

# Labelling guidance for prepacked for direct sale (PPDS) food products

Guidance to help food businesses meet labelling requirements for prepacked for direct sale (PPDS) food

This guidance is to help food business who need to follow prepacked for direct sale (PPDS) allergen labelling requirements, also known as Natasha's Law.

You can find out more information about the changes applied from 1 October 2021 and which food products are affected in our [introduction to PPDS allergen labelling changes](#).

This guidance has been produced with the aim of providing best practice and regulatory advice to food businesses.

It should be read in conjunction with the Food Information for Consumers Regulation (EU) No 1169/2011 and the Food Information Regulations 2014 (FIR) relevant to the nation in which your business operates.

- [The Food Information \(Amendment\) \(England\) Regulations 2022](#)
- [The Food Information \(Wales\) \(Amendment\) \(No. 2\) Regulations 2020](#)
- [The Food Information \(Amendment No. 2\) Regulations \(Northern Ireland\) 2020](#)

Food Standards Scotland have separate [guidance for food businesses operating in Scotland](#).

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

Legal advice

## Legal requirements across UK

This page highlights the requirements of Regulation No. 1169/2011, the Food Information to Consumers (FIC) Regulation, and associated legal standards for labelling and composition of food products such as bottled water, milk, fish and meat.

The Food Information to Consumers (FIC) Regulation 1169/2011 on the provision of food information to consumers, brings together EU rules on general food labelling and nutrition labelling into one piece of legislation.

### For businesses based in England and Wales

For food businesses operating in England and Wales, reference to 'food law' in this guidance refers to the [retained version of EU Regulation 1169/2011 on the provision of food information to consumers](#). This can be referred to as '**Retained EU law**'.

## For businesses based in Northern Ireland

For food businesses operating in Northern Ireland, reference to '**food law**' in this guidance refers to EU food law, including [Regulation \(EU\) No 1169/2011 on the provision of food information to consumers](#).

EU food law will continue to apply, as listed in the Northern Ireland Protocol. Retained EU law will not apply in these circumstances.

## What to include on a food label

The label for PPDS food needs to show:

- the name of the food
- an ingredients list
- any of the [14 allergens](#) emphasised in the ingredients list, if these are present in the food.

These criteria need to be displayed in line with the legal requirements that apply to naming the food and listing ingredients, as per food law.

The allergenic ingredients within the food must be emphasised every time they appear in the ingredients list.

### Name of the food

The food label must feature the food's legal name or, in the absence of a legal name, its customary name. This could also be a descriptive name providing an accurate description of the product.

These legal requirements are contained in [Article 17 of the Retained FIC](#) and [Article 17 of the EU FIC](#).

### Legal name

Some foods have a legally defined name. This can be a prescribed name or a reserved description:

- **Prescribed names** - these are names which either EU or UK food law specifies must be used for certain foods. For example, 'sausage', 'jam', 'sugar', 'butter', 'skimmed milk' and various species of sea food, fish and meat.
- **Reserved descriptions** - To use certain reserved food descriptions you must ensure that the food contains a certain percentage of an ingredient. For example, a 'beef burger' must contain 62% beef; an 'economy beef burger' must contain 47% beef. Further details of these requirements can be found in food law.

### Customary name

Customary names are names that, in time, may come to be accepted by consumers in the UK, or in particular, areas of the UK, as the name of the food, without need for further explanation. For example, this could include fish fingers or Bakewell tarts.

## Descriptive name

A descriptive name is a name which is precise enough to allow consumers to know the true nature of the product. A descriptive name should distinguish it from other foods with which it could be confused.

More information on the 'Name of Food' can be found in wider government guidance: [Naming Food Products](#).

## Additional indications to accompany the name of food

There are certain mandatory requirements that need to accompany the name of food in certain circumstances. These are contained within [Annex VI of the Retained FIC](#) and [Annex VI of the EU FIC](#).

The mandatory requirements that must accompany the name of the food on the label can be part of the descriptive name of food.

## List of ingredients

There are 14 allergens that are required by food law to be emphasised in the ingredients list.

The 14 allergens required to be labelled by food law are: **celery**, **cereals containing gluten** (such as barley and oats), **crustaceans** (such as prawns, crabs and lobsters), **eggs**, **fish**, **lupin**, **milk**, **molluscs** (such as mussels and oysters), **mustard**, **peanuts**, **sesame**, **soybeans**, **sulphur dioxide and sulphites** (if they are at a concentration of more than ten parts per million) and **tree nuts** (such as almonds, hazelnuts, walnuts, brazil nuts, cashews, pecans, pistachios and macadamia nuts).

