



# Current rules on allergen labelling – PPDS

At the moment, allergen information for PPDS products can be provided in the same way as non-prepacked (loose) foods, in line with The Food Information Regulations 2014 and supported by Regulation (EU) 1169/2011.

## Examples



## All Change from 1<sup>st</sup> October 2021

From the **1<sup>st</sup> October 2021**, the implementation of 'Natasha's Law' ([The Food Information \(Amendment\) \(England\) Regulation 2019](#), [The Food Information \(Wales\) \(Amendment\) \(No. 2\) Regulations 2020](#), [The Food Information \(Amendment No. 2\) Regulations \(Northern Ireland\) 2020](#), and [The Food Information \(Scotland\) Amendment Regulations 2021](#)), will see the rules change for those products packed on site prior to being offered for sale.

See the FSA's [Food Allergen Labelling & Information: Technical Guidance](#) for more information



# What is PPDS?

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.

*\*In this instance 'site' refers to a building complex such as a shopping centre or airport terminal in which the same food business operates from more than one unit within the building complex.*




## **Packaging definition:**

Food Information for Consumers regulation (article 2) sets out that '...packaging encloses the food completely or only partially, but in any event in such a way that the contents cannot be altered without opening or changing the packaging...'

See the FSA's [Food Allergen Labelling & Information: Technical Guidance](#) for more information

