

SOFHT Regulatory Forum

What's on the Horizon

March 19., 2025

Introducing NSF

The trusted global authority for health standards, testing, certification, consulting and training for food, water, health products, and the environment.



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NSF®



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7. Legislative Changes EU, Germany and UK

The European Court of Auditors recently carried out an audit on labelling within the EU, their main findings?



There is significant requirement in the EU legal framework and the gaps need to be addressed



Greater monitoring required around consumer expectations and actions taken from this information – including improved reporting on food labelling



Strengthen member states' checks on voluntary labels and online retail

NSF Findings

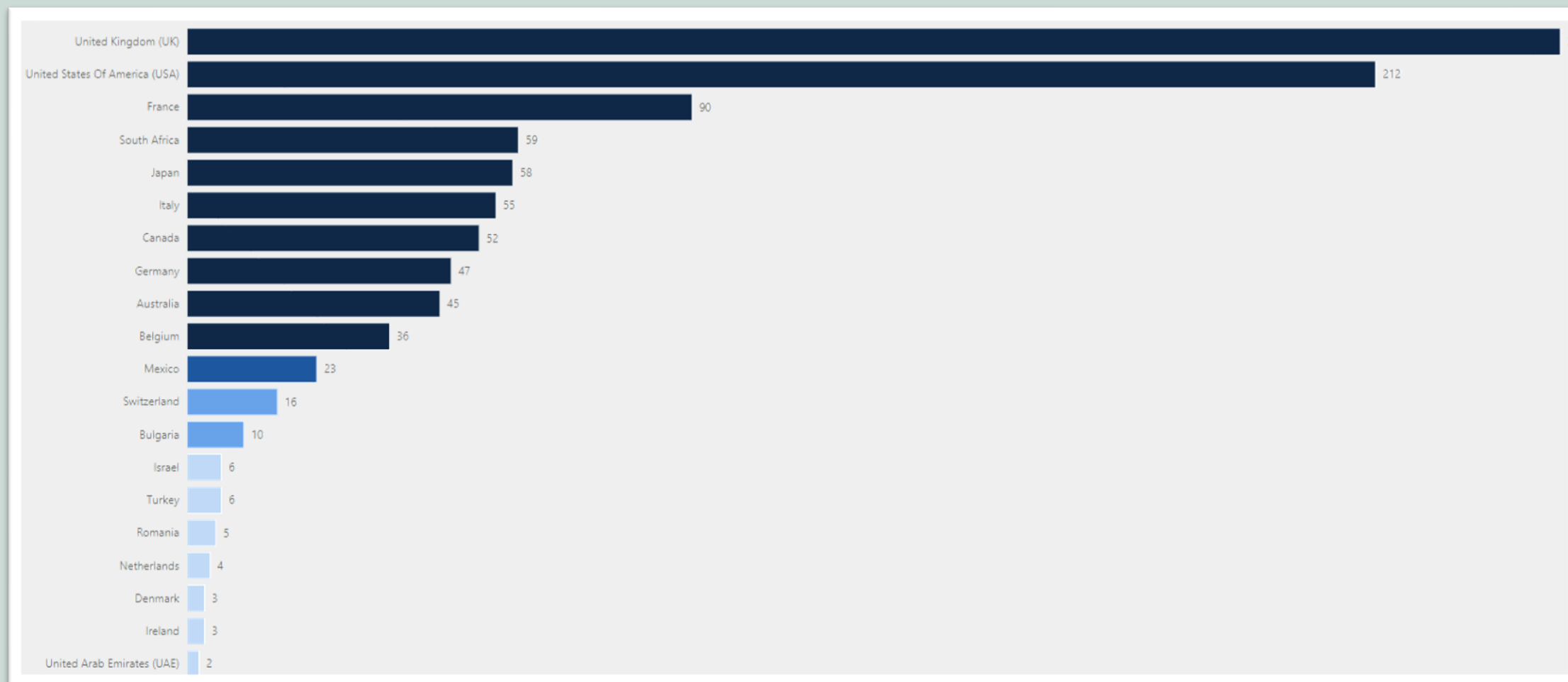


- More than **three quarters (76%)** of UK adults read food labels before purchasing, rising to **82%** among **18-34-year-olds**
- **45%** of UK adults pay more attention to food labelling compared to **five years ago**
- Only **49%** feel current labels provide **sufficient information** for making healthy choices
- Mere **29%** believe labels adequately address **sustainability** concerns
- **36%** of Brits admit struggling to interpret food labels
- **70%** want clearer details about processed ingredients
- **65%** call for more transparent allergen information

The Commission has not systematically monitored consumer understanding of labels, or whether food labelling rules address their needs.

