Retail Risk Outlook
Product and marketing

For what comes next

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Introduction

In this Retail Risk Outlook 2026: Products and marketing edition, we focus on the key developments taking effect during 2026 and beyond, explaining what is changing, why it matters for retailers, and the practical steps businesses can take now to prepare.

Product and marketing compliance is moving rapidly up the retail risk agenda, with heightened scrutiny across both physical and digital channels. This shift is being driven by wide-ranging product safety and consumer protection reform.

In the UK, the Product Regulation and Metrology Act 2025 introduces a strengthened enforcement framework with expanded obligations across the supply chain, including for online marketplaces. In the EU, reforms such as the General Product Safety Regulation, the revised Product Liability Directive and the Cyber Resilience Act significantly raise the compliance bar for products sold into the EU.

Marketing and pricing practices are also firmly under the spotlight. Enforcement is becoming more proactive, with the ASA increasingly using automated monitoring to identify non compliant advertising at scale. New restrictions on less healthy food advertising, alongside continued scrutiny of pricing claims, promotions and influencer marketing, mean retailers must take a more disciplined approach to marketing governance.

Product and marketing compliance can no longer be treated as a standalone issue. Retailers need strong governance, clear accountability and closer coordination across legal, commercial and marketing teams to manage risk, protect consumer trust and make confident decisions about products and consumer communications in the year ahead.

We hope you find this report useful in planning for the year ahead. If you have any questions about these changes or would like assistance in preparing for them, please get in touch.

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New UK product safety framework

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What's changing?

The Product Regulation and Metrology Act 2025 received Royal Assent on 21 July 2025 and represents a significant development in product safety law. The Act is a high-level enabling framework, giving the Secretary of State powers to create detailed regulations governing how products must be designed, manufactured, labelled, transported, installed, marketed and monitored, with further detail expected to be developed through consultation and secondary legislation. Its scope extends across the entire supply chain, including manufacturers, importers, distributors, retailers and online marketplace operators.

Future regulations introduced under the Act may incorporate technical standards and, in certain circumstances, allow product requirements to be met by demonstrating compliance with specified provisions of European Union (EU) law. This flexibility is designed to manage practical risks of divergence with the EU while allowing the UK to adapt quickly to new technologies, emerging hazards and evolving market behaviours.

A key feature of the Act is the strengthened enforcement framework. which has which has been the subject of a government **consultation** launched in March 2026 and is expected to be further streamlined and expanded through regulations made under the Act.

Inspectors may be granted powers to enter premises (subject to warrant safeguards), carry out searches, seize products and documentation, and issue legally binding notices. Non-compliance may lead to civil sanctions or criminal penalties, including potential imprisonment of up to two years on indictment.

These changes heighten the regulatory expectations placed on all actors in the supply chain.

