

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

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fdf food & drink
federation
passionate about food & drink

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Ashbury



Introduction

About Ashbury

Founded in 2002.

Trusted regulatory,
technical & training
consultancy

Specialists in:

- ▶ Multi-category labelling and product compliance
- ▶ Multi-country labelling and product compliance



Global Expertise

We understand the unique regulatory landscape of each market we serve.

- ▶ Projects delivered globally
- ▶ Centralised service model

200,000+

approvals without labelling
related product withdrawals or
recalls



An aerial photograph of a desert landscape with a winding road and a maze in the foreground. A black and white striped pill bottle is placed on top of the maze. A green banner is overlaid on the left side of the image.

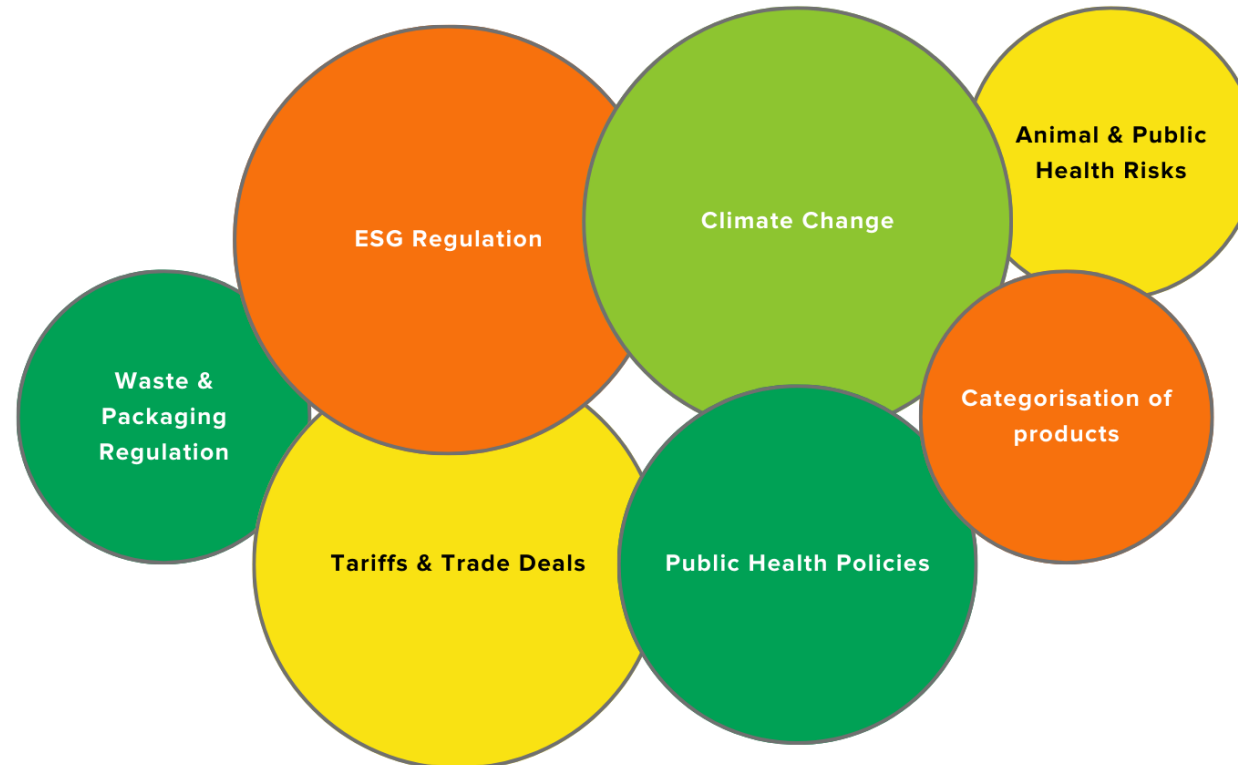
The Product Journey and the Regulatory Maze