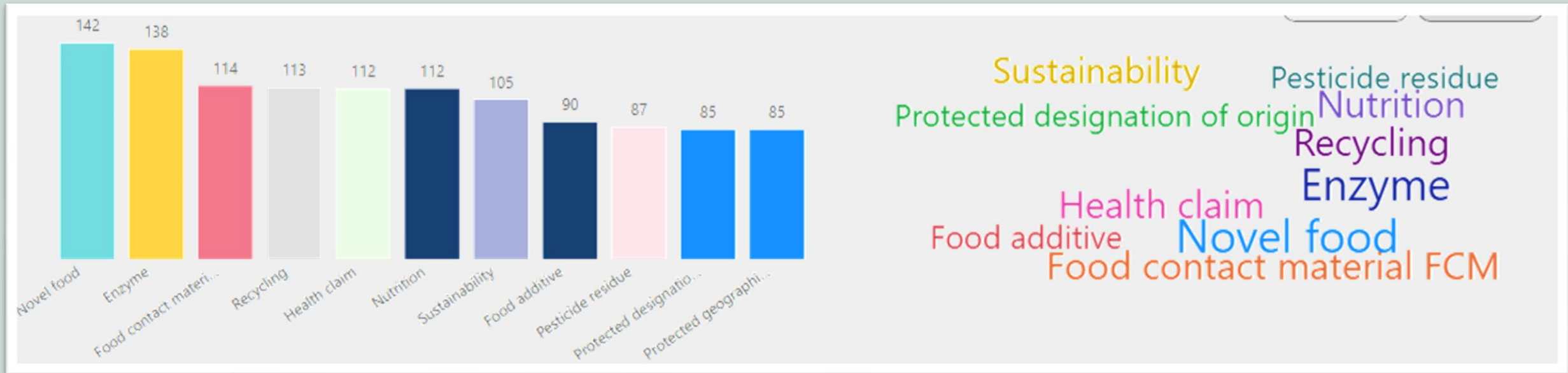
Number of alerts per a selective region

Alerts cover draft legislation, gazetted legislation & news articles



What are the top 10 tags across all alerts

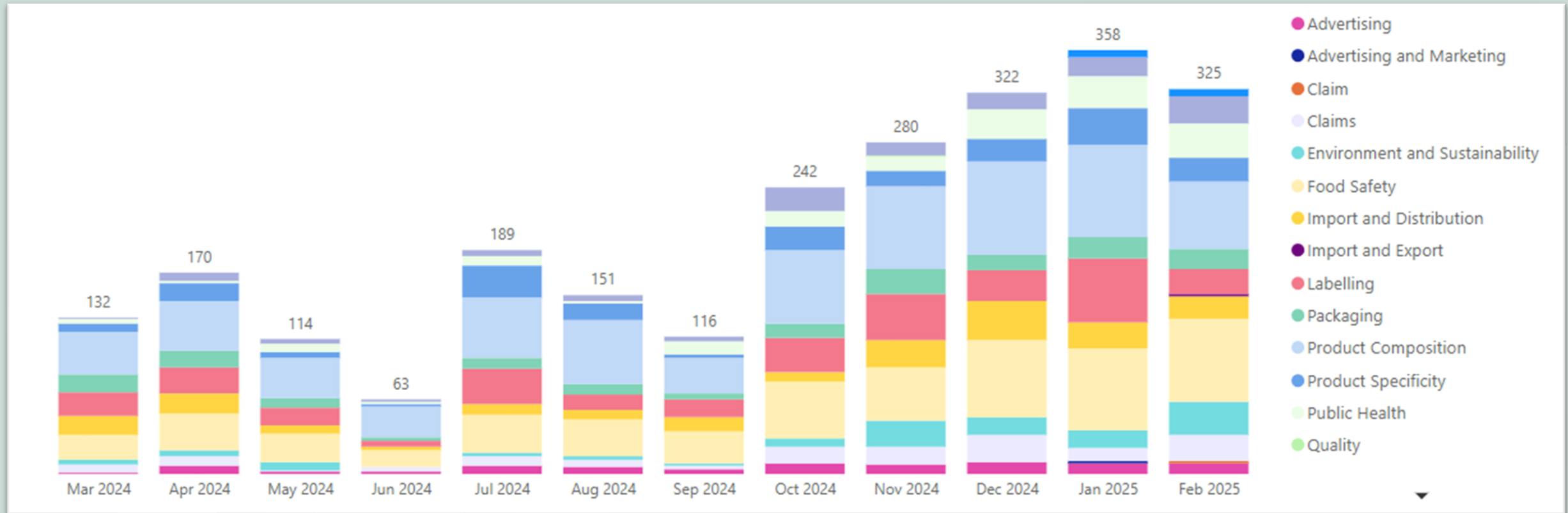
1st March 2024-28th February 2025



The Society of
Food Hygiene
and Technology

Trending Regulatory Topics breakdown by month

Number of times an alert was attributed to a specific regulatory topic