The 14 allergens required to be declared by food law must be emphasised within this list. This can be done using **bold type**, capital letters, contrasting colours or through underlining.

However, the indication of an allergen is not required in cases where the name of the food clearly refers to the allergen concerned, such as 'milk'.

The list of ingredients must be headed or preceded by a suitable heading which consists of, or includes, the word 'ingredients'. The ingredients used must be listed in descending order of weight at the time the product was made. These legal requirements are contained in [Article 18 of the Retained FIC](#) and [Article 18 of the EU FIC](#).

[Annex VII, Part A of the Retained FIC](#) and [Annex VII, Part A of the EU FIC](#), set out certain situations where variation on descending order of weight is permitted..

More information can be found in wider government [guidance on listing the ingredients on food labelling](#).

# CHEESE AND PICKLE SANDWICH

**Mature Cheddar cheese, pickle and butter in sliced wholemeal bread**

**INGREDIENTS:** Wholemeal bread (wholemeal **wheat** flour, water, **wheat** bran, **wheat** protein, yeast, salt, emulsifiers (mono- and diglycerides of fatty acids, mono- and diacetyl tartaric acid esters of mono- and diglycerides of fatty acids), spirit vinegar, rapeseed oil, flour treatment agent (ascorbic acid), palm fat, 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**).

## Compound ingredients

A compound ingredient is an ingredient that is itself the product of more than one ingredient. For example, this could include bread in a sandwich, where the bread itself is made of various ingredients.

Compound ingredients should be used in a list of ingredients. For example, a sandwich label should include a list of the ingredients in the bread following the name 'bread'.

Legal requirements for compound ingredients are contained [Annex VII, Part E of the Retained FIC](#) and [Annex VII, Part E of the EU FIC](#).

This legislation also describes area where you do not need to list the compound ingredients. For example, this could be in a mixture of spices or herbs (without additives) that makes up less than 2% of the overall product.

Any engineered nanomaterials used as an ingredient in a food need to be clearly indicated. They must have 'nano' in brackets after its name in the ingredient list. This requirement also applies to

compound ingredients.

## **Exemptions from the list of ingredients**

There are some situations where you do not need to list ingredients, such as for fresh fruit and vegetables, including potatoes, which have not been peeled, cut or similarly treated.

You will need to adhere to existing requirements as contained in food law. The presence of any allergens must still be indicated.

There are also occasions where constituents of a food are not required to be included on the list of ingredients. For example, this could apply when the constituents of an ingredient have been temporarily separated during the manufacturing process and later reintroduced, but not in excess of their original proportions. You will need to adhere to existing food law requirements contained in [Article 20 of the Retained FIC](#) and [Article 20 of the EU FIC](#).

More information can be found in wider government [guidance on listing the ingredients on food labelling](#).

## **Food additives and flavourings**

Food additives used in food must be listed in the ingredients list using the name of their functional class, such as antioxidant or preservative.

This should be followed by their specific name or E number. For example, Antioxidant: Ascorbic Acid or Antioxidant: E300.

Food additives and enzymes, whose presence in a given foodstuff is solely due to the fact that they were contained in one or more ingredients of that foodstuff (i.e. carry over additives) do not have to be listed in the ingredients list provided that they serve no technological function in the finished product.

However, the presence of sulphites used as preservatives and present in amounts greater than 10 mg/kg or 10 mg/l will need to be declared as an allergen, whether present as a deliberate ingredient or as carry over.

Certain sweeteners and colours require warnings to be provided on the packaging. Labelling requirements for sweeteners, such as 'contains a source of phenylalanine', 'excessive consumption may product laxative effects' and "with sweetener(s)" statements are set out in [Annex III of the Retained FIC](#) and [Annex III of the EU FIC](#).

This legislation also details labelling requirements when liquorice or the flavourings glycyrrhizinic acid or its ammonium salt are added to food.

The warning statement required for certain colours 'may have an adverse effect on activity and attentions in children' is set out in Annex V of [retained Regulation No 1333/2008](#) and [EU Regulation No 1333/2008](#).

Flavourings must be listed by either the term 'flavouring(s)' or a more specific name or description of the flavouring. For example, this could include strawberry flavouring or peppermint oil.

More information in relation to flavourings can be found in [Annex VII, Part D of the Retained FIC](#) and [Annex VII, Part D of the EU FIC](#).

Food businesses intending to use the term 'natural' when referring to flavourings should consult [Article 16 of retained Regulation No 1334/2008](#) and [EU Regulation No 1334/2008](#). This legislation

sets out when 'natural' can be used on food labelling.