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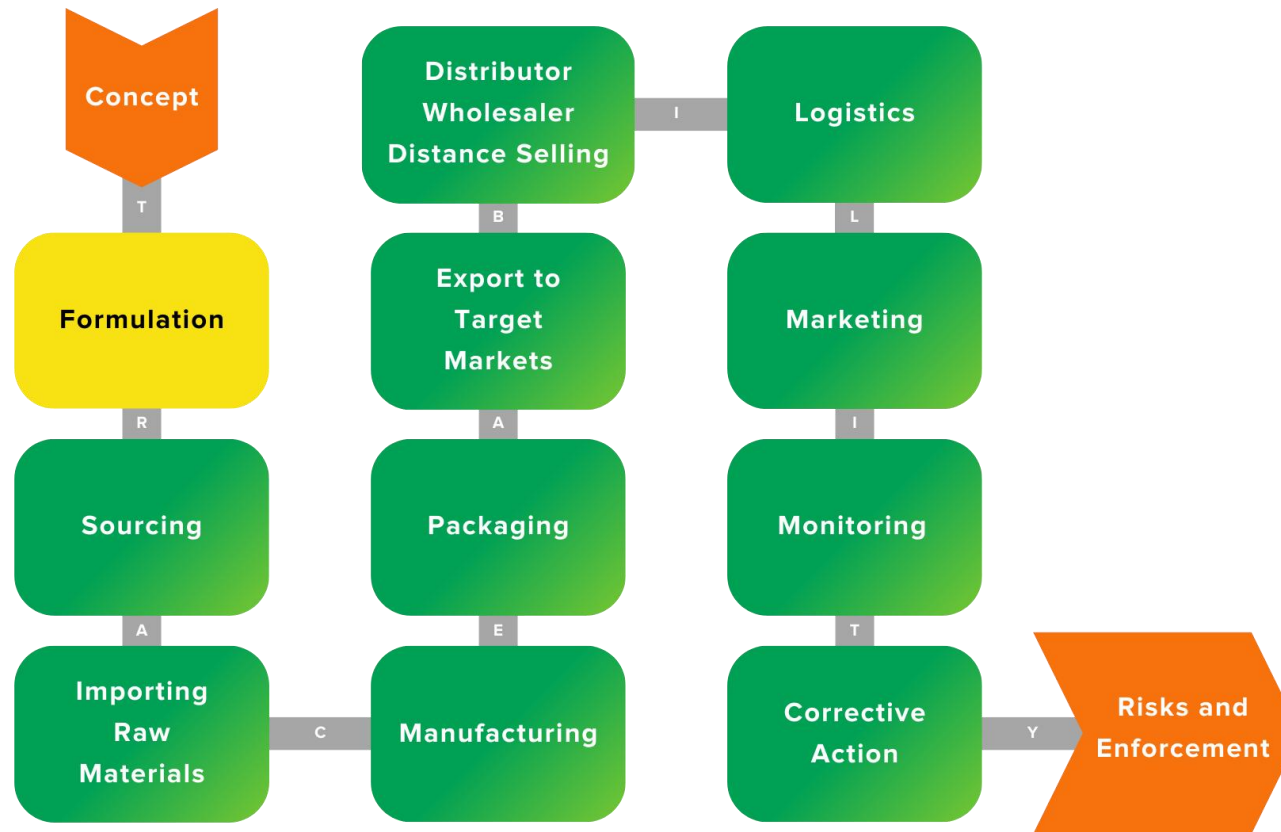
Worldwide Drivers of Change

There are several current and predicated, main arenas of policy and regulatory change expected in 2025.