Roles and Responsibilities of those involved in Food Regulation

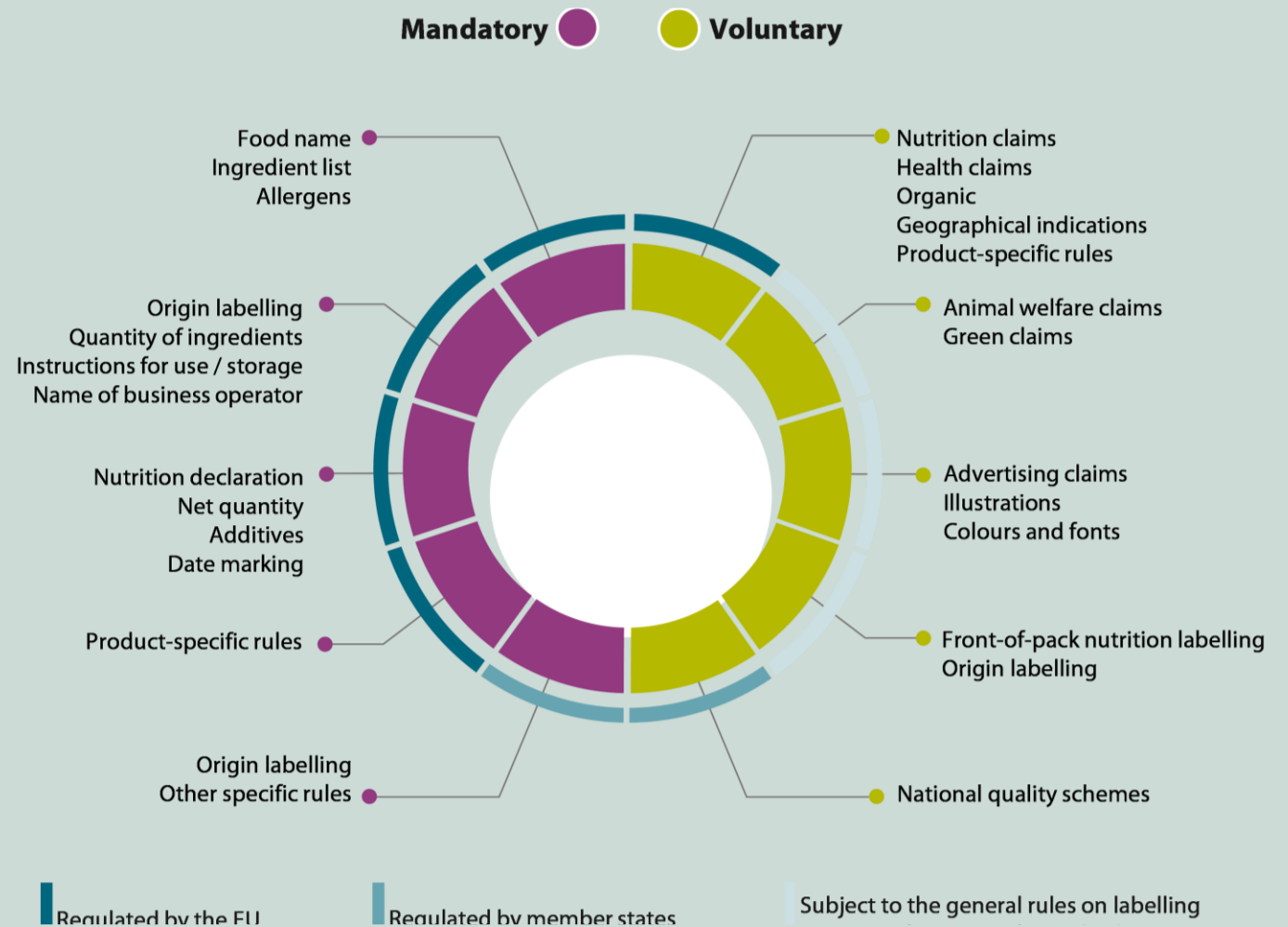


- **Food business operators (FBO)** must ensure that their products fulfil food law requirements.
- **Member states** enforce food law
- **The Commission** monitors the performance of the EU legal framework on food labelling and can propose updates to the framework.
- **The European Food Safety Authority** provides independent scientific and technical advice to the Commission in fields which can have a direct or indirect impact on food labelling.

Mandatory v Voluntary – are more aspects to become mandatory?



While mandatory information is mostly focused on health and safety, voluntary elements are broader in scope, ranging from green claims to illustrations.



