

# RETAIL ROADMAP 2025

KEY UPCOMING LEGAL & REGULATORY CHANGES IN THE UK



# RETAIL ROADMAP 2025: INTERACTIVE SUMMARY



## Q1

### JANUARY

- PACKAGING AND WASTE OBLIGATIONS TO CHANGE FOR PRODUCERS



### FEBRUARY

- REVIEW OF SECURITY OF TENURE PROVISIONS - LAW COMMISSION CONSULTATION
- NEW GUIDANCE ON ALLERGENS FOR LOOSE FOOD



### MARCH

- MANDATORY FOOD WASTE SEPARATION AND STORAGE CHANGES
- ONLINE SAFETY ACT - PHASE 1 RULES IMPLEMENTED



## Q2

### APRIL

- MANDATORY DIGITAL WASTE TRACKING
- CHANGES TO DATA PROTECTION INTERNATIONAL TRANSFERS RULES
- UK NATIONAL MINIMUM WAGE INCREASE
- CONSUMER PROTECTION LAW - START OF ENFORCEMENT UNDER NEW REGIME



### JUNE

- SINGLE-USE VAPES SALES TO BE BANNED IN THE UK
- UK PRIVACY AND DATA PROTECTION ADEQUACY DECISION REVIEW



## Q3

### JULY

- MILK FAIR DEALING OBLIGATIONS
- CHANGES TO FOOD LABELLING REQUIREMENTS
- SUSTAINABILITY DISCLOSURE REQUIREMENTS
- ONLINE SAFETY ACT - PHASE 2 CHANGES IMPLEMENTED
- RICS CONSULTATION ON ITS SERVICE CHARGES IN COMMERCIAL PROPERTY PROFESSIONAL STANDARD



### AUGUST

- ONLINE SAFETY ACT - PHASE 3 CHANGES IMPLEMENTED



## Q4

### OCTOBER

- HFSS ADVERTISING BAN



### ON THE HORIZON...

- VENUE SAFETY - MARTYN'S LAW
- PRODUCT REGULATION AND METROLOGY BILL
- DIGITAL POUND PROPOSED
- BUY-NOW, PAY-LATER LEGISLATION
- MANDATORY WATER EFFICIENCY LABELLING
- DATA (USE AND ACCESS) BILL
- KEY PROPOSED CHANGES TO HR AND EMPLOYMENT OBLIGATIONS - EMPLOYMENT RIGHTS BILL



DIGITAL, TECH & AI



EMPLOYMENT



PRIVACY



PROPERTY



REGULATORY/ESG



## JANUARY



### PRODUCER RESPONSIBILITY OBLIGATIONS (PACKAGING AND PACKAGING WASTE) - NEW LEGISLATION



**SNAPSHOT:** The Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations 2024 came into force on 1 January 2025, introducing new and more burdensome obligations on producers (including online marketplaces) and compliance schemes with respect to waste, recycling and labelling.

**DETAIL & ACTION POINTS:** The regulations overhaul existing packaging reporting obligations from 2007, and include the following key changes:

- **new recycling targets** for the 2025 – 2030 period;
- extending the responsibility to **packaging producers to cover the full cost** of dealing with packaging waste, including collection, recycling and disposal;
- adjustments to **labelling provisions**, with all obligations now set to commence on 1 April 2027;
- a requirement for the ERP scheme administrator to provide guidance on the methodology and factors considered in assessing net efficient disposal costs and effectiveness; and

### PRODUCER RESPONSIBILITY OBLIGATIONS (PACKAGING AND PACKAGING WASTE) - NEW LEGISLATION (CONTINUED)

- a revised definition of '*household packaging*' which broadens the exemption criteria, aligning with the data reporting regulations.

**FURTHER READING:** You can see the Environment Agency's monitoring plan for 2025 [here](#), and the legislation itself [here](#).



## FEBRUARY



### REVIEW OF SECURITY OF TENURE PROVISIONS UNDER THE LANDLORD AND TENANT ACT 1954

**SNAPSHOT:** The Law Commission published a consultation paper on **19 November 2024** to review the security of tenure provisions within the **Landlord and Tenant Act 1954**, which automatically grants security of tenure with respect to business premises. The consultation is open until **19 February 2025**.

**FURTHER READING:** This is the first of two consultations on the provisions of the LTA 1954, focusing on whether the current approach is appropriate for the current market. You can read our detailed review and potential impact [here](#).