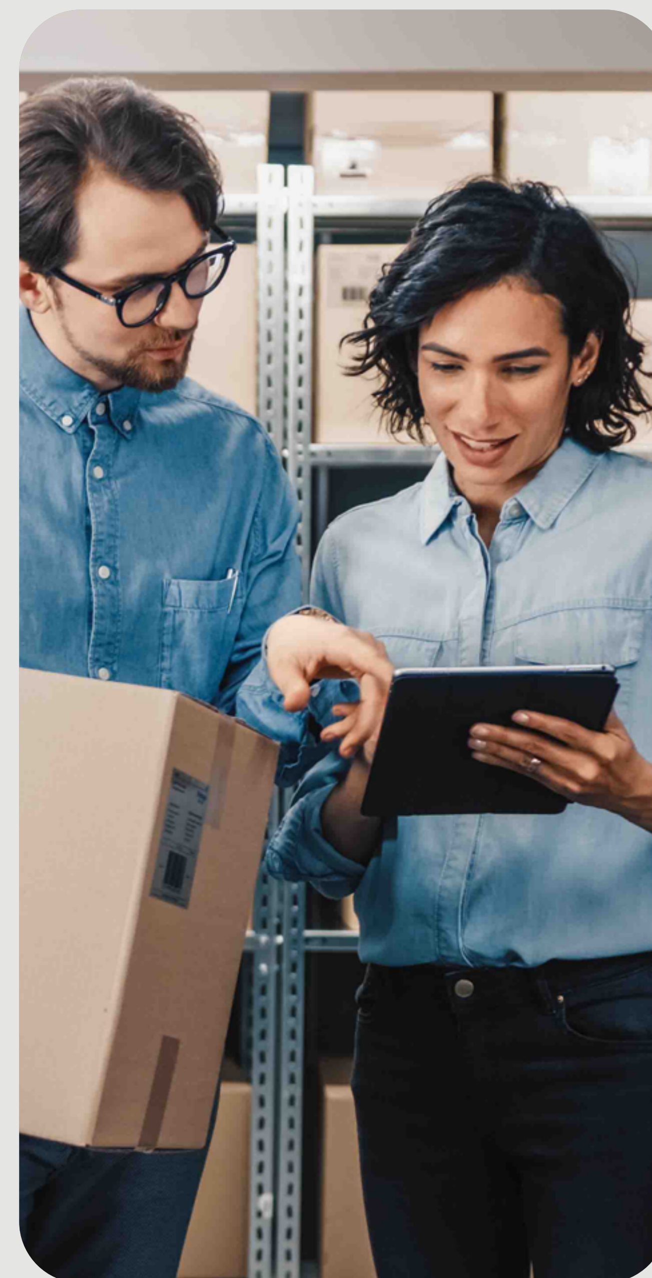
The Act also introduces cost recovery powers, meaning regulators may require businesses to contribute to the costs of enforcement activity, particularly where they need to intervene directly. Alongside this, new information sharing mechanisms allow relevant authorities and emergency services to exchange intelligence more easily where safety concerns arise, reflecting themes explored in the Government's consultation on product safety reform.

In parallel, the Office for Product Safety and Standards (OPSS), the UK's national product safety regulator within the Department for Business and Trade, published its updated Enforcement Policy in January 2026.

OPSS continues to endorse a risk-based, "proportionate" and escalating approach to non-compliance, beginning with advice, moving through notices and sanctions, and progressing to prosecution where it deems appropriate. For products presenting a serious risk, OPSS may intervene directly (including ordering withdrawals or recalls) and may seek cost recovery where the legislation permits. OPSS also publishes safety alerts, investigation reports and enforcement decisions, providing retailers and consumers with greater transparency.

What should retailers do to prepare?

- **Strengthen supply-chain assurance:** Retailers may wish to review supplier onboarding, audit processes and contractual arrangements. The Government is focused on higher-risk product sectors and cross-cutting hazards, with lithium-ion battery-operated e-bikes sold through online marketplaces. Retailers handling such products, or operating internationally, should ensure suppliers can evidence compliance.
- **Prepare for online marketplace obligations:** Online marketplace operators are explicitly within scope, with the consultation signalling a greater emphasis on proactive monitoring, seller verification and cooperation with regulators. Retailers running online platforms may benefit from reviewing seller verification processes, product listing controls, monitoring systems, takedown procedures and record keeping.
- **Expect increased regulatory visibility:** With OPSS regularly publishing enforcement actions and able to recover costs, internal documentation is increasingly important. Comprehensive technical files, traceability records, test reports and incident logs will help retailers demonstrate compliance if approached by a regulator.
- **EU/UK divergence:** Retailers operating across both markets should consider whether dual testing, labelling or conformity assessment routes may be required. Early planning can minimise disruption to product lines and logistics.



EU product safety and liability update

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What's changing?

The EU is entering a new regulatory phase for consumer products. Three major reforms – the General Product Safety Regulation (GPSR), the Cyber Resilience Act (CRA) and the revised Product Liability Directive (PLD) – will apply in parallel, reshaping how retailers design, source, list, monitor and support products sold into the EU. Collectively, these reforms represent one of the most comprehensive updates to the EU's consumer protection framework in recent years.