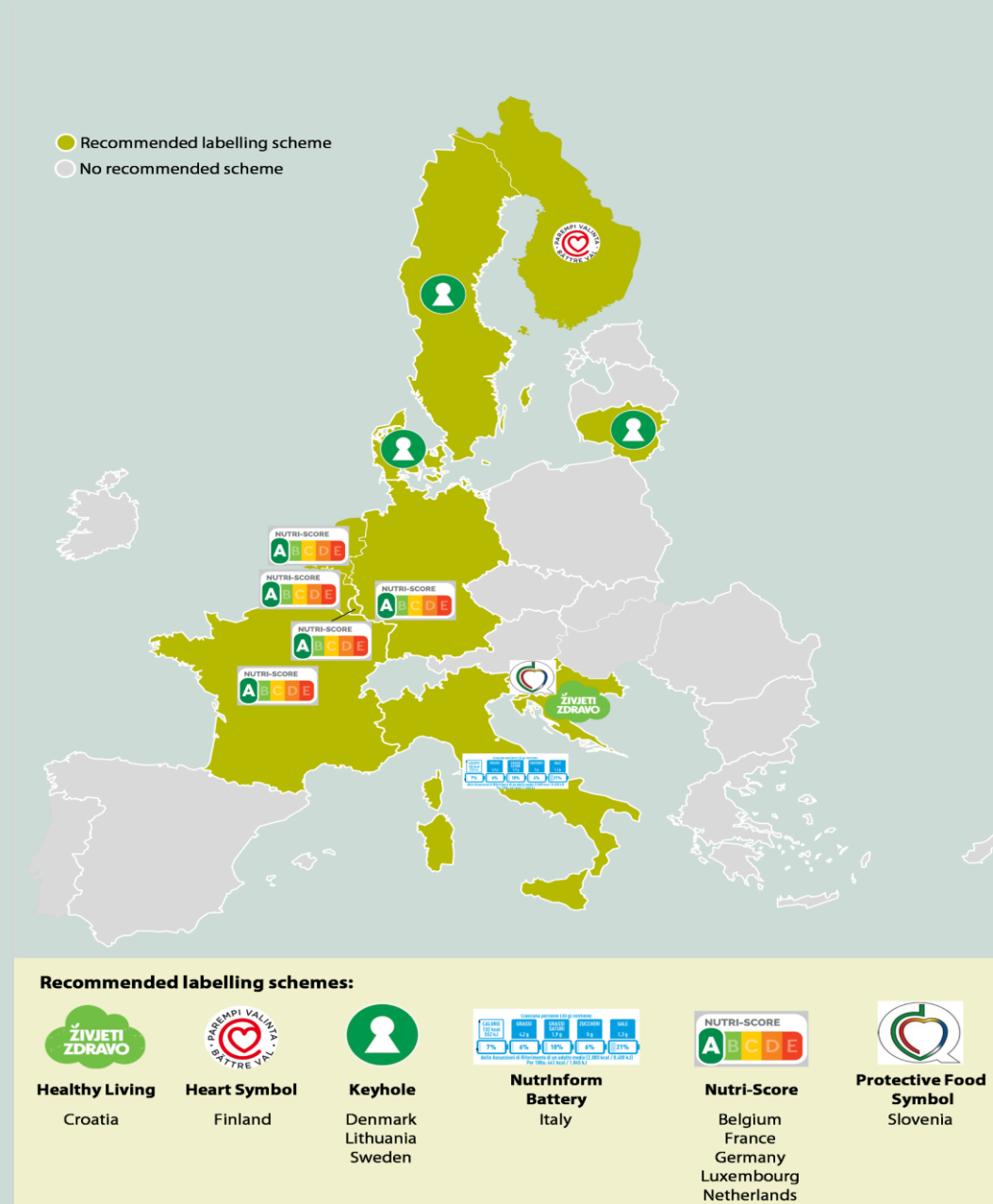
The EU legal framework provides for essential information on food labels, but it has notable gaps particularly in relation to proposed updates to the framework

- Delayed updates
- Differing approaches between member states
- Labels without certification e.g. 100% natural