# What is PPDS?

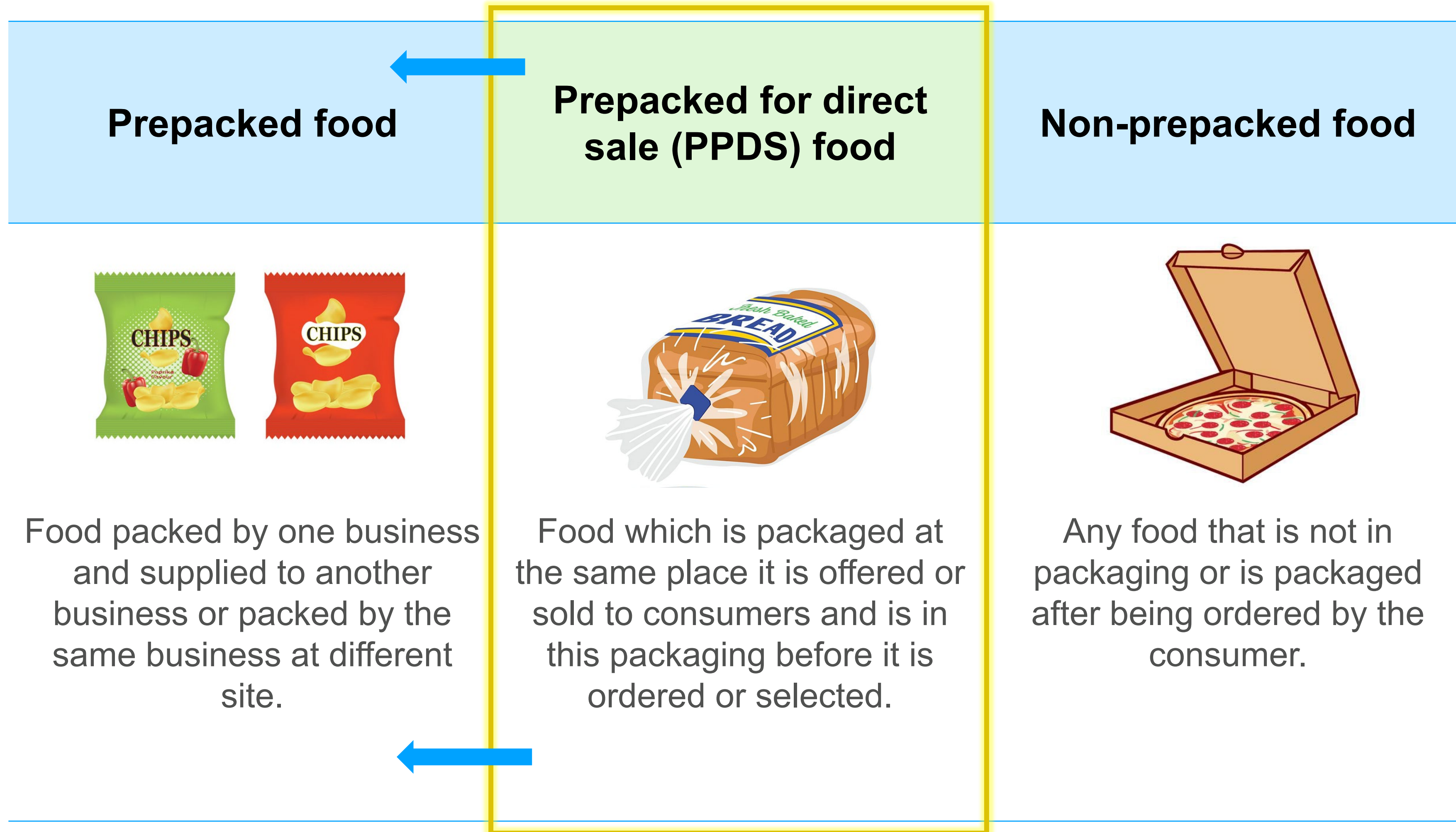
Pre – 1<sup>st</sup> October 2021

Prepacked food	Prepacked for direct sale (PPDS) food	Non-prepacked food
 <p data-bbox="493 1189 1209 1497">Food packed by one business and supplied to another business or packed by the same business at different site.</p>	 <p data-bbox="1259 1189 1975 1497">Food which is packaged at the same place it is offered or sold to consumers and is in this packaging before it is ordered or selected.</p>	 <p data-bbox="2075 1189 2692 1433">Any food that is not in packaging or is packaged after being ordered by the consumer.</p>

See the FSA's [Food Allergen Labelling & Information: Technical Guidance](#) for more information