GPSR

Applicable since December 2024, the GPSR expands what constitutes a "safe" product. Commission guidance (21 November 2025) confirms "health" now explicitly includes cognitive and psychological wellbeing, requiring assessments of risks including digital addiction; impaired concentration; poor sleep; or anxiety. This is particularly relevant for interactive, connected and attention-capturing products.

Online listings are a frontline compliance obligation. Product pages must display manufacturer identity, responsible person details, product identifiers, clear images, and safety warnings in accessible language.

Retailers must also ensure each product has an EU-based responsible person. Recall notices must be accessible and machine-readable, and retailers must:

- Avoid minimising terms such as "voluntary" or "precautionary";
- Notify affected consumers; and
- Offer at least two cost-free remedies (repair, replacement, or refund) with no time limit.

Technical documentation obligations also increase. Manufacturers must produce proportionate model-level documentation, retaining these for ten years, and complete internal risk analyses before placing products on the market. The Safety Business Gateway becomes the mandatory channel for notifying unsafe products and accidents.

CRA

The CRA introduces mandatory cybersecurity requirements for all products with digital elements made available in the EU. Full application begins on 11 December 2027, although key obligations commence earlier. From 11 June 2026, the conformity assessment body notification framework applies, enabling Member States to designate notifying authorities and for conformity assessment bodies to be notified.

Manufacturers must classify products as default, important, or critical, determining whether self-assessment or a notified body is required. Harmonised standards are expected in Q3 2026, with notified bodies operational from December 2026.

From 11 September 2026, manufacturers must notify both actively exploited vulnerabilities and severe incidents with an impact on product security as follows:

- an early warning within 24 hours of becoming aware; and
- a full notification within 72 hours.

Final reports must then be provided within 14 days of a corrective measure being available for actively exploited vulnerabilities, and one month for severe incidents. These duties apply to all in-scope products on the EU market, including legacy stock.

The CRA also mandates secure by design development, cybersecurity risk assessments, continuous vulnerability handling (including security updates), due diligence over third party components, and clear specification of support periods. Failures to provide necessary updates may contribute to a finding of defectiveness under the PLD.

PLD

From 9 December 2026, the revised PLD modernises strict liability for connected and software-enabled products. Member States must transpose the PLD by that date, though implementation is progressing unevenly across the EU.

The definition of "product" includes software, digital files, and related services essential to a product's operation. Compensable damage expands to medically recognised psychological harm, destruction or corruption of non-professional data, and mixed use property damage.

The Directive introduces rebuttable presumptions of defectiveness where manufacturers withhold relevant evidence, where products fail to meet mandatory safety requirements, or where there is an obvious malfunction. Causation is presumed where the damage is of a type typically caused by the relevant defect, and courts may presume defectiveness, causation or both where technical or scientific complexity makes proof excessively difficult.

Liability may cascade across the supply chain, capturing manufacturers, authorised representatives, importers, fulfilment providers, distributors, and online platforms. The limitation period also extends significantly: for latent health injuries, claims may be brought up to 25 years after placing a product on the market.

What should retailers do to prepare?

Although implementation is phased, retailers should begin planning now:

- **Strengthen listings, traceability and documentation:** ensure online listings meet GPSR requirements, confirm an EU-based responsible person, and maintain technical, safety and update compliance records for required retention periods
- **Refresh risk assessments:** integrate mental health impacts, evolving digital features and cybersecurity considerations into safety and compliance processes.
- **Enhance recall capability:** build systems to identify affected consumers quickly and issue accessible notifications.
- **Map digital exposure:** classify in scope products and identify dependencies on third party components that may trigger vulnerability handling duties.

ASA Enforcement

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What's changing?

Active Ad Monitoring is transforming enforcement: The ASA's Active Ad Monitoring (AAM) system processed nearly 60 million online advertisements in 2025, cementing the regulator's shift towards proactive, preventative regulation. By the end of 2025, 45% of the ASA's regulatory resource was devoted to proactive work, compared with just 5% in 2012, with advertisements identified through algorithmic monitoring increasingly resulting in published rulings and themed enforcement batches.

