

frESH Law Horizons

January to March 2025



Water (Special Measures) Bill [Receives](#) Royal Assent

On 24 February 2025, the Water (Special Measures) Bill received Royal Assent. In a [policy paper](#) of same date, the Department for Environment Food and Rural Affairs (Defra) commented that the Water (Special Measures) Act 2025 “delivers on government promises” by blocking bonuses for executives. Performance-related pay for senior roles will now be linked to water companies meeting standards on matters including the environment, criminal liability and financial resilience. Criminal charges will be brought against “persistent law breakers”, enabling automatic and severe penalties for wrongdoing, as well as ensuring monitoring of every sewage outlet. Notably, the Act will require sewerage undertakers in England to produce an annual pollution incident reduction plan and require water companies to publish data on discharges from storm overflows. The standard of proof required for certain offences will change from the civil to the criminal standard, which is intended to result in more expedient penalties from the regulators. Water Services Regulation Authority (Ofwat) Ofwat, which published its “[Growth Duty](#)” in May 2024, will now also be required to “have regard” to how the water industry can contribute to net zero.

Environment Agency (EA) Publishes Consultation on Decarbonisation Readiness Guidance

The UK government has introduced [decarbonisation readiness](#) requirements, amending the Environmental Permitting (England and Wales) Regulations 2016. From 28 February 2026, new or substantially refurbished electricity generators must submit a decarbonisation readiness report as part of their permit applications. This ensures facilities are prepared for future carbon reduction measures, supporting the UK’s net-zero targets.

To assist operators, the EA has drafted technical guidance outlining reporting requirements and compliance steps. A public consultation is open from 28 February to 9 May 2025, seeking feedback from industry stakeholders, government bodies, non-governmental organisations, and community groups. Responses can be submitted via the [Citizen Space](#) consultation website or email.

These regulations will align environmental permitting with long-term decarbonisation goals, ensuring new energy infrastructure is designed for low-carbon transition. The final guidance, published after the consultation, will clarify operators’ responsibilities and implementation expectations.

Mandatory Digital Waste Tracking Delayed to April 2026

In February 2025, Defra announced a delay in the introduction of mandatory [digital waste tracking](#) in the UK. Initially planned for April 2025, the new system, introduced by the UK Government, Scottish Government, Welsh Government and Department of Agriculture, Environment and Rural Affairs for Northern Ireland is now expected to launch in April 2026. Further updates on the scope and timeline of the project will be provided in May 2025.

The digital waste tracking service will replace existing paper-based waste transfer notes and hazardous waste consignment notes. This initiative is enabled by powers granted under the Environment Act 2021. The government had previously confirmed in October 2023, following a consultation, that it intended to introduce digital waste tracking in April 2025. However, feedback from industry stakeholders and delivery partners indicated that the original timeline was too challenging, prompting the delay. The additional time will allow for further development and refinement of the system before implementation.



Compliance Assessment Reports to be Made Public

From April 2025, the EA will start publishing [Compliance Assessment Reports](#) (CARs) online as part of its commitment to regulatory transparency. CARs assess compliance of a “competent operator” with its environmental permit, including documenting inspections, audits and monitoring results. Any non-compliance is recorded, impacting compliance scores, subsistence fees and potential enforcement actions.

Previously available only upon request, CARs will now be published in phases, starting with water discharge activities from February 2025. Reports will be made public 42 days after issuance, allowing time for appeals and commercial confidentiality considerations. Increased public accessibility may lead to greater scrutiny and create reputational risks for operators, including potential litigation, prompting more challenges to adverse CAR. It will be crucial for operators to carefully manage their environmental permit compliance and understand the appeals process to avoid negative public reactions.

Defra and Devolved Nations Publish Pesticides Action Plan for the UK

The [UK Pesticides National Action Plan](#), published on 21 March 2025, sets out a commitment and strategy for managing pesticide use and minimising risk. This plan has been long awaited by those in the biocidal and plant protection industry and sets a minimum domestic target to reduce each of the UK pesticide load indicator (PLI) metrics by at least 10% by 2030 (using 2018 figures as baseline). Three main objectives are outlined in the document:

1. Encouraging uptake of integrated pest management
2. Setting clear targets and measures to monitor use of pesticides
3. Strengthen compliance to ensure safety and better environmental outcomes

The plan explains that the PLI indicator (which consists of the harm pesticide could cause to different species groups, the way pesticides behave in the environment and the quantity used) applies only to the agricultural arable sector, which represents approximately 90% of overall pesticide use in agriculture and horticulture. The National Farmers’ Union has been quick to [question](#) how the plan will be delivered without impact on the agricultural sector.



