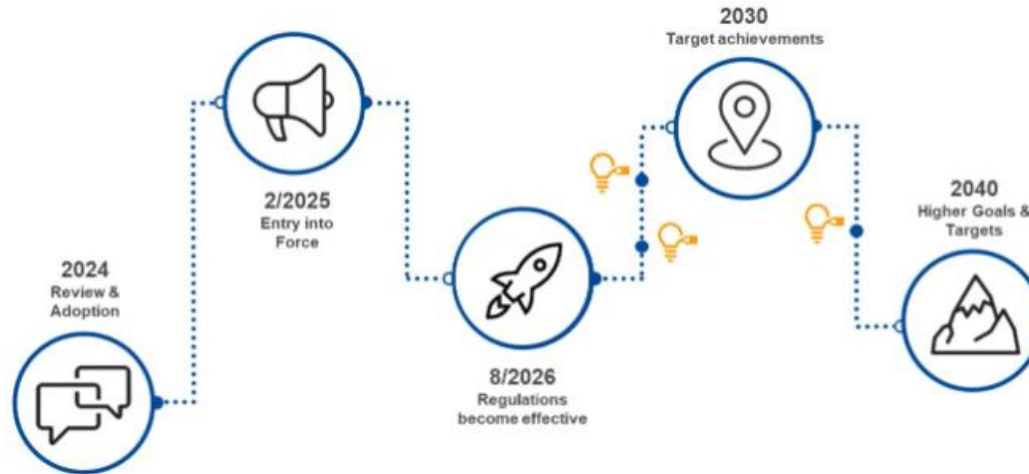
- Allows for appointment of an independent Producer Responsibility Organisation (PRO) to deliver pEPR alongside PackUK.
- The application window runs from 3 November to 12 December 2025, with appointment expected in March 2026. FDF consortium is front runner.
- Producers operating closed-loop recycling systems for food-grade plastics will be able to offset the tonnage they collect and recycle against their household disposal fees.
- A consultation on further Packaging Recovery Note (PRN) reforms will take place in early 2026.

Implementation

- PackUK has issued the [first invoices to packaging producers under the pEPR scheme. Based on 2024 data, the notices cover disposal costs from April 2025 to March 2026.](#)
- PackUK has published [the Recyclability Assessment Methodology \(RAM\) roadmap, a strategic overview of RAM development from 2025 to 2030.](#)
- Ecosurety [report](#) on retailer 'take-back' schemes for flexible plastics : Supports producers seeking to justify an amber rating under the RAM Assessment.

EU PPWR

Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC



The EU's Packaging and Packaging Waste Regulation (PPWR) came into force on 11 February 2025 with a hard implementation date of 12 August 2026.

HOWEVER, a number of implementation and interpretation issues are still open.

EU PPWR

Article 25 introduces restrictions on the use of certain packaging formats (listed in Annex V of the Regulation) prohibiting their placement on the market by economic operators from 1 January 2030.

- Annex V introduces a ban on the use of *‘Single-use plastic packaging used at the point of sale to group goods sold in bottles, cans, tins, pots, tubs, and packets designed as convenience packaging to enable or encourage consumers to purchase more than one product.’*
- A derogation is foreseen for grouped packaging necessary to facilitate handling, however there is significant uncertainty regarding the exact scope. For savoury snacks, uncertainty remains around use of multipacks.
- COM is obligated to publish guidelines by 12 February 2027, which explain Annex V in more detail, including examples of the packaging formats in scope, and any exemptions from the restrictions.
- In the absence of COM guidance FoodDrinkEurope has developed a position and is engaging stakeholders.
- EUROPEN has also developed its own approach, with a decision-tree (not fully endorsed by the FDE membership).

EU PPWR: EUROPEAN Flowchart

Is the packaging *single-use plastic packaging*?

no

Not in scope - the ban exclusively applies to single-use plastic packaging

yes and

Is the single-use plastic packaging *used to group a certain number of sales units at the point of sale*?

no

Not in scope - the packaging is not a grouped packaging used at the point of sale

yes and

Is the packaging used to group *goods sold in bottles, cans, tins, pots, tubs and packets*?

no

Not in scope - the ban exclusively applies to packaging grouping goods sold in the listed formats

yes and

Is the packaging used for a *temporary promotional offer to consumers, such as discounts or promotional sales*?

no

Not in scope - the packaging is not a convenience packaging

yes

Does the packaging present features that *enable the handling and transportation of product units by consumers**?