Focus areas included climate claims, weight-loss injections, influencer disclosure, pricing claims and green claims. In 2026, the ASA anticipates formalising its Intermediary and Platform Principles framework, delivering greater transparency and accountability to online advertising regulation.

AI in advertising: Generative AI is enabling greater volumes of increasingly personalised advertisements, and the ASA assessed a growing number of complaints involving AI-generated content in 2025. The Advertising Codes apply with full force regardless of the means of content creation — including advertisements made with, for, or placed within AI-based products. Retailers deploying AI-assisted marketing tools should not assume any different standard applies.

Less healthy food restrictions: first rulings published: From 5 January 2026, paid online advertising for identifiable less healthy food and drink products is prohibited entirely, with broadcast television subject to a 05:30–21:00 watershed. In December 2025, the ASA published comprehensive guidance on how it will interpret and apply the rules. Key points include:

- Brand advertising that does not depict a specific identifiable less healthy product is exempt, as are businesses with fewer than 250 employees.
- Even where the restrictions do not apply, HFSS-specific rules on content and placement continue to apply.
- The ASA plans to deploy AI-assisted monitoring to this sector, confirming that active enforcement is a near-term priority.

The ASA published its first rulings under the regime on 16 April 2026.

Complaints against Lidl — where an influencer post featured close-up visuals of a less healthy bakery product despite being framed as brand-led — and Iceland — whose paid online display ads featured identifiable less healthy products including Swizzels sweets and Haribo alongside pricing information — were both upheld. The rulings confirm that brand-led or lifestyle framing does not automatically provide protection, and that the rules apply to all businesses, not only food retailers.

Pricing and promotions under dual scrutiny: Both the ASA and CMA are targeting misleading pricing practices including drip pricing, false reference pricing and deceptive time-limited offers. CAP updated the Advertising Codes in 2025 to align them with the Digital Markets, Competition and Consumers Act 2024 (DMCC Act). Retailers operating complex pricing models face materially heightened enforcement risk across both regulatory channels simultaneously.

Influencer disclosure gaps persist: The ASA's second Influencer Ad Disclosure report (May 2025) found that 34% of reviewed posts included no disclosure at all. Travel and fashion sectors recorded higher rates of non-compliance, informing a focused piece of work on travel influencer disclosure in 2026. Clear, upfront labels such as “Ad” and use of platform-specific disclosure tools remain the most effective means of signalling commercial content.

Green claims: The ASA worked closely with the CMA on green claims in 2025, including sustainability claims in the fashion sector. The ASA is clear that the choice is not between greenwashing and silence — it is between accuracy and inaccuracy, and between hard-to-prove absolute claims and safer, conditional claims that are properly evidenced.

What should retailers do to prepare?

- Treat proactive enforcement as the baseline: Compliance cannot rely on the absence of complaints. Conduct regular internal audits of live advertising across all digital channels.
- Ensure immediate HFSS compliance: Verify all paid online advertising for in-scope products has ceased and broadcast campaigns respect the watershed. Do not assume brand-led framing provides protection — review the published guidance carefully.
- Strengthen influencer governance: Build contractual disclosure obligations — including platform-specific tools and “#ad” labelling — into every influencer contract and campaign brief.
- Review green claims and pricing: dual ASA and CMA enforcement means non-compliance carries both reputational and financial risk.

New rules for price transparency

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What's changing?

Price transparency continues to be a high priority area for CMA enforcement. In November 2025, we saw the CMA use its enhanced consumer enforcement powers under the DMCC Act for the first time in a co-ordinated enforcement drive targeting online pricing practices – simultaneously opening eight investigations, issuing 100 advisory letters across 14 sectors and publishing final guidance on price transparency.

On 15 April 2026, the **first two of these cases** were decided, with the AA ordered to pay a £4.2 million fine and £760k in compensation to affected consumers for engaging in drip pricing. The CMA's 2026/27 Annual Plan confirms that price transparency will remain a key focus for enforcement going forward.

