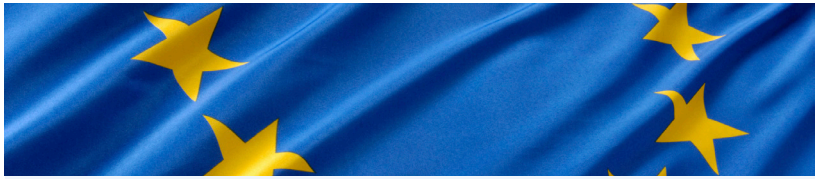


Doing Business in the EU: How Does the Omnibus Proposal Affect Large Food Businesses?

The EU's Corporate Sustainability Reporting Directive (CSRD) was due to come into force in stages from 2025 onwards (obligations for large public interest companies began in 2024, with reports due in 2025). However, the European Commission has now issued an "Omnibus Proposal", which proposes delays to implementation and a change in thresholds. It also proposes changes to other EU measures with a focus on environmental, social and governance (ESG) objectives, namely the Corporate Sustainability Due Diligence Directive (CS3D) and the Carbon Border Adjustment Mechanism (CBAM).

For food businesses doing business in the EU, the implications of CSRD, CS3D and CBAM are significant. Many food and drink supply chains are global, and the environment and environmental resources, such as carbon and water, are key to production, particularly around agricultural processes. Even those food businesses not directly in scope and/or outside of the EU may be affected, because of the impact of increased scrutiny of the supply chain (albeit proposals in relation to CS3D include a change of focus to Tier 1, or direct, suppliers only).

The Omnibus Proposal means that there are some changes afoot, but the legislation has not disappeared altogether. Food businesses should ensure that they understand the impact of the changes proposed (which are likely to evolve with the Council and Parliament starting their work as co-legislators) and prepare accordingly – taking your foot off the gas altogether may not be advisable. Read more in our blog post on what companies should do while the EU makes up its mind and register for our webinar on what the EU Omnibus Proposals on sustainability and simplification means for your reporting and compliance strategy.

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

In February, 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 that are most subject to fraud, because those commodities that 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 substances 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.

In the EU and the UK, food fraud can generally be enforced under general food laws. For example, provisions relating to misleading food information are relevant to origin fraud and dilution. Where non-food substances can cause harm, food safety laws are also likely to be breached.

Safeguards and precautions that food business operators have in place to detect and prevent such frauds in their supply chain are important, to defend against fraud and against enforcement action. These could range from supplier checks and audits, to authenticity testing, to traceability systems. To understand what safeguards are appropriate for a particular business, Global Food Safety Initiative (GFSI) benchmarking requirements include a food fraud vulnerability assessment and a food fraud mitigation plan, supported by a food safety management system. The UK's Food Standards Agency has an online tool that can help with a vulnerability assessment.

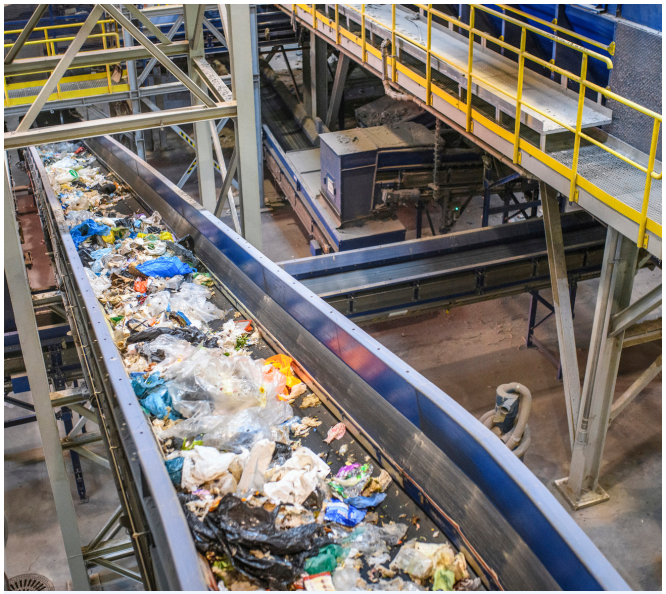
Food business operators should check that current assessments and mitigation plans remain appropriate, to address new and evolving risks. The Report from FAN is a helpful tool to sense-check that systems remain relevant and suitably robust.