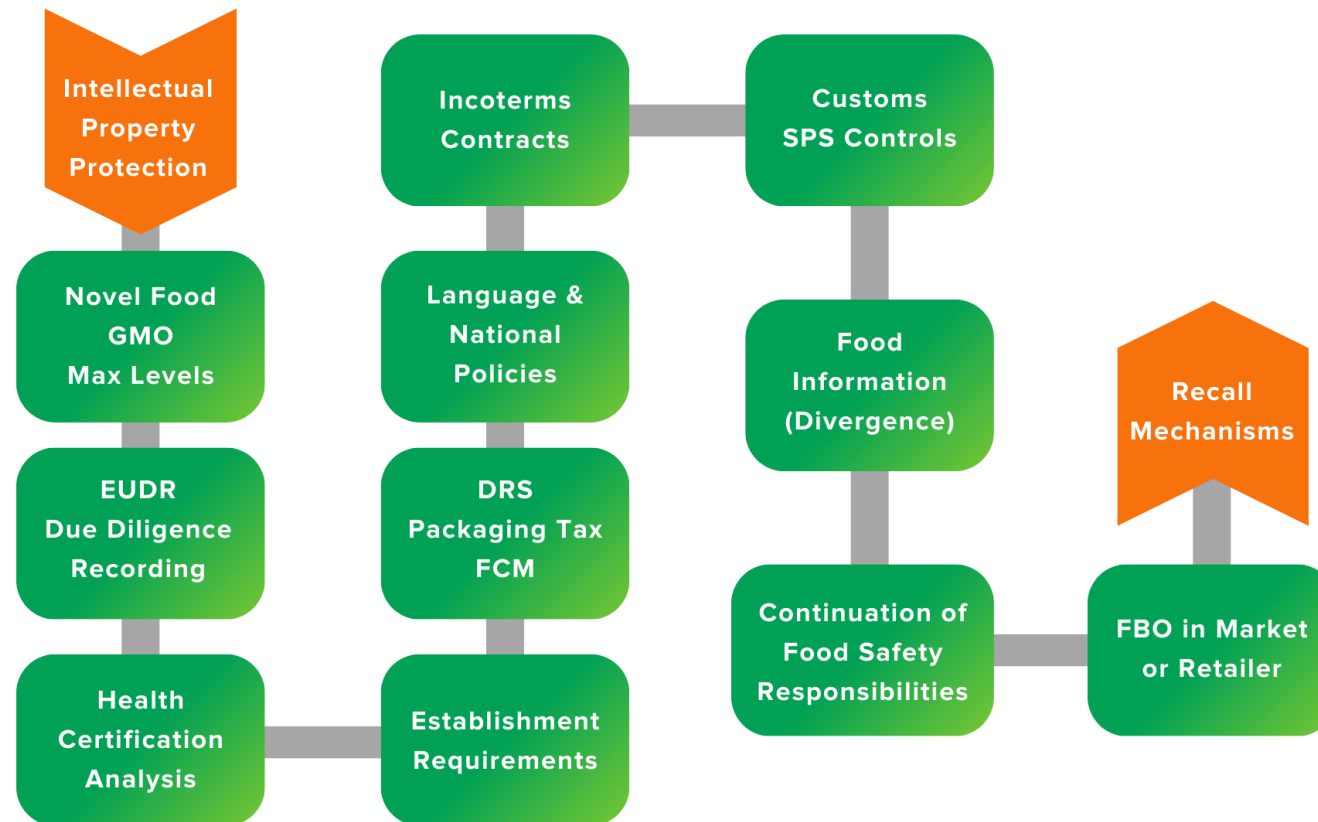
Mapping the Product Journey

To ensure compliance, the whole journey of a packaged product must be clearly envisaged from the outset.



Wider Compliance Considerations

In committing to a product's journey to market and beyond, key Regulations and requirements loom into view.