Health and Safety Executive (HSE) Publishes New [UK REACH Work Programme](#) (Work Programme) Describing Operational Work Planned for 2024/2025

The Work Programme details the operational activities that the HSE, supported by the EA, will undertake and seeks to provide a comprehensive picture of all activities conducted under the UK retained version of the EU Regulation on the Registration, Evaluation, Authorisation and Restriction of Chemicals (UK REACH). Within each subject theme, the Work Programme provides deliverables for the year ahead. The document also sets out ongoing priorities and work to be undertaken in future years. The HSE's work will be directed by activities within industry and government, and by specific legislative triggers. The plan reveals deliverables and targets on a range of topics, including:

- Dossier evaluation
- Substance evaluation, authorisation
- An initial assessment of substances submitted to be "substances of very high concern" (SVHC) in the EU to consider whether they are appropriate for SVHC identification in the UK
- Completing ongoing restriction opinions for lead in ammunition and completing restriction dossiers for public consultation for per and poly-fluoroalkyl substances (PFAS) in firefighting foam

Anyone affected by UK REACH should review this Work Programme and whether it impacts any of their substances.

PackUK Becomes Scheme Administrator For Packaging Extended Producer Responsibility (pEPR) Scheme

[PackUK](#) was officially launched on 21 January 2025, as the [scheme administrator](#) for UK's pEPR scheme. The [pEPR scheme](#) will transfer the costs of dealing with household waste away from taxpayers and local authorities, as well as onto the packaging producers themselves.

PackUK will lead the implementation of the pEPR scheme, which will revolutionise the approach UK takes to packaging and packaging waste as it steps towards a circular economy, as well as ensuring alignment with international best practice. PackUK will be responsible for setting up pEPR fees, raising fees from obligated producers and making packaging waste disposal payments to local authorities in return for their delivery of efficient and effective collection and recycling services. PackUK will also be responsible for public communications and information campaigns to encourage correct disposal of packaging waste and discourage littering. Large and small producers must [submit](#) their data by 1 April 2025. The [third iteration of the pEPR illustrative base fees](#) was published at the end of 2024, with the final version expected in July 2025.



Biodiversity at the Top of the UK and World Agendas

The UK has made an important commitment to biodiversity by publishing its [Blueprint for halting and Reversing Biodiversity Loss: the UK's National Biodiversity Strategy and Action Plan for 2030](#) (UK NBSAP) on 26 February 2026. This summarises the consensus and commitment of all four UK countries to “meet the goals, targets and mission of the Global Biodiversity Framework (GBF) ([Kunming-Montreal Global Biodiversity Framework](#)) domestically” and sets out [23 ambitious UK targets](#), which align with the 23 targets of the GBF.

The GBF was adopted at the Committee of the Parties 15 (COP15) at the Convention on Biological Diversity (CBD) in Montreal 2022, and sets the global biodiversity goals, including protecting 30% of land and sea by 2030 (30x30), reducing species extinctions and restoring ecosystems. On 28 February 2025, the [COP 16 process](#) (reconvened in Rome after suspension in Cali, Columbia in November 2024) made significant advances for biodiversity by setting a strategy for global collaboration to mobilise US\$200 billion annually by 2030 for biodiversity protection (from public, private and philanthropic avenues in addition to multilateral development banks) and adopting a monitoring framework for tracking progress toward global biodiversity targets, ensuring consistent assessment across nations.

The UK NBSAP aligns national policies with the GBF, ensuring that biodiversity protection, restoration and sustainable use are implemented at a country level, which ultimately will help drive coordinated efforts to halt biodiversity loss and restore nature, maintain food security, store carbon and tackle the impacts of floods and droughts, as well as ultimately ensure a healthier planet for this and future generations. This shift towards a nature-positive economy means that companies must proactively align with biodiversity targets across business operations, including supply chains and markets to comply with regulations, attract investment, maintain consumer trust and position themselves for long-term resilience.