UK Labour and Employment Law Issues for the Food Sector for the Year Ahead

2025 may not be as busy as 2024, but as highlighted in our recent hot topics webinar, food businesses should be using this year to prepare themselves for the significant reforms ahead. Key developments include:

- **Employment Rights Bill** – The Bill proposes wide-ranging changes to employment law, from "day one" unfair dismissal rights to greater rights for trade unions. The government has recently announced various amendments to the bill and is expected to launch a number of consultation exercises during 2025 on key proposals.
- **Neonatal care leave and pay** – A new statutory right for employees to take paid leave from work if their children are admitted to neonatal care will be coming into force from 6 April. Employers should consider introducing a policy to reflect the new statutory rights, so their staff are aware of them (see our article on neonatal care leave for further detail).
- **New failure to prevent fraud offence** – The Economic Crime and Corporate Transparency Act 2023 created a new corporate offence of failure to take reasonable steps to prevent fraud. This will apply to large organisations that meet certain criteria and will come into force on 1 September 2025. Affected employers should review their existing fraud prevention procedures in light of recently issued government guidance to see if any changes will be required to ensure compliance with these new requirements.

Access the recording of our webinar rounding up these items on the "to-do list" through our website.



Food Waste – New EU Targets for Reduction

On 19 February 2025, the Council and European Parliament reached a provisional agreement on a targeted revision of the EU's Waste Framework Directive, which sets EU waste reduction targets for food (as well as harmonised rules on extended producer responsibility for textiles).

Member states will be required to take appropriate measures to achieve, by end of 2030:

- 10% reduction in processing and manufacturing waste
- 30% reduction per capita in waste from retail, restaurants, food services and households

Such reduction targets are to be compared with the average amounts of food waste generated in these sectors in 2021-2023.

The provisional agreement will now have to be finalised and formally endorsed. Once adopted, member states will have up to 20 months to update their national laws to reflect the new rules. Companies will need to adapt their business models to incorporate the costs of waste management.

Cider in the Supreme Court?

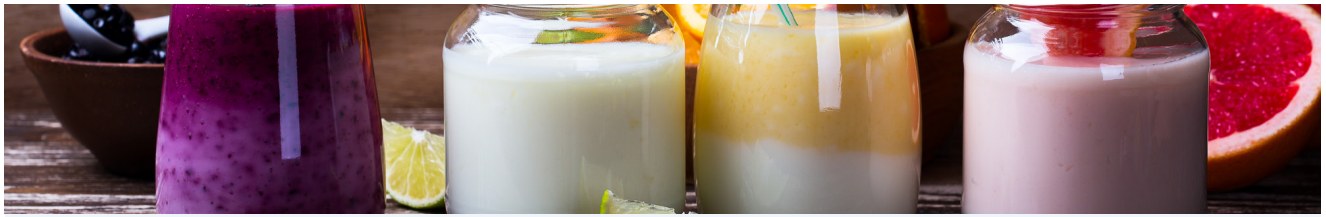
In 2024, the English High Court found that a discount retailer's packaging for its "Cloudy Cider Lemon" did not infringe UK-based cider company Thatchers' trade mark for its "Cloudy Lemon Cider" packaging, under Section 10(2)(b) or Section 10(3) of the Trade Marks Act 1994, nor constitute passing off.

Thatchers appealed the High Court's decision to the Court of Appeal in respect of the Section 10(3) finding only. A person infringes this section if they use a sign that is similar (or identical) to a trade mark with a reputation, and such use takes unfair advantage of, or is detrimental to the distinctive character of the trademark (i.e. it "rides on the coattails" of the trademark's unique character).

At the High Court, the judge held that whilst Thatchers' trademark had a reputation, the retailer's sign did not take unfair advantage of, and only had a "low degree of similarity" to, Thatchers' trademark. The Court of Appeal disagreed, noting that the retailer had intended to remind consumers of the Thatchers' trademark with the relevant packaging "closely" resembling the trademark. The retailer had therefore subsequently infringed Section 10(3).

The retailer has since applied for permission to appeal the Court of Appeal's decision to the final UK court of appeal, the Supreme Court. Whether the appeal is accepted, or the Court of Appeal decision stands, this case will impact rights holders that are looking to protect their brands as well as brands or supermarkets that create lookalikes.

For any further information or assistance with brand protection in the UK, please contact Carlton Daniel and Dannielle Jones.