# What is PPDS?

Post – 1<sup>st</sup> October 2021

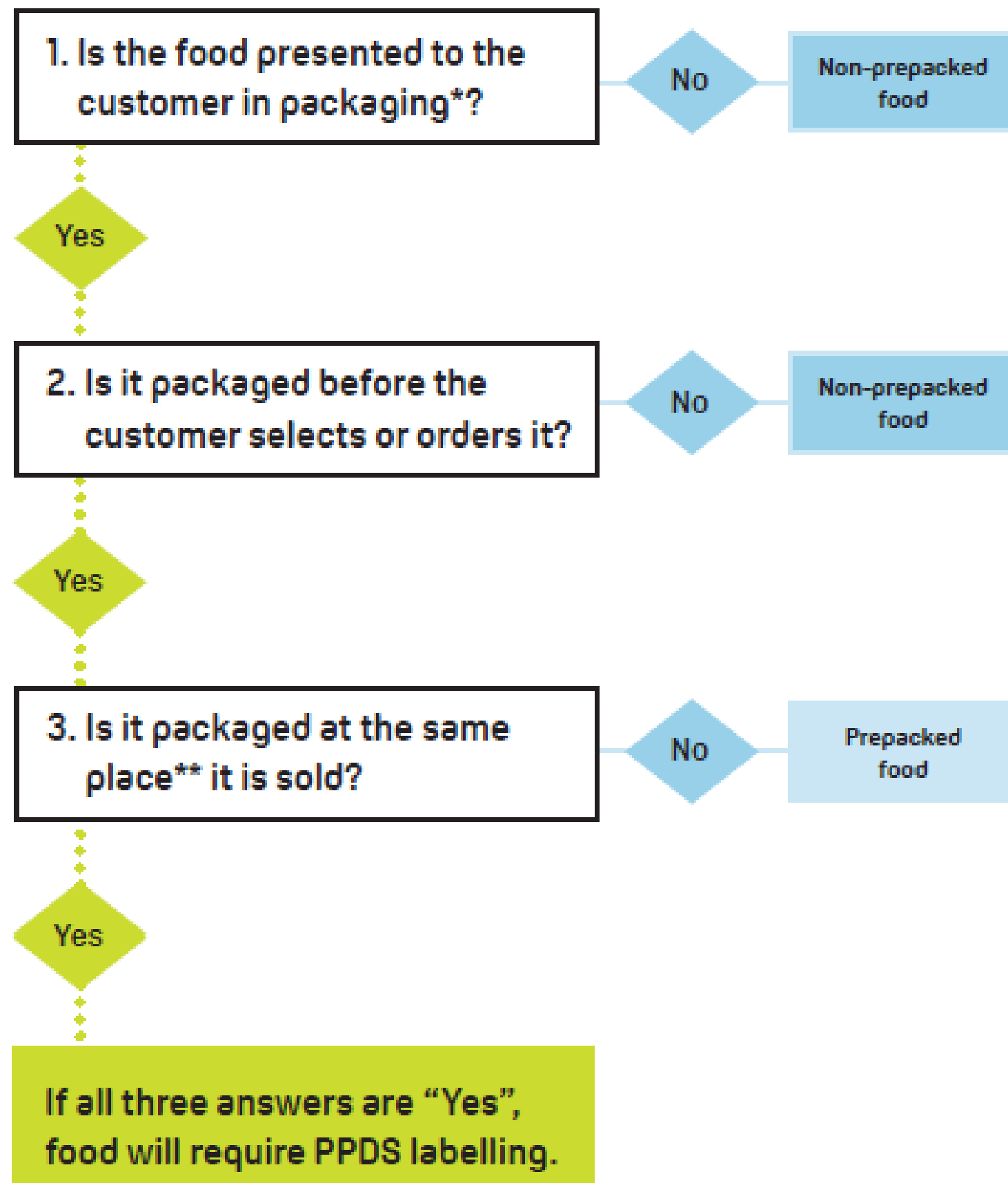


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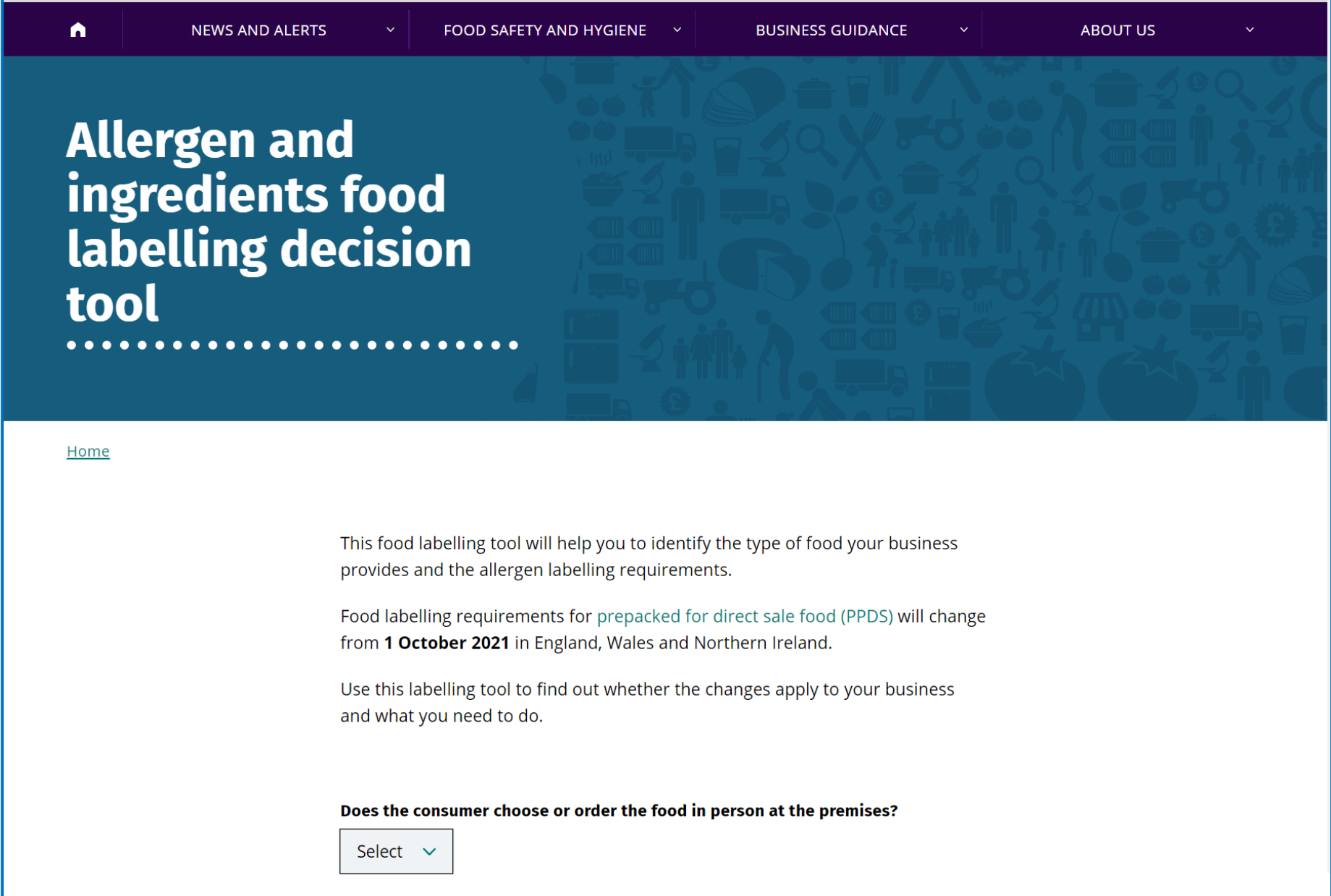


