

**leatherhead
food research**

part of SAGENTIA REGULATORY

Interactive session: EU Member State hotspots – key developments in 2026

Jonathan Sliney, Consultant

Agenda

1. Hotspots in the EU
2. Key developments and common themes
3. Takeaways



The European Union in 2026

- 27 Member States – 24 languages
- 450 million+ people “**United in diversity**”

“The EU is the **biggest exporter** and **importer** of goods and services **worldwide**”

EC Trade and Economic Security

- EU Member States 
- EFTA Members 
- Candidate Countries 

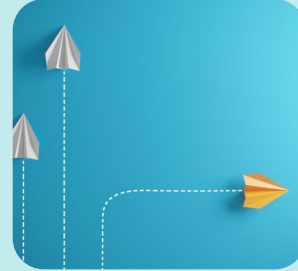


What is a hotspot?

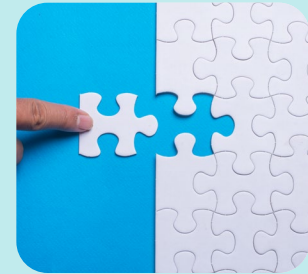
*noun • a place where fighting is common, especially for political reasons
/ • a place where there is a lot of activity or entertainment*



- Interventionist policy
- Rapidly implemented
- **High urgency**



- Review of 2025-6 topics
- Share identified 'themes'
- **Highlight potential risks**



- Key takeaway trends
- Priority actions
- **Strategies for monitoring**

Interventionist policy where the EC are perceived to be “lagging”

**Labeling, public
health &
nutrition policy**

**Sustainability,
packaging &
environment**

**Potential food
safety concerns**

1. Labelling, public health and nutrition policy



Nutri-Score - a unified vision or a fragmented future?



2025: Commission avoided confirming support for Nutri-Score.
2026: Legislation trackers suggest 'stalled'.



2025: Adoption of new algorithm (March).
2026: New algorithm 'in force' (January).



2025: Finland & Romania considering adoption.
2026: No official adoptions.

NutriScore® 
Keyhole 
Heart Symbol 
NutriInform 
Traffic light scheme 

Labelling, public health & nutrition policy

Ultra-processed foods

- EU wide U-turn
- Scientific Advice 03/2027
- UPF “levy”?



Date marking

- EC research confirming significant contributor to food waste



Alcoholic drink labelling

- Health & Nutrition warnings
- Building pressure from WHO EU



“Shrinkflation”

- Disclosure legislation – FR, HU, RO, AT
- Unit price increase >3%
- POS notice for 60 days



High fat, sugars, salt

- Marketing restrictions
- Specific measures for children



Caffeine & energy drinks

- Ban of sale to <16's
- Restrictions <18's
- Caffeine >32 mg/100 ml



Urgency

2. Sustainability, packaging and environment



Sustainability, packaging & environment

EmpCo and the Green Directive

- **National measures** to restrict ‘**vague environmental claims**’ and ‘**greenwashing**’

- ‘**Aggressive**’ sustainability claim enforcement and support for labelling schemes
 “Correct, clear, specific and complete”
 3,000 inspections Feb ‘26 (>15% **serious infringements**)
- **EUDR discontent** - *“The requirements are impossible to implement. They are not commensurate with objectives of the regulation”*

PPWR – Variations in implementing legislation

-  Expands **registration, recycling and EPR** obligations
-  New **EPR requirements for professional** packaging and **secondary** packaging
-  Revisions to national packaging **waste legislation and labelling requirements**
-  Commission FAQs under constant revision

Urgency



National legislation is likely to continue to fill gaps and address blind-spots in EU regulations; increasing complexity for FBOs

3. Food safety concerns



Food safety concerns

Stronger supplement oversight

- Updated notification processes – incl. updates
- Stricter 'positive' and 'negative' lists



Undesirable substances and claims



-  Belgium is revising **botanical rules** and issuing **new guidance on health claims**
-  ANSES issued safety determinations (*Garcinia cambogia* and *Cannabidiol*), growing concern with **pesticides** and **cadmium**
-  Hungary has prohibited **melatonin** and updated **botanical restrictions** due to concerns of undesirable substances

Urgency



Member State initiatives now prompting EC actions

Strategic takeaways for regulatory affairs



Strategic takeaways for Regulatory Affairs

Where to expect interventionist policy from Member States

Labelling, public health & nutrition policy

- **FOPNL & Nutrient profiling**
- 'Less of the bad' especially for children
 - HFSS – *certainly*
 - Caffeine – *likely*
 - UPF – *maybe*
- Shrinkflation
- Alcohol health concerns (especially cancer link)

Sustainability, packaging & environment

- **Green claims and substantiation focus**
- Expansion of EPR schemes
- Further diversification of recycling logos
- Waste reduction

Potential food safety concerns

- **Undesirable substances**
 - Botanical safety
 - Borderline substances
- **Food supplement pre-market procedures**
- MPLs for vitamins and minerals
- Novel technology and appetite for innovation

Questions?

leatherhead food research

part of SAGENTIA REGULATORY

For further information visit us at: leatherheadfood.com

Email: help@leatherheadfood.com

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

Cambridge

Harston Mill
Harston
Cambridge
CB22 7GG
UK

London

First Floor
17 Waterloo Place
London
SW1Y 4AR
UK

Epsom

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

Knaresborough

Concordia House
St. James Business Park
Grimbald Crag Court
Knaresborough
North Yorkshire
HG5 8QB
UK

Washington

1150 18th Street NW
Suite 475
Washington
DC 20036
USA

Disclaimer

Some parts of a report of this nature and/or the responses given to any follow-up enquiries or discussions after issuance of the report 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 provided may be affected. Accordingly, while this report and any subsequent responses have been compiled in good faith, no representation or warranty, express or implied, is made by Leatherhead Food Research as to their 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 and you agree to indemnify Leatherhead Food Research and/or its personnel against any liability resulting from the same.