## FEBRUARY



### FOOD STANDARDS AGENCY BEST PRACTICE ON ALLERGENS FOR LOOSE FOOD

**SNAPSHOT:** In late 2024, the Food Standards Agency (FSA) consulted with relevant stakeholders on best practice for food business operators providing non-prepacked food. The FSA is in the process of reviewing the responses received before publishing its best practice guidance in early 2025.

## MARCH

### MANDATORY FOOD WASTE SEPARATION FOR BUSINESSES FROM SPRING 2025

**SNAPSHOT:** From 31 March 2025, most UK food businesses must arrange separate food waste collections.

**DETAIL & ACTION POINTS:** Any business in England that produces more than 5kg of food waste per week must arrange separate collection by licenced waste-carriers. This includes any biodegradable materials produced from processing or preparing food – including inedible parts like bones, eggshells, fruit and vegetable skins, tea bags and coffee grounds. Micro businesses (fewer than 10 full time employees) are exempt from this obligation until **31 March 2027**.



### ONLINE SAFETY ACT 2023, PHASE 1

**SNAPSHOT:** The Online Safety Act 2023 (OSA) received Royal Assent in October 2023 and aims to protect people, particularly children, online. Duties under the OSA are being rolled out in phases until 2026.

**Organisations in scope (mainly user-to-user platforms) must comply with the OSA as it applies to 'illegal harms' by mid-March 2025, which involves creating an 'illegal content risk assessment'.**

**DETAIL & ACTION POINTS:** Equipped with Ofcom's Illegal Harms Codes of Practice and the illegal content risk assessment guidance published on 14 December 2024, organisations must use the next three months to risk-assess their platforms. We are expecting to see further key dates and guidance from Ofcom in Spring 2025 with respect to online safety obligations. The subsequent 'Phase 2' will focus on child safety, pornography and the protection of women and girls.



APRIL



## MANDATORY DIGITAL WASTE TRACKING

**SNAPSHOT:** From 1 April 2025, the Department for Environment, Food & Rural Affairs' (DEFRA) digital waste tracking system will be introduced. This will allow DEFRA to track more than 200 million tonnes of waste across the UK digitally, instead of using hard copy waste transfer notes. Each and every waste collection will be assigned a unique tracking ID, created and captured by the waste carrier.

**FURTHER READING:** You can read more about waste tracking and the Environment Agency's wider goals [here](#).



## NEW SET OF STANDARD CONTRACTUAL CLAUSES TO BE INTRODUCED

**SNAPSHOT:** This fifth set of Standard Contractual Clauses (SCCs) regulating transfers of personal data outside of the EEA are intended to complement the existing model clauses, and cover data transfers to third country importers in restricted territories that are directly subject to the GDPR. It is anticipated that the new SCCs will not require a transfer impact assessment. These are EU transfer documents, but it is likely that the UK will follow suit with a UK addendum in the same way as the existing international transfers process.

## APRIL



### NATIONAL MINIMUM WAGE INCREASE

**SNAPSHOT:** From **1 April 2025**, the following changes to minimum wages in the UK come into force:

- the National Living Wage (the minimum wage for over 21-year-olds) will increase to **£12.21 per hour** (from **£11.44**);
- the Minimum Wage for 18-20 year olds will rise to **£10.00 per hour** (from **£8.60**); and
- apprentice\* pay will increase to **£7.55 per hour** (from **£6.40**).

\*An apprentice is entitled to be paid at least the apprentice rate if they are either:

- aged under 19; or
- aged 19 or over, and in the first year of their current apprenticeship agreement,


if they are 19 or over and have completed the first year of their current apprenticeship, they're entitled to be paid at least the minimum wage for their age.



### CONSUMER PROTECTION LAWS ENFORCED BY DIGITAL MARKETS, COMPETITION AND CONSUMER ACT 2024

**SNAPSHOT:** On **1 April 2025**, the consumer protection enforcement provisions of the Digital Markets, Competition and Consumers Act 2024 (DMCC) are expected to come into force. This legislation aims to offer greater protection to consumers by giving powers to the CMA to fine non-compliant companies.

**DETAIL & ACTION POINTS:** The DMCC gives the CMA power to determine whether consumer laws have been breached and impose penalties of up to 10% of an offender's global turnover, or £18m, mirroring the CMA's approach to competition law. The CMA can fine businesses up to 5% of global annual turnover for failing to comply with an undertaking or direction. The DMCC allows the CMA to enforce with greater speed and ease, in contrast to their incumbent approach.

