

Introduction - PPDS evaluation

Background to the PPDS labelling requirements

The Food Standards Agency (FSA) plays an important role in ensuring safeguarding of public health, namely protecting consumers in relation to food. Similarly, Food Standards Scotland (FSS) is the public sector body for food and related safety for Scotland. Part of these organisations' work encompasses protecting members of the public with food hypersensitivities. This includes those with food allergies, intolerances, and Coeliac disease.

The FSA and FSS work with the food industry to ensure that consumers can identify what food they can safely eat through labelling on food items. In terms of packaging, there are three key types of food that is sold to consumers:

- **Prepacked foods:** foods put into packaging at a different location to where it is sold. For example, bags of crisps, breakfast cereals and ready meals.
- **Foods prepacked for direct sale (PPDS):** foods that are packed before being offered for sale by the same food business on the same premises or location (or from moveable or temporary premises). For example, sandwiches placed into packaging by the food business on site before being offered for sale to customers, cakes a baker puts in a box on their premises, and burgers or sausages prepacked by a butcher and sold on the same premises or market stall.
- **Non-prepacked (loose) foods:** foods that are sold 'loose' without any packaging, or are packed at the request of the consumer. For example, foods sold from a delicatessen (e.g., cold meats and cheeses), bread or pastries sold in bakery shops or a meal in a restaurant.

In December 2014, the EU Food Information to Consumers (FIC) Regulation and Food Information Regulations (FIR) made it a legal requirement for UK Food Business Operators (FBOs) to provide information on the 14 regulated allergens for non-prepacked (loose) foods including those sold as PPDS. This legislation states that FBOs can provide this information in written or verbal form, whereas for prepacked food, allergens have to be provided in written format.

In 2016, Natasha Ednan-Laperouse died after suffering an allergic reaction to sesame whilst eating a baguette. This was a PPDS food and triggered a major campaign for the legal requirements on PPDS to be tightened, given previous legislation did not specify that PPDS food required labelling. This new legislation was laid in England 2019, with Northern Ireland, Wales following suit in 2020 and Scotland in 2021, with the law across all countries coming into force on 1 October 2021. This new legislation is often referred to as 'Natasha's Law' and requires PPDS foods to be labelled with the name of the food and a full ingredients list with allergens emphasised within the list (e.g. in bold).

In terms of responsibility, FBOs have an obligation to ensure that they are abiding by laws relating to the provision of allergen information across all food types, with Local Authorities (LAs) supporting and enforcing compliance with the legislation.

Research objectives

The FSA and FSS commissioned research to evaluate the implementation of the new PPDS legislation and the effect it has had on the three key audiences: consumers who have a food hypersensitivity (FHS consumers) across England, Northern Ireland and Wales and FBOs and Local Authorities (LA) across all four nations ([footnote 1](#)).

In particular, the research aimed to understand:

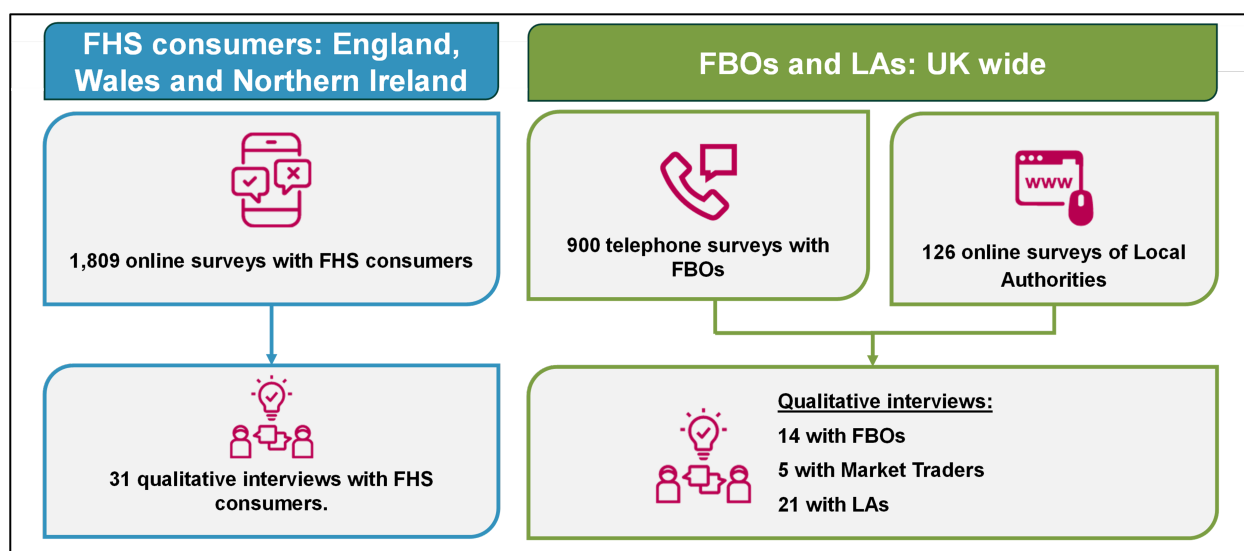
- Awareness of new requirements across FHS consumers, FBOs and LAs
- Uptake and compliance with the new requirements, including changes in business behaviour with regards to the types of foods they sell
- The effect of PPDS legislation on FHS consumers
- LA experience of resources to support compliance provided by the FSA and FSS and those offered and developed by LAs, and to understand whether additional support and resources are required
- What critical success factors and lessons learned can be gained from the implementation of PPDS which could be applied in future

Throughout this report, findings from previous research related to allergen labelling will be referenced where appropriate to further understand any potential changes due to the introduction of the new legislation. These previous research projects include a 2020 baseline telephone survey with FBOs ([footnote 2](#)), Food Sensitivities Survey with FHS consumers in 2021 ([footnote 3](#)) and research with LAs conducted internally by the FSA between April and May 2022.

Methodology

A mixed-method approach was undertaken for all audiences included in the research, with quantitative surveys followed by in-depth qualitative interviews. An overview of the methodology and completed interviews is shown in Figure 2.1. The specific details of the methodology are covered in Chapter 3.3.

Figure 1 - overview of methodology



Analysis and reporting

Quantitative analysis

Once fieldwork was complete, a set of data tables was produced for each of the audiences which encompassed all questions and contained breaks for key subgroups to allow for analysis of

potential significant differences by these groups.

All differences noted between sub-groups are statistically significant to a 95% confidence level: by convention, this is the statistical 'cut off point' used to mean a difference is large enough to be treated as genuine. This means the significant differences noted throughout this report have a 95% chance of being 'true' (i.e. due to a genuine difference in the groups being compared, and only a 5% chance that the results are due to chance). In some cases, the report refers to a subgroup being 'more' or 'less' likely than average, this means that this subgroup is significantly different to the average, excluding the subgroup in question.

Where possible, comparisons have been made to surveys conducted prior to this research. Where comparisons are made and a difference is highlighted, this is also significant to a 95% confidence level.

The majority of the quantitative findings are reported as percentages, however, where the overall base size is lower than 50, these findings are reported using numbers.

Qualitative analysis

Findings from qualitative interviews businesses are integrated throughout. All interviews were written up into an analysis framework, which were structured under headings relating to the objectives, allowing discussions to be compared and judgements made about the commonality of experiences. The framework also allowed identification of any trends by different subgroups. An analysis session was then conducted to discuss initial interpretation of the findings and compare the emerging narratives to understand the key messages from the interviews.

It should be noted that findings from qualitative fieldwork provide insight into perceptions, feelings, and behaviours rather than quantifiable findings from a statistically representative sample. Because qualitative samples are small and purposively designed, the findings cannot be considered representative of the views of all stakeholders.

1. Food Standard Scotland did not partake in the consumer research because they are conducting their own research with FHS consumers in Scotland which will be reported separately.
2. [The Food Industry's Provision of Allergen Information to Consumers](#)
3. [FSA Food Sensitivity Survey \(food.gov.uk\)](#)