The rules on price transparency were strengthened under the DMCC Act, with the government introducing a new hardline obligation to include the total price in every invitation to purchase with limited exceptions. An 'invitation to purchase' is a broad concept and consumers are typically faced with multiple during the customer journey, all of which must comply with the new rules. Following a consultation run over the summer, the CMA has now published its **final guidance**, which includes many practical examples to help businesses apply these rules. Despite widespread industry pushback on the draft guidance, the CMA made few changes, confirming its strict interpretation of the DMCCA Act.

Retailers should familiarise themselves with the guidance, but the following points should be noted in particular:

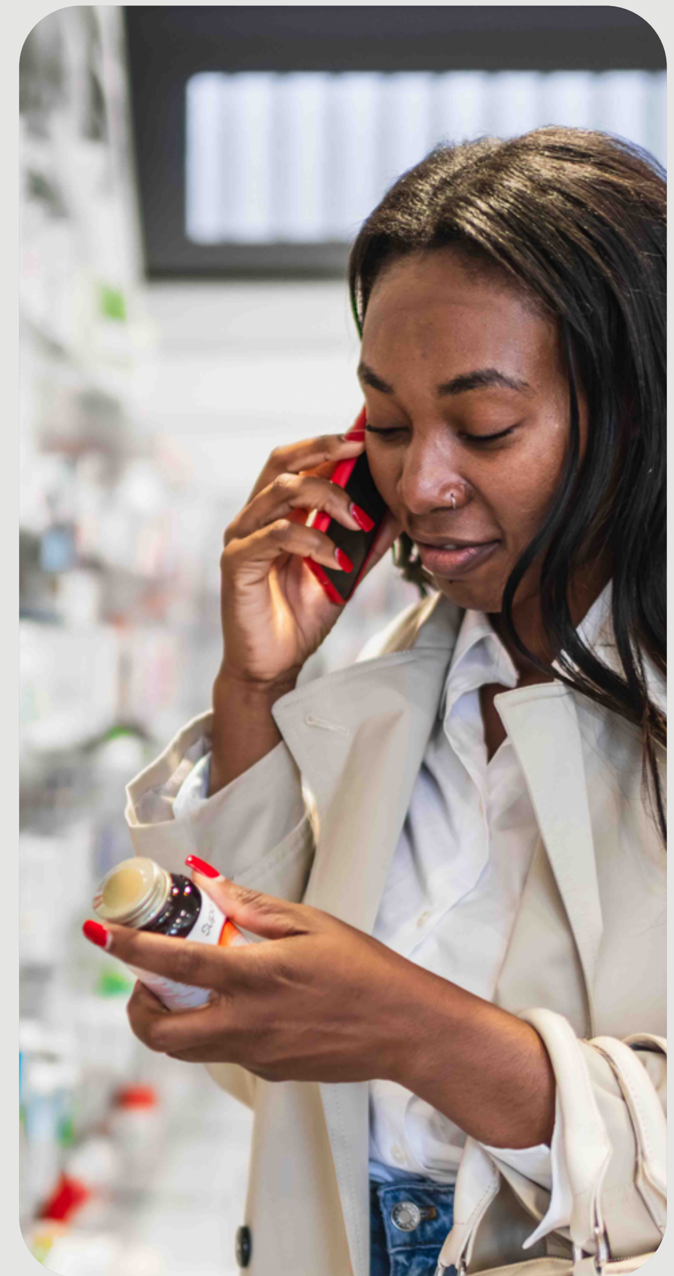
- **Responsibility sits with the person making the invitation to purchase** – even if this is not the person actually selling the product, for example an online marketplace, comparison website or even influencer. Brands are also likely to be on the hook where they have not provided sellers with all of the information required under the DMCC Act.
- **The CMA takes a narrow view of charges not calculable in advance** – additional fees can only be omitted from the total price where they cannot be calculated in advance due to the nature of the product. Admin fees, booking fees and transaction fees are unlikely to meet this test and should be included in the total price.