**FURTHER READING:** You can read more about the key changes [here](#). 

## JUNE



### THE ENVIRONMENTAL PROTECTION (SINGLE-USE VAPES) (ENGLAND) REGULATIONS 2024

**SNAPSHOT:** The Government has introduced a ban on the sale and supply of single-use vapes in England, to start on 1 June 2025. The Scottish Government and Welsh Government have also confirmed they intend to introduce legislation to the same effect.



### EU GDPR AND THE LAW ENFORCEMENT DIRECTIVE ADEQUACY DECISION FOR THE UK

**SNAPSHOT:** The EU approved adequacy decisions for GDPR and the Law Enforcement Directive will expire on 27 June 2025, if not renewed by the Government and the European Commission. On 22 October 2024, Chair of the European Affairs Committee wrote to the Digital Secretary requesting that the Government engages in talks with the European Union to maximise the prospects of achieving data adequacy in early 2025. Adequacy allows the free flow of data between the UK and Europe. Without it, further safeguards will need to be adopted by organisations.

## JULY



### THE FAIR DEALING OBLIGATIONS (MILK) REGULATIONS 2024

**SNAPSHOT:** Any new contract, and from 9 July 2025, all existing contracts to purchase milk from a 'producer' must comply with The Fair Dealing Obligations (Milk) Regulations 2024 ('FDM Regs'). The FDM Regs require business purchasers to enter into a written agreement with the producer which includes express terms covering duration, price, volumes, dispute resolution and termination notice periods. An Agricultural Supply Chain Adjudicator has been established to enforce the terms of the FDM Regs and the Adjudicator can fine purchasers in breach of the FDM Regs up to 1% of their turnover.

**FURTHER READING:** You can read more [here](#)



## JULY



### ONLINE SAFETY ACT 2023, PHASE 2

**SNAPSHOT:** Phase 2 of OSA implementation focuses on child safety, pornography and the protection of women and girls. Ofcom will publish its final children’s access assessment guidance in January 2025. Service Providers will have three months to complete the children’s access assessment process. For any services which are likely to be accessed by children, the services must carry out a children’s risk assessment within three months of Ofcom publishing its Protection of Children Codes and risk assessment guidance. It is expected that the child protection safety duties will become enforceable in July 2025.



### FINAL PHASE FOR LABELLING REQUIREMENTS FOR FOOD MOVING FROM GREAT BRITAIN TO NORTHERN IRELAND

**SNAPSHOT:** From 1 July 2025, composite products, fruit, vegetables, fish and some other products moving from Great Britain to Northern Ireland under the Northern Ireland Retail Movement Scheme (NIRMS) will need to be individually labelled with the words ‘Not for EU’, subject to exemptions. Since 1 October 2023, businesses in Great Britain have been able to move prepacked retail goods as well as certain loose goods, including fruit and vegetables, through NIRMS.



### NEW SUSTAINABILITY DISCLOSURE REQUIREMENTS STANDARDS EXPECTED

**SNAPSHOT:** Following a consultation process, the Government is expected to endorse the new International Sustainability Standards Boards standards by July 2025. This will likely mean that all UK businesses regardless of size will eventually need to carry out some form of carbon reporting.



## JULY



### RICS CONSULTATION ON ITS SERVICE CHARGES IN COMMERCIAL PROPERTY PROFESSIONAL STANDARD

**SNAPSHOT:** The second edition of this standard is set to be released in summer 2025, and is designed to address key challenges in the management of service charges, namely the issuing of budgets and year-end certificates, and aims to reduce the causes of disputes between landlords and tenants.

## AUGUST



### ONLINE SAFETY ACT 2023, PHASE 3

**SNAPSHOT:** Phase 3 of OSA implementation focuses on transparency, user empowerment, and other duties on categorised services. It is expected that the Government will confirm the thresholds for 'categorised services' in late 2024. Following this, in summer 2025, it is anticipated that Ofcom will publish the register of categorised services and within a few weeks of doing so, issue draft transparency notices.

## OCTOBER



### HFSS ADVERTISING BAN

**SNAPSHOT:** From 1 October 2025 foods high in fat, salt or sugar (HFSS) - as per the Government's 'Nutrient Profiling Technical Guidance' - will be banned from being advertised on TV, on-demand and online between 5.30am and 9pm.

**DETAIL & ACTION POINTS:** Retailers should review their advertising arrangements with broadcasting, media and social media platforms to ensure they do not fall foul of this new secondary legislation.


## NO SET DATE



### MARTYN'S LAW - VENUE SAFETY

**SNAPSHOT:** Martyn's Law would require responsible persons for public premises and qualifying events (relating to e.g. retail, hospitality, entertainment, sport/leisure, education, transport, worship) to take action to mitigate the risk relating to terrorism.