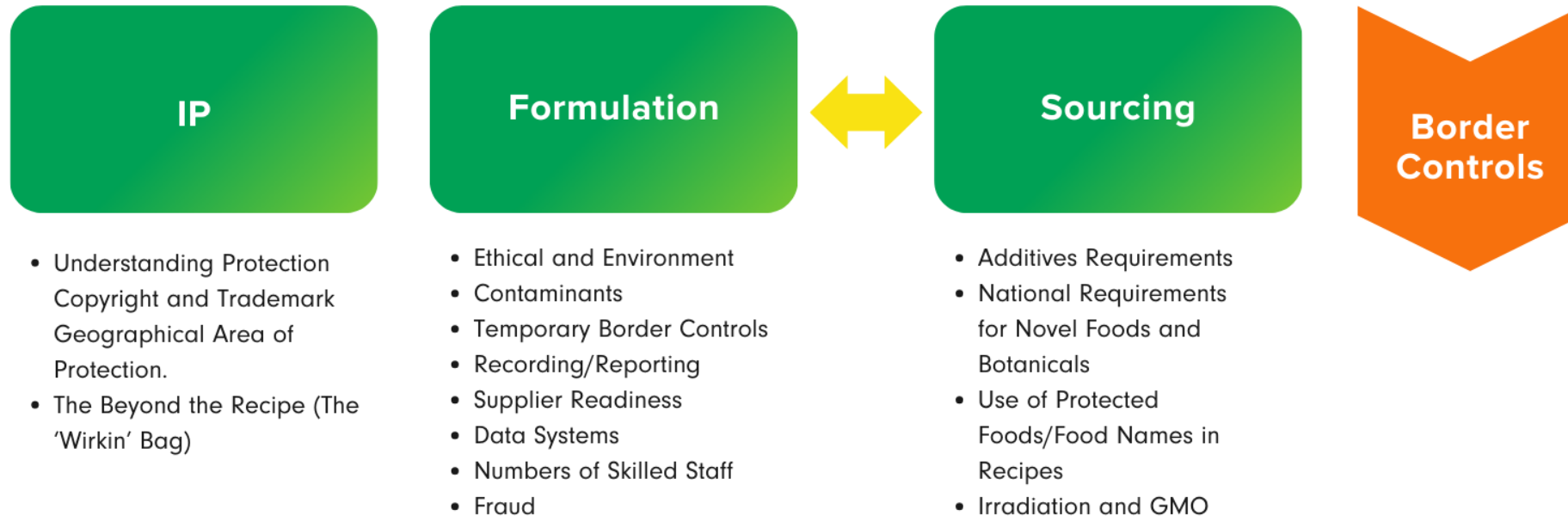
Regulatory Risk Points: An Outline

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Granular Compliance Considerations

What are the Regulatory and supply chain challenges at each point in the product journey?



Granular Compliance Considerations

Considering and monitoring changes in these key areas from the start will lessen the risk of non-compliance.



Classification Factors for Understanding Compliance, Scope and Protection

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'Classifications' in Compliance Considerations

Throughout the product journey understanding classification regimes is vital given the scope of Regulations and protections for products are increasingly governed by them.



- Product
- Classes



- Lo & No
- Nova & SIGA
- LHF



- Composite
- BTOM
- CN/HS
- EUDR Annex



- 'Clean Labelled'
- Medicinal



- Scope of DRS
- Scope of Pricing Restrictions



Risks of Enforcement: Considerations

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Key Actions, Factors and Enforcers

Understanding who is the enforcer and policy-maker at each point in the journey is essential, as is understanding who is the regulated or responsible entity at any point.

Actions that food business operators must take:

- ▶ Identify your market's Competent Authority (CA)
- ▶ Trusted trader schemes and a history of good compliance

Factors that affect competent authorities:

- ▶ There is currently little collaboration between CA's
- ▶ Questions over funding and commitment remain, especially in GB