Kick-off Discussions on the Future Ecodesign for Sustainable Products Regulation (ESPR) and Energy Labelling 1st Working Plan

The first meeting of the Experts on Ecodesign for Sustainable Products and Energy (ESPR) Labelling (referred to as “the Ecodesign Forum”) was held on 19 and 20 February 2025 in Brussels.

During this meeting, the European Commission (Commission) presented the [discussion paper](#) on the first [ESPR](#) and energy labelling working plan. According to Article 18(5) ESPR, the initial working plan is expected to include products such as textiles and apparel, furniture and tyres, along with intermediate materials like steel and aluminium. It will also encompass 16 energy-related products, including displays, household dishwashers, professional laundry equipment and professional dishwashers (prioritised for early implementation). The working plan will likely feature two coexisting acts, addressing reparability, recyclability and recycled content.

However, it appears that the Commission intends to exercise its option to exclude certain product groups listed in the ESPR from the first working plan. Notable exclusions may include detergents, paints and chemicals. Businesses whose products and/or supply chain include products and intermediaries in scope of ESPR should monitor these developments closely.



New EU Restrictions on BPA and Hazardous Bisphenols in Food Contact Articles

[Commission Regulation \(EU\) 2024/3190](#) (Bisphenol Regulation) entered into force on 20 January 2025. It introduces a ban on the use and placing on the EU market of not only bisphenol A (BPA) and its salts, but also hazardous bisphenols and bisphenol derivatives in the manufacture of certain food contact materials and articles. These materials and articles include adhesives, rubbers, ion-exchange resins, plastics, printing inks, silicones and varnishes and coatings.

The ban follows the publication of an [opinion](#) by the European Food Safety Authority (EFSA) in 2023 that established a new tolerable daily intake for BPA approximately 20,000 times lower than the previous level.

During the legislative process, the scope of the restriction was extended to include other hazardous bisphenols and bisphenol derivatives. These are bisphenols that have a [harmonized classification](#) as 1A or 1B “mutagenic”, “carcinogenic”, “toxic to reproduction” or category 1 “endocrine disrupting” for human health. Notably, this includes bisphenol S, classified as toxic for reproduction 1B.

As it currently stands, the legislation offers only limited possibilities to escape the ban. Narrow derogations are granted for the use of BPA as a monomer, or starting substance in the manufacture of liquid epoxy resins applied to self-supporting food contact materials or articles with a capacity greater than 1,000 litres, as well as in the manufacture of polysulfone filtration membrane assemblies. Interestingly, no such derogation is foreseen for bisphenol S (BPS) as Annex II only refers to BPA. For BPS or hazardous bisphenols other than BPA and bisphenol derivatives, industry or trade association can submit a specific application in line with the requirements of the [FCM Regulation](#) to request a specific derogation.

Transitional periods are foreseen for certain single-use and repeat-use final food contact articles manufactured using BPA. No explicit reference is made to other hazardous bisphenols in the transitional provisions. The BPA Regulation also introduces extra reporting obligations, information requirements (as part of the declaration of compliance) and amends the [Plastic Regulation \(EU\) No 10/2011](#). The next important step will be the publication of the EFSA scientific output detailing the information necessary for the assessment of hazardous bisphenols or bisphenol derivatives, which must be published before 20 January 2027. In the meantime, the industry should measure the impact of the ban, assess their supply chains, and take appropriate actions, including preparing FCM applications if the continued use of bisphenols appears necessary.

Challenge to the Urban Wastewater Treatment Directive

Adopted at the end of 2024, [Directive \(EU\) 2024/3019](#) on urban wastewater treatment is now under review in Luxembourg for a legality check by the EU Court of Justice. This directive introduces a contentious extended producer responsibility system, aimed at financing the quaternary treatment needed to eliminate micropollutants from urban wastewater. However, it has sparked opposition from the two key sectors impacted. Trade associations such as [EFPIA](#) and [Cosmetics Europe](#), alongside companies affiliated with [Medicines for Europe](#), have filed actions for annulment. At the time of drafting, it is unknown whether other applicants, such as a member state, have also submitted actions for annulment. Member states must already begin preparations to implement the directive, with the transposition deadline set for 31 July 2027.



