

leatherhead  
food research

part of SAGENTIA REGULATORY

# Updates on UK Regulatory Landscape

Agota Ditchfield, Consultant

# Healthy nation



# 10-year Health Plan for England: fit for the future?

Driver  
Health

Maturity  
Evolving

Product categories  
All food



## The story

Government's plan to reduce obesity, encourage healthier food environments, and improve overall public health by shifting the food system towards healthier options.

Key implications businesses need to face:

- **Mandatory healthy food sales reporting**
- **Restrictions on junk food advertising** to children
- **Restricting volume price and aisle placement promotion** may be repealed by smarter regulation
- **Ban on high-caffeine energy drinks for under-16s**
- **Soft drinks industry levy reform**

## Regulations

- Policy paper: [Fit for the Future: The 10-Year Health Plan for England](#) (171 pages)  
Published on July 3, 2025
- [Strategy: Scotland's Population Health Framework](#)  
Published on June 17, 2025

# Ban on high-caffeine energy drinks for under-16s

The driver

Health

Maturity

Evolving

Product categories  
Energy drinks

## The story

- The consultation sets out a proposal to ban:
  - The sale of energy drinks based on age of under 16
  - Any drink that contains over 150 mg of caffeine per litre
  - Applies to all sellers, retailers and businesses; in store and online
  - The sale of energy drinks from all vending machines

## Regulations

- [Consultation](#) opened on September 3, closes November 26

# Sugar tax changes

The driver

Health

Maturity

Evolving

Product categories  
Soft drinks, milk alternatives, sugary milk

## The story

- The consultation sets out a proposal for changes:
  - To the minimum sugar content threshold at which the levy applies (reduce from 5g to 4g per 100ml)
  - Milk-based drinks with added sugar and milk substitute drinks with added sugar in scope
  - Increase the higher rate or creating a third, higher rate

## Regulations

- [Consultation](#) ran until July on proposed changes to the Soft Drinks Industry Levy (SDIL)

# What's next for HFSS regulation in England? Advertising ban delay & repeal of volume promo restrictions

## Driver

Health & nutrition

## Maturity

Established

## Product categories

Foods high in fat, salt and sugar



## The story

- Volume price promotion ban: **delayed to October 1, 2025**
- TV and online advertising restrictions: Ban HFSS ads between 5:30am and 9.00pm
- The UK Government has formally moved the enforcement date from October 1, 2025 to **January 5, 2026**. Businesses have voluntarily committed to begin compliance
- Brand-only advertising exemptions: allowing companies whose brand is associated with HFSS products to advertise:
  - Their corporate identity
  - Non-HFSS products
  - Public health commitments

## Regulations

[The Advertising \(Less Healthy Food Definitions and Exemptions\) Regulations 2024](#)

[The Communications Act 2003 \(Restrictions on the Advertising of Less Healthy Food\) \(Effective Date\) \(Amendment\) Regulations 2025](#)

[The Advertising \(Less Healthy Food and Drink\) \(Brand Advertising Exemption\) Regulations 2025](#)

Guidance: [Restricting advertising of less healthy food or drink on TV and online: products in scope](#)

# Timeline for HFSS restrictions food across the UK

## England

Yes, placement restrictions have been in place since October 2022

Yes, promotion restrictions apply from October 1, 2025

## Scotland

No placement restrictions currently. Following [consultation](#), government will bring forward regulations in Autumn 2025

No promotion restrictions currently. Following [consultation](#), government will bring forward regulations in Autumn 2025

## Wales

Yes, under [The Food \(Promotion and Presentation\) \(Wales\) Regulations 2025](#) placement restrictions effective from March 26, 2026

Yes, under [The Food \(Promotion and Presentation\) \(Wales\) Regulations 2025](#) promotion restrictions effective from March 26, 2026

New advertising restrictions on TV before 9.00pm and on paid-for online will be **UK-wide** and are due to come into force **from January 5, 2026**