EU Ombudsman Decision on the Use of the Term "Probiotics"

As it approaches its 20th anniversary, the Nutrition and Health Claims Regulation (EC) 1924/2006 remains a hot topic of discussion.

At the end of 2024, a decision by former EU Ombudsman Emily O'Reilly reignited the debate on the use of the term "probiotic" and its compatibility with the Nutrition and Health Claims Regulation (NHCR) requirements.

The decision followed a complaint by the International Probiotic Association (IPA), lodged in 2023. The IPA argued that the Commission was wrong to assimilate the use of the term "probiotics" to a health claim, relying on the 2007 Commission Guidance, according to which "reference to probiotic/prebiotic implies a health benefit" and thus a claim of "contains probiotics" should be considered a health claim. According to IPA, the Commission should "allow the use of statements such as 'contains probiotics' as 'nutrition claims' under the Claims Regulation. Alternatively, the Commission could consider such statements to be neutral descriptors."

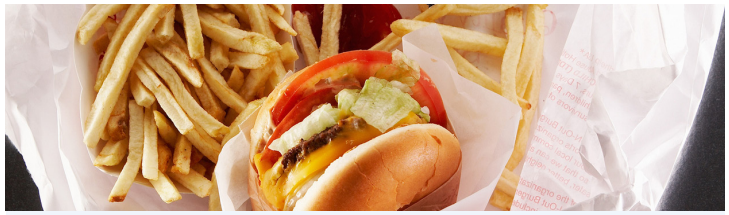
The Ombudsman dismissed IPA's arguments, agreeing with the Commission that the 2007 Commission Guidance is still up to date and fit for purpose, and thus implying that, to date, using the term "probiotics" equals using an unsubstantiated health claim. She emphasised that, in doing so, the Commission rightly erred "on the side of caution" by giving "effect to the general aim of the Claims Regulation [to] protect consumers from potentially misleading information about the food they purchase."

The Ombudsman further dismissed IPA's argument that the term "probiotics" could never be authorised as a health claim in view of the European Food Safety Authority (EFSA) guidance on health claims, stating that past failure should not prevent the industry from "submitting new applications to authorise health claims concerning 'probiotics' in the future", highlighting that, in any event, "food operators must prove health benefits of their products with scientific evidence before making such claims."

In that respect, one should wonder if it is a true possibility offered to the industry when considering the high costs of such applications and the low chance of seeing an application lead to positive results, as admitted by the Commission in its reply. It acknowledged that out of the 27 applications it received to date, none has obtained a favourable opinion by EFSA.

Ms. O'Reilly concluded that there was no maladministration by the European Commission, even commending the institution for its approach. She stated that the Commission's interpretation of the term "probiotics" does not create legal uncertainty, and incidentally recalled that, if member states had different views, "This would not mean that the Commission is wrong, but rather that some member states do not comply with EU law, which would be for the Commission to address in its capacity as guardian of the EU treaties."

Now, it remains to be seen if and how member states, which may have had a more pragmatic approach toward the use of the term "probiotics," will react, notably France, which recently changed its position and authorised the use of the term "probiotics" to designate the category of food supplements on the basis of Article 6 of the Food Supplements Directive 2002/46/EC.



Draft UK Advertising Standards Authority (ASA) Guidance on "Less Healthy" Foods

The UK's ASA is issuing revised guidance in relation to the 2024 regulations on the advertising of such foods (and applicable exemptions) due to come into force on 1 October 2025 (Advertising Regulations). The definition of what is "less healthy" under these Advertising Regulations is based on certain categories of food and drink, combined with consideration of the "nutrient profile", regardless of whether they are sold for consumption at home, or elsewhere.

ASA's earlier draft guidance, issued as part of a consultation in 2023, notes that additional restrictions under the Advertising Regulations prohibit Ofcom-licensed TV services from including advertising and sponsorship for identifiable less healthy products between 5:30 a.m. and 9 p.m.; Ofcom-regulated on-demand programme services (ODPS) from including advertising and sponsorship for identifiable less healthy products between 5:30 a.m. and 9 p.m.; and paid-for advertisements for identifiable less healthy products aimed at UK consumers from being placed in online media at any time (but, in each case, not applying to adverts by or on behalf of small and medium-sized enterprises SMEs).