Omnibus Package Proposal: Commission Publishes First Omnibus Package

On 26 February 2025, the Commission published the much-anticipated proposal for the first “omnibus package” to amend existing sustainability regulations ([Omnibus I](#)) and EU investment programs ([Omnibus II](#)).

The Omnibus package includes the following proposals:

Omnibus I

- [“Stop-the-clock”](#) for the dates of application of certain corporate sustainability reporting and due diligence requirements under the Corporate Sustainability Reporting Directive ([CSRD](#)) and the Corporate Sustainability Due Diligence Directive ([CSDDD](#)):
 - **CSRD** – A two-year delay for companies due to report in 2026 and 2027 (mainly large undertakings, parent companies of large groups and listed SMEs).
 - **CSDDD** – A one-year extension for transposition into national law (now July 2027) and a delay for the first application to the largest companies until 2028.
- [For a Directive amending the CSRD and the CSDDD.](#)
- For an [EU CBAM simplification](#).
- A draft act to amend the Taxonomy Disclosures Delegated Act and the Taxonomy Climate and Environmental Delegated Act, which are open for public [consultation](#).
- Omnibus II, a [Regulation amending the InvestEU Regulation](#).

These proposals were submitted to the European Parliament and the council under the ordinary legislative procedure. On 1 April, Members of the EU Parliament agreed to accelerate agreement on ‘Stop the Clock’ proposals. The final “Stop the Clock” vote took place on 3 April 2025.

For further insights on the proposed changes and impacts for companies in scope of CSRD, please see our publication [What Should Companies do on CSRD While They Wait for The EU to Make Up Its Mind?](#)

Simplifying and Strengthening EU Carbon Border Adjustment Mechanism (EU CBAM)

On 26 February 2026, as part of the [Omnibus I](#) package the Commission adopted a [proposal](#) for a regulation to simplify and strengthen the EU CBAM. We have previously reported on EU CBAM, a carbon tariff on embedded greenhouse gas (GHG) emissions in certain carbon intensive products being imported into the EU (cement, iron and steel, aluminium and hydrogen, as well as fertilisers and some electricity). EU importers of these products goods must buy carbon certificates which correspond to an EU equivalent carbon price (as if the goods been produced in the EU). The EU CBAM system was introduced to prevent carbon leakage and drive decarbonisation, and the recent EC proposals include new weight thresholds, a delay on the obligation to purchase CBAM certificates and a revised deadline for emissions reporting. Further details and insight are outlined in our recent [EU CBAM simplification](#) publication.



Commission Introduces Clean Industrial Deal

On 26 February 2025, the Commission published a communication entitled "[The Clean Industrial Deal: a joint roadmap for competitiveness and decarbonisation](#)" (CID) together with a [factsheet](#) and [Q&A](#).

The CID is a strategic initiative to introduce tangible actions to make decarbonisation a driver of industrial growth in the EU, including ensuring lower prices of energy, increasing quality jobs and a competitive business environment. The CID measures will focus on energy-intensive industries and the clean-tech sector. In addition, the CID promotes circularity to reduce waste, extend material life and strengthen EU resource independence to third countries for a competitive, resilient market.

The main elements of the CID include:

- The adoption of the [Affordable Energy Action Plan](#) aimed at ensuring lower energy costs for industries and households through accelerated clean energy deployment, improved energy market integration and infrastructure, as well as reduced fossil fuel dependence
- The Industrial Decarbonization Accelerator Act which will introduce sustainability and "Made in Europe" criteria in public and private procurement, as well as review the public procurement framework in 2026 accordingly
- Mobilization of €100 billion to finance EU-made clean manufacturing, including the adoption of a new CID state aid framework; strengthen the innovation fund and propose an industrial decarbonisation bank, and increasing InvestEU financial guarantees, unlocking up to €50 billion
- Securing access to critical raw materials (CRM) by establishing an EU critical raw material centre and the adoption of the Circular Economy Act in 2026 with the aim to have 24% of circular materials by 2030
- On global trade and resilience, the Commission aims at launching the first clean trade and investment partnerships, enhance trade defense measures and streamline the EU CBAM.
- Create a union of skills to upskill workers in clean tech and digitalisation.

