Regulatory Update

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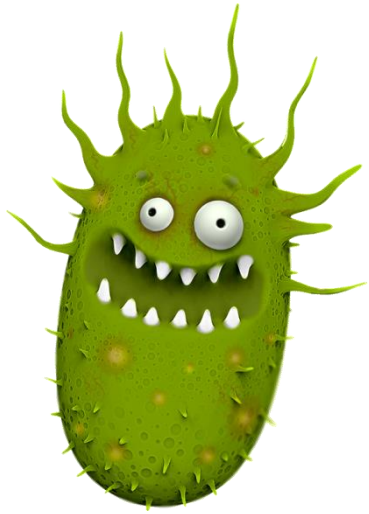
food and drink innovation

01

Stricter application of the Listeria criterion for ready-to-eat foods

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Amendment to Food Safety Criteria: Regulation (EU) 2024/2895 amending Regulation (EC) No 2073/2005 as regards *Listeria monocytogenes* (applied from 1 July 2026)



Food category	Micro-organisms/their toxins, metabolites	Sampling plan		Limits		Analytical reference method	Stage where the criterion applies
		n	c	m	M		
'1.2 Ready-to-eat foods able to support the growth of *L. monocytogenes*, other than those intended for infants and for special medical purposes	*Listeria monocytogenes*	5	0	100 cfu/g (*)		EN/ISO 11290-2 (**)	Products placed on the market during their shelf-life
		5	0	Not detected in 25 g (***)		EN/ISO 11290-1	Products placed on the market during their shelf-life

02 PPWR

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EU Packaging & Packaging Waste Regulation (PPWR)

Regulation (EU) 2025/40 (PPWR) replaces Directive 94/62/EC

Entered into force February 2025 - applied from 12 August 2026 across the Member States, but with several implementation dates to come

Aim to reduce packaging waste and harmonise EU packaging rules

Covers all packaging and applies to manufacturers, importers, distributors, retailers

EU Packaging & Packaging Waste Regulation (PPWR)

Core requirements:

All packaging recyclable by 2030 with minimum recycled content (especially plastics)
Reduce unnecessary packaging and Reuse & refill (where possible)
Clear labelling for recycling and materials
Limits on single use plastic and Restrictions on harmful chemicals (e.g. PFAS)
Deposit return schemes (for drinks containers) and
Extended Producer Responsibility (EPR)
Applies to UK exporters selling into the EU

Key Requirements from 12 August 2026



Manufacturers must conduct a conformity assessment (Annex VII) and issue a Declaration of Conformity (Annex VIII)



Manufacturer and Importer Obligations apply including indication requirements



New thresholds for PFAS and substances of concern in food contact packaging to be implemented (Article 5)

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Recyclable

All packaging must be recyclable or reusable

- Recyclability will be split into three grades (A, B, or C), by **1 January 2028**
- From **1 January 2030**, any packaging scoring below A-C will be banned
- From **1 July 2029** EPR fees must be modulated based on the recyclability grade of packaging
- From **1 January 2035**, packaging must not only be recyclable in theory but also recycled at scale
- From **1 January 2038**, only packaging with a recyclability grade of A or B will be allowed on the EU market. Packaging graded as C will no longer be permitted

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Compostable formats

By **12 February 2028**, the following formats must be compatible:

- Fruit and vegetable stickers
- Tea (and coffee) bags

If not intended to be collected in the bio-waste management systems, packaging must be recyclable

Updates requested on compostable standards



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Reducing Excessive Packaging

By **12th February 2027**, the Commission must request the European standardisation organisations to prepare harmonised standards and assessment methodologies for packaging minimisation to ensure consistent enforcement across Member States

By **1 January 2030**, grouped, transport, and e-commerce packaging may contain no more than 50% empty space

Reuse and refill

To qualify as reusable, packaging must be designed and marketed to be reused multiple times without losing its intended function.

By **February 2027**, the EC must establish the minimum number of rotations required for packaging to be considered reusable.

Additionally, from 1 January 2030, final distributors with a sales area exceeding 400 m^2 are required to allocate at least 10% of their sales area to refill stations, covering both food and non-food products.