The draft ASA guidance then set out criteria that determine whether an advertisement is subject to the less healthy product rules. It also included a section on the application of rules to branding and the use of "branding" (which is explained to include a diverse range of content and techniques, such as logos, livery, straplines, fonts, colour schemes, characters, audio cues and jingles) in advertising. ASA announced in January that it was amending the previous draft guidance with regards to brand advertising, and issued a further consultation in February, which closed on 18 March, through which the revised draft guidance can be accessed.

EU Packaging and Packaging Waste Regulation (PPWR) in Force

On 11 February 2025, the EU's new 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 and how businesses in general can prepare can be found in our previous articles.

For the food and drink sector, there are numerous impacts. The PPWR includes, for example, provisions relevant to "takeaway packaging", provisions applicable to the hotels, restaurant and catering (HORECA) sector, food contact materials requirements (with regards to substances in packaging), requirements for recyclable packaging, and targets for reuse. Of course, food business operators must also continue to ensure that compliance with food safety and hygiene requirements and packaging can be relevant to those obligations.

PackUK Becomes Scheme Administrator for UK Packaging Extended Producer Responsibility (pEPR) Scheme

PackUK was officially launched on 21 January 2025 as the scheme administrator for the UK's pEPR scheme. The pEPR is a scheme that will transfer the costs of "dealing with household packaging waste away from taxpayers and local authorities and onto the packaging producers themselves, applying the 'polluter pays' principle".

PackUK will lead the implementation of the pEPR scheme, which is intended to revolutionise the approach the 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.

German Court Ruling on Spirit Drinks

In its judgment of 21 February 2025 (Ref.: 51 O 36/24), the Potsdam Regional Court prohibited the sale of a "mulled gin" and a "mulled whisky". These are alcoholic beverages with a total alcohol content of 9% abv, which contain "gin" and "whisky", respectively, modelled on the more well-known "mulled wine".

A ban on such drinks is potentially justified, firstly, by the fact that an alcoholic beverage with an alcohol content of between 1.2% and 10% abv, which contains alcohol subject to alcohol tax, such as spirits, is considered to be an "alcopop". Not only is such a product subject to alcopop tax, but it must also carry an explicit warning in accordance with the German Youth Protection Act. The warning must be printed on the front label in the same font, size and colour as the brand name or invented name. Secondly, the judgment once again emphasises the EU-wide obligation to indicate the quantitative proportion of the individual alcoholic ingredients when referring to protected spirit categories, so that the consumer can recognise the alcoholic composition (Art. 12 (2) of Regulation (EU) No. 2019/787).

Christian Böhler from our Frankfurt office, representing the plaintiff, comments, "It is particularly interesting that the District Court of Potsdam this time decided without further ado on the basis of Regulation (EU) No. 2019/787, where it still considered a violation of Art. 16 GrCh under Art. 10 of the same regulation and therefore referred the matter to the ECJ."

Groundbreaking Pension Development

Would you like to provide your employees with up to 20% more benefits in retirement at no extra cost to you? Well, it might just be possible …

We have advised RMCPP Trustees Limited on its role as trustee of the Royal Mail Collective Pension Plan, the UK's first – and so far only – collective defined contribution (CDC) plan, which launched in October 2024.

CDC plans provide members with a predictable income in retirement (like a defined benefit or final salary plan) for fixed employer and employee costs (like a defined contribution or money purchase plan). Pooling investment and longevity risks means members do not have to make choices about how their savings are invested or how to receive their benefits at retirement and, in terms of income in retirement, industry modelling predicts that for the same level of contributions, members can expect up to a 20% better outcome than a defined contribution plan.

CDC plans are managed by trustees on behalf of members, and there is a special regime for authorisation and supervision by The Pensions Regulator. Funding is checked annually, and all member benefits are subject to the same adjustment to make sure the plan has enough money to meet its liabilities. While the annual adjustment can be up or down, trustees must demonstrate to The Pensions Regulator that the plan's benefit design, investment strategy and operations are "sound", including a very low likelihood of negative adjustments materialising.

Currently, the legislation that applies to CDC plans only applies to employers in the same corporate group. New regulations are expected later in 2025 that will allow unconnected employer schemes, opening the door to commercial master trust arrangements and making this exciting opportunity available to a much wider group of employers, including large operators in the food and drink industry.

If you would like to discuss what a CDC plan might offer to your business and your employees, your usual contact at the firm can put you in touch with a member of our pensions team who would be delighted to speak with you.