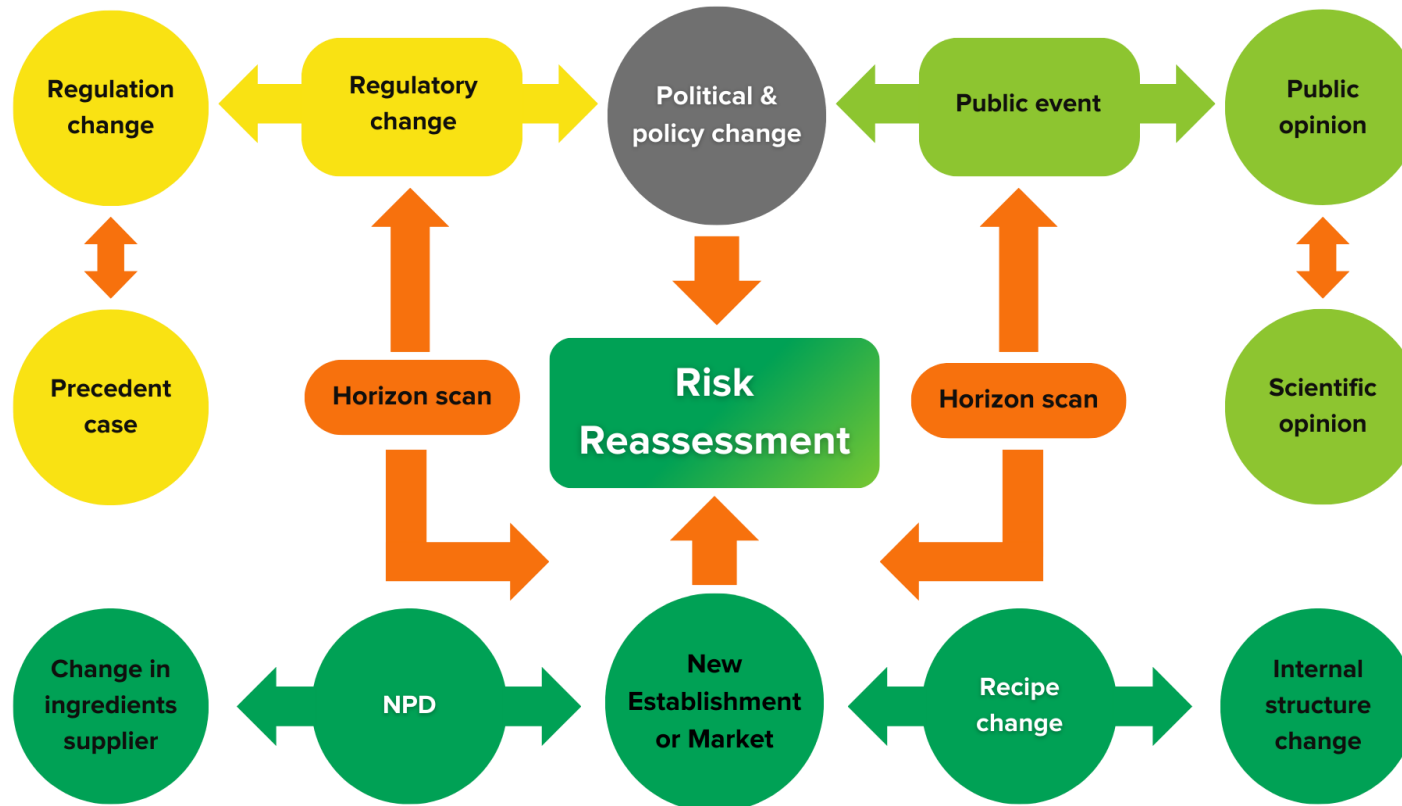
Managing Risks: An Overview

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Non-compliance Triggers

For Food Business Operators (FBO's), assessing risk is a dynamic and skilled operation required to maintain compliance and should be based on broader factors than might be first anticipated.



Horizon Scanning & Accurate Risk Assessment

FBO's should ensure horizon scanning results in accurate risk assessment. Prioritisation will ease strains on resourcing.

Cost of enforcement versus cost of compliance?

- ▶ Damage to public trust in brands
- ▶ Growth in private prosecutions is growing and can be catastrophic

Likelihood	Almost Certain 4				
	Likely 3				
	Possible 2	G	GA	AR	R
	Unlikely 1				
		1 Minor	2 Moderate	3 Major	4 Catastrophic
Impact					

G	Green
GA	Green / Amber
AR	Amber / Red
R	Red

Trend	
Unknown; baseline to be established	-
Situation Worsening; risk increasing	R
Situation Stable; risk unchanged	A
Situation Improving; risk decreasing	G

FSA Manual for Official Controls - Chapter 7 Enforcement

A woman with curly hair, wearing a grey cardigan over a striped shirt, is leaning over a man. The man has a beard and is wearing a blue shirt under a grey cardigan. They are both looking at a large document or laptop screen. The man is pointing at something on the screen with his right hand. The background shows a window with blinds.

Staying Ahead of Policy and Regulatory Change

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Key Diverging Regulation Risks