# What is PPDS?

## Decision Tree



We also have an [Allergen & Ingredients Food Labelling Decision Tool](#) on our website help you to identify the type of food your business provides and the allergen labelling requirements.



The screenshot shows the website interface for the 'Allergen and ingredients food labelling decision tool'. It features a dark blue header with navigation links: NEWS AND ALERTS, FOOD SAFETY AND HYGIENE, BUSINESS GUIDANCE, and ABOUT US. The main content area has a dark blue background with the title 'Allergen and ingredients food labelling decision tool' and a dotted line separator. Below the title, there is a 'Home' link and a paragraph explaining the tool's purpose: 'This food labelling tool will help you to identify the type of food your business provides and the allergen labelling requirements.' Another paragraph states: 'Food labelling requirements for prepacked for direct sale food (PPDS) will change from 1 October 2021 in England, Wales and Northern Ireland. Use this labelling tool to find out whether the changes apply to your business and what you need to do.' At the bottom, there is a question: 'Does the consumer choose or order the food in person at the premises?' with a dropdown menu currently set to 'Select'.

For food to be PPDS it **must meet all three criteria.**

See the FSA's [Food Allergen Labelling & Information: Technical Guidance](#) for more information

# What is PPDS?

## Examples of what **IS** PPDS

The following are examples of what foods are PPDS:

- Sandwiches packaged by the food business and sold or offered from the same premises.
- Fast food which is wrapped or packaged before a customer selects or orders it.
- Bakery products which are packaged before a customer selects them.
- Supermarket products which are produced and packaged in store, such as pizzas, rotisserie chicken, pre-weighed and packed cheese and meats and baked products.

## Examples of what **IS NOT** PPDS

The following are examples of what foods are not PPDS:

- Food not in packaging (loose).
- Pre packed food (packaged at a different premises).
- Food packaged at the customer's request.
- Distance sales (e.g. foods ordered online).

### Distance Selling

The new labelling requirements **do not** apply to PPDS food sold by means of **distance selling**, such as food which is purchased through telephone / internet.

Businesses selling PPDS food this way will need to ensure that mandatory allergen information is available to the consumer **before they purchase** the product and also at the **moment of delivery**.

See the FSA's [Food Allergen Labelling & Information: Technical Guidance](#) for more information

# What is the Change?

## The Food Information (Amendment) (England) Regulations 2019

From 1st October 2021, PPDS food must display the following information, either on the package or on a label attached to the package:

- the name of the food and;
- An ingredients list including the 14 mandatory allergens (hereafter referred to as allergens).