- **Delivery charges should be included if mandatory** – however, the CMA recognises that this presents difficulties for multi-product purchases where a single 'per basket' delivery fee applies and provides solutions such as floating baskets and dynamic "add to basket" buttons which show a running total. Optional delivery charges (e.g. next-day delivery) must also be included in the invitation to purchase, but can be provided separately.
- **"Optional" charges are interpreted narrowly** – A charge is not optional merely by being presented separately or labelled as an add-on. If a consumer cannot complete a purchase without paying it, it is mandatory and must appear in the total price.
- **"From" pricing and promotional availability should be accurate** – businesses must ensure that the advertised price reflects realistic availability and the price advertised must be one that a typical consumer can genuinely access.

What should retailers do to prepare?

As retailers will be aware, consumer law breaches now carry the possibility of fines of up to 10% of global turnover, as well as other remedies such as enforced UX changes and compensation to consumers. Retailers should be mindful that these rules have a low evidential bar, with no need for the CMA to demonstrate an impact on consumer behaviour and retailers' online practices very easy to monitor. The CMA's multi-sector enforcement demonstrates that no retailer is out of scope, and there is likely to be more to come.

Retailers should consider **conducting a structured audit of the full customer purchase journey**, considering every touchpoint at which a price is displayed to ensure compliance with the price transparency rules and guidance. Contracts with marketplace operators, affiliates and influencers should be reviewed to ensure those partners have the information needed to display pricing correctly and are contractually required to do so.



Customs treatment of low-value imports

Impact H

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What's changing?

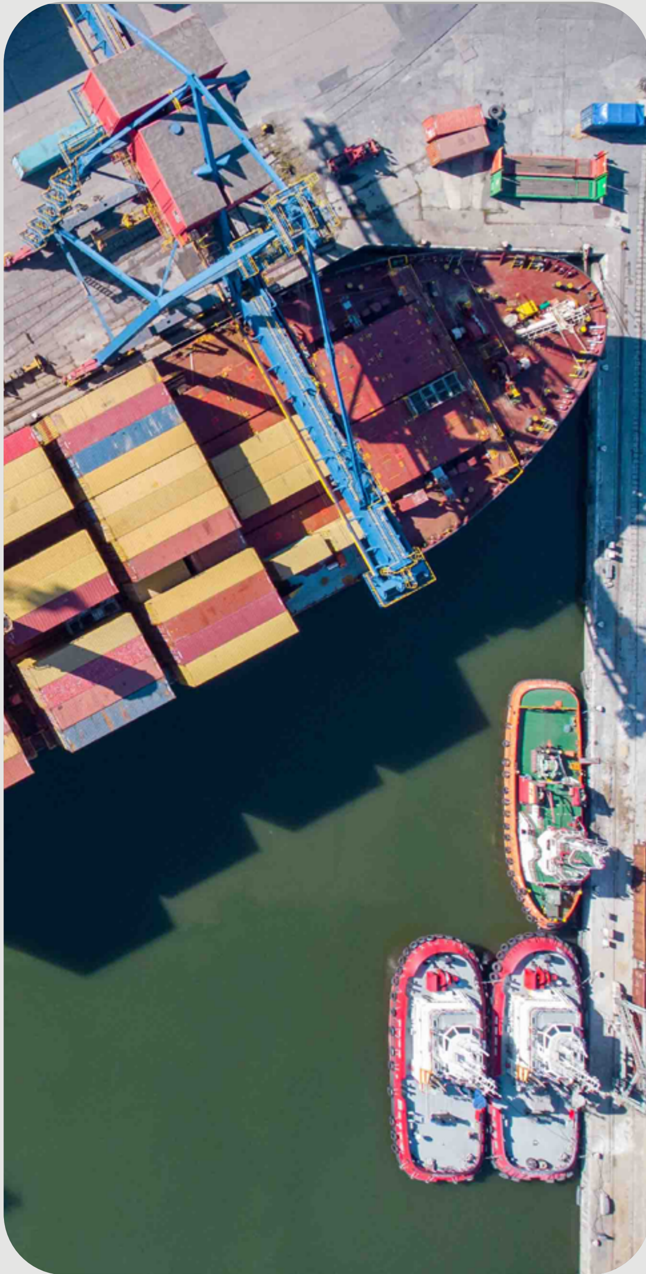
UK retailers face a critical juncture as both the UK and EU move to eliminate customs duty relief on low-value imports ("LVIs"), a reform that promises competitive fairness but could risk damage through delayed implementation.