More information on labelling, including high caffeine warning statements, can be found in our [food additive and flavourings labelling guidance](#).

## Quantitative Ingredient Declaration (QUID)

Quantitative Ingredient Declaration (QUID), tells a customer the percentage of particular ingredients contained in a food product. For PPDS foods, QUID is only required for meat products. This is outlined in the following legislation:

- **England** - [Regulation 7 of the Food Information Regulations 2014](#)
- **Wales** - [Regulation 7 of the Food Information \(Wales\) Regulations 2014](#)
- **Northern Ireland** - [Regulation 7 of the Food Information Regulations \(Northern Ireland\) 2014](#)

You must give this information either:

- as a percentage in brackets in the ingredients list after the name of the ingredient, for example 'pork (80%)'
- in or next to the name of the food, for example 'containing 80% pork'

There are exemptions to providing QUID, as outlined in Regulation 7(3) of the Food Information Regulations 2014. This includes ready-to-eat food sold by mass caterers.

More information on QUID is contained in wider government [guidance on food labelling](#).



## Alcohol

Alcoholic drinks which contain more than 1.2% of alcohol by volume are not required to bear a list of ingredients. However, any allergens will still need to be declared in a contains statement. For example, this could be phrased as: "Contains: wheat".

Requirements for labelling alcohol are contained in [Article 16 of the Retained FIC](#) and [Article 16 of the EU FIC](#).

## **Precautionary allergen information**

Food businesses have a responsibility to provide food which is safe for consumers. You must provide information to help your customers make safe and informed choices.

In addition to mandatory allergen information, voluntary information about the unintentional presence of allergens, usually from unavoidable cross-contamination, should also be provided.

Precautionary allergen information from ingredient suppliers must be passed on to the consumer. This precautionary allergen labelling often appears as “may contain” or “not suitable for” information on packaging.

Although it is not a legal requirement of food law, we recommend that information on the unintended presence of allergens for PPDS foods is communicated on the packaging or label. This is to ensure that consumers with a food allergy or intolerance are aware of the risk and that food is safe.

This precautionary allergen information should only be provided if a real risk of allergen cross-contact has been identified following a thorough risk assessment. This should only be provided in scenarios where this risk cannot be removed through risk management actions, such as segregation and cleaning.

The use of precautionary allergen labelling when there is not a real risk, could be considered to be misleading food information and unnecessarily limit consumer choice.

Providing this voluntary information is not a substitute for good food hygiene and safety practices.

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

Further information on managing and assessing the risk of cross-contamination can be found in our [Safer food, better business](#) packs.

## **Labelling multi-packs of individually wrapped items**

Multi-packs, where the contents are individually wrapped and are packaged at another site to where they are provided, are prepacked food.

Any prepacked food sold or offered for sale must be labelled in accordance with the requirements set out in food law for prepacked food.

If individual packets from a multi-pack are separated, they should not be sold or offered if they are not individually labelled and do not comply with labelling requirements.

Further information is available in our [allergen labelling for food manufacturers guidance](#).

## **How to present a food label**

The availability and placement of [mandatory particulars](#) must appear on the package or on a label attached to the package, as contained in [Article 12 of the Retained FIC](#) and [Article 12 of the EU FIC](#).

A food label must be visible and clearly legible. The consumer should not need to open the packaging to access this information.

The requirements for the presentation of mandatory particulars, including font size, are contained in [Article 13 of the Retained FIC](#) and [Article 13 of the EU FIC](#).

More information on specific details of how to present a food label can be found in wider government [guidance on food labelling](#).



## How to produce a food label

There are different ways in which you can produce food labels. You should consider how best to produce food labels to suit your particular business model.

This can include:

### Printed food labels

There are multiple options food businesses can 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 how their business operates.

For example, you may wish to consider having reserve pre-printed labels to use in such circumstances.

### Handwritten food labels

Food labels can be handwritten as long as they meet the legal font size requirements. They should be easily visible and clearly legible. Allergens can be emphasised using **bold type**, capital letters, contrasting colours or through underlining.



## **Legal responsibility for food labelling**

Food businesses packing their food products on site to sell to consumers are responsible for labelling their food products. You need to use the information provided from suppliers to produce accurate labels.

You should also ensure that you have processes in place to update this information should there be a change in suppliers, or if ingredients change.

### **Ingredient and allergen information from suppliers**

Food businesses supplying food and ingredients, from operator to operator, have a duty to pass food information down the supply chain.

They should ensure that food businesses are provided with sufficient information to allow them, where appropriate, to meet their labelling obligations as set out in food law.