

**PPA Food Law and Consumer (FLC) Committee
Minutes of the meeting 12 November 2025,
Teleconference**

<u>Participants:</u>		<u>Guest speakers</u>	
Catharine Hall	KP Snacks (Chair)	Simon Dadd	FSA
Andrew Curtis	PPA (Secretariat)	Sam Faulkner	FSA
Vanessa Richardson	PPA (Secretariat)	Ilona Fleischmann	Euromonitor
Gillian Black	Taylor’s Snacks		
Shane Green	McCain		
Claire Hassell	Proper Snacks		
Darren Hewish	Tayto Group	<u>Apologies</u>	
Jyoty Modha	PepsiCo	Michael Brown	Proper Snacks
Sara Stanley	Proper Snacks	Joana Marques	Barcel (non-member)
Susana Rivera	Barcel (non-member)	Charlotte Pick	McCain
Stuart Williams	PepsiCo	Meredith Williams	McCain

1) Welcome and anti-trust guidance

Members were welcomed to the meeting and asked to observe the new PPA Competition Law Statement, which was read out loud. Members were pointed to the full statement which can be found on the [PPA website](#). Given the presence of new members and one non-member (Barcel), introductions were undertaken.

2) Review of meeting minutes (1 July 2025) and any actions arising

The Committee confirmed that the minutes of the previous FLC meeting held on 1 July 2025 (FLC 261/25) were correct and proceeded to review the actions arising from the meeting. See slides for details. In addition, please note:

- **Department for the Environment, Food & Rural Affairs (Defra) visit:** At the last couple of meetings, the Secretariat informed members that the new Defra labelling team was interested in visiting members’ factories. Unfortunately, no requests were received. The item has been marked as ‘completed’, but if any members are interested in hosting a visit, please contact the PPA Secretariat.
- **Secretariat to carry out an analysis of NDNS (National Diet and Nutrition Survey) data once raw data is made available:** Partially completed (see meeting notes and slides).
- **Bread and Flour Regulations (BFR) – folic acid fortification – labelling issues:** Members are advised to continue their discussions with their Local Authorities (LAs)/Primary Authorities (PAs) to agree on any necessary labelling derogations.
- **Members** interested in applying to FLC’s **vice-chair position** to contact the PPA Secretariat: PPA Secretariat still looking for volunteers. Please contact the PPA Secretariat if you are interested in helping the team.

3) Invited Guest Speaker: Ilona Fleischmann (Senior Research Analyst, Euromonitor)

Ilona Fleischmann (IF) Senior Research Analyst at Euromonitor, provided an update on savoury snacks and frozen processed potatoes in the UK, with particular attention to current market performance, key drivers shaping the category in 2025 and beyond, and future growth opportunities. See slides for more information.

IF began with an overview of the UK savoury snacks market. In 2024, according to Euromonitor data, the retail value was approximately £7 billion, excluding nuts, seeds and trail mixes, representing a quarter of Europe's total sales. The UK's strong position was attributed to a deeply embedded snacking culture and popular meal deals, with Germany and France following closely. Average per capita consumption was around 8kg, with potato crisps dominating at 44% of the market and 2.7kg per person, followed by puffed snacks, savoury biscuits, and emerging categories like vegetable- and pulse-based chips and meat snacks, driven by health and protein trends.

IF then turned to frozen processed potatoes, explaining that the market had grown in value due to price rises, particularly in 2023, with volume consumption remaining steady, supported by convenience, affordability and the growing popularity of air fryers. Prices were expected to stabilise in 2025, with forecast growth of 4% in value and 1.6% in volume, and per capita consumption was around 6.8kg.

Moving on to key trends shaping savoury snacks, IF outlined three overarching themes: affordability, flavour innovation and health. Savoury snacks were benefiting from a shift away from chocolate due to price sensitivity, with private label products strong for everyday consumption, while branded products drove indulgence and flavour innovation. Flavour trends included mainstreaming of spicy options, ranging from ultra-spicy to sweet-heat combinations. Global taste influences and continued importance of regional and nostalgic flavours were also noted.

Addressing health trends, IF explained that consumer focus had shifted towards longer-term wellbeing, with increasing scrutiny of nutritional labels. While taste remained critical, functional attributes such as protein, fibre and cleaner labels were becoming more influential in purchasing decisions. IF noted that enjoyment and wellness were no longer seen as opposing forces. Protein was highlighted as a particularly important functional ingredient, driving growth in meat snacks and other protein-positioned products. IF acknowledged concerns about potential oversaturation but suggested that protein was likely to remain a central macronutrient of interest.

IF also discussed the impact of recent regulations on products high in fat, sugar and salt (HFSS), describing them as a major catalyst for change in the UK snacking market. IF noted that savoury snacks were generally better positioned than confectionery to reformulate without compromising taste. While the precise impact of HFSS measures was difficult to isolate due to concurrent inflationary pressures, IF suggested that the category had demonstrated resilience.

In concluding her presentation, IF stated that the savoury snacks category was expected to deliver steady growth over the next five years, with forecast volume growth of around 1.2%. IF highlighted the role of flavour innovation, expanding consumption occasions and the influence of younger consumers, particularly Gen Z, who were identified as frequent snackers. She also pointed to the rise of 'big night in' culture and opportunities for larger, sharing-oriented formats. IF closed her presentation by inviting questions from attendees.

The Secretariat and members asked questions on future trends. IF highlighted the polarisation between health-focused products, such as vegetable and protein-based snacks, and indulgent products, driven by flavour innovation. The Secretariat sought clarification on per capita figures, which IF explained were based on retail, at-home consumption only for frozen potatoes, while savoury snacks figures included all categories except nuts. No further questions were raised.

The PPA Secretariat and members thanked IF for the presentation.

