



**HFMA
UPDATE**
by Martin Last,
Director General

2024 – the challenges continue...

Welcome to the new year. Already the signs are there that we face many new challenges and issues. Some of these may be related to what is most likely going to be an election year here in the UK, and in Europe; the HFMA is prepared and geared up to help support our industry whatever this brings.

I am pleased to inform members that recruitment of our new Technical Manager and our new Political Advisors is being completed, and will help with our restructuring, providing the assets needed to address our industry's needs. I am continuing to review our regular communications to make them more purposeful and useful to members, and I foresee further improvements to follow.

We have already introduced a new addition to our regular working groups to enable greater engagement with members with opportunities to present and discuss relevant topics and share practical examples. Our first presentation at the November meeting saw Livia Menichetti of the EHPM provide hands-on feedback of European issues and how they are being managed, which received excellent feedback, and we are planning to include further presentations from interested groups at 2024 meetings.

In the UK, we can expect the new border control milestones to take effect as part of the Border Target Operating Model (BTOM), with the introduction of Sanitary and Phytosanitary (SPS) and Safety and Security (S&S) controls at the UK border on EU imports. The most immediate of these is January 31, 2024, with the introduction of SPS health certification on imports of medium-risk animal products, plants, plant products and high-risk food (and feed) of non-animal origin from the EU. This will be followed on April 30, 2024, with the introduction of SPS documentary and risk-based identity

and physical checks on medium risk animal products, plants, plant products and high-risk food (and feed) of non-animal origin from the EU. And from October 31, 2024, we will see the deadline for S&S declarations for EU imports to come into force. All industry needs to be prepared and ready for these changes and the HFMA is fully engaged with DEFRA's business support groups on requirements and are providing HFMA members with assistance and guidance in preparation for these new controls.

There are continued discussions with the FSA on CBD, with the HFMA fully engaged in several recent stakeholder meetings. The key question being asked by the FSA is what will happen with the public list of CBDs once first authorisations are completed. The FSA can see that once some applications are approved, there will be an unlevel playing field between those approved and those not yet validated. However, this question is not so straightforward to answer given that the HFMA does not have any clear input on what the FSA's intentions are, nor of what timescales they are working to. As part of this engagement, the HFMA has now written to the FSA seeking clarity and have made several proposals, as well as seeking further engagement from FSA.

In Europe, there is increased activity from the Commission which, it appears, they are trying to complete before the EU elections in June. Unfortunately, much of this activity has potential negative impacts on our industry and the HFMA is working strongly with our European partner, EHPM, to counter these impacts in the limited time available.

On Nutrition and Health Claims, feedback from the DG Sante working groups is raising concerns on proposals to limit or remove the use of traditional evidence for food supplements (botanicals) claims. They



also propose that buying of products be only under medical supervision, and that a vigilance system be introduced, all measures that would severely restrict the free sale of food supplements throughout Europe. The EHPM is strongly lobbying MEPs in all member states to vote against such proposals in January.

Further negative Commission attitude to the food supplements industry is reflected in latest developments on the setting of maximum permitted levels (MPLs), where meetings between the Commission and selected national authorities indicates strongly that they are only considering adopting the German model on risk assessment, which it is clear would result in the setting of unacceptable low maximum levels for the food supplement industry and which are not based on current accepted science. The Commission are also considering not to apply MPLs for different age groups, a change that is

likely to drive levels downwards even more.

The HFMA continues to work with the EHPM to help counter these negative proposals and gather support with other EU stakeholders to reflect that regulations are fit for purpose, fully consider all viable options, and reflect the needs of EU citizens. The HFMA are also supporting the EHPM new positioning papers and proposals for launch in events early in 2024 on probiotics, Novel Foods, and vigilance systems.

So, we already have many challenges as we go into 2024 and the HFMA is ready and continues to be at the forefront of defending our industry and representing the interests of our members. If you would like to know more about the benefits of membership to your company, simply visit our website, www.hfma.co.uk, to learn more, or contact me directly at martin@hfma.co.uk

HFMA membership is vital to ensure that your company keeps abreast of the fast-changing regulatory environment. The HFMA is the UK's best source of information and most effective defender of our industry's interests. To help the HFMA defend your business at this most critical time, contact hfma@hfma.co.uk or call 020 8481 7100.

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