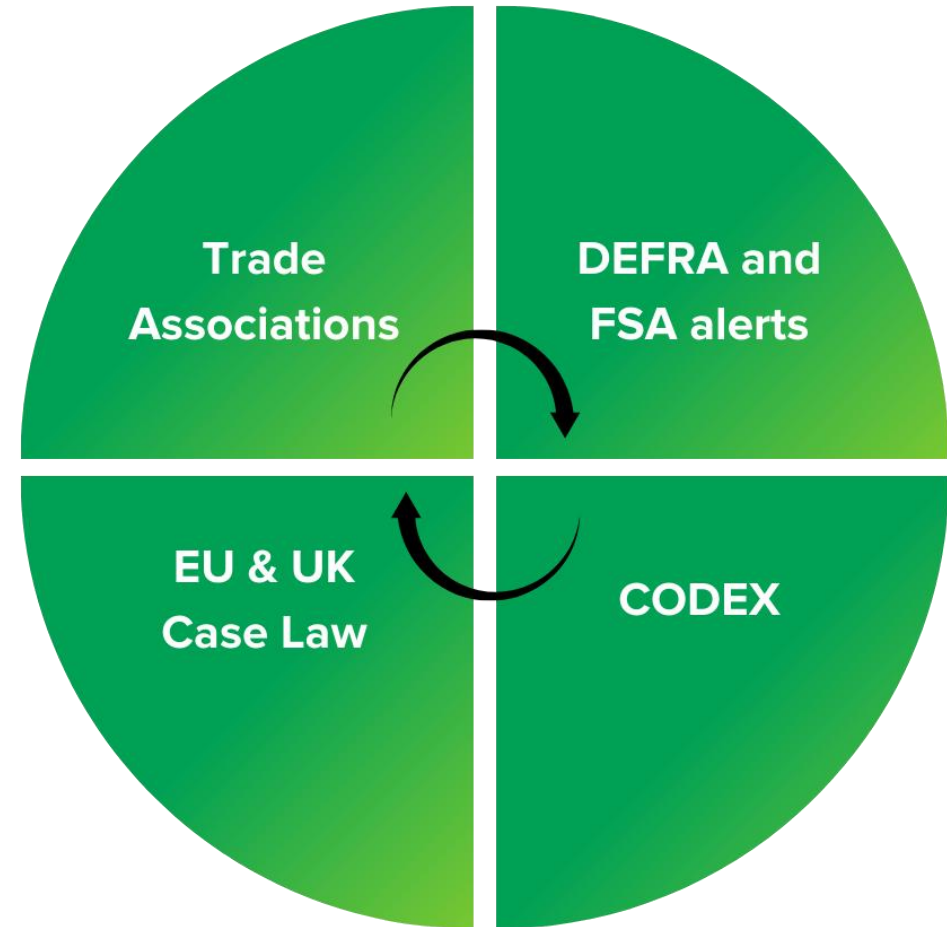
Following Brexit, EU and UK (GB) Regulatory divergence has created additional Horizon Scanning for Businesses.

UK (GB)	EU	RAG
The Official Controls (Amendment) Regulations 2025 Removes the requirement for documentary checks on all imported consignments and expands exemptions from official controls. Amends many assimilated laws.	Regulation (EU) 2017/625 on Official Controls regarding agri-food goods and EU plant and animal health rules 135 implementing and delegated Regulations	
Assimilated Regulation (EU) 2016/429 (Animal Health Law)	430 implementing and delegated regulations to the Regulation	
Assimilated Regulation (EU) No 1308/2013 establishing a common organisation of the markets in agricultural products	10 amendments including Corrigenda especially affecting wines and spirits	
The Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations 2024	Regulation (EU) 2025/40 in place from February 2025	
The Nutrition and Health Claims (England) (Amendment) Regulations 2024 Enables the use of improvement notices	Regulation (EC) No 1924/2006 on nutrition and health claims made on foods	
UK Forrester Risk Commodities Regulations under the Environment Act 2021 Proposal	Regulation (EU) 2023/1115 The EUDR	
Digital Markets, Competition and Consumers Act 2024 (DMCC) Introduction swinging powers for the Competition and markets Authority	Directive (EU) 2024/825 as regards empowering consumers for the green transition through better protection against unfair practices To be in force in Member States by 27 th September 2026	

Key Open Sources

Whilst information on policy and Regulatory change is readily available (with AI tools now assisting more than ever), there is still no substitute for critical thinking.

- ▶ Collaboration with other businesses and business groups.
- ▶ Information vs Application (business specific requirements)