4) Invited Guest Speakers: Sam Faulkner and Simon Dadd (Food Standards Agency - FSA)

Sam Faulkner (SF), Co-Deputy Director for International Trade and Devolution at the FSA and Simon Dadd (SD), Programme Manager for the FSA's SPS Programme, joined the meeting to provide an update on the FSA's role and perspective on the proposed UK/EU Sanitary and Phytosanitary (SPS) agreement and the wider EU relationship 'reset'.

SF began by explaining that there were two main public reference points for the SPS agreement to date: the [Common Understanding document](#) published in May 2025, which set out the broad intent and direction of the reset, and a [speech by the Minister for the Cabinet Office](#) in August 2025, which provided additional clarity and committed the Government to a delivery timeframe of 2027. SF emphasised that discussions remained live and subject to negotiation, and that while some commentary had appeared in the press, not all details could yet be shared.

SF explained that the Common Understanding text confirmed that the SPS agreement would be underpinned by dynamic alignment with EU law, subject to UK parliamentary scrutiny and governance arrangements. While limited exceptions to alignment may be sought, these would be constrained and subject to a small number of tests, with the detail still to be negotiated. He noted that dynamic alignment was balanced by anticipated access to EU Agencies, systems and Databases (ASDs), including the European Food Safety Authority (EFSA), and the European Commission's (EC) Rapid Alert System for Food and Feed (RASFF) and Trade Control and Expert System (TRACES). This access was considered essential to enable the UK to engage constructively with EU processes, present UK data and evidence, and maintain an informed perspective on EU decision-making, despite the UK remaining a third country.

SF stressed that the UK would not regain Member State status or voting rights, but explained that access to working groups, systems and committees would enable the UK to contribute evidence and expertise in advance of EU decisions. He illustrated this with reference to import controls for High-Risk Food of Non-Animal Origin (HRFNAO), an area where the UK and EU have diverged on commodity coverage and control frequencies. Under a dynamically aligned system, EU controls would need to be reflected in UK legislation, while UK evidence would be presented to inform EU risk assessments and control measures.

Turning to the role of the FSA, SF explained that the Agency was fully embedded within the core SPS negotiating team, alongside Defra and the Cabinet Office, and that there was strong recognition across Government of the FSA's central role both in negotiating and implementing any agreement. He noted that the scope of the SPS agreement would cover the vast majority of FSA responsibilities, making this a significant shift in how the FSA operates. He also highlighted ongoing engagement with the Devolved Administrations (DAs), given that food is a devolved matter, and explained that the FSA was working closely with Wales and Food Standards Scotland (FSS) to ensure a coherent approach, with some ministerial-level engagement led by Defra.

SF highlighted that the overarching priority for the FSA Board was the protection of public health, and he stated that the Board had been clear that this must not be compromised in any agreement. He expressed confidence that public health could be safeguarded through alignment, supported by improved access to EU data and incident alert systems, which were seen as particularly beneficial for managing food incidents. He also noted that integration with systems such as TRACES would bring practical efficiencies, and that one of the most significant anticipated benefits of the agreement would be the removal of SPS border controls between Great Britain (GB) and the EU, and between GB and Northern Ireland (NI), contingent on dynamic alignment.

SF explained that the UK negotiating mandate had been agreed and that the EU mandate was expected imminently. He indicated that, from the UK's perspective, there was strong political pressure to begin negotiations quickly and to deliver tangible benefits for businesses and consumers as soon as possible. He suggested that while the Common Understanding had addressed the strategic 'what' of the agreement, the next phase would focus on the technical 'how', including governance structures, committee arrangements, and practical mechanisms for access to EU systems and data.

The Secretariat thanked SF for the overview and invited questions from members.

A member asked about the interaction between the SPS agreement and the Windsor Framework. SF explained that the two arrangements would need to operate in parallel, as the Windsor Framework had a broader scope and could not be superseded by the SPS agreement. He noted that although certain mechanisms, such as the Northern Ireland Retail Movement Scheme (NIRMS), would continue to exist, their practical use might diminish if alignment reduced the need for them. He confirmed that work was underway to identify any areas of incompatibility between the two frameworks.

The Secretariat asked specifically about the future of 'Not for EU' labelling in the context of dynamic alignment. SF stated that, in principle, where UK legislation aligned fully with EU requirements, there would be no substantive need for 'Not for EU' labelling. He cautioned, however, that this position could be affected by negotiated exceptions and by transitional arrangements, which meant that labelling changes were unlikely to be immediate. SD added that transitional periods would need to be considered carefully and that elements of the current regime might remain in place during any transition.

The Secretariat also asked when negotiations were likely to commence in practice. SF explained that extensive discussions had already taken place in agreeing the Common Understanding, and that negotiations would now move into more detailed and technical areas. He confirmed that the UK was ready to begin talks as soon as the EU mandate was agreed but noted that timing and pace would depend on both parties [**POST MEETING NOTE:** Negotiations are now underway].

The Secretariat raised concerns about engagement with businesses, particularly around areas such as contaminants, pesticides, additives and labelling, where divergence had built up over the last five years. Considering the long lead times in agricultural production and the Secretariat questioned how sudden alignment could be managed without significant disruption or compliance risks, especially for businesses focused solely on the UK market. The Secretariat also expressed concern about whether sufficient notice and transitional arrangements would be provided.

SD responded that much of the engagement to date had been conducted jointly with Defra and the Cabinet Office, meaning that FSA involvement was not always visible. He highlighted recent and forthcoming engagement activity, including a government-led meeting with sector associations and more targeted sector discussions planned to follow. He acknowledged the importance of transition periods and noted that these issues had been raised consistently by industry, particularly in sectors with long shelf lives or lengthy production cycles. He explained that detailed guidance would only be possible once negotiations had progressed further, and clearer outcomes were known.

SF noted that SMEs presented a particular challenge, as many had not tracked EU regulatory developments since EU exit. He acknowledged that dynamic alignment would require a significant communications and engagement effort to ensure that all parts of the sector understood the implications and compliance requirements. He also noted that the government would need to balance ministerial ambition for rapid delivery with the practical realities faced by businesses, including differing transition needs across sectors.

