



Natasha's Law: Guidance On Pre-Packed For Direct Sale (PPDS) Food & Labelling

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From 1st October 2021, the Food Information (Amendment) Regulations will come into force throughout the UK. From this date, EHOs will be including checks on the labelling of PPDS to their inspections and will be able to take enforcement action where appropriate.

Commonly referred to as 'Natasha's Law', the aim of the regulations is to protect food allergy sufferers and help them make informed and confident choices about the foods they buy.

The Requirements Of Natasha's Law Are As Follows:

All pre-packed for direct sale foods must be labelled with the name of the food and full ingredients listing, with any of the 14 allergens contained clearly emphasised (e.g. in bold, italics, underlined, etc).

Which Foods Are PPDS?

In short, PPDS foods are those which are wrapped or packaged on the same premises they are sold from. Below are some examples:



Sandwiches and bakery products which are packed on site before a consumer selects or orders them.
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Wrapped samples of cookies given to consumers for free which were packed on site.



Fast food packed before it is ordered, such as a burger under a hot lamp.



Foods packaged and then sold elsewhere by the same operator at a market stall or mobile site.



Products which are pre-packed on site ready for sale, such as pizzas, rotisserie chicken, salads and pasta pots.



PPDS food provided in schools, care homes or hospitals and other similar settings will also require labelling.

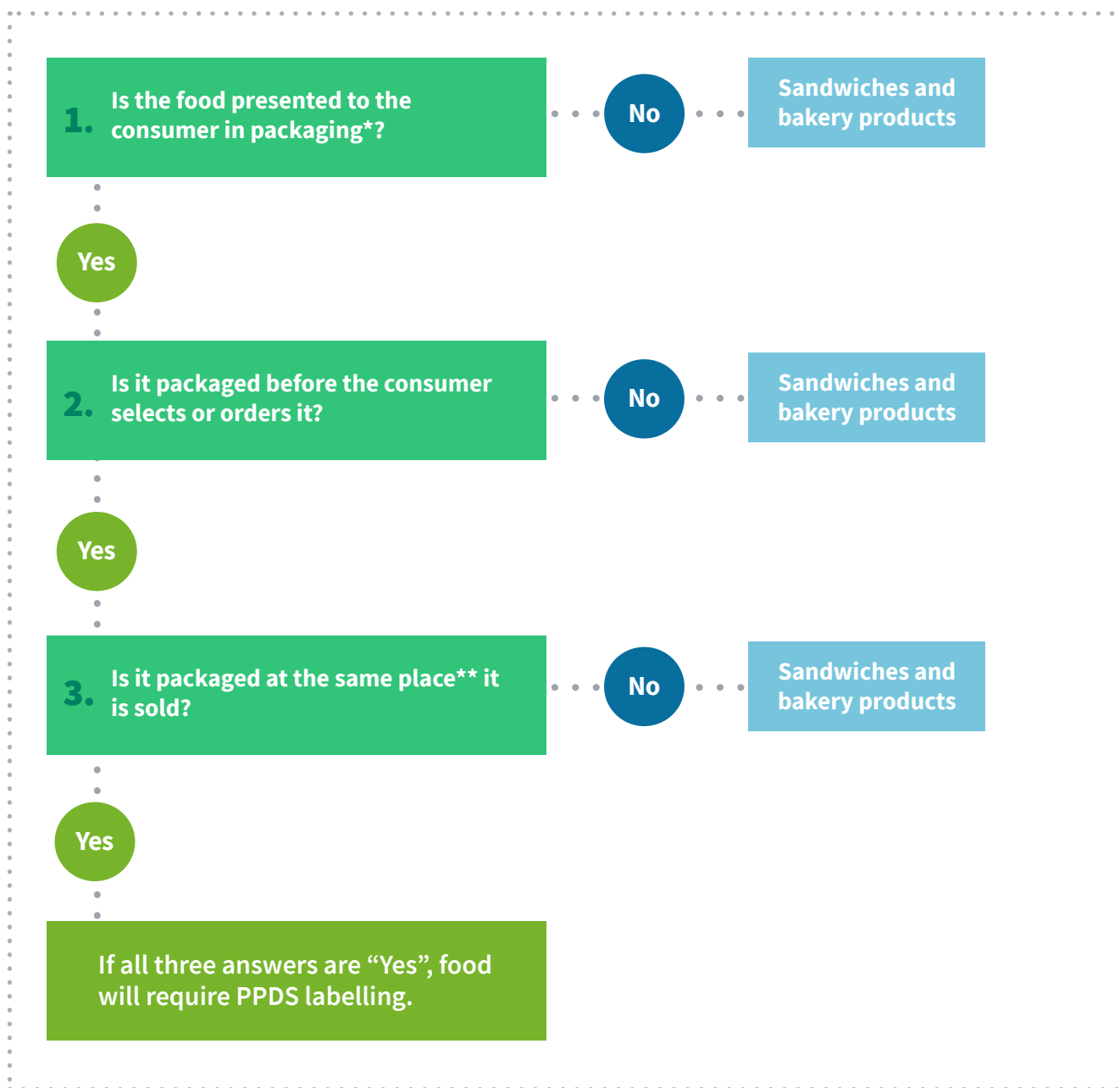


Burgers and sausages pre-packed by a butcher on the premises ready for sale to consumers.

For a pre-packed food to be considered PPDS, it **must** be wrapped or packaged **before** the customer orders it and packaged in a way that the food cannot be altered without opening or changing the packaging. Foods wrapped or packaged after the customer has placed their order are not considered PPDS.

What Food Will Require PPDS Labelling?

The Food Standards Agency (FSA) has published a simple flow chart to help food businesses determine if the foods they sell are considered PPDS:



Important Notes:

***For food to be considered 'packaged' it must:**

- be fully or partly enclosed by packaging; and
- cannot be altered without opening or changing the packaging in some way; and
- be ready for sale to the consumer.