Finally, the CID will also strengthen horizontal enablers by cutting red tape, maximizing the Single Market, promoting quality jobs and improving EU and national policy coordination.

N-hexane added to Substance of Very High Concern (SVHC) intentions list

On 18 February 2025, the European Chemicals Agency's (ECHA) register of SVHC intentions was updated to include [n-hexane](#) as a SVHC. The proposal was made by Slovenia, and the remarks cite the substance's neurotoxic effects and serious risks to human health. N-hexane is used in adhesives, coatings, lubricants, pharmaceuticals and cosmetics, and is currently classified as a "highly flammable liquid and vapour" with additional concerns over chronic health effects including nerve damage, risks to fertility and foetal development, organ damage and toxicity to aquatic life.

If n-hexane is classified as a SVHC then it will be subject to stricter regulatory controls across the EU, therefore supply chains involving this substance should monitor developments and consider submitting feedback to ECHA during any public consultation. Member states can propose changes to the EU REACH register for formal evaluation and this process is expected on 4 August 2025, following the current period of stakeholder engagement and consultation.



EU and UK PFAS updates

In the UK, the Royal Society of Chemistry has published the first [survey of the public's attitudes to PFAS](#). The survey found that, "although overall awareness of PFAS was low, with only 29% of survey respondents being aware of them, respondents with higher levels of awareness were more likely to perceive them as higher risk to human health and the environment (54% of respondents)". 84% of those surveyed supported regulation requiring PFAS-using industries to reduce and reverse contamination, and 75% supported a fee or tax on these industries for end-of-life management and environmental clean-up. In Jersey, a [petition](#) has called for cleaner water, the construction of a treatment plant and improvement of PFAS related healthcare. At the time of writing, it has received modest interest, but indicates growing public awareness and [press coverage](#) around this form of contamination. Particular concerns in Jersey centre on PFAS presence in boreholes and wells, and PFAS-containing firefighting foams used at Jersey Airport. Sampling and remedial works are reportedly [ongoing](#).

In March 2024, the ECHA [announced](#) that its Committees for Risk Assessment (RAC) and for Socio-Economic Analysis (SEAC) had reached a number of "provisional conclusions" on PFAS uses. A broad restriction on the manufacture, placing on the market and use of PFAS in the EU was first [proposed](#) by five national authorities in February 2023. The RAC and SEAC are in the process of reviewing the proposed restriction and the 5,600 scientific and technical comments received from third parties in response to a consultation. In the March meetings, both committees reached a provisional conclusion on fluorinated gases, and the RAC also reached provisional conclusions for transport and energy applications and the energy sector. The SEAC will continue discussing these areas in its June meeting. Medical devices, lubricants and electronics and semiconductors are also on the June agenda. Once final, the opinions of the RAC and SEAC will contribute to the Commission's decision on the restriction proposal.

EU Titanium Dioxide Case – Advocate General (AG) Ćapeta's Opinion

On 6 February 2025, AG Ćapeta [proposed](#) that the European Court of Justice set aside the General Court's decision annulling the harmonised classification of titanium dioxide as a carcinogen in certain powder forms. AG Ćapeta emphasised that "[i]n cases of scientific uncertainty relevant for the identification and classification of hazardous substances, the CLP Regulation bestows the role of final interpreter on the Commission, which in turn renders its decision on the basis of an assessment by the RAC". The AG concluded that the General Court exceeded the limit of its power of judicial review by going further than simply judging whether the administration was aware of, and had assessed all of the aspects that current scientific knowledge required to be taken into consideration. Titanium dioxide is a component across several sectors, and opinions have varied over its classification for a number of years. Stakeholders will need to monitor these developments and any response from the General Court.