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

Published on the last day of 2024, 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. Both food packaging (for example, cans and plastic containers) and food production equipment could be impacted.

As it currently stands, the legislation offers only limited "exemptions", but 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, and in the manufacture of polysulfone filtration membrane assemblies. For hazardous bisphenols other than BPA and bisphenol derivatives, industry or trade associations could submit an application in line with the requirements of the Food Contact Materials Regulation to request a specific derogation. However, this will not be actionable until the EFSA has published relevant guidelines. There are transitional periods for certain single-use and repeat-use final food contact articles manufactured using BPA.

Food businesses should consider whether they use relevant materials and articles in production and/ or in packaging and assess the impact of the ban, in the context of their supply chains, and also consider whether transitional periods are relevant. Food businesses outside of the EU will also be affected to the extent that they supply relevant products into the EU.

Welsh Government To Progress With the Restrictions on the Price and Locations of High Fat, Salt and Sugar (HFSS) products

On 11 February 2025, the Welsh government's cabinet secretary for health and social care confirmed that its draft regulations were laid before the Senedd. The draft regulations concern restrictions on the price and location of promotions of specific prepacked products that are HFSS. These restrictions are intended to prevent impulse purchases and overconsumption of HFSS products, in an attempt to fight against the rising obesity levels in Wales.

The draft regulations aim to restrict specific in-scope businesses from:

- Offering multibuy offers in-store or online (for example, "buy one get one free") for the sale of specific HFSS foods.
- Placing HFSS foods in prominent locations in-store. This includes store entrances, designated areas where customers queue, aisle ends and checkouts. Where a smaller store only sells one category of HFSS products, there will be specific exemptions applicable to it.
- Promoting HFSS foods on certain locations online. This includes the website's home page, while searching for other non-HFSS products (subject to exceptions), on pop-up pages, on shopping basket or checkout pages.
- Offering free refills of certain prepackaged sugar-sweetened drinks in-store.

These restrictions will only apply to medium and large businesses with 50 or more employees. The scope of the draft regulations will exclude care homes, education institutions and restaurants.

If approved by the Senedd, the restrictions would come into force from 26 March 2026. This date factors in a 12-month implementation period, and the Welsh government plans to publish supporting guidance to assist businesses through such changes.

This draft regulation follows similar changes in the UK as it largely mirrors the rules already introduced in England. Further, the Scottish government, following its consultation last year, plans to introduce new rules that also restrict the promotion of HFSS products.

Payment Processor Charges Under Scrutiny

Payment processors' increasing fees charged when businesses accept card payments are significantly impacting the food and drink industry. In particular, restaurants and other food outlets face higher transaction costs, which may lead to menu price increases, ultimately impacting on consumer demand. The charges operate in a similar way to a tax and are damaging businesses already operating on low profit margins.