The allergens within the food must be emphasised every time they appear in the ingredients list. For example, the allergens in the food can be listed in CAPITALS, **bold**, in [contrasting colours](#) or underlined.

See [Article 16\(2\)](#) of Regulation (EU) No. 1169/2011 for the requirements applicable to packaging or containers with a surface area less than 10cm<sup>2</sup>.

See [Article 19](#) of Regulation (EU) No. 1169/2011 for foods which are not required to bear a list of ingredients.

See [Article 6A](#) of The Food Information (Amendment) (England) Regulation 2019 for general requirements to name them, *Refer also to Wales, Northern Ireland & Scotland legislation.*

See [Article 5A](#) of The Food Information (Amendment) (England) Regulation 2019 for duty to list ingredients, *Refer also to Wales, Northern Ireland & Scotland legislation.*

See the FSA's [Food Allergen Labelling & Information: Technical Guidance](#) for more information



# Example

## Name of the food

- Must be descriptive and inform the customer of the true nature of the food.
- Customary names which are commonly understood can be used, such as 'BLT sandwich'.
- Where names are prescribed in law they must be used. This mainly applies to food containing certain seafood, fish and meat ingredients.

See [Article 17](#) of Regulation (EU) No. 1169/2011 for the requirements of Name of Food.

See [Article 6A](#) of The Food Information (Amendment) (England) Regulation 2019 for general requirements to name them, *Refer also to Wales, Northern Ireland & Scotland legislation.*

### CHEESE AND PICKLE SANDWICH

Mature Cheddar cheese, pickle and butter in sliced malted bread

INGREDIENTS: Malted bread (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), mature Cheddar cheese (milk), pickle (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), butter (milk).

See the FSA's [Food Allergen Labelling & Information: Technical Guidance](#) for more information

# Example

## Ingredients

- The list of ingredients shall be headed by a suitable heading which consists of or includes the word 'ingredients'.
- It shall include all the ingredients of the food, in descending order of weight, as recorded at the time of their use in the manufacture of the food.
- If the product contains any of the 14 allergens they must be clearly highlighted on the listed ingredients.
- They can be in **bold** type, CAPITAL letters, **contrasting colours** or **underlined**. Alternative allergen statements, such as 'Contains: wheat, egg and milk' are not permitted.

### CHEESE AND PICKLE SANDWICH

Mature Cheddar cheese, pickle and butter in sliced malted bread

INGREDIENTS: Malted bread (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**), mature Cheddar cheese (**milk**), pickle (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), butter (**milk**).

See [Article 18](#) of Regulation (EU) No. 1169/2011 for the requirements of List of Ingredients.

See [Article 19](#) of Regulation (EU) No. 1169/2011 for foods which are not required to bear a list of ingredients.

See [Article 5A](#) of The Food Information (Amendment) (England) Regulation 2019 for duty to list ingredients. *Refer also to Wales, Northern Ireland & Scotland legislation.*

See the FSA's [Food Allergen Labelling & Information: Technical Guidance](#) for more information

# Labelling

## How Labels are Presented

- The information must appear on the package or on a label attached to the package.
- Must be easily visible and clearly legible.
- On the outside of the product and not obscured in any way.
- Must not be difficult to read due to poor lettering or colour contrast.
- The ingredient list has to be a minimum font size where x-height is 1.2mm or more. If products have a packaging surface less than 80 cm<sup>2</sup>, in which case the x-height can be reduced to 0.9mm.
- Labels can be handwritten as long as they meet the requirements of being easily visible and clearly legible.

See [Article 13](#) of Regulation (EU) No. 1169/2011 for the presentation of mandatory particulars.

See [Annex 4](#) of Regulation (EU) No. 1169/2011 for the definition of x-height.

See the FSA's [Food Allergen Labelling & Information: Technical Guidance](#) for more information



# Labelling

## How to Produce Labelling

### Handwritten Labels

- Labels can be handwritten as long as they meet the legal font size requirements and are easily visible and clearly legible.