Members asked about areas of greatest divergence between UK and EU rules. SF explained that the FSA actively tracked divergence, including both deliberate policy choices and 'passive' divergence where EU legislation had changed without corresponding UK updates. SF suggested that industry input would be valuable in identifying the most challenging areas and invited members to share their perspectives. Members raised examples including additives, contaminants, pesticides and Food Contact Materials (FCMs), and questioned whether previous UK positions would be undermined by future alignment.

The Secretariat asked about financial and legal implications for businesses that had invested heavily in UK authorisations for active substances, which might later become unacceptable under EU-aligned rules. SF acknowledged this as one of the most complex areas under consideration and explained that ongoing authorisations would require careful handling, but he was unable to provide detailed assurances at that stage.

The Chair asked whether customs issues and rules of origin would fall within the scope of the SPS agreement. SD explained that these issues were generally governed by the Trade and Cooperation Agreement (TCA) and other trade arrangements, and that significant changes in this area were not anticipated as part of the SPS negotiations. The Chair also raised questions about labelling, mutual recognition, organic certification and address requirements. SF confirmed that these issues were within scope and subject to negotiation, while SD noted that engagement was already underway in certain areas, including organics.

The PPA Secretariat and members thanked SF and SD for their presence and valuable discussion.

Members then reflected on the discussion and expressed concern about the scale of change implied by dynamic alignment after several years of divergence. Members noted longstanding unresolved issues, including market access for seed potatoes, and questioned whether sufficient benefits had yet materialised for UK exporters. Concerns were also raised about the availability and robustness of UK data to inform EU-level discussions, given limited engagement since EU exit, and about the cumulative regulatory burden on businesses.

Members discussed how best to engage with the FSA and Defra going forward. There was broad agreement that while producing a detailed list of technical issues at this stage might be premature, there was value in identifying high-level priority areas and key concerns to inform ongoing engagement. Members suggested drawing on existing divergence trackers and seeking member input to identify gaps and priorities. The Secretariat indicated that views would be sought from members before any formal submission was made, and that further discussion would follow.

ACTION: Secretariat to compile a list of **UK/EU regulatory areas** that likely affect members in the event of realignment with the EU due to **UK/EU SPS agreement** (e.g., smoke flavourings, additives, plant protection products, seed potatoes) **to be shared with the FSA**, following agreement with members. **[POST MEETING NOTE: Draft document shared with members for input on 19 January 2026 (FLC 038/26)].**

[POST MEETING NOTE: A [UK-EU joint statement](#), published 17 December 2025, expressed an ambition for negotiations on the SPS Agreement to be concluded by the next EU-UK summit (expected to be Spring/Summer 2026). In January 2026, Defra informed the PPA Secretariat that industry guidance is expected in the Spring 2026, and it is likely to include legislation in scope, exceptions agreed, expected implementation dates and information about industry engagement. Discussion on exceptions to take place in February, first at UK-level and then Brussels. Also, there have been numerous changes within the Defra and FSA teams. SD has now retired. The FSA Director of Devolution has moved to Defra. SF and Laura Blair are now standing in until a new Director is in place].

5) Updates

a) Nutrition and Health

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

- [NI NDNS 2017-2023](#): Published on 15 September 2025.
- **Department of Health and Social Care (DHSC) response to report of the Scientific Advisory Committee on Nutrition (SACN) on Ultra-Processed Foods (UPF)**
- **Public Health Wales (PHW) position on UPF**
- **World Health Organization (WHO) guidelines on nutrition labelling policies**
- **WHO guidelines on polyunsaturated fatty acids**
- **WHO SHAKE Technical Package for salt reduction**
- **Office for Health Improvement and Disparities (OHID) 1st report on 2024 salt reduction targets**
- **OHID 2nd progress report on calorie reduction targets**

- **UK Government response to consultation on Front of Pack Nutrition Labelling (FOPNL)**
- **EU Food Dialogue Conference:** announced as part of the Vision for the Future of Agriculture and Food

See slides for further details [**POST MEETING NOTE:** To date, with the exception of the NI NDNS, none of these documents/reports have been published. On 27 January 2026, the DHSC has informed the PPA Secretariat that SACN has commenced work on vitamin D requirements for dark skin population groups, and that it plans to commence work on protein, iodine and wholegrains later in 2026. Priorities identified (no timescales) also include iron bioavailability and omega-3 fatty acids. SACN is also keeping a watching brief on processed foods, non-nutritive/sugar sweeteners, plant-based diets, folic acid, calcium, magnesium and selenium. DHSC is currently focussing on baby foods and the Soft Drink Industry Levy (SDIL). There have been no updates on the salt reduction programme monitoring reports. Calories are included within the programme of analysis currently being considered by the DHSC. Further updates will be provided in due course. Also, the PPA Secretariat now understands that the EU Food Dialogue is expected to take place in Q1 2026].

i) HFSS Promotion restrictions (England and DAs)

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

England:

- [University of Leeds/Institute of Grocery Distribution \(IGD\) study on impact of HFSS promotion restrictions in England \(FLC 276/25\)](#): Study undertaken by the University of Leeds in collaboration with the IGD and involving four major retailers: Asda, Morrisons, Sainsbury's and Tesco. The study assessed the impact of the first phase of HFSS promotion restrictions, focusing on placement measures. Headline findings indicate a reduction in sales of in-scope HFSS products as a proportion of total sales, equating to approximately two million fewer in-scope products sold per day across the participating retailers. Consumer research conducted as part of the study, involving around 2,000 shoppers, showed that most respondents reported not noticing the changes in-store. Despite this, the observed decline in HFSS sales suggested that the placement restrictions had influenced consumer behaviour, even in the absence of conscious awareness. The report also included recommendations for potential future action.

Wales:

- [Welsh Government \(WG\) implementation guidance HFSS promotion restrictions \(FLC 216/25\)](#): Broadly aligned with the [English guidance](#), but two notable differences: the application to end of aisle restrictions (applies regardless of distance to main customer routes) and the absence of any transitional period for 'on-pack' volume promotions.

