

Prepacked for direct sale (PPDS) allergen labelling changes for butchers

Information for butchers and farm shops on the changes to allergen labelling for prepacked for direct sale (PPDS) food, also known as Natasha's Law.

From 1 October 2021 the <u>requirements for labelling prepacked for direct sale (PPDS) food</u> changed across the UK.

Also known as Natasha's Law, this applies to any food business that produces PPDS food, including butchers and farm shops.

PPDS food is food that is packaged at the same place it is offered or sold to consumers. It is a single item, consisting of the food and its packaging, that is ready for presentation to the consumer before it is ordered or selected.

The changes mean that food packaged before the consumer orders or selects it, and sold on the same premises (or site where a business operates from more than one location such as a shopping centre) it is packaged at, will require labelling.

For butchers and farm shops, this may mean changes to labelling for foods such as sausages, marinated steaks, and other products.

In this guide you will find examples of PPDS food commonly found in butchers or farm shops, as well as example labels and answers to frequently asked questions from the sector.



Changes to allergen labelling for butchers and farm shops

The change to labelling requirements helps to protect consumers by providing potentially lifesaving allergen information on packaging. This legislation is also known as <u>Natasha's Law</u>.

Any food business that produces PPDS food is required to label it with the name of the food and a full ingredients list. Allergenic ingredients must be emphasised within this list.

This can include food that consumers select themselves, for example from a display unit, as well as products kept behind a counter, or some food sold at mobile or temporary outlets, such as at farmers' markets.

Examples of food that is prepacked for direct sale

Foods that may be provided by a butcher or farm shop include:

- sausages, burgers, or other foods packaged in store before being ordered or selected.
- steaks that are seasoned or marinated, and packaged on the premises
- stir fry packs packaged on the premises
- sliced meat put into packaging on the premises before a consumer orders it.

Examples of food that is not prepacked for direct sale

PPDS does not include food that is not in packaging, such as meat on display including joints of meat or loose sausages. Food placed into packaging at the consumers request is not PPDS.

Prepacked food

You may also sell pre-packaged food that was packed at a different site to where it is offered to consumers, or food that has been packaged by another business.

This is not PPDS food, but it still requires a label with a name, ingredients list, allergens and other mandatory details.

We have <u>further information on labelling prepacked food</u> and the requirements food labels must meet.

Tips

Use our <u>allergen and ingredients food labelling tool</u> to check if your business provides PPDS food.

Labelling guidance for butchers and farm shops

Labels on PPDS food need to show the name of the food and the ingredients list.

This includes emphasising within the ingredients list any of the <u>14 allergens</u> used in the product, as required by food law. The allergens can be emphasised within the ingredients list by using **bold** type, capital letters, contrasting colours or underlined text. This must be clear enough for the consumer to read.

Our <u>labelling guide for PPDS food</u> has detailed information on labelling requirements, including naming conventions, type size and precautionary allergen labelling such as 'may contain'.

Specific requirements for labelling meat products

You should ensure that you meet existing food information requirements for meat products when producing PPDS food.

One of these is providing a Quantitative Ingredient Declaration (QUID), which tells a consumer the percentage of meat contained in a food product. For PPDS foods. The QUID information can be provided on the label for PPDS foods or you can place the QUID information on a notice, ticket or another label that is visible at the location where the consumer chooses the food.

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'.

We have further information on QUID and exemptions in our <u>guide to labelling prepacked for</u> <u>direct sale food</u>.

Example PPDS food label

Our <u>labelling guide for PPDS food</u> has detailed information on what to include on a food label, and how to present and produce it.

One example of how the label could look can be found below, but you could choose to present it differently as long as you meet the legal requirements. You must include the name of the food, a full ingredients list and emphasise any of the 14 allergens present in the food.

PORK BURGERS

INGREDIENTS: Pork (90%), breadcrumb: (Wheat Flour (Wheat Flour, Calcium Carbonate, Iron, Niacin, Thiamin), Yeast, Salt), seasoning: (salt, pepper, dextrose, dried onion, preservative: (sodium metabisulphite (sulphites)), water, flavouring.

Definition of 'packaging'

Food is PPDS if it is packaged as follows:

- the food is fully or partly enclosed by the packaging
- the food cannot be altered without opening or changing the packaging
- the food is ready for sale to the final consumer.

Examples of this kind of packaging would be:

- sausages enclosed in paper or plastic packaging
- a pie in a closed cardboard box
- rolls contained in a plastic bag that is tied with a knot or sealed.

Food is not PPDS if it does not have packaging, or if it is packaged in a way that the food can be altered without opening or changing the packaging (for example a hotdog served on an open cardboard tray).

Frequently asked questions from butchers about PPDS labelling

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

Our <u>labelling guide for PPDS food</u> has detailed information on labelling requirements, including naming conventions, type size and precautionary allergen labelling such as 'may contain'.

Do I need to label food if it is packaged and weighed after being ordered?

Food packed after a consumer selects or orders it is non-prepacked food and does not require a label. You should still provide information on whether any of the 14 major allergens are present in the food and can choose how to present this to the consumer.

Do I need to label food when the consumer makes their selection based on loose display products?

If you provide the consumer with food that is already packed when they order it, then the PPDS rules apply.

Even if the consumer bases their choice on loose food that is on display, the packed food will require PPDS labelling.

Do I need to apply PPDS labelling if food is packaged at a different site?

Food that is packaged by another business at a different site to where it is sold is prepacked food.

Prepacked food already requires full labelling, including the name of the food and a full ingredients list, with allergenic ingredients emphasised within it. It also requires other information, including nutritional information and use-by dates.

However, food packed by a business and sold by the same business at moveable or temporary premises, such as farmers' markets, market stalls or mobile vehicles, will be PPDS food

We have more information on PPDS labelling for mobile sellers.

How much detail do I need to provide when labelling 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.

Naming compound ingredients in a list is not a requirement but can be done. For example, a sandwich label could include a list of the ingredients in the bread following the name 'bread.'

If you chose not to list a compound ingredient under its own name, you will need to list all constituent ingredients of compound ingredients separately, in order of weight to the finished product as a whole.

Our <u>labelling guide</u> provides detailed information on compound ingredients and labelling PPDS food.

What should I do if the labelling machine stops working?

You may want to proactively plan for any incidents such as malfunctions or print errors, taking account of how your business operates.

For example, you may wish to consider having some pre-printed labels to use in such circumstances that accurately describe the allergens and ingredients.

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, or through underlining.

Our <u>labelling guide for PPDS food</u> contains more information on producing food labels. You may also wish to talk to the food safety team in your local authority.