### Printed Labels

- There are multiple options businesses could consider when deciding how to label their PPDS products.
- Software solutions or labelling programmes with printers could be used as well as pre-printed packaging.
- Businesses may want to proactively plan for any incidents such as malfunctions, taking account of their particular business model. For example, they may wish to consider having some pre-printed labels to use in these circumstances that accurately describe the allergens and ingredients.

### Ingredient and allergen information from suppliers

- Food businesses and their suppliers already have an obligation to ensure that accurate ingredient and allergen information is passed to consumers.
- Food businesses should also ensure that they have processes in place to update this information should they change suppliers or when ingredients change.

See the FSA's [Food Allergen Labelling & Information: Technical Guidance](#) for more information

# Advisory or Precautionary Allergen Labelling (PAL)

## PAL and PPDS

- Food businesses have a responsibility to provide food which is safe for consumers and to provide information to help them make safe and informed choices.
- In addition to mandatory allergen information, voluntary information about the unintentional presence of allergens, usually from unavoidable cross-contamination, can also be provided.
- This often appears as “**may contains**” or “**not suitable for**” information on packaging, but for PPDS foods, unlike the ingredients used to make the product, **precautionary allergen statements do not need to be included on the label**. It is permissible for information on the unintended presence of allergens to be communicated by other means, such as orally by staff or on signs/boards on display at the premises.
- This information should only be provided if a real risk of allergen cross-contact has been identified following a thorough risk assessment that cannot be removed through risk management actions, for example segregation and cleaning.
- Precautionary allergen information from ingredient suppliers must be passed on to the consumer.
- The use of precautionary allergen labelling when there is not a real risk, could be considered misleading food information. This voluntary information is not a substitute for good food hygiene and safety practices.

Food Drink Europe (FDE) has produced [best practice guidance on voluntary application of precautionary allergen labelling](#)

See the FSA's [Food Allergen Labelling & Information: Technical Guidance](#) for more information

# Illustrative Examples

## Who does PPDS affect?

Here are some illustrative examples outlining general principles to how PPDS will impact.



### **“I am a home baker and bake cakes for individuals, do I need to comply with PPDS?”**

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



### **“I have a deli bar which customers can purchase a freshly filled baguette that we then put into a package. Do we need to add a label to this?”**

If you put the baguette in packaging after a customer orders it, you do not need to label the baguette with ingredient and allergen information. However, you must provide information about the allergens present in the food either orally or by means of a menu, ticket or sign. However, if you prepack the baguettes in anticipation for lunchtime rush, then this would be PPDS.



### **“We are a school, the food is plated at the demand, so do we have to list all ingredients? As we already do for the 14 allergens.”**

If you are plating freshly cooked food (not prepacked before the point that it is ordered) there is no need to list ingredients. You must be able to provide information, in writing or orally, on the presence of any allergens in the food you are serving.

Any food that is packed on the same site before being ordered by the student will need to provide:

- The name of the food, and;
- An ingredients list with allergens emphasised on its packaging or a label fixed to its packaging.