[Healthy Weight: Healthy Wales Delivery Plan 2025-2027 \(FLC 311/25\)](#): Third delivery plan to date. The plan set out a range of themes, including embedding a whole-systems approach, supporting families and early life, strengthening schools and other supportive settings, creating healthier food environments, promoting active lives and improving treatment pathways. A number of proposed actions were noted as potentially relevant to members, including work with retailers and academic partners to test voluntary approaches aimed at accelerating improvements in the availability of healthier food options in retail settings. The plan also signalled forthcoming consultations on proposals to support a healthier balance of food outlets through planning measures, improvement of the provision of healthier food within the public sector, and restrictions to HFSS advertising in public-sector settings. Advertising considerations likely to be extended across a broad range of environments, including transport and sponsorship. The document also refers to the possible exploration of additional fiscal measures to incentivise the development of healthier products.

Scotland:

- **Scottish Government's (SG) Good Food Nation plan:** [POST MEETING NOTE: The [SG's First National Good Food Nation Plan](#) was published on 17 December 2025. Secondary legislation is expected to be introduced early in the next parliamentary term following this year's election (FLC 014/26)].
- **Scottish Dietary Goals review:** [POST MEETING NOTE: To date, this has not been published].

NI:

- **NI Obesity Strategy:** [POST MEETING NOTE: On 26 November 2025, the NI Department of Health (DoH) published its '[Healthy Futures' Obesity Strategic Framework](#)' (FLC 378/25). This is a high-level, ten-year document which sets out actions to prevent and address overweight and obesity, amongst others. A set of policies related to the food environment include promotion and advertising restrictions of HFSS foods, FOPNL, procurement nutrition standards for the public sector, etc. No specific time frames are stated, although promotion restrictions are given high priority (1-2 years)].
- **NI review on nutritional standards in vending in public sector buildings:** [POST MEETING NOTE: Early in 2026, PPA was advised of the publication of the revised '[Nutritional Standards for food served to staff and visitors across Health and Social Care settings](#)' (FLC 016/26) on 25 September 2025].

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

The Chair provided an update on the upcoming advertising restrictions of LHF. See slides for details. [POST MEETING NOTE: The UK-wide LHF advertising restrictions entered into force on 5 January 2026].

Please also note:

- **Final Advertising Standards Authority (ASA)/Committee of Advertising Practice (CAP) guidance on LHF advertising:** [POST MEETING NOTE: On 4 December 2025, CAP published its [implementation guidance](#) alongside the responses to the August consultation and secondary advice resources, based on feedback received to the consultation (FLC 390/25)].

iii) England 10-Year Health Plan and Food Strategy

The Chair provided an update to the Government's 10 Year Health Plan, '[Fit for the Future](#)' (FLC 205/25) published on 3 July 2025. Please see slides for information and references. Also note:

- **Mandatory reporting by large businesses on healthier food sales:** Expected by end of Parliamentary term, i.e. no later than 2029. Likely to build on the metrics previously developed through the Food Data Transparency Partnership (FDTP). [POST MEETING NOTE: DHSC started engagement with key stakeholders, and have set up a cross-sector Working Group including industry (manufacturers, retailers, Out of Home (OOH) and wholesalers), other government departments (incl. Defra and the Department for Business and Trade (DBT)), trade associations (incl. the Food and Drink Federation (FDF)) and NGOs to scope out and design its mandatory reporting policy, ahead of consultation, which is expected Late Spring 2026. PPA has shared with members lists of policy design questions issued by DHSC for feedback (FLC 371/25, FLC 05/26 and FLC 027/26)].
- **Mandatory targets:** Expected in the next Parliament. Likely to focus on large retailers and the OOH sector, rather than manufacturers. [POST MEETING NOTE: Consultation on mandatory reporting AND mandatory targets expected at the same time – Late Spring 2026].
- **2018 Nutrient Profile Model (NPM):**
 - Members reflected on the practical issues posed by the use of free sugars, noting that free sugars are not declared on back-of-pack labelling and cannot be directly tested, raising challenges for both businesses and enforcement authorities. It was confirmed that the

forthcoming consultation would focus solely on implementation of the 2018 NPM to the HFSS promotion/LHF advertising restrictions, rather than revisiting its content.

- Members discussed the broader implications for reformulation strategies, noting tensions between reducing sugars and managing processing levels. It was agreed that these trade-offs created significant complexity for product development.
- **[POST MEETING NOTE:** The consultation response to the 2018 NPM and technical guidance were published on 27 January 2026 (FLC 047/26). The consultation on the application of the NPM to the England HFSS promotions/UK-wide LHF advertising restrictions is expected in Spring 2026. A Ministerial roundtable is planned for March 2026].

The Chair then briefly covered the UK Government's Food Strategy for England '[Towards a Good Food Cycle](#)' (FLC 223/25) published on 15 July 2025. See slides for further details. The Secretariat added that a significant proportion of the policy activity under the 10-Year Health Plan was expected to sit beneath the broader Food Strategy umbrella, reinforcing the links between the two initiatives.

iv) PPA Salt & Sugar data collection 2024/25 and UK NDNS Y12-15

The Secretariat provided an overview of the results of the PPA analysis of members' data on salt levels in savoury snacks and processed potato products, and sugar in popcorn, for the period between April 2024 and March 2025. See slides for further detail. In addition:

Salt:

- Downward trend for most categories.
- Now all categories of crisps and snacks meet 2024 salt reduction targets, with the exception of salt and vinegar (which follows up closely). For the first time, pelleted snacks now meet 2024 salt targets.
- Savoury Popcorn dropped below the 2024 salt target for the first time.
- Flavoured nuts and sweet popcorn levels are still above 2024 targets, but the Sales Weighted Average (SWA) in nuts have decreased slightly against last year. There has been no change in the salt SWA for sweet popcorn compared to last year.
- Overall, the processed potato category continues to meet the 2024 salt reduction targets, although 'waffle, shapes and hash browns' and now 'wedges, mash and others' lag slightly behind.
- The Secretariat noted that the 'processed potato category' was considered as a whole for the salt reduction programme (there are no sub-categories) and therefore the whole category has been compliant with 2024 salt targets since 2021.