# Mandatory flour fortification with folic acid

## Driver

Ingredients & compositions

## Maturity

Established

## Product categories

Flour



## The story

- There is a 24-month transition period: **December 13, 2026**
- It mandates **non-wholemeal wheat** flour fortification with **250 micrograms folic acid per 100g**
- Increase the minimum level of nutrients to **15% of NRV**
- An exemption applies for small-scale millers
- Manufacturers need to adjust both the composition and labelling of their products
- Any product made with non-wholemeal flour as an ingredient could contain fortified flour from the UK. The flour must be declared as a compound ingredient, e.g. **Wheat Flour (Wheat Flour, Calcium Carbonate, Iron, Thiamin, Niacin, Folic Acid)**

## Regulations

- [The Bread and Flour \(Amendment\) \(England\) Regulations 2024](#)
- [Guidance: Bread and flour: labelling and composition](#)

# Voluntary guidelines to reduce the levels of sugar and salt in baby food

## Driver

Health & nutrition

## Maturity

Established

## Product categories

Foods and drinks for infants and young children



## The story

Full implementation with the targets set for products for infants and young children is required by the **end of February 2027**.

### **SUGAR reduction:**

- Restrict most types of free sugars in meals, finger foods and drinks aimed at babies aged up to 12 months
- Restrict the use of fruit as an ingredient in products
- Applies total sugar limits across product categories
- Banning sweeteners in all foods for infants and young children

**SALT reduction:** Not allowed as an ingredient in any meals/finger foods/snacks, and limit the sodium content of products with cheese.

**Labelling:** Be transparent, avoid misleading health claims.

## Regulations

- [Guidelines](#) Commercial baby food and drink: voluntary industry guidelines

# Labelling and claims



# FSA allergy guidance for the out-of-home sector

## Driver

Allergens & contaminants

## Maturity

Established

## Product categories

All foods



## The story

- Helps food businesses offering **non-prepacked food in person or online** provide mandatory allergen information clearly and effectively
- Consumers prefer allergen information to be provided **in writing**, supported by a verbal conversation
- FBOs must provide written and easy to find allergen information on menus, labels, or allergen matrices
- [Free downloadable resources](#) are available
- FBO must train their staff to communicate allergen information accurately

## Regulations

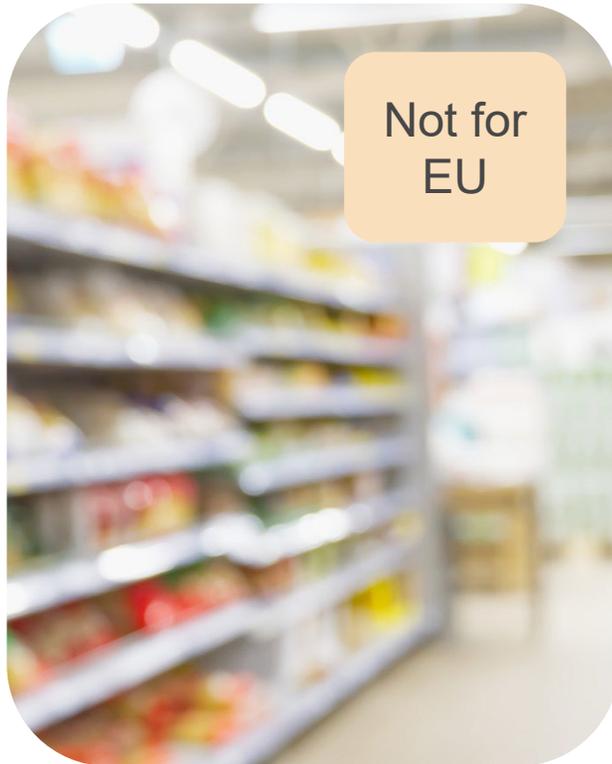
- [Guidance](#) for food allergen information in the out-of-home sector

# Is it mandatory “Not for EU” for products in GB?

Driver  
Labelling

Maturity  
Established

Product categories  
All foods



## The story

- Following consultations, the UK government decided **not** to make the label mandatory in Great Britain **from October 1, 2024**
- This removal is viewed as a pragmatic step toward closer UK-EU regulatory alignment. It signals the possibility of a future sanitary and phytosanitary (SPS) agreement between the UK and EU, helping to reduce technical barriers to trade and support dynamic alignment in areas such as food safety and product standards
- The government retains the legal authority to reintroduce the labelling if necessary, depending on trade dynamics