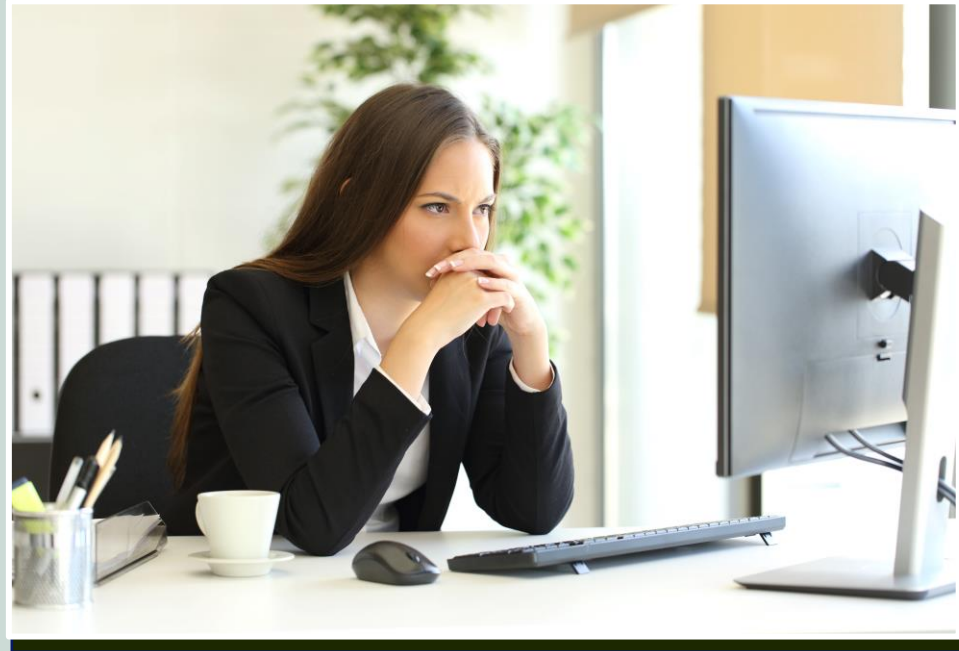
Topic	Expected result	Deadline	
Trans fats	Report / Legislative proposal (if appropriate)	2014	 Completed
Presence of gluten	Legal act	-	
Country of origin	Legal act Report / Legislative proposal (if appropriate)	2013 2014	
Alcoholic beverages	Report / Legislative proposal (if appropriate)	2014	
Health claims	Legal act	2010	 Ongoing
Nutrient profiles	Legal act	2009	
Front-of-pack nutrition labelling	Report / Legislative proposal (if appropriate)	2017	
Precautionary allergen labelling	Legal act	-	
Legibility	Legal act	-	 No action so far
Food for vegetarians or vegans	Legal act	-	
Reference intakes for specific population groups	Legal act	-	

One notable differentiation is the FOP nutrition labelling

- Schemes recommended by public authorities.
- Commission Nutri- Score Policy - update.
- Is there going to be a unified approach for FOP?



Is enough being done to enforce fines on those companies who are not abiding by the laws?



Are the regulations too ambiguous for certain aspects making it impossible for some companies to follow all the regulations?

Food labelling in the EU: Maze of labels confuses consumers

EUROPEAN COMMISSION REPLIES



- **The Commission** aims to take implementation steps with regard to **food claims**, especially on topics where a legal act is pending (i.e. claims related to botanicals and placing allergen warnings on packaging).
- In addition, work to resolve issues related to **origin labeling and alcoholic beverages**.
- Steps will also be taken to **proactively and regularly analyse labelling practices** as well as to improve guidelines for food manufacturers.
- Systematically **track consumer needs and understanding of labels**.
- The target implementation date is **2027**.



"Making Europe simpler and faster"



Reducing unnecessary bureaucracy:

- With new targets to reduce administrative burden
- By stress-testing EU legislation
- With direct outreach to stakeholders
- By prioritising simplification measures in our work

Improving how new EU rules are made:

- With better impact assessments
- With smarter delivery
- By avoiding the proliferation of delegated and implementing acts

Improving how rules are implemented:

- By providing stronger support to Member States
- By building administrative capacity
- By cooperating closer with stakeholders
- With a swift and resolute enforcement action

"Making Europe simpler and faster"



Brussels, 29.1.2025
COM(2025) 30 final

**COMMUNICATION FROM THE COMMISSION
TO THE EUROPEAN PARLIAMENT, THE EUROPEAN COUNCIL, THE
COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE
COMMITTEE OF THE REGIONS**

A Competitiveness Compass for the EU

"Making Europe simpler and faster"



- **First omnibus simplification** package presented on 26 February 2025:
- Far-reaching simplifications in the areas of sustainable financial reporting (CSRD - Corporate Sustainability Reporting Directive), sustainability due diligence (CSDDD - Corporate Sustainability Diligence Directive) and EU taxonomy
- Reduction of reporting burden by 25 % for all companies and by 35 % for small and medium-sized companies
- New definition of the term 'small enterprises with medium capitalisation' for companies that are larger than SMEs but smaller than large companies, simplifications within the meaning of SME
- Measures to prevent the "trickle-down" effect of reporting requirements on smaller companies in the supply chain.