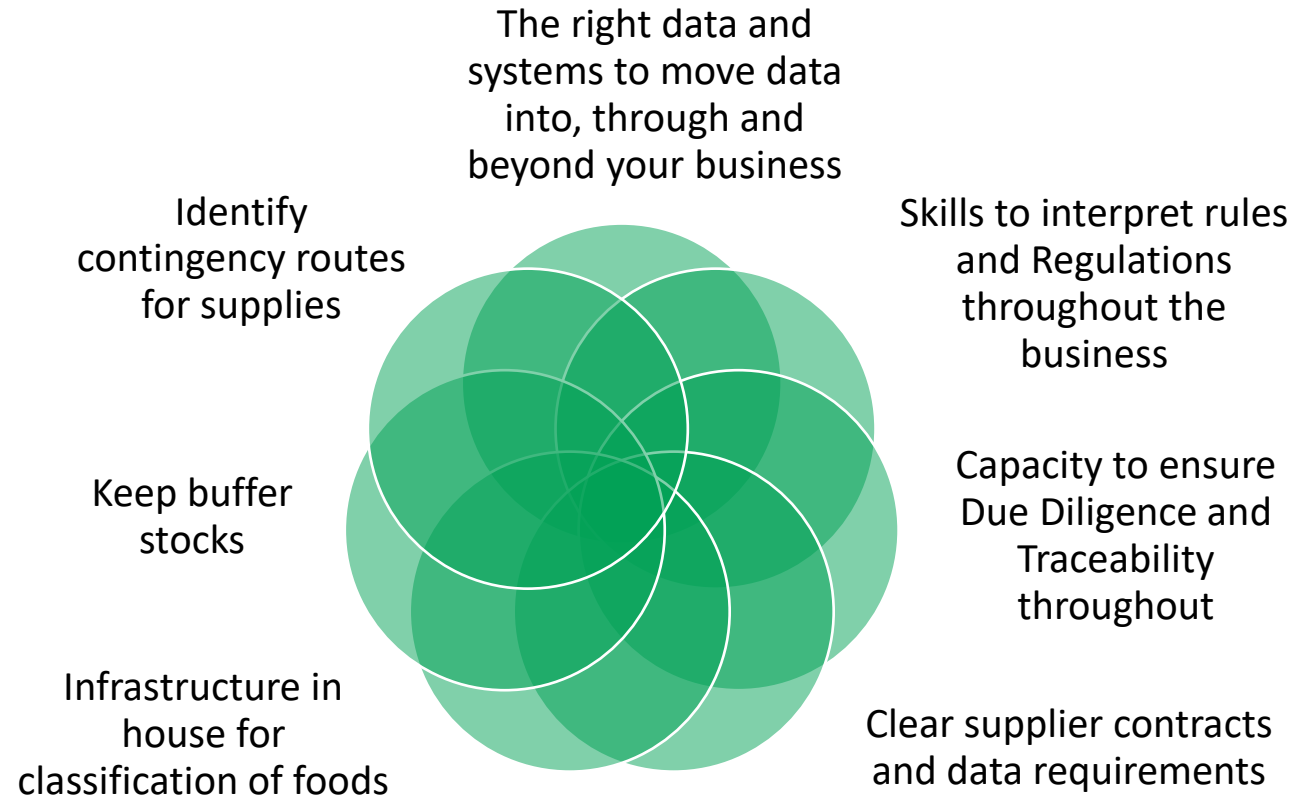
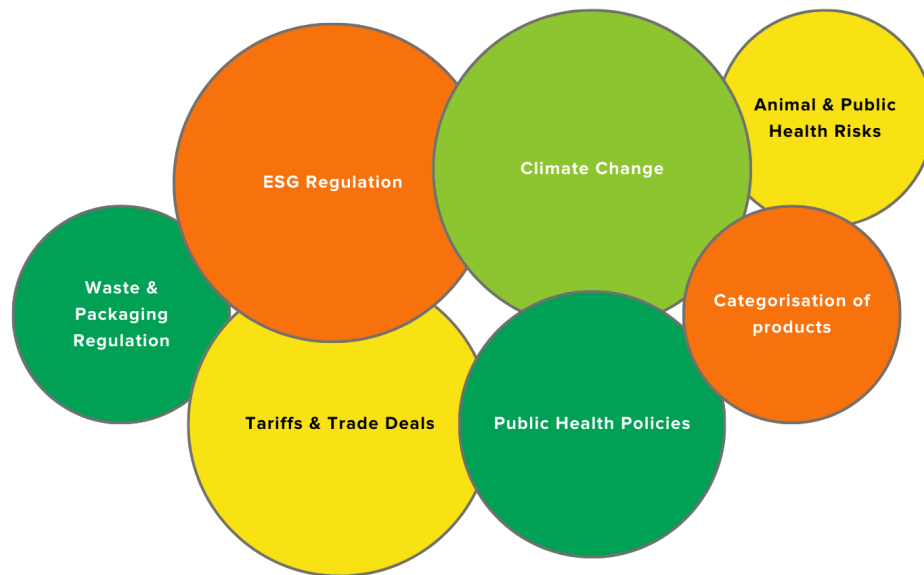




Ashbury says ensure you can ringfence data for each country you market in

Next Steps and Actions

Businesses must invest in skills and resources throughout their businesses to be resilient to the drivers of change outlined.



Get In Touch

For more information on how to get your products compliant-ready for market and staying a step ahead of your competitors, please get in touch.

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