## Regulations

- A [policy paper update](#) on ‘Not for EU’ labelling for retail products across Great Britain
- [Joint Statement](#) issued by the leaders on the UK –EU Summit on May
- [The Marking of Retail Goods Regulations 2025](#)

# Health claim: authorised or non-authorised?

## Driver

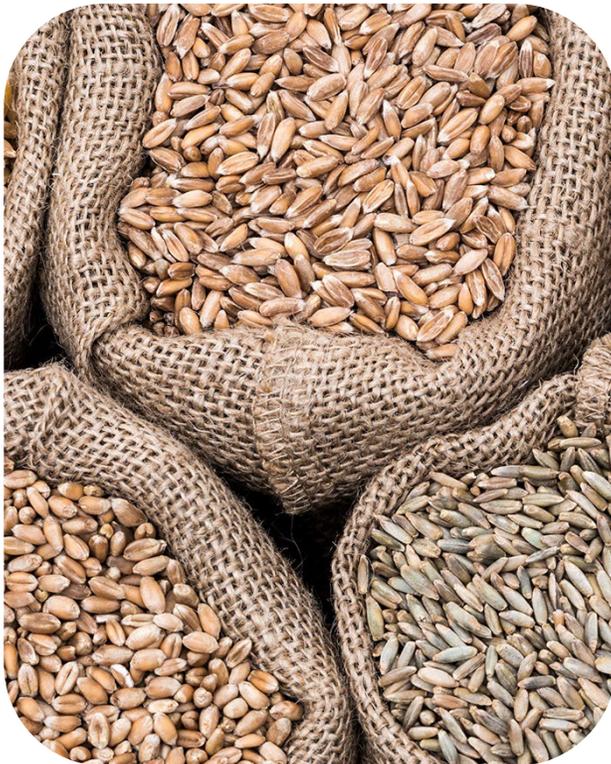
Health & nutrition

## Maturity

Established

## Product categories

All foods



## The story

- Two new non-authorised claims added to the Register:
  - For **beta-glucan** a modification in the conditions of an existing authorised health claim: *“Consumption of beta-glucans from oats or barley contributes to the reduction of the glucose rise after a meal”*
  - For **creatine** the claim is based on newly developed scientific evidence: *“daily creatine supplementation can contribute to improved cognitive function”*

## Regulations

- [Update](#) to the GB Register of nutrition and health claims
- [UKNHCC scientific opinion: beta-glucan from oats or barley and reduction of blood glucose rise after a meal](#)
- [UKNHCC scientific opinion: creatine supplementation and improved cognitive function - GOV.UK](#)

# Packaging

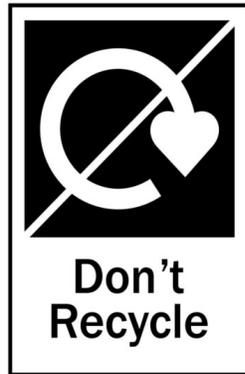


# Is the recycling logo mandatory?

Driver  
Packaging

Maturity  
Evolving

Product categories  
All food



## The story

- Defra has chosen to withdraw the requirement for mandatory recyclability labelling from **April 2027**, aiming to prevent extra costs for businesses and avoid trade barriers with the EU
- Therefore, recyclability labelling requirements is not included in the Regulations. It is temporarily removed
- **On-pack recycling label (OPRL)** UK-based labelling scheme designed to help consumers understand how to dispose of packaging responsibly is already in use

## Regulations

- [The Producer Responsibility Obligations \(Packaging and Packaging Waste\) Regulations 2024](#) (161 pages)

# Packaging Recyclability Assessment Methodology (RAM)

Driver  
Packaging

Maturity  
Established

Product categories  
Packaging



## The story

- The UK Government is incentivizing use of recyclable packaging via its EPR for Packaging (pEPR) scheme which applies **modulated fees** based on recyclability
- Fees for affected businesses will be determined using the **Recyclability Assessment Methodology (RAM)**. This methodology assigns each packaging format a **red** (poorly recyclable), **amber** (standard) or **green** (highly recyclable) rating. **From 2026**, green-rated packaging will benefit from steadily reducing fees while red-rated formats will face progressively higher charges
- The first reporting deadline for submitting RAM packaging data will be **October 1, 2025**