ECHA Assumes New Role to Improve the Chemical Safety of Packaging

On 11 February 2025, the EU's new [Packaging and Packaging Waste Regulation](#) (PPWR) formally entered into force. It introduces a broad range of measures to enhance the sustainability of packaging and reduce packaging waste. The first of those requirements will start to apply from 12 August 2026. More information on the PPWR can be found [here](#) and [here](#). The formal entry into force of the PPWR brings with it new tasks for ECHA. Notably ECHA will prepare a study identifying chemicals of concern in packaging and assessing their impact on safety, reuse and recycling. ECHA's study is expected by the end of September 2026. It will feed into a subsequent Commission report, expected by the end of 2026, identifying any required follow-up measures. These may include REACH restrictions, in the case of substances primarily affecting human health or the environment, or requirements set under the PPWR's design for recyclability criteria, in the case of substances that negatively affect the reuse and recycling of materials. Such measures would be in addition to the concentration limits which the PPWR already prescribes for certain heavy metals (applicable to all packaging) and PFAS (applicable to food contact packaging).

Publication of Community Rolling Action Plan (CoRAP)

On 25 March 2025, ECHA published the [CoRAP for 2025-2027](#). It identifies eight substances targeted for evaluation in 2025, with twenty further substances listed for evaluation in 2026 and 2027. The purpose of the CoRAP is to set out, based on a risk-based selection criteria, what ECHA's priority substances for evaluation are for the next three years. Eight EU member state competent authorities will lead the charge on the CoRAP substances. ECHA has listed detailed justifications for inclusion of substances in CoRAP available on its website.

Notably three substances that were included in last year's CoRAP have now been withdrawn:

- Benzaldehyde, on the basis that data are considered already sufficient to clarify the initial concerns
- Sodium hydroxymethanesulphinate, as the dossier evaluation process is to be completed prior to initiating substance evaluation
- Reaction mass of: triphenylthiophosphate and tertiary butylated phenyl derivatives, as the substance has now been identified as a SVHC

HSE to Focus on Mental Health and Wellbeing in the Workplace

The HSE has published its ten-year strategy ["Protecting People and Places"](#) that identifies mental health and wellbeing in the workplace, as a key focus area. This strategic shift underscores the importance of creating healthier work environments and supporting employee mental health. However, consistent investigation and enforcement of these initiatives are still pending, leaving room for improvement in their implementation.

There is also [potential for increased regulation](#) of office-based, "City" companies, which could lead to more comprehensive oversight and better mental health support for employees in these sectors. As the HSE continues to evolve its approach, it will be crucial for stakeholders to monitor how these changes impact workplace wellbeing and overall safety standards – including employers who may consider themselves "lower risk" from a health and safety perspective.



HSE to Take on New Building Safety Responsibilities

The HSE has taken on the role of the [Building Safety Regulator](#) (BSR), as established by the Building Safety Act 2022. The BSR is tasked with overseeing higher-risk buildings, improving safety standards across all structures and providing support to professionals in design, construction and building control.

The BSR's authority encompasses a range of enforcement activities, including investigations, interim suspensions and information requests. Additionally, the BSR can impose sanctions such as financial penalties, registration actions, compliance notices, and, if necessary, refer cases for prosecution. These powers enable the HSE to play a crucial role in improving building safety and protecting residents, as well as evidencing the rising influence that the HSE will have on building safety. The HSE has [addressed](#) the resourcing issues it has faced in this area, an ongoing challenge for many regulators.

Martyn's Law Receives Royal Assent

The [Terrorism \(Protection of Premises\) Bill](#) received Royal Assent on 3 April 2025, becoming the Terrorism (Protection of Premises) Act 2025. The new legislation, commonly known as "Martyn's Law", is intended to improve protective security and organisational preparedness across the UK. The act introduces mandatory security measures including terrorism risk assessment and emergency plans, and a regulatory body will oversee compliance with fines for non-compliance. It establishes a tiered approach, linked to the number of individuals it is reasonable to expect may be present at the same time at premises and events. With these measures, the legislation recognises that the highest risk of harm is likely to occur at specific locations and events accessible to the public.

The legislation will be regulated by the Security Industry Authority (SIA) and will be subject to a 24-month implementation period to allow those impacted (in particular qualifying premises) to understand their new obligations and to establish the SIA's new function. Guidance is expected but has not yet been published.

Martyn's Law will be of particular interest to those with publicly accessible premises as the legislation establishes both a standard duty (200-799 individuals), as well as an enhanced duty (800 or more individuals).