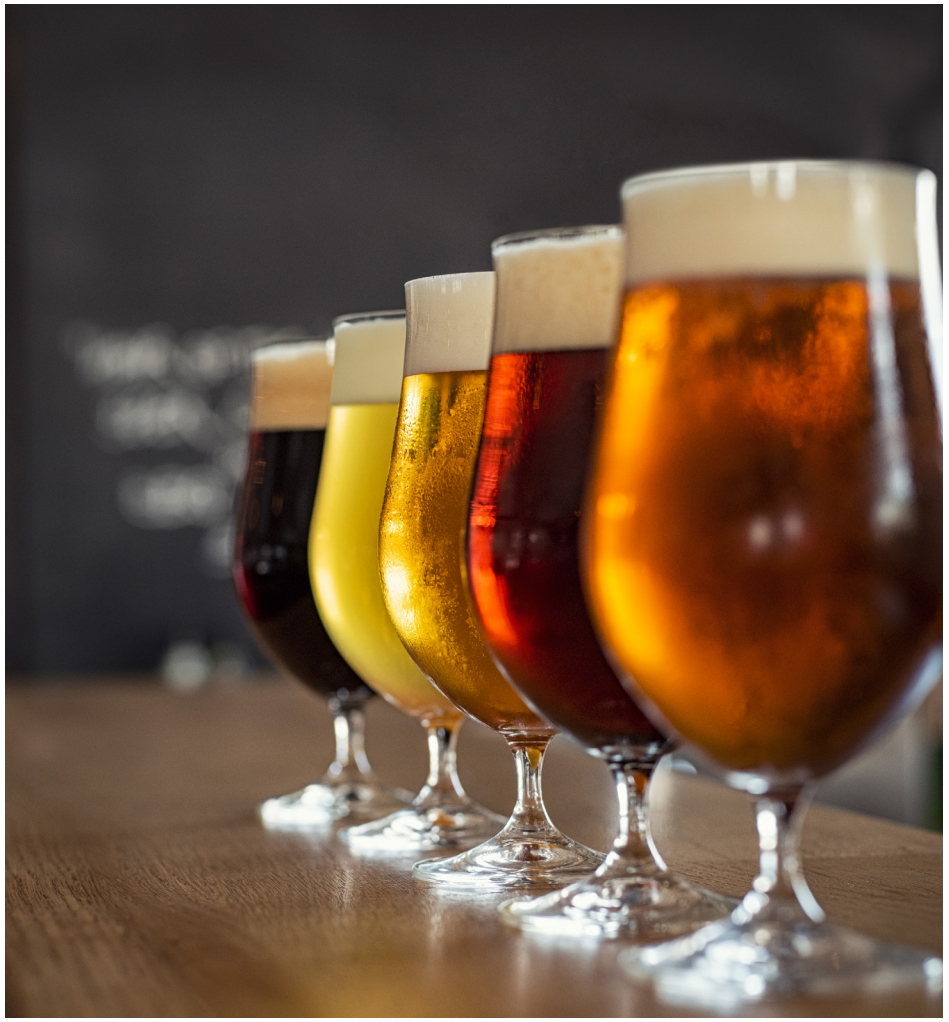
Class representative action in respect of such "excessive fees" has been ongoing for a number of years, and the payment systems regulator has recently proposed a price cap on cross-border card fees due to concerns about competition in the market.

Deposit Tourism Between Germany and Austria – How Austrian Deposits Are Becoming a Problem for German Brewers

The Austrian brewing industry has increased the deposit on bottles from 9 to 20 cents. In Germany it remains at 8 cents. In addition, the deposit on crates in Austria has long been twice as high as in Germany, at €3.

German and Austrian breweries sell their beer on both sides of the border. When a crate of beer bought in Germany is returned in Austria, the deposit paid back is €3.90 higher than the deposit charged at the point of sale. This difference is a significant burden for brewers and retailers. Especially in border regions, it can be quite lucrative for customers to return goods bought in Germany in Austria.

The deposit increase in Austria is aimed at increasing the return rate, while an increase in Germany has been discussed for years. In Germany, there are fears that a deposit increase would lead to a further decline in beer sales. At the same time, the outflow of empties from Germany to Austria poses a threat to small and medium-sized breweries. Austria faces the problem of additional costs due to deposit tourism, which is currently being countered by limiting returns to standard retail quantities. As a result of this development, the discussion in Germany about increasing the deposit may gain momentum again.



New Consumer Law Enforcement Powers – CEO of the Competition and Markets Authority (CMA) Speech

In her speech to TechUK on 10 March, Sarah Cardell, CEO of the CMA, made some references re how the CMA plans to approach the early stages of its new consumer law enforcement powers, which will come into force on 6 April 2025.

Under the Digital Markets, Competition and Consumers Act 2024 (DMCCA), the CMA will acquire new direct enforcement powers against businesses that have breached consumer protection laws and will be able to take direct action (for instance, imposing fines and ordering redress) in order to tackle the breaches, without having to go to court.

Final guidance will be published by the CMA in early April. At the same time, the CMA will also publish a document setting out its enforcement priorities for the first 12 months of the regime.

What areas in particular will be scrutinised? More than one source has suggested the CMA may investigate greenwashing again, but this time, will that have much greater consequences?

