Getting your Product on the Market in 2025: Formulation to Packaging

A Summary

Bringing a packaged food product to market in a complex global landscape requires Food Businesses Operators (FBO's) to understand the entire compliance chain.

From ingredient sourcing to labelling, claims and packaging waste, FBO's must integrate compliance considerations at every stage.



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Q&A Summary

- There are a number of global influences dominating and shaping regulations that are applicable FBO business processes. Policy and regulation changes in many areas including, Ethical and Environmental legislation, Animal Health, Public Health and Human Health Legislation have become the most important spheres of global regulation. In addition, the increasing use of categorisation systems such as high-fat, salt and sugar foods complicate navigation of global compliance.
- As an industry best practice, FBO's should plan meticulously from product concept onwards to understand and account for relevant compliance factors.
- FBO's should integrate dynamic risk assessment models to underscore their product compliance. In turn, this should be based on horizon scanning for regulatory, government policy and public and scientific opinion changes in their target markets.
- FBO's must ensure their employees posses the right skillsets throughout the business and that there is effective inter-departmental communication on compliance matters. Similarly, investing in the right information and data systems to be able to prove compliance and appropriate due diligence is pivotal.
- Fostering a compliance-driven mindset from the top-down and the bottom-up is crucial to embedding wholesale compliance culture. Although advocating for resources for potential changes may seem difficult without clear, immediate returns, investing in skills and infrastructure will enhance overall business efficiency, resilience and productivity.
- In the current and future climate of regulations, FBO's that can implement these actions will avoid being left behind.

Question 1

"What information has been published on the 'EU wide' recycling logo, what will this look like and when will it be implemented?"

By August 2026, the EU must settle on harmonised (EU wide) Recycling and Deposit Return Scheme (DRS) Icons to give consumers information on the nature of any packaging and options for it's disposal, reuse and/or return. To date, there has been no direction other than that it will be based on the French mandatory images introduced in 2022 by Decree No. 2021-835. <u>Click here for discussion.</u>

Question 2

"What are the requirements for businesses operating across multiple Member States (MS) of the European Union (EU) in respect of waste packaging? Is there a requirement that they are registered in each MS in respect of the Extended Producer Responsibility (EPR) requirements under Regulation (EU) 2025/40; The EU Packaging & Packaging Waste Regulation?"

Anyone who produces waste packaging by placing packaged products onto the EU marketplace must appoint an authorised representative in each MS where products are made available on the market for the first time.

According to the Regulation, there are 3 steps that you must take. Appoint an authorised representative, ensure you are registered in each MS you sell into and ensure that the packaging complies with all design and composition requirements. The supplier of the packaging components you use to pack your products must be able to give you all the details on compliance needed for this.

The terms 'manufacturer' and 'packaging' in this regulation do include a business using packaging to place products onto the EU market rather than only suppliers of packaging materials.

Question 3

"What are the new requirements surrounding Protected Geographic Indication (PGI) and Protected Designation of Origin (PDO) products?

'Geographical Indications', is the term used to describe Intellectual Property protection of the names of agricultural products, spirit drinks and wines. These foods and drinks have unique characteristics, attributes and a reputation linked to their place of production or manufacture. These product qualities are subsequently afforded comprehensive legal protection, enshrined in both EU and GB Regulations.



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