Sugar:

- The sugar SWA in popcorn decreased slightly compared to last year.
- 100% of PPA members' products analysed meet 5% reduction targets (previously 99.8%) and 62.5% of volume now meet 20% reduction target (previously 62.2%).

The Secretariat confirmed that the data call for salt/sugar for the next reporting cycle (2025-2026) will be issued around May 2026, and it was agreed to extend the invitation to Barcel, noting that products such as Takis would fall within the pelleted snack category.

NDNS Y12-15

The Secretariat provided a summary of the analytical work undertaken during the year on the nutritional contribution of members' products to the diet, based on the latest NDNS results covering years 12-15 (2019–2023) (**FLC 328/25**). See meeting slides for more information. The Secretariat explained that changes to both the food grouping system and assessment methodology meant the results were not directly comparable with previous years.

The Secretariat noted that consumption analysis had not yet been completed, as the relevant NDNS consumption data was not easily accessible. In previous years this work had been supported by OHID and AHDB (Agriculture and Horticulture Development Board) Potatoes, but following AHDB Potatoes'

disbandment, this support was no longer available. The Secretariat confirmed that enquiries had been made to OHID for assistance and that further analysis would follow once data became available.

ACTION: Secretariat to continue efforts to gather *consumption data* on members' product categories from the Y12-15 NDNS. [POST MEETING NOTE: The raw consumption data has now been extracted and PPA is in the process of reviewing the data].

Members were also informed that the latest Family Food statistics had been published earlier in the week, and that a further interim analysis would be undertaken and circulated in due course.

ACTION: Secretariat to analyse *consumption data* on members' product categories from the recently published *Family Food Statistics FYE 2025*.

iv. Other Diet & Nutrition updates

The Secretariat then provided an update on other recent health and nutrition developments. See slides for further information. In addition:

[Health and Social Care Select Committee inquiry into food, diet and weight management](#) (FLC 225/25):

- Mirrored earlier work undertaken by the House of Lords.
- FDF submission emphasised the importance of evidence-based policymaking, raised concerns about the 2018 NPM, supported a whole-systems approach to obesity, and highlighted the lack of support for food taxes in the context of rising food costs.
- Inquiry ongoing, with oral evidence sessions beginning in October 2025.
- Evidence sessions with NGOs, incl. Bite Back, Food Foundation, Nesta, Obesity Health Alliance and Prof Chris Van Tulleken - explored public understanding of concepts such as healthy and unhealthy foods, UPF, food labelling, and promotion and advertising restrictions.
- Further sessions planned with industry representatives, incl. the FDF and UK Hospitality on 3 December 2025. [POST MEETING NOTE: A session with retailers took place on 28 January 2026].

UPF:

- Lancet Series on UPF and Human Health: [POST MEETING NOTE: Lancet series on '[Ultra-Processed Foods and Human Health](#)' containing three new papers was launched on 19 November 2025 (FLC 370/25)].
- EU Cardiovascular Health Plan: [POST MEETING NOTE: On 16 December 2025, the EC adopted its Communication on an EU Cardiovascular Health Plan '[Safe Hearts Plan](#)'. While plans for a comprehensive food processing assessment system remain, the proposed micro-levy on UPFs has been dropped, but the EC will explore appropriate tools (incl. potential financial measures), to support public health actions. A study on the impacts of UPF has been launched based on the opinion of the Scientific Advisory Mechanism (SAM) and the European Group of Ethics (EGE). The European Parliament's (EP) SANTE Committee will prepare a non-legislative own-initiative report, with first discussions expected in January 2026. The EC also plans to review the Audiovisual Media Service Directive to address marketing of UPFs by the end of 2026 (FLC 410/25)].

b) Food Labelling, Composition & Regulation

i. FSA Food Strategy Workshop (FLC 358/25)

The Secretariat briefly introduced the FSA's forthcoming Food System Strategic Assessment Workshop, explaining that PPA had been invited to participate in the first workshop, scheduled for 19 November.

The Secretariat noted that the assessment aims to identify and prioritise emerging issues that could affect food safety, food security and the wider regulatory system over the next decade, and that the FSA intends to share its findings with other government departments. See slides for further details.

The Secretariat explained that preparatory work had been requested in advance of the workshop and was grateful for member feedback. Having reviewed the full list of approximately 130 emerging issues, the Secretariat had highlighted those deemed most relevant to the sector, marking items receiving multiple member comments in yellow and those attracting broader consensus in orange. Due to time constraints, the Secretariat proposed that further feedback be sent by e-mail and confirmed that members would receive the slides showing the prioritised items. Members were invited to submit any final observations by the following day, in order to meet the FSA's requested deadline for input ahead of the workshop.

ACTION: Secretariat to share with members narrowed down list of issues which could most heavily impact their business, our industry and our membership in the next 10 years, in preparation for the upcoming FSA Food System Strategic Assessment Workshop (which PPA will attend).

ACTION: Members to provide input on narrowed down list of issues for the upcoming FSA Food System Strategic Assessment Workshop by 13 November

[POST MEETING NOTE: Completed on 12 November 2025 (FLC 365/25). Thanks for all additional comments received. The FSA workshop took place on the 19 November. PPA will share the output and report once available (the final assessment is exp. mid-2026)].