## Regulations

- Guidance: [Recyclability assessment methodology: how to assess your packaging waste](#)
- [The Producer Responsibility Obligations \(Packaging and Packaging Waste\) Regulations 2024](#)
- Guidance: [Extended producer responsibility for packaging: who is affected and what to do](#)

# Other



# Precision bred plants in England – A new era for innovation and responsibility

## Driver

Processing technologies

## Maturity

Established

## Product categories

PB fruits and vegetables



## The story

- Coming into force **November 13, 2025**, limited to plants
- It sets out the detailed legal framework for the release, marketing, and use of precision bred plants in food and feed in England
- It requires developers to notify Defra before releasing precision bred plants into the environment
- Food and feed products derived from these plants must also receive separate authorisation from FSA to ensure safety
- **Two public registers** are created: one by Defra (detailing prescribed information on releases and marketing of PBO) and one by the FSA (listing authorised precision bred plants for food/feed)

## Regulations

- [The Genetic Technology \(Precision Breeding\) Regulations 2025](#)
- [The Genetic Technology \(Precision Breeding\) Act 2023 \(Commencement No. 1\) Regulations 2025](#)
- [Application guidance: Precision bred organisms](#)

# Two major reforms for regulated products

## Driver

Ingredients & compositions

## Maturity

Established

## Product categories

All regulated products



### The story

- **Removal of periodic renewal requirements:** authorisations for GMOs, and smoke flavourings no longer require renewal every ten years
- **Streamlined authorisation process:** authorisations now come into effect following a ministerial decision and are published in an official register, rather than being prescribed by statutory instruments

### Regulations

- [The Food and Feed \(Regulated Products\) \(Amendment, Revocation, Consequential and Transitional Provision\) Regulations 2025](#)
- Came into force on **April 1, 2025**

# Food strategy in England – Building a Healthier, Fairer, and More Sustainable Food System

## Driver

Health & nutrition, environmental sustainability

## Maturity

Evolving

## Product categories

All food



## The story

- The strategy sets out a vision for a healthier, more affordable, sustainable, and resilient food system
- Among its priorities, **health** stands out—tackling obesity and improving nutrition, particularly in products aimed at children
- Food security, economic growth and environmental sustainability are equally important
- To support delivery and ensure business alignment, Defra has established a [Food Strategy Advisory Board](#) (FSAB)

## Regulations

- [Policy paper: A UK government food strategy for England, considering the wider UK food system](#)
- Published 15 July 2025

# Questions?

# leatherhead food research

part of SAGENTIA REGULATORY

For further information visit us at: [leatherheadfood.com](https://leatherheadfood.com)

Email: [help@leatherheadfood.com](mailto:help@leatherheadfood.com)

Follow us on LinkedIn: [@leatherheadfoodresearch](https://www.linkedin.com/company/leatherheadfoodresearch)

## Epsom

Great Burgh  
Yew Tree Bottom Road  
Epsom  
Surrey  
KT18 5XT  
UK

## Cambridge

Harston Mill  
Harston  
Cambridge  
CB22 7GG  
UK

## London

First Floor  
17 Waterloo Place  
London  
SW1Y 4AR  
UK

## Washington

1150 18<sup>th</sup> Street NW  
Suite 475  
Washington  
DC 20036  
USA

## Disclaimer

Some parts of a report of this nature are inevitably subjective and/or based on information obtained in good faith from third party sources. Where opinions are expressed, they are the opinions of the individual author and/or the relevant third party source and not those of Leatherhead Food Research. Furthermore, if new facts become available and/or the commercial or technological environment evolves, the relevance and applicability of opinions and conclusions in this report may be affected. Accordingly, while this report has been compiled in good faith, no representation or warranty, express or implied, is made by Leatherhead Food Research as to its completeness, accuracy or fairness. Except where limited by law, Leatherhead Food Research shall not be responsible for any actions taken or not taken as a result of any opinions and conclusions provided in this report and you agree to indemnify Leatherhead Food Research and/or its personnel against any liability resulting from the same.