Currently, goods valued at £135 or less entering the UK can claim LVI relief, avoiding customs duties entirely. Domestic businesses importing goods in bulk must pay customs duties on entire commercial shipments, whilst overseas platforms like Shein and Temu can ship individual parcels directly to UK consumers, each qualifying for duty-free treatment. This de minimis threshold has created a competitive disadvantage for UK retailers competing with these companies. This loophole enables foreign sellers to systematically undercut UK retailers through duty avoidance that domestic businesses cannot replicate.

The government's Autumn Budget 2025 announced that LVI relief will be removed between December 2026 and March 2029. The current proposal is a simplified duty system, bracketing products into tariff bands rather than thousands of commodity codes (internationally standardised numerical reference numbers, classifying goods for international trade). This could reduce the administrative burden of collecting these duties whilst creating the level playing field UK retailers are seeking.

However, a potential four-year implementation delay could have negative consequences for UK retailers. It could extend the period during which they face a competitive disadvantage, particularly as overseas platforms continue to strengthen their market position, possibly entrenching consumer habits and eroding market share. The consultation process, which closed on 6 March 2026, adds to the uncertainty, as UK retailers are unable to plan with confidence while the final structure remains unresolved.

The European Council has made a similar decision to remove its €150 threshold and apply a fixed €3 customs duty per item from July 2026. This timing creates a complex dynamic for UK retailers. Whilst earlier EU implementation may accelerate UK action, the timing disparity creates acute risks.



EU-based retailers would gain protection from July 2026, whilst UK retailers continue facing duty-free competition in their home market until potentially 2029. This divergence could redirect overseas e-retailers to focus on the UK market, further increasing competition.

What should retailers do to prepare?

A large period between EU implementation (July 2026) and potential UK implementation (March 2029) represents maximum risk for UK retailers. Without accelerated implementation, the long-term impacts could reshape UK retail in favour of overseas platforms, with competitive positions becoming harder to reverse even once duty equalisation is finally achieved.

UK retailers should proactively navigate LVI reform challenges and the first step is to await the outcome of the consultation.

Since UK retailers cannot match the artificial price advantages of duty-free imports during the transition period, they may need to consider increasing emphasis on competition beyond price, for example by emphasising delivery speed, quality assurance and sustainability credentials.

UK retailers should also consider close examination of the proposed simplified tariff system, building a clearer picture of how the changes will alter competitors' landed costs. This will help reveal the extent to which the playing field will shift once duties are applied, highlighting the product categories likely to experience the greatest swings in competitiveness. With this understanding, robust pricing strategies for the post-reform market can be introduced; whether that means holding prices steady to strengthen margins or lowering them to win market share when overseas platforms start to absorb their new cost pressures.

Finally, developing robust scenario planning for different implementation timelines, building financial resilience, and monitoring EU implementation from July 2026 to gather evidence supporting UK acceleration are key steps UK retailers may wish to take to be best prepared.

UK Carbon Border Tax: downstream challenges for retailers

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What's changing?