- It is unclear specifically which areas or sectors will be looked at by the CMA in the first instance. That said, Sarah Cardell has said that the CMA's early enforcement action is likely to focus on the most serious breaches that cause the most harm to consumers. Examples of such breaches might include aggressive sales practices that prey on vulnerability, providing information to consumers that is objectively false, or imposing contract terms that are very obviously imbalanced and unfair, behaviour where the CMA has already put down a marker through previous work, and where the law states that a practice is unfair.
- "Greenwashing" is not mentioned explicitly in the DMCCA, but making statements (or indeed omitting to include information) that are likely to mislead consumers into making transactions they would not otherwise make is likely to lead to enforcement action by the CMA. Greenwashing is co-regulated by Trading Standards and the ASA, and we anticipate that ASA will remain the primary regulator for all but the most serious infringements.
- The CMA identified certain areas that received a lot of feedback in the consultation in advance of producing its guidance, namely (i) drip pricing, and (ii) fake and misleading reviews.
  - Drip pricing is the adding on of unexpected and untrailed mandatory charges at the end of a purchasing journey. This harms consumers, as effective price competition primarily takes place at the headline price level. The CMA is going to takes its time to digest feedback to its c onsultation and provide guidance on this practice in stages. So called "dynamic pricing" is also likely to form an area of focus in this regard.
  - Under the Consumer Protection from Unfair Trading Regulations 2008, the CMA already has powers to tackle the provision of false and misleading reviews. However, when the DMCCA comes fully into force, it will replace the regulations, and the obligations on business to combat fake reviews will be enhanced. The CMA will focus its early efforts (for the first three months from April) towards supporting businesses' compliance rather than enforcement.

What could this mean for food companies? Could they face the threat of huge fines?

- What this means for food companies will depend largely on the nature of the companies in question, including whether they are directly consumer-facing (or further up the supply chain) and also including their size and level of sophistication, as well as whether they sell online in the first place. It will also depend on whether they are involved in practices that are considered by the CMA to be harmful to consumers. The CMA has recognised that the compliance burden on smaller businesses has to be proportionate, and will try to make the upcoming guidance as clear and accessible as possible.
- The CMA's new powers will make it easier and quicker for the CMA to investigate and enforce breaches of the consumer protection laws. Breaches for noncompliance could lead to fines of up to £300,000 or 10% of a business's total global turnover, whichever is higher. The CMA may also impose directions for the business to change its behaviour, which may include enhanced consumer measures, such as payment of compensation to affected consumers. Failure to comply with directions may lead to the CMA imposing further large penalties of up to 5% of worldwide turnover and/or 5% of daily turnover.
- The Draft Consumer Guidance published by the CMA in July 2024 confirmed that the CMA's new penalty powers do not apply to conduct that has taken place before the commencement date of the DMCCA (although the CMA may have regard to such conduct when imposing fines).
- We can expect companies to scrutinise marketing and advertising claims made by competitors and to make complaints and ultimately refer non-compliant rivals to one of the many regulators to achieve a level playing field. Fast-growing challengers and high-profile brands are most likely to be in the firing line for both regulators and competitors.

How does this fit with the "growth first" CMA that the government has promised?

- Sarah Cardell reiterated on a number of occasions in her speech that the CMA is committed to driving growth and that it is the government's No. 1 priority. The CMA's job is to exercise its duties and its interventions in such a way that will drive growth and investment in the UK.
- If businesses "get it right", consumers benefit, which will in turn drive growth. The CMA's job is to ensure that consumers are adequately protected.

Sam Hare and Carlton Daniel provide expert advice on consumer law and have a focus on the food and drink sector.

Contacts

Hannah Kendrick
Partner, Leeds
T +44 113 284 7620
E hannah.kendrick@squirepb.com

Nicola Smith
Partner, Birmingham
T +44 121 222 3230
E nicola.smith@squirepb.com

Carlton Daniel
Partner, London
T +44 20 7655 1026
E carlton.daniel@squirepb.com

Matthew Lewis
Partner, Leeds
T +44 113 284 7525
E matthew.lewis@squirepb.com

Christofer Eggers
Partner, Frankfurt
T +49 69 1739 2444
E christofer.eggers@squirepb.com

Dr. Christian Boehler
Senior Associate, Frankfurt
T +49 69 1739 2421
E christian.boehler@squirepb.com

Manon Ombredane
Director, Brussels
T + 32 2 627 1134
E manon.ombredane@squirepb.com

Kirsty McLean
Partner, London
T +44 20 7655 0298
E kirsty.mclean@squirepb.com

Wendy Hunter
Partner, London
T +44 20 7655 1119
E wendy.hunter@squirepb.com

Victoria Callicott
Partner, Birmingham
T +44 121 222 3260
E victoria.callicott@squirepb.com

Sam Hare
Senior Associate, London
T +44 207 655 1154
E sam.hare@squirepb.com