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Packaging Minimisation

*"By **1 January 2030**, the manufacturer or importer shall ensure that the packaging placed on the market is designed so that its weight and volume is reduced to the minimum necessary to ensure its functionality, taking account of the shape and material from which the packaging is made."*



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03 EUDR

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Deforestation: EUDR

EUDR is a supply-chain regulation, but it will have significant implications for food regulatory, technical and procurement teams

Five of the seven core commodities are particularly relevant to the food and drink industry:

Cocoa, Coffee, Palm oil, Soya & Cattle

Requires operators to collect information including the geolocation of production plots, assess deforestation and legal-production risks, mitigate non-negligible risks and submit a due-diligence statement

Deforestation: EUDR

In December 2024 and December 2025, the EU amended the Deforestation Regulation, introducing simplification measures which will reduce administrative costs and burdens for companies covered by the Regulation

Entry into application:

Large and medium operators: 30 December 2026

Micro and small operators: 30 June 2027

Micro and small operators already covered by the EU Timber Regulation (EUTR): 30 December 2026

04 SPS Agreement

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New - SPS Agreements (Sanitary & Phytosanitary Agreements)

Aim of the SPS Agreement:



- Fewer / no border checks on food and animal products
- Less paperwork and certification (e.g. export health certificates removed)
- Faster movement of goods across borders

Affecting the following……
General Food Law & Consumer Information – 178/2002, 1169/2011, etc
Food Hygiene & Safety of Foods of Animal Origin - 852/2004, 853/2004, etc
Food Additives, Flavourings, Supplements & Novel Foods – 1333/2008, 1334/2008, 2015/2283
Marketing Standards for Specific Foods – Breakfast Directives, etc
Food Contact Materials – 1935/2004, etc
Other Food-Related Measures – Contaminants, Organic, Mineral waters, Irradiation, etc

Coming into effect 2027……..

Possible outcomes……

Area	Current EU position	Current GB position	Possible SPS impact
Additives	EU Union list	GB authorised list	Potential realignment
Novel foods	EU authorisations	GB authorisations	Future alignment possible
Pesticide MRLs	EU MRLs	GB MRLs	EU alignment expected
Food-contact materials	New EU restrictions	Current GB framework	Potential adoption of EU changes
Precision breeding	GMO framework	Separate English regime	Treatment remains strategically important
Labelling and claims	EU rules and amendments	Assimilated GB rules	Future EU changes may flow into GB

05 Future of Fortification

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Does Fortification Matter in the Current Food Landscape?

Shift to Nutrient Density

Consumers now focus on nutrient density over calories, seeking foods with meaningful nutrition in smaller portions

Role of Fortified Foods

Fortified foods support nutritional adequacy especially as appetite-suppressing therapies reduce overall food intake

Regulatory and Trust Challenges

Accurate, substantiated, and compliant nutritional claims are essential to maintain consumer trust and avoid enforcement

Sustainability and Ethics

Fortification strategies must align with sustainability goals, influencing ingredient sourcing and packaging choices



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GLP-1 Medications and the Shift to Nutrient Density

Impact of GLP-1 Medications

GLP-1 receptor agonists reduce appetite and food intake, leading to lower overall nutrient consumption.

Importance of Nutrient Density

Nutrient density crucial to maintain health during reduced-calorie diets, ensuring essential vitamins and minerals intake.

Fortified Foods Role

Fortified foods could help bridge nutritional gaps by delivering essential nutrients in smaller portions.

Ethical and Regulatory Considerations

Product messaging must avoid therapeutic claims and comply with nutrition regulations to ensure ethical marketing.



Dietary guidance for people using GLP-1 medications

Include adequate high-quality protein to help preserve lean muscle mass

Choose **nutrient-dense foods** to reduce the risk of deficiencies

Eat smaller portions while avoiding an excessively low-calorie intake

Prioritise fibre to help manage side effects such as constipation

Maintain adequate hydration and electrolyte intake, particularly during nausea or vomiting

No authorised health claims specifically relate to GLP-1 use

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