- **Higher costs and lower margins:** Suppliers facing both direct and administrative CBAM compliance costs may pass some or all of these downstream (through manufacturers and wholesalers). Retailers may then face a choice between absorbing these costs (reducing profitability) or passing them on to consumers (risking reduced demand). This may therefore affect the viability of certain products incorporating CBAM covered goods.
- **Competitive disadvantage:** Large, international retailers might handle CBAM requirements more efficiently than smaller firms (using their scale and diverse sourcing). This could give bigger players a cost advantage, leaving less-prepared small retailers at a disadvantage.
- **Product viability risks:** Retailers may find certain products become unprofitable if suppliers cannot provide verified emissions data. Without third-party verified emissions information, importers face inflated CBAM charges based on default emissions values, intentionally set higher than actual emissions to penalise non-compliance. Whilst this mechanism pressures producers to invest in emissions tracking, it creates a direct cost problem for retailers: suppliers will either absorb these higher costs (unlikely) or pass them downstream. For carbon-intensive products, the mark-up from default values alone could price items out of competitive retail ranges.

What should retailers do to prepare?

Retailers should consider engaging with their suppliers well in advance of CBAM coming into force on 1 January 2027. This engagement should cover the extent of the supplier's exposure to CBAM costs, the steps being taken to reduce that exposure (for example, obtaining verified emissions data or sourcing lower carbon goods), and whether and how those costs may be passed on. Retailers negotiating supply agreements extending beyond the end of 2026 should also expect to see CBAM-related clauses introduced by suppliers, and may wish to consider including contractual mechanisms allowing them to switch suppliers where CBAM related costs are not being effectively managed.

Trade mark update: Getty Images v Stability AI

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What's changing?

Getty Images v Stability AI has been one of the most closely watched intellectual property disputes in recent years. Getty Images, a well-known media company, brought proceedings against Stability AI, an AI model developer, alleging that Stability AI had unlawfully scraped millions of its images without consent to train the AI model. The case raised a key question across all industries: can third-party copyright content be used lawfully to train an AI model?

By the time the case reached trial, several of the most significant claims including primary copyright infringement had fallen away, largely because the training and development of the AI model had taken place outside the UK. What remained were trade mark infringement, passing off, and secondary copyright infringement claims. The High Court found limited trade mark infringement in relation to certain model versions, whilst broader claims based on dilution and unfair advantage failed entirely. For retailers, the message is clear: even where major claims do not succeed, the risk of AI-generated outputs bearing your brand identifiers remains real.

Subsequently, the High Court has now granted permission for Getty to appeal its case, focusing on the secondary copyright infringement claim and the novel question of: whether an AI model can constitute an "infringing copy" under UK copyright law even if it doesn't store the protected works used to train it? The outcome could have far-reaching consequences for how AI tools are developed, imported and deployed in the UK. For AI developers, a Getty victory could require extensive licensing arrangements and potentially increase costs across the supply chain. For rights holders, including retailers whose product images, brand and marketing content is incorporated into AI training datasets without their consent, it could determine the extent to which they can enforce their IP against unauthorised use.

The appeal is likely to be heard in late 2026 to early 2027. Retailers should not wait for the final answer before taking steps to protect their position.

What should retailers do to prepare?

- **Review your vendor relationships and contracts urgently**: AI-specific clauses are no longer hypothetical, they must be standard practice. Review your vendor agreements for AI-powered tools and ensure contracts address content ownership, licensing arrangements and intellectual property rights to prevent disputes over AI-generated outputs.
- **Monitor legislative developments closely**: The Government published the much-anticipated Report on Copyright and Artificial Intelligence with the accompanying Copyright and AI Impact Assessment in March 2026.
  In these documents, the Government still appears not to have provided certainty to proprietors or developers, but it confirmed that some of the options that it was considering to regulate the use of copyright by AI developers are off the table, such as the opt-out model. Keeping an eye on these developments will be imperative.
- **Critically assess your current portfolio for any gaps**: Review your existing registrations to ensure they cover your current business operations, including brands, products, trading names and digital presence. Identify where your business is missing protections, particularly for any new ventures or AI-related partnerships and prioritise these registrations accordingly.

The record-high trade mark filings seen in 2025 are a clear indication that businesses are already making these changes. As we move into 2026, with AI development and regulatory demands only intensifying, the time to act is now and retailers who do will be far better equipped to navigate what comes next.

Contact our retail team

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