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

The Secretariat briefly introduced a further piece of work underway within the Business Expert Group (BExG) on Food Standards and Labelling. The Secretariat explained that, following earlier discussions with Defra about longstanding food labelling guidance in need of updating, a sub-group had been convened comprising PPA, the British Retail Consortium (BRC), National Farmers Union (NFU), Provision Trade Federation (PTF), CRN (Council for Responsible Nutrition) UK, Dairy UK and others. See slides for further details. In addition:

- The Royal National Institute for Blind (RNIB) provided comments with the aim of improving accessibility for visually impaired consumers.
- The draft guidance will undergo review by the Food Standards & Information Focus Group (FSIFG) and Enforcement Focus Group, before returning to Defra.
- Final ownership of the guidance is still undecided. The BExG Secretariat suggested Defra is likely to badge it, as they are keen for the work to progress.
- Members have already provided some early feedback, particularly around RNIB additions, legibility and accessible QR codes.
- Members were asked to send further comments by 21 November so the Secretariat can feed them into the sub-group.

ACTION: Members to inform the PPA Secretariat of any concerns regarding the draft FSA Guidance on Clear Food Labelling by 18 November.

[POST MEETING NOTE: Completed. The Secretariat has circulated a 4th draft for members comments, by 6 February 2026 (FLC 042/26)].

iii. Other Labelling, Composition and Regs.

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

- **BFR – folic acid implementation:**
 - Some mills delayed folic-acid implementation until November 2025. One NI mill delayed until January 2026 due to impacts on the Republic of Ireland.
 - Members reported significant supply-chain uncertainty, with suppliers unable to confirm definitive changeover dates.

- This lack of clarity caused difficulties planning label changes and managing customer expectations.
- Secretariat asked members to report further issues so that follow-up action can be considered.

ACTION: Members to inform the PPA Secretariat of **issues** encountered with regards to **the transition to folic acid fortified wheat flour**.

[POST MEETING NOTE: On 22 January 2026, the FSA’s Food Industry Liaison Group (FILG) notified its members of distribution issues affecting the NI market as a result of concerns related to the distribution of products to the Republic of Ireland. The PPA Secretariat will keep members abreast of any relevant developments on this (FLC 058/26)].

- **BMG/ADAS cost of food labelling project:** **[POST MEETING NOTE:** Defra has since informed the PPA Secretariat that the final report is now complete and awaiting publication by the Defra central team. Publication is exp. by April 2026 TBC].
- **Vegan/vegetarian/plant-based labelling:** **[POST MEETING NOTE:** At the last BExG meeting on 27 January 2026, Defra informed that the UK Government has no plans on changing the Common Market Organisation (CMO) Regulation (Assimilated Regulation 1308/2013). The UK is aware of the ongoing EU review and will not review it nationally as a result (considering ongoing discussions on the SPS agreement)].
- **Allergen Labelling UK:** **[POST MEETING NOTE:** The FSA published a paper on their [position on the Codex Precautionary Allergen Labelling \(PAL\) Standard](#) ahead of the December 2025 Board meeting. At the Board meeting, the FSA Board unanimously concluded that standardisation would deliver significant benefits and would bolster confidence across supply chains by ensuring PAL is applied only when truly necessary. They also agreed that the ED05 threshold provides a scientifically sound baseline for protecting consumers. Adoption of the PAL guidelines is exp. July 2026, after which the FSA will begin planning alongside FSS and implementation (FLC 403/25)].
- **Smoke Flavourings UK:** **[POST MEETING NOTE:** To date, the risk assessment of the 8 smoke flavourings has not been published].
- **EU Enzymes:** AMFEP (the Association of Manufacturers & Formulators of Enzyme Products) is proposing a 36-month transition period for market adaptation and reformulation **[POST MEETING NOTE:** AMFEP has now developed its proposals for the structure of the Union List (based on an updated 2023 version) for further discussion].
- **EU Simplification omnibus:** **[POST MEETING NOTE:** On 16 December 2025, the EC adopted its Food and Feed Safety Implementation Package. The proposal has now been transmitted to the EP and the Council under ordinary legislative procedure (FLC 411/25)].
- **EU CMO Regulation review:** Uncertainty over whether restrictions could also apply to products labelled as ‘meat flavour’ (e.g. snacks) **[POST MEETING NOTE:** Agreement not reached between representatives of the EU Council, EP, and EC on talks held on 10 November 2025. Discussions likely to continue in 2026. Debate on meat denominations was a contentious issue and therefore the EP is suggesting deferring it to post-2027 CAP discussions (FLC 404/25). EC proposal very likely to go ahead due to strong support by EU Member States and EP. The European Snacks Association (ESA) is supporting the inclusion of an explicit clarification note stating that ‘meat flavour’ products are not in scope of the Regulation].
- **EU Recycling labelling/Packaging & Packaging Waste Regulation (PPWR):** **[POST MEETING NOTE:** The EC Joint Research Center (JRC) finalised its [technical proposal on harmonised waste sorting labelling system](#) on 13 January 2026. A draft implementing act, to be developed by the EC, will go through the Comitology procedure and is expected to be subject to a 4-week public consultation (FLC 039/26)].
- **EU Green Claims Directive:** **[POST MEETING NOTE:** There have been no further updates].
- **EU Empowering Consumers for the Green Transition (EmpCo) Directive:**
 - EmpCo amends both the Consumer Rights Directive and the Unfair Commercial Practices Directive.
 - Claim and substantiation must appear in the same medium and same field of vision.