****Food packaged at the same place includes:**

- food packaged by the same food business and sold at a temporary or mobile site, such as a food truck or market stall.
- food packaged and offered at different units by the same business in one building complex, such as an airport or shopping centre.

Which Foods Are Not PPDS?

Any food that is not in packaging or is packaged after being ordered by the consumer. These are types of non-prepacked food and do not require a label with name, ingredients and allergens emphasised. Allergen information must still be provided but this can be done through other means, including verbally.

Food packed by one business and supplied to another business. This is pre-packed food and must be delivered to you with full labelling, including the name of the food and a full ingredients list, with allergenic ingredients emphasised within it.

How Can I Make Sure The Information On Labels Is Accurate?

It's vital that the information on your PPDS labels is correct and maintained up to date. With allergen ingredients on labels for these products, your customers may not ask you about the allergens in the foods they purchase. Any mistakes on your labels could prove fatal for an allergy sufferer.

Any changes to ingredients, e.g. a recipe change or product substitution, means you'll have to re-do your labels for affected PPDS foods.

Preparation Is Key. The Following Steps Will Help You Get Your Labelling Right:

- Put a policy in place that explains how you'll manage product substitutions.
- Plan your menus in advance and identify which products are PPDS.
- Speak with your suppliers to ensure they can provide you with up to date allergen information for the foods you buy from them.
- Write your set recipes for your PPDS foods in advance, highlighting any of the 14 allergens clearly and remembering to measure 'pinches' and 'splashes' of ingredients by weight, e.g. grams/ml, etc.
- Use your set recipes to create your labels.
- Prepare your PPDS foods according to your set recipes and wrap/pack.
- Apply the right label to the right PPDS product.
- Write your set recipes for your PPDS foods in advance, highlighting any of the 14 allergens clearly and remembering to measure 'pinches' and 'splashes' of ingredients by weight, e.g. grams/ml, etc

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It's a good idea to include brand information and product codes in your set recipes to help you easily spot any product substitutions.

Qty	Ingredient	Allergens
2 slices (80g)	Maxwell's Malted bread <i>Product code 0034567</i>	Fortified wheat flour (wheat flour, calcium carbonate, iron, niacin, thiamin), water, malted wheat flakes, wheat bran, wheat protein, yeast, malted barley flour, salt, emulsifiers (mono- and diglycerides of fatty acids, mono- and diacetyl tartaric acid esters of mono- and diglycerides of fatty acids), spirit vinegar, malted wheat flour, rapeseed oil, flour treatment agent (ascorbic acid), palm fat, wheat flour, palm oil, wheat starch)
30g	West Country Fayre Mature cheddar cheese <i>Product code 123456</i>	Milk
25g	Mrs Pringle's Pickle <i>Product code 1023</i>	Carrots, sugar, swede, onion, barley malt vinegar, water, spirit vinegar, apple pulp, dates, salt, modified maize starch, rice flour, colour (sulphite ammonia caramel), onion powder, concentrated lemon juice, spices, spice and herb extracts
5g	Butter	Milk



Method:

Butter each slice of bread, spread the pickle on top of the butter on one slice of bread and put the cheese on top. Add the second slice of bread, butter side down and slice in two on the diagonal.

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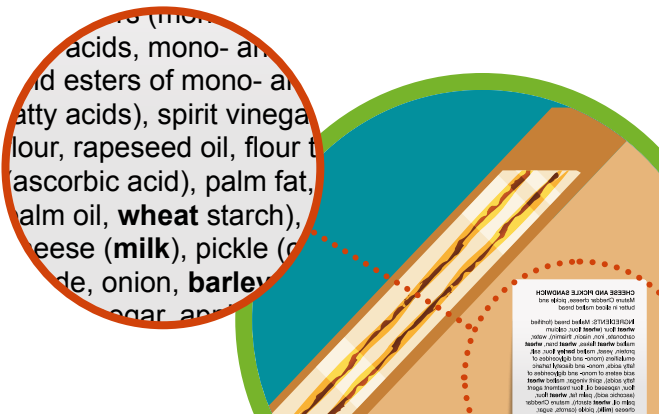
PPDS food labelling must meet the same requirements as foods delivered to you pre-packed.

You must include the following information on your labels:

- The name of the food, e.g. cheese and pickle sandwich on malted wheat bread.
- The word 'ingredients'.
- Then detail the ingredients in descending order of weight, from largest quantity to smallest.
- Make sure you highlight any of the 14 allergens clearly, e.g. in bold, italics, capitals, underlined, etc.
- Herbs and spices which make up less than 2% of the total product portion weight do not need to be in descending order of weight but must be included in the ingredients list.

You don't need to know the final weight of the individual product/portion to work out the descending order of weight, your set recipes will help you work this out.

Remember, composite ingredients (i.e. one ingredient that is made up of multiple other ingredients, such as bread or dressings) must be listed by the name of the product with its ingredients in brackets afterwards:





Are There Any Other Controls I Need To Have In Place?

Yes. You'll need to ensure your existing procedures for minimising allergenic contamination during delivery, storage, preparation, cooking, transportation and service, and so on, are in place and being followed. Any accidental contamination is likely to affect your PPDS labels and could prove cause a serious allergic reaction.

Regularly review your allergen information to make sure it is accurate. This includes PPDS labels and set recipes as well as information you provide verbally for non pre-packed foods you sell.

Train your staff. Your new procedures for PPDS foods and labelling are contingent on your staff being both competent and confident in dealing with allergens and allergen information. It's essential to complete training and test knowledge regularly.

It's a good idea to have one or two people who can lead and co-ordinate allergen management on site, your allergy champions!

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