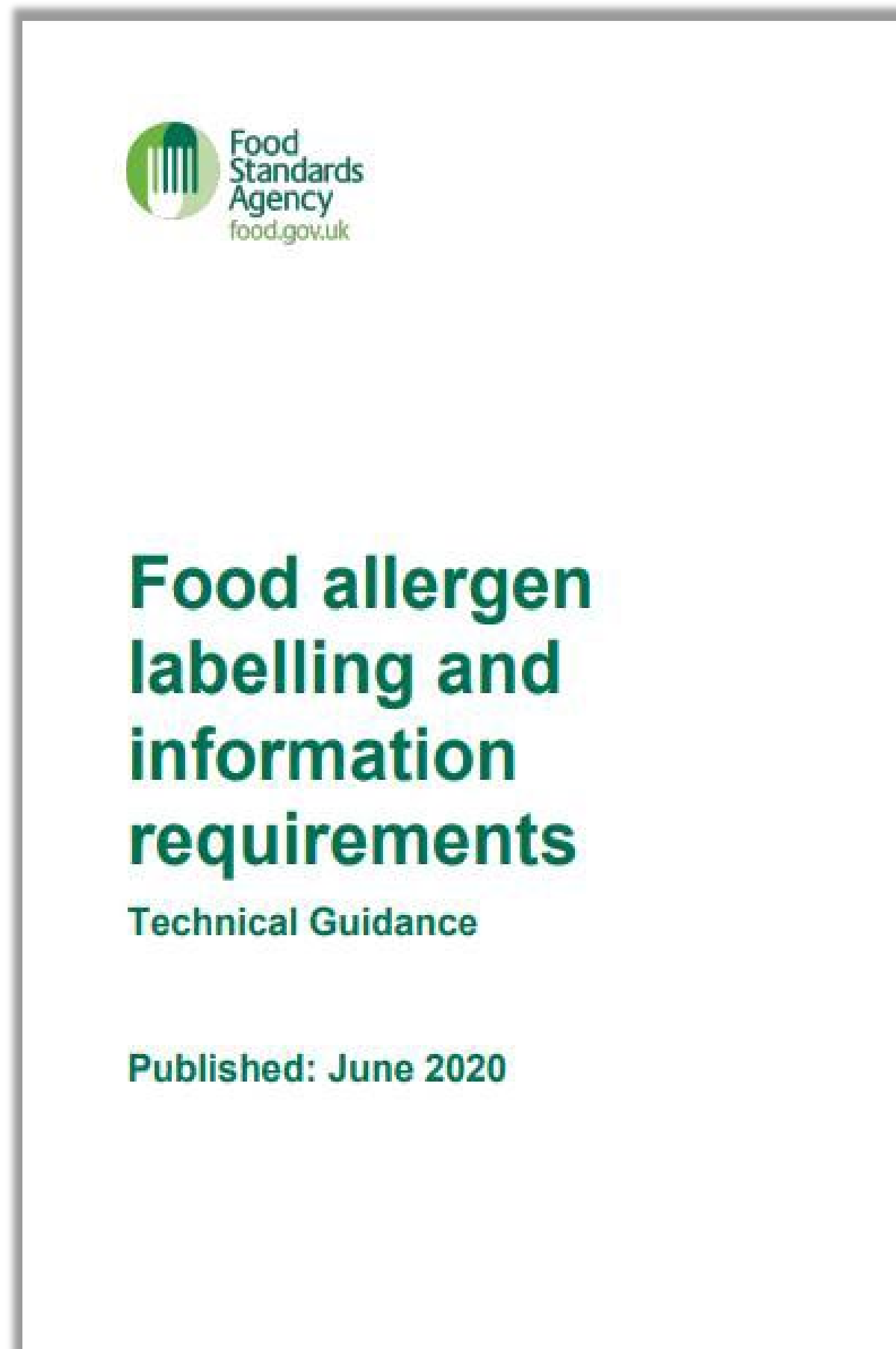
*Due to the varied nature of each food business model, we encourage all food businesses to review the guidance and legislation to support you to implement the changes for your particular business.*

See the FSA's [Food Allergen Labelling & Information: Technical Guidance](#) for more information



# Communications

## Published Guidance

Cymraeg The impact of food *allergy*

## Welcome to the Food Standards Agency's food allergy online training

Study the modules and pass the tests to get a continuing professional development (CPD) certificate. This training has been developed by the Agency for enforcement officers. However, it might also be of interest to food business operators, those involved in selling or producing food or anyone wanting to learn more about food allergies.

### Step 1: Study the modules

There are six modules to study, each with a test. These modules cover

**Module 1:** current and incoming [rules and legislation](#)

**Module 2:** the effects that allergies have [in the body](#)

**Module 3:** considerations of allergies [in the factory](#)

**Module 4:** how allergenic ingredients should be displayed [on the label](#)

**Module 5:** identifying allergens in example of dishes [in the restaurant](#)

**Module 6:** how food businesses should be [providing consumers with allergen information](#) about the non-prepacked food they serve

### Step 2: Register and complete the tests

Once you have registered and are logged into the site you will be able to access the tests, either by clicking on the banner at the bottom of each module page, or via your CPD dashboard.