- DG JUST suggested possible compliance options such as overstickered labels and/or additional point-of-sale information specifying that a claim is generic.
- EC stressed that the Unfair Commercial Practices Directive is principles-based, allowing pragmatic enforcement on a case-by-case basis.
- DG JUST to engage with national consumer protection authorities to inform enforcement practice, particularly for products already on shelves.
- DG JUST confirmed they have been contacted by many stakeholders and are gathering data. They require strong, evidence-based cases.
- FAQs on EmpCo are being prepared, but no transitional solution has yet been identified **[POST MEETING NOTE: The EC published its FAQs document on 4 December 2025 (FLC 393/25)]**.
- FoodDrinkEurope continues to push for a grandfathering/exhaustion-of-stocks clause within the guidance **[POST MEETING NOTE: On 22 January 2026, in response to a Joint Business Statement sent to the EC's DG JUST in December 2025, the EC clarified that the application date of 27 September 2026 applies only to environmental claims and sustainability labels that are made or displayed towards consumers from that day onwards, and will not apply to products placed on the market before then (FLC 053/26)]**.
- Concerns raised about products supplied to the Republic of Ireland or NI (moved outside NIRMS) - requirements for certified substantiation and same-field-of-vision presentation are especially onerous and already causing operational concern.
- **Allergen labelling - Codex:** **[POST MEETING NOTE: Codex issued the 2nd consultation on PAL early in January 2026. PPA responded to the consultation via the FSA, who represents the UK on food hypersensitivity matters at Codex level. Adoption of the PAL guidelines is exp. July 2026 at the 49th Codex Alimentarius Commission meeting (CAC49), following adoption by the Codex Committee on Food Labelling (CCFL) in May 2026, during CCFL49 (FLC 007/26)]**.

c) Food Safety

The Secretariat gave an update on recent relevant developments on food safety issues, including acrylamide, glycoalkaloids, 3-monochloropropanediol (3-MCPD), mancozeb and precision breeding. See slides for details. Please also note the following:

i) Acrylamide

- **EU**
 - **[POST MEETING NOTE: Discussions still ongoing. The EC's Working Group on Environmental Contaminants held a meeting on 12 January 2026 to exclusively discuss acrylamide. A paper was published ahead of the meeting which was circulated to PPA members on 21 January 2026 (FLC 040/26). The paper contains several proposals, incl. Maximum Levels (MLs) and Benchmark Levels (BMLs) for crisps and potato crisps sticks].**
 - **[POST MEETING NOTE: At the start of January 2026, ESA issued its call for acrylamide data for the period 1 January 2025 to 31 December 2025. The call for data for sliced potato/chips closes on 31 March 2026 (FLC 004/26) and, for nuts & seeds, on 30 April 2025 (FLC 006/26). ESA also published the results of the analysis carried out on dough-based snack products for the period 2017-2024 (FLC 030/26) and nuts & seeds for the period 2016-2024 (FLC 035/26)].**
 - **[POST MEETING NOTE: To date, the FoodDrinkEurope acrylamide toolbox revision has not been finalised].**
- **UK**
 - The European Potato Processors' Association (EUPPA) has agreed to PPA to sharing acrylamide data with FSA.
[POST MEETING NOTE: ESA and EUPPA data have now been shared with FSA. There have been no further updates on acrylamide in the UK].

ii) Glycoalkaloids

- **EU**
 - EUPPA successfully submitted glycoalkaloid data to EFSA. ESA could not submit due to insufficient data points (only one company responded).
 - Additional data from the Association of Germany Confectionery Industry (BDSI) was sent directly to the EC after the EFSA deadline, creating a submission gap.
 - Raw materials can show high glycoalkaloid levels in some cases, but finished products appear low based on available data.
 - **[POST MEETING NOTE: In December 2025, the EC launched a targeted consultation on requirements for sampling and methods analysis for autocontrols for the presence of mycotoxins and plant toxins in food (incl. glycoalkaloids), harmonising requirements under Art.4(4) of Regulation (EC) 852/2004. The consultation closed on 9 January 2026 (FLC 400/25)].**
 - **[POST MEETING NOTE: In January 2026, EUPPA shared a presentation deck from the last MinGlyKa project meeting which was held on 16 September 2025 (FLC 002/26)].**
 - **[POST MEETING NOTE: Europatat is currently finalising a new glycoalkaloids Code of Practice (CoP). Following industry concerns related to processed potatoes, the CoP is being amended to account for storage temperatures requirements for processed potatoes. Depending on the scope of the changes, PPA, ESA and EUPPA will countersign the document (FLC 376/25 and FLC 401/25). EUPPA will organise a consultation round to get feedback on the CoP in February 2026].**
- **UK**
 - No UK-specific activity was noted **[POST MEETING NOTE: There have been no further updates on glycoalkaloids in the UK].**

iii) 3-MCPD and glycidyl esters

- **EU**
 - Discussions are effectively concluded, with little further debate expected.
 - Legislative text could be published around April 2026, followed by a lead-in period before enforcement begins.
 - One to watch as it moves into the implementation phase.
 - **[POST MEETING NOTE: In December 2025, PPA shared with members the draft Regulations amending Regulation (EU) 2023/915 as regards maximum levels of 3-MCPD (FLC 398/25). These drafts were expected to be voted on at the EU SCoPAFF meeting on 15 December 2025].**
- **UK**
 - No UK-specific activity was noted **[POST MEETING NOTE: There have been no further updates on 3-MCPD in the UK].**

iv) Plant Protection Products (PPPs) - Mancozeb

- **UK**
 - Authorisation withdrawal in GB took effect in November 2025.
 - PPA's decision not to co-sign the UPL white paper was reaffirmed as correct in light of the Government's subsequent clarification.
 - Emergency authorisation is theoretically possible, but tends to be slow, impractical and not always used in practice, even when granted.
 - Reinstatement remains very unlikely.
 - **[POST MEETING NOTE: GB potatoes are in ongoing discussions with UPL and with the Health and Safety Executive (HSE) on the scope and requirements for a possible Emergency**

Authorisation for mancozeb usage to combat emerging blight strains. There have been no further updates on the GB situation].

- **EU**

- Reinstatement remains very unlikely.
- **[POST MEETING NOTE:** On 7 January 2026, the French Government published a new Decree suspending the importation, introduction, and sale of foodstuffs from non-EU countries containing residues of certain active substances prohibited for use in the EU, including mancozeb in potatoes. It is understood that the ban also applies to processed foodstuffs (**FLC 012/26**). The EC had 10 days to oppose the ban. The issue was going to be discussed at the SCoPAFF meeting on 20 January 2026. The outcome of that meeting has yet to be communicated publicly. France has now notified the new Decree to the World Trade Organization (WTO)].

