AOP, ABDO and FODO statement – New rules for subscription contracts

The UK Government is introducing new subscription contract rules from 1 January 2027. The new rules will apply to optical appliances and services supplied via subscription, including the supply of contact lenses, aftercare; sight tests and spectacles.

The supply of medical prescriptions and products are exempt from the new rules. We previously argued that the supply of optical appliances should be similarly exempt. However, it is now clear that optical businesses supplying goods and services under subscription to consumers will need to meet the new rules.

A subscription contract is a contract for the ongoing supply of goods and/or services in exchange for regular payments. Subscription contracts in the optical sector include, for example:

- Contracts for the regular supply of contact lenses and solutions.
- Contracts for the supply of services, such as regular eye examinations, contact lens appointments or treatments.
- Contracts for the supply of both goods and services – for example regular eye examinations and spectacles.

Financial products are exempt from the new rules because they are regulated separately.

In summary, when the new rules come into force, businesses will be required to:

- Provide clear information before a consumer enters into a subscription contract, so the consumer understands what they are signing up to.
- Provide reminder notices to the consumer at key points during the subscription contract – for example, once every six months if a consumer is on a rolling weekly or monthly contract.
- Enable consumers to easily bring their contact to an end - for example, if a consumer can enter into a contract online, they should be able to cancel online.

Consumers also benefit from the ability to cancel contracts without penalty at key points – for example, during a 14-day cooling-off period when they enter into the contract, or if a business has not met the subscription contract rules.

Importantly, the new rules apply only to new contracts entered into on or after 1 January 2027. They do not apply to existing contracts.

The Department for Business, Innovation, Science and Trade (DBIST) has now published guidance on the new rules which explains what businesses will need to do. The guidance has been published in draft alongside secondary legislation which is currently before the UK Parliament.

Now that the new rules are clear, we are working together to develop tailored guidance for the sector.

In the meantime, we encourage optical businesses to prepare to meet the new rules by 1 January 2027 by reading the draft DBIST guidance.

November 2026