LEGISLATIVE CHANGES: Product Liability Directive (EU) 2024/2853



Extension of the definition of a defect:

"A product shall be considered defective where it does not provide the safety that a person is entitled to expect or that is required under Union or national law." (Art. 7 para. 1)

- Extension of liability to other economic operators, e.g. suppliers, if the manufacturer is not named
- Disclosure of evidence and Facilitation of evidence.

Applicable from 9 December 2026

Voluntary or governmental product recalls may be an indication of a defect.

LEGISLATIVE CHANGES: PPWR (Packaging and Packaging Waste Regulation)



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 (PPWR)

Highlights:

- The regulation covers the **entire lifecycle of packaging** – from production to usage and disposal.
- **Horizontal regulation covering all materials** expanded by vertical laws and directives over the next five years.
- **Extended Producer Responsibility**
- Producers and importers have to comply with new requirements for **sustainable packaging design, labeling and conformity assessment**.

LEGISLATIVE CHANGES: PPWR (Packaging and Packaging Waste Regulation)



Not all obligations apply from 2026



Deadlines: Common implementation date: 12 August 2026 (18 months after entry into force).



Exceptions: certain amendments (sustainability) will apply from 2030.

Transition periods: attention to the start date of each requirement

The legal basis will **limit the introduction of national measures** that could **hinder trade and the free movement of packaged goods**.

LEGISLATIVE CHANGES: PPWR (Packaging and Packaging Waste Regulation)



Background information: Different packaging logos in member states



LEGISLATIVE CHANGES: PPWR -Article 12 Labelling of packaging



EU Specifications through Regulations by the end 2026 expected:

- Harmonized Labeling Requirements from 2028 expected
- Compostability Information: Home composting vs. industrial composting
- Digital Labeling for Hazardous Substances
- Reusable Packaging from 2028 expected: reuse systems, collection points, and QR codes
- Labeling Visibility: Labels and QR codes must be prominently displayed
- Consumer Protection: Misleading or confusing claims or waste management options are prohibited
- Art. 13: harmonised labelling on all waste containers for the collection of packaging waste



LEGISLATIVE CHANGES: EU-Food labelling practices



By Regulation (EU) No 2023/2429, the European Commission adopted revised marketing standards for fruit and vegetables.



- Under the new rules, the **country of origin** must now also be indicated for **dried fruit, nuts and ripe bananas**.
- The revised rules also allow fruit and vegetables that do not meet market standards **to be sold for further processing** or for animal feed.

These changes aim to support the objectives of the EU's Farm to Table strategy to improve consumer information and reduce food waste.

LEGISLATIVE CHANGES: Germany-Food labelling practices



Implementation of a mandatory animal husbandry labeling system (**August 2025**).

Animal Husbandry Labeling Act, aims to provide consumers with clear information **on the husbandry conditions of animals**, specifically **targeting fresh pork products initially**.

This move aligns with **growing consumer demand** for ethical and sustainable food production practices.

Private labels and **mandatory animal husbandry labeling** complement each other in many ways → Important: Prohibition of contradictory information

For **EU countries and other countries**, animal welfare labelling is voluntary



Source: BMEL.de

The Digital Market, Competition and Consumers Act



- Enforcing stricter regulations against greenwashing and misleading advertising.
- The Competition & Markets Authority (CMA) have powers to fine companies without going to court
- Enforcement could be **civil fines** of up to 10% of turnover for non- compliance



Comes into force from 6 April



Thank You

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We understand needs and deliver solutions matched to their organization's requirements **NSF** experts can help your company, services and products deliver on credible and sustainable promises and manage risks in a more complex world.

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