- v) **Precision Breeding (England)**

- Work is underway behind the scenes to operationalise the UK's precision breeding framework. **[POST MEETING NOTE:** [The Genetic Technology \(Precision Breeding\) Regulations 2025](#) have entered into force on 13 November 2025. On the 12 December 2025, the FSA published their [precision breeding guidance package](#)].

- d) **Sustainability**

The Secretariat provided a brief update on recent relevant developments on the Extended Producer Responsibility for packaging (pEPR) scheme, the EU PPWR and the UK and EU Deforestation Regulations. See slides for further details. Please also note the following:

- i) **pEPR:**

- Members who have not submitted data to PackUK are urged to make contact immediately, as liabilities may still apply.
- **[POST MEETING NOTE:** In December 2025, PPA signed a letter endorsing the appointment of Packaging PRO Ltd as the UK packaging PRO (pEPR Producer Responsibility Organisation) for the first three-year period].
- **[POST MEETING NOTE:** On 16 December 2025, PackUK published the Year 2 illustrative fees under pEPR].
- **[POST MEETING NOTE:** [The Producer Responsibility Obligations \(Packaging and Packaging Waste\) \(Amendment\) Regulations 2025](#) entered into force on 1 January 2026].

- ii) **PPWR:**

- FoodDrinkEurope and the European Organisation for Packaging and the Environment (EUROPEN) have each published approaches.
- The EUROPEN decision tree suggests multipacks are out of scope. However, it is not clear this has not been fully endorsed by all FoodDrinkEurope members.
- Also see notes above re. recycling labelling under the PPWR.

- iii) **Deforestation:**

- **UK**

- **[POST MEETING NOTE:** Defra written update 27 January 2026 from the BExG meeting: “We recognise the urgency of taking action to ensure that UK consumption of forest risk commodities is not driving deforestation and will set out our approach to addressing UK consumption of forest risk commodities in due course. We are working across government

to agree the most effective way to reduce the impact of the UK's consumption of forest risk commodities on deforestation. We are aware of businesses' need for certainty on this in Northern Ireland. We will communicate the relevant arrangements at the earliest possible opportunity and entirely understand the urgency of this.”].

- EU
 - **[POST MEETING NOTE:** On 23 December 2025, [Regulation \(EU\) 2025/2650](#) amending Regulation (EU) 2023/1115 as regards certain obligations of operators and traders, was laid, postponing the date of application of the EU Deforestation Regulation (EUDR) by another 12 months to 30 December 2026, for large and medium enterprises, and 30 June 2027, for micro- and small enterprises, alongside other simplifications. See [UK Government Explanatory Memorandum](#)].

6) Committee matters

The Secretariat noted again that the FLC vice-chair role remains vacant and invited interested members to contact the PPA Secretariat or Chair for more information.

ACTION: Members interested in applying for FLC's vice-chair position to contact the PPA Secretariat.

- Risk matrix

The Risk Matrix was discussed during the meeting and some changes were agreed. Some items were parked and members agreed that the Secretariat would later review and circulate the revised matrix.

ACTION: Secretariat to amend FLC Issues Matrix and circulate to members for approval. [POST MEETING NOTE: The Secretariat shared a draft revised Issues Matrix with members for approval (FLC 372/25). Although no comments were received, the Secretariat made a final change to include the NI Obesity Strategy as a 'current issue' following its publication in November (FLC 378/25)].

The following changes were made:

- Moved 'CIPC tMRL monitoring' from 'current issue' x 'big impact' to 'current issue' x 'moderate impact'.
- Removed 'UK Border Target Operating Model (BTOM)'.
- Removed 'Nutrient profiling (Ofcom 2018 model consultation)' and added 'Consultation on implementation 2018 NPM' as a new item. Added as 'current issue' x 'big impact'.
- Moved 'UK/EU SPS Agreement' from 'future issue' x 'big impact' to 'current issue' x 'big impact'.
- Removed all references to 'FDTP' work, both environment and health (as likely to be rebranded).
- Removed 'Nutrient Profiling (EU F2F Strategy)'.
- Removed 'Precision Breeding (England)' and added 'Precision Breeding implementation' as a new item. Kept it under 'future issue' x 'moderate impact'.
- Reworded 'Allergens (precautionary labels/vegan)' to 'Allergens (precautionary labels)'. Kept it under 'current issue' x 'moderate impact'. Remains a high-profile media issue.
- Removed 'GBSF/CQUIN'.
- Reworded 'Plant-based/vegan and vegetarian definitions' to 'Plant-based/vegan/vegetarian/meat definitions' (with 'meat' identified as a new item. Kept it under 'future issue' x 'small impact'.
- Added 'EU EmpCo Directive' as a new item under 'future issue' x 'moderate impact'.
- Removed 'DAs Obesity Strategy' and added 'Wales Obesity Strategy (Healthy Weight: Healthy Wales)' and 'NI Obesity Strategy (Healthy Futures)' as new items under 'current issue' x 'moderate impact', and 'Scotland Obesity Strategy' as a new item under 'future issue' x 'moderate impact'.
- Added 'Mandatory reporting of healthy food sales by large businesses' as a new item under 'future issue' x 'high impact'.
- Removed '10-year Health Plan' from 'future issue' x 'moderate impact' (as both the reporting of mandatory healthy sales and the 2018 NPM consultation have been included).

7) AOB

Due to time constraints no AOBs were discussed. Questions were addressed directly with members.

8) Next meeting dates

The Secretariat agreed to circulate a Doodle poll to agree on dates for the 2026 FLC meetings. It was suggested to continue with the same format as 2025 (2 online and 1 physical meeting per year).

ACTION: Secretariat to circulate Doodle poll with proposed dates for the 2026 FLC meetings. [POST

MEETING NOTE: Completed (FLC 418/25). 2026 meeting dates have been agreed as follows (FLC 024/26):

- **Online:** 10 March – 1pm start
- **In-person:** 30 June – 10:30am start (venue TBC)
- **Online:** 11 November– 1pm start].

ADDENDUM:

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

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