Significant Fines from the HSE – Notable HSE fines in the last few months have included:

- A [fine of more than £1 million](#) for a multinational company that manufactures wood-based products after two workers were seriously injured following health and safety breaches. In 2022, the same company had been fined £2 million following the death of an employee in connection with the failure of a safe system of work.
- A company that "failed to ensure that the lifting activity was properly planned by a competent person, or carried out in a safe manner" and "failed to establish a safe system of work" has been [fined £100,000](#).
- A company has been fined [£100,000](#) for failures at a waste and recycling centre after "the compactors operation had not been adequately assessed", and there was "no clear instruction or training provided to workers."
- A hydraulics company that had "no safe systems of work", "lack of adequate training" and "failure to carry out sufficient risk assessment" has been [fined £96,333](#) after a worker's legs were trapped in a machine.



Advertising (Less Healthy Food Definitions and Exemptions) Regulations 2024 – New restrictions on advertising of high fat, salt, or sugar (HFSS) food and drink

From [1 October 2025](#), new restrictions under the [Advertising \(Less Healthy Food Definitions and Exemptions\) Regulations 2024](#) will limit the advertising of HFSS food and drink. These rules aim to reduce children’s exposure to HFSS marketing through television and online platforms and will have consequences for businesses in the food and drink sector.

The restrictions include a 9 p.m. watershed on HFSS adverts on TV and Ofcom-regulated on-demand programme services (ODPS). Online, a 24-hour ban will apply to paid HFSS product advertising, including non-Ofcom-regulated ODPS. In-scope organisations are those with 250+ employees that manufacture or sell HFSS products and pay for advertising.

A two-stage test determines if a product is restricted. It must belong to one of 13 specified categories (e.g., confectionery, ready meals and cereals) and exceed set Nutrient Profiling Model (NPM) scores. Exemptions apply to infant formula, baby food, meal replacements and medical foods.

The Advertising Standards Authority (ASA) will enforce compliance, with Ofcom oversight. Non-compliance could result in regulatory action, fines and reputational damage. Businesses should assess product compliance, adjust marketing strategies, train teams and monitor ASA guidance, expected in spring 2025, to ensure readiness.

Regulation (EU) 2025/351, amending multiple food contact materials (FCM) regulations (Plastic, Good Manufacturing Practices, and Recycling) on food contact

[Regulation \(EU\) 2025/351](#), adopted on 21 February 2025, has updated food contact material (FCM) rules, focusing on plastics, good manufacturing practices and recycling. It strengthens purity standards, ensuring only well-defined chemicals with minimal impurities are used in plastic FCMs. Stricter migration limits now apply to substances transferring from plastics to food, covering both virgin and recycled plastics.

The regulation also enhances recycled plastics requirements, improving quality control for recyclers and setting clearer reprocessing rules. Definitions for key terms like “additive” and “UVCB substance” have been refined for consistency with broader EU chemical safety laws.

These amendments took effect on 24 March 2025, with a compliance deadline of 16 September 2026. Businesses manufacturing, recycling or using plastic FCMs must comply with these new rules to continue operating in the EU market. The changes support food safety and sustainability within the circular economy framework.



Food Authenticity Network (FAN) Global Food Fraud Report 2024 Published

In February 2025, the latest [FAN annual report](#) on food fraud globally (Report), was published. The Report focuses on the commodities with the most food fraud reports, both using official reports and media and other publication reports (depending on the source, top reports include milk and dairy products, beverages, seafood, honey and processed foods). It is noted, though, that this does not necessarily mean that those products are those which are most subject to fraud, because those commodities which are most often targeted by regulators will influence these findings.

Types of fraud have also been analysed in the Report. The executive summary indicates that botanical and animal origin fraud were the most reported type of food fraud in 2024, followed by use of non-food substance and dilution. It notes that “of these frauds, using non-food substances in food has the potential to do the most harm as seen in the Sudan dyes in chilli powder and melamine in infant formula incidents”. Of note, though, the Report indicates that the number of “official” food fraud reports is very low at around 8% of total food safety reports. It recommends that, for meaningful analysis of official data, more regulatory agencies should publish their data in an open access format.

Food business operators should check that current assessments and mitigation plans remain appropriate to address new and evolving risks. The Report from FAN is a helpful tool to sense-check that systems remain relevant and suitably robust.

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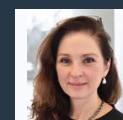
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