### Quick Links

- [About this training](#)
- [Find out about food sensitivities](#)
- [Food allergy facts](#)
- [Resource section](#)

See the FSA's [Food Allergen Labelling & Information: Technical Guidance](#) for more information

# Communications

## What Food Businesses will See and Hear

**Introduction to Allergen Labelling Changes for Food Businesses**  
**Out now!** on our FSA Website



**Introduction to allergen labelling changes**  
 What businesses need to know about the new allergen labelling for **prepacked for direct sale (PPDS) food**

**Criteria:**

- Prepacked food
- Prepacked food
- Prepacked food

See over page for important Notes on the definition of packaging and place.

**14 allergens emphasised**  
 the allergen ingredients

[www.food.gov.uk/PPDS](http://www.food.gov.uk/PPDS)

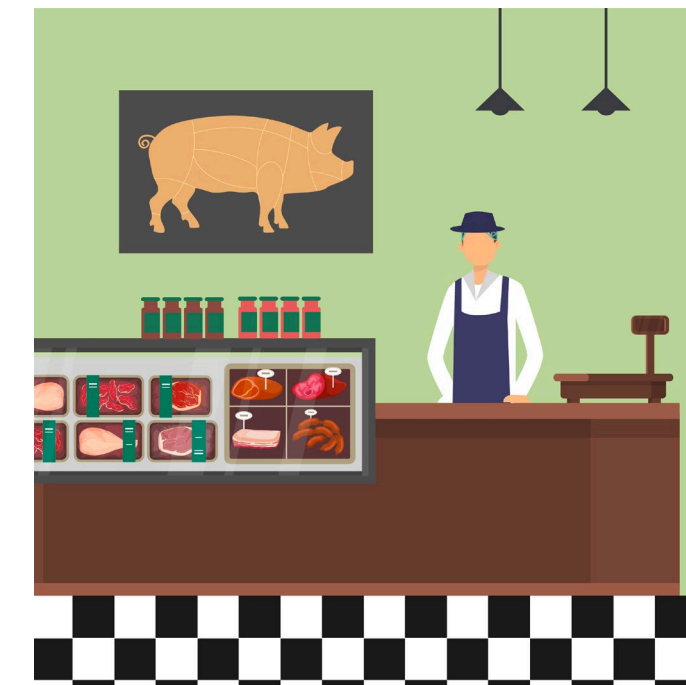
**SANDWICH**  
 e, pickle and butter in

bread (fortified wheat  
 um carbonate, iron,  
 wheat bran, wheat protein  
 flour, salt, emulsifiers  
 s of fatty acids, mono-  
 d esters of mono- and  
 ds), spirit vinegar,  
 eseed oil, flour treatment  
 alm fat, wheat flour,  
 mature Cheddar cheese  
 sugar, swede,  
 gar, water, spirit vinegar,  
 modified maize starch,  
 ile ammonia caramel),  
 rated lemon juice, spices,  
 barley malt extract),  
 spice and herb extracts), butter (milk).

**Sector Guides**  
**Due to be published soon in 2021**

### Seven sector guides

- butchers
- bakeries & sandwich shops
- cafes & restaurants
- fast food / takeaways
- mobile sellers (farmers markets and stalls)
- caterers
- schools



### Each will cover:

- Examples of likely PPDS products for each sector
- Specific questions and answers for each sector
- Practical guide for labelling:
  - what information you must have
  - what labels must show
- Precautionary allergen information (PAL)



See the FSA's [Food Allergen Labelling & Information: Technical Guidance](#) for more information

# Communications

## Further Support & Advice

The changes to PPDS will come into force from **1<sup>st</sup> October 2021**.

Further advice on how best to be prepared can be found on the FSA website:

[www.food.gov.uk/PPDS](http://www.food.gov.uk/PPDS)

Questions on PPDS can be sent to the FSA:

[PPDS@food.gov.uk](mailto:PPDS@food.gov.uk)

See the FSA's [Food Allergen Labelling & Information: Technical Guidance](#) for more information