



PPDS FAQs

What is Natasha's Law?

Natasha's Law is a new piece of food labelling legislation that is being brought in from October 2021 to ensure that all pre-packed for direct sale food is labelled with a list of all of its potential allergens. It is named after a fifteen-year-old girl who died in 2016 after consuming a sandwich with an allergen in it that led to anaphylactic shock and death; an incident that would have been prevented if the food had been individually labelled with its ingredients.

What is PPDS food?

Food that is packed before being offered for sale by the same food business to the final consumer:

- I. on the same premises; or
- II. on the same site*; or
- III. on other premises

If the food is offered for sale from a moveable and/or temporary premises (such as marquees, market stalls, mobile sales vehicles) if the food is offered for sale by the same food business who packed it.

It does not include food packed at a consumer's request, food not in packaging, or food in packaging that can be altered without opening or changing the packaging.

When will the changes apply/become mandatory?

From 1 October 2021, the requirements for prepacked for direct sale (PPDS) food labelling will change in Wales, England, and Northern Ireland. From this date EHOs will be adding this requirement to their inspection list and will issue enforcement/change orders, and escalate as required.

How will I know what is considered as a PPDS food?

The FSA has developed a handy checker tool:

www.food.gov.uk/allergen-ingredients-food-labelling-decision-tool

What is the difference between prepacked and prepacked for direct sale (PPDS) foods?

Prepacked for direct sale (PPDS) food is packaged at the same place it is offered and before it is ordered or selected by consumers. This includes food that customers select themselves, as well as pre-wrapped items, kept behind a counter. Food sold at mobile or temporary outlets also falls under PPDS foods.

Prepacked food, however, is either offered or sold by a different business to one which packaged it or offered or sold at a different location to where it was packaged. Prepacked food already requires full ingredient and allergen labelling as well as a nutritional information declaration.

What isn't 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 orally.

Food packed by one business and supplied to another business. This is prepacked food and already must have full labelling, including the name of the food and a full ingredients list, with allergenic ingredients emphasised within it.

What are the food labelling requirements under PPDS?

The label on PPDS food must show the name of the food and the ingredients list with the 14 allergens required to be declared by law emphasised within it. This information must be provided in accordance with the existing legal requirements that apply to the naming of food and listing ingredients. The FSA has produced guidance on the labelling of PPDS food. You can access this [here](#).

What about distance sales and PPDS?

The PPDS labelling requirements do not apply to PPDS food that is supplied by means of distance selling, such as food that is purchased over the phone, internet or via apps.

Would products made and packed at a central location, then sold direct from three market stall sites, qualify as PPDS? Or should these be prepacked products?

Yes, if the business that's packing the products is the same one that's selling it from those three different market stalls. So in that instance, as it's sold by a mobile seller, it would be PPDS. So you've packed it at a different location, but you're the same business and you're selling it as a mobile seller, so it will need PPDS labelling. But if the packaging of the food was done by a different business and then was sold from the three market stalls, that would be prepacked food, which has slightly differing labelling requirements to PPDS food.

If a product has a number of items that have ingredients lists, do we need to list all of them too, or just that we have used that item?

Yes, you will need to have a full list of ingredients for everything that's in the product. In a sandwich for example, then you'll need to list the ingredients of the bread and the bread is a compound ingredient, as well as the filling of the sandwich you'll need to list. A compound ingredient is an ingredient that is in itself a product of more than one ingredient.

There are some exemptions in terms of small quantities of items. For example, if you have something that is a compound ingredient but it makes up less than two per cent of the finished product, then you wouldn't need to list them separately. Good practice, however, is to include them at the end of the ingredients list.

Does packed lunches in primary school to be taken away from the premises will fall under the category of PPDS?

If the lunches are made and packed to order, these are not prepacked before a customer orders them, so they're not PPDS. However, if you made a set of school lunches and packed them without specific orders from individual children and then offered them to the children to make their choices later on, then these would need PPDS labelling and should meet the new requirements.

If you've got multiple items within a packed lunch, you'll need to make sure that you're labelling or providing allergen information for each item in that packed lunch. Any PPDS items within that need to be labelled specifically.

Can a take away supply packed and pre-packed version of the same food?

Yes, it effectively comes down to the moment when a customer orders and when food is packaged. Where the food is packaged before the customer has ordered it is considered 'pre-packed food for direct sale' (PPDS). If it is packaged after it is ordered, it is considered to be 'non-prepacked food', even if the food is then provided in packaging. The reason for the distinction is that if the food is in packaging before it is ordered, then the customer can't change it and it requires a label.

If the food is packaged after it is ordered then, in theory, the consumer could request that items are removed which would change the contents. Therefore, this is considered to be 'non prepacked' and a label is not required.

Can the ingredients be listed by means of a QR code?

No. A QR code will not suffice.

As per the new allergen requirements, PPDS foods will need to have a label with a full ingredients list with allergenic ingredients emphasised within it. According to the new rules, PPDS food will have to clearly display the following information on the packaging:

- name of the food
- full ingredients list, with allergenic ingredients emphasised (for example in bold, italics or a different colour)

What is the minimum font size required on a label?

Ingredient lists including the emphasis of any of the 14 categories of allergens must be printed on the package or on the label in such a way as to ensure clear legibility.

In characters using a font size where the x-height is equal to or greater than 1.2 mm.

In case of packaging or containers, the largest surface of which has an area of less than 80 cm², the x-height of the font size shall be equal to or greater than 0.9 mm.

Where can I find the specific requirements for what to include on a PPDS food label?

You can find specific requirements from FSA website. Packaging can completely or partially enclose the product. However, if you can alter the product contained in the packaging, the product is not prepacked. Changing how packaging is presented can change whether the product is comes under the definition of prepacked and whether the prepacked/prepacked for direct sale labelling requirements will apply.

Scenario 1 - Fish and chip shops sell curry sauce stored in a bain-marie. A customer can go into the shop and request a portion of curry sauce to take home in a pot along with their fish and chips. Is this pot of curry sauce classed as PPDS from 1st October?

If the sauce is only packaged after the customer orders it, then it's not PPDS. So if the seller in the fish and chip shop packaged the curry sauce into a pot and put a lid on and then gave it to a customer after they ordered it, that's not PPDS. But if, however, pots of sauce were prepared before customers ordered them, they would be PPDS and would need to be labelled.

So if you have a pot where the largest surface area is less than 10 centimetres squared, you can provide an ingredients list separately to the packaging, but on the pot itself you do need to specify what the allergens are.

Scenario 2 - Deli Counter: If a sandwich was on display (not packaged) and the customer asked for it toasted and then packaged for takeaway, does this sandwich then have to be labelled?

If the food is pre packed before it has been ordered by the customer, a full ingredient list is required with allergens emphasised in the text.

In the scenario mentioned in the question, the food is not prepacked before the order. It therefore does not need to be labelled.

Scenario 3 - For home bakers, who have the cake collected by the purchaser and may not be packaged by the baker, but by the purchaser, (if at all). Is the ingredient declaration and associated allergen labelling required?

All food products sold through distance selling (such as over the internet or by telephone) already require allergen information to be provided before food is ordered and when it is delivered. This will not be affected by the new regulations.