or

Does the packaging present features that *enable the handling and transportation of product units in distribution*?

no

If neither options apply

In scope - the packaging is not needed to facilitate handling

yes

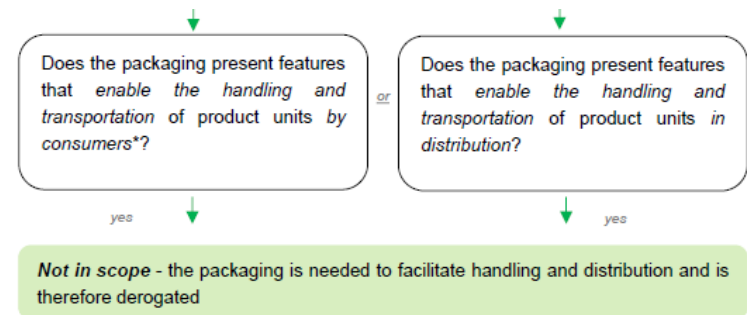
yes

Not in scope - the packaging is needed to facilitate handling and distribution and is therefore derogated

EU PPWR: EUROPEAN Flowchart

Examples of packaging excluded from the ban

Packaging format	Explanation
	While the single-use plastic packaging is used to group several bottles which can also be separately purchased by consumers at the point of sale, this group packaging is not used for a temporary promotional offer
	Multipacks are not a grouped packaging. They do not constitute a grouping of sales units and only enable consumers to purchase several individual portions of products
	The packaging is not a grouped packaging and presents features that facilitates the handling by consumers



Deforestation

UK Forest Risk Commodities Regulations (FLC 361/25)

- Defra recognises urgency of taking action on forest risk commodities - will set out approach in due course.
 - Working across government to agree the most effective way to reduce the impact of the UK's consumption of forest risk commodities on deforestation.
 - Aware of businesses' need for certainty on this in NI - will communicate the relevant arrangements at the earliest possible opportunity.
- Opportunities for alignment with EU – TBC
- UK ORBC (DBT) – [review due diligence in business conduct](#) – to include human rights and environment.

EU Deforestation Regulations (EUDR) (FLC 361/25)

- One-year postponement delay dropped in October (FLC 338/25)
- As it stands, EUDR applies from **30 December 2025** for **large and medium-size** businesses.
- [EC proposals on simplifications](#) on 21 October:
 - No due diligence statement for downstream operators
 - Exemption for micro and small businesses importing from low-risk countries (including the UK)
 - Longer transition period for **micro and small businesses** – **30 December 2026** - simplified declarations will be required
 - Longer grace period for **large businesses**, with **enforcement and checks** coming into force on **30 June 2026**
- Proposal awaiting sign off by the EP and Council – 16 EUMS still pushing for delay.

COMMITTEE MATTERS

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 (July 2025)

Risk Analysis	Current Issue Actions in hand Dynamic situation	Future Issue Plans in preparation	Managed issue Controlled/monitored Could reoccur Outstanding actions
Big Company Impact Cost Reputation Media	Acrylamide 3-MCPD/Glycidyl-Esters HFSS/LHF Advertising/Promotions restrictions Portion Size/Calories CIPC tMRL monitoring UK Devolved regulatory divergence Packaging waste/Taxation/EPR Ultra-Processed Foods	Food taxation FOPNL developments Salt/Sodium reduction (2024 targets) Nutrient profiling (Ofcom 2018 model consultation) UK/EU SPS Agreement	
Moderate Impact Cost Material availability Working practice	Environment Act (implementation)/EU Farm to Fork Strategy Food waste Allergens (precautionary labels/vegan) Bread and Flour Regulations implementation UK Border Target Operating Model (BTOM)	Eco-labelling/FDTP Environment workstream Nutrient Profiling (EU F2F Strategy) 10-year Health Plan for England 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 NIRMS/'Not for EU' labelling
Small Impact Cost Materials Change	EU Flavourings reviews Sugars (popcorn) EU MOAH/MOSH	UK Recycling labelling EU PFAS GBSF/CQUIN Plant-based/vegan and vegetarian definitions Glycoalkaloids Furans	

New issue

Changed priority

Identified as a potential high-profile media issue

Decreasing impact on business ↓

AOB

Dates of next 2026 meetings

2026 dates TBC

 Secretariat to circulate Doodle poll with potential meeting dates for 2026

 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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