**DETAIL & ACTION POINTS:** The Bill uses terminology consistent with UK health and fire safety law such where specific parties take responsibility for their premises and are obliged to consider what is reasonably practicable. This broadly requires organisations to assess risks and introduce proportionate measures to control the nature of those risks consistent with cost, practicality and effectiveness. It is proposed that the Security Industry Authority will be the regulator and enforcement authority for this regime. Civil sanctions for non-compliance are proposed to range from compliance notices (requiring remedial action to be taken within a specified timeframe) to penalties of £18m (or 5% of worldwide revenue) for enhanced premises or qualifying events.

**FURTHER READING:** You can see the Government's factsheet on Martyn's law [here](#). 

NO SET DATE



## PRODUCT REGULATION AND METROLOGY BILL

**SNAPSHOT:** This proposed law would give the Government the power to introduce secondary legislation concerning product safety and standards much faster and autonomously than existing laws allow; to keep up to date with emerging risks that come with new products particularly in the technology sector. These powers would allow the Government to make regulations concerning a product's marketing, use, provision of information to consumers and the monitoring and certification of products, to name a few. A key purpose of the law will be to address the disparity on ensuring products sold via online marketplaces are captured by product safety standards. The Bill is currently progressing through Parliament, but is likely to become law in early 2025.



## UK DIGITAL POUND

**SNAPSHOT:** The Bank of England (BoE) is considering introducing a 'digital pound'. It would be issued directly by BoE and it would always have the same value as a Sterling banknote. The Government has committed to introducing primary legislation before Parliament in advance of launching a digital pound. The Bank of England have said in the meantime that they will design and test proof of concepts.

**FURTHER READING:** You can read the Bank of England's proposal and updates to the potential digital pound [here](#).

## BUY-NOW, PAY-LATER LEGISLATION EXPECTED

**SNAPSHOT:** In October 2024, the Government launched a consultation on bringing Buy-Now, Pay-Later products under the supervision of the Financial Conduct Authority (FCA) and applying the Consumer Credit Act. Buy-Now, Pay-Later users will be given stronger rights if issues arise with products they purchase, making it quicker and easier to get redress. This includes applying Section 75 of the Consumer Credit Act, which allows consumers to claim refunds from their lender, and access to the Financial Ombudsman Service to make complaints. Legislation is expected to be laid in early 2025.



NO SET DATE



## MANDATORY WATER EFFICIENCY LABELLING

**SNAPSHOT:** The former Government were planning to introduce a mandatory water efficiency labelling scheme in 2025 for household goods including washing machines, toilets, sinks and dishwashers, all of which would help consumers understand and reduce their water usage and save money. This would be similar to the mandatory energy efficiency labelling scheme. The new Government are yet to confirm whether they will be taking this initiative forward.

## DATA PROTECTION LAW: DATA (USE AND ACCESS) BILL

**SNAPSHOT:** The Data (Use and Access) Bill was introduced into Parliament in October 2024. If this becomes law, it will replace the legacy GDPR in the UK. The legislation intends to remove 'red tape' imposed by the EU GDPR and pave a new framework allowing data-driven innovation.

**FURTHER READING:** See our breakdown of the Data (Use and Access) Bill in its current form and how it differs from the GDPR [here](#).



## EMPLOYMENT RIGHTS BILL

**SNAPSHOT:** The Employment Rights Bill (Bill) was published on Thursday 10 October 2024. Dubbed the "biggest upgrade of workers rights" in a generation" by the Prime Minister, the Bill contains some 28 proposals to reform employment law as part of the Government's 'Make Work Pay' plan.

**DETAIL & ACTION POINTS:** Whilst many of the finer details are subject to changes as the Bill progresses through Parliament, some key headline proposals currently include:

- 'Day One' right not to be unfairly dismissed;
- increased employee protections against employers implementing a 'fire and re-hire' practice;
- new restrictions on the use of zero-hour contracts by giving workers a right to demand guaranteed hours if they work regular hours over a defined period;
- Statutory Sick Pay (SSP) will be paid from the first day of sickness and the lower earnings threshold for SSP will be removed; and
- changes to collective redundancy consultation requirements

Whilst many of the changes are not likely to come into force until 2026 - there are a number of action points employers should take in preparation.

**FURTHER READING:** For our more detailed analysis of the Bill, please see our Employment Law Changes Briefing [here](#).



THANK YOU FOR READING, WE HOPE YOU FOUND THIS ROADMAP HELPFUL AND INFORMATIVE.

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