

# Prepacked for direct sale (PPDS) allergen labelling changes for mobile sellers and street food vendors

Information for mobile sellers, burger vans, street food vendors and farmers' markets on the changes to allergen labelling for prepacked for direct sale (PPDS) food, also known as Natasha's Law.

From 1 October 2021 the [requirements for labelling prepacked for direct sale \(PPDS\) food](#) changed across the UK.

Also known as Natasha's Law, this applies to any food business that produces PPDS food, including mobile sellers, food stalls, burger vans, stalls at farmers' markets and street food vendors.

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.

These changes also affect mobile sellers selling food where the same business packages food at a different location. So if your business sells food from, for example, a market stall or van, and you package this food yourself at a different location, this is PPDS food.

In this guide you will find examples of PPDS food commonly provided by mobile sellers and street food vendors, as well as example labels and answers to frequently asked questions from the sector.



## Changes to allergen labelling for mobile sellers and street vendors

The changes to labelling requirements help to protect consumers by providing potentially life-saving allergen information on packaging. This legislation is also known as [Natasha's Law](#).

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.

## Examples of food that is prepacked for direct sale

PPDS food which may be provided by mobile sellers or street food vendors include:

- meals put in containers before they are ordered
- packaged cartons of chips or chicken nuggets placed under a hot lamp ahead of an expected lunchtime rush
- prepacked paninis or boxes of pizza which can be reheated at the consumer's request
- packaged sandwiches or salad boxes
- burgers wrapped and ready to sell.

## Examples of food that is not prepacked for direct sale

PPDS does not include food that is not in packaging when a consumer orders it. Food made to order and food placed into packaging at the consumer's request is not PPDS.

This food is not PPDS and can include products such as:

- hot drinks made to order

- cheese not in packaging when the customer orders it
- pizza on display, with slices served on an open cardboard tray
- unpackaged cakes and pastries in a glass display
- fried chicken that's not boxed under a hot lamp
- chips or fries placed into packaging at the time of order
- unpackaged burgers and non-packed fried onions on a hot plate.

Non-prepacked (loose) food does not require a label and must meet current requirements for providing allergen information. This means you must provide information on the 14 major allergens to customers. You have some choice in [how you provide this information](#) to them.

## Prepacked food

You may also sell pre-packaged food that was 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 [further information on labelling prepacked food](#) and the requirements food labels must meet.

### Tips

Use our [allergen and ingredients food labelling tool](#) to check if your business provides PPDS food.

## Labelling guidance for mobile sellers and street food vendors

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

This includes emphasising in the ingredients list any of the 14 allergens used in the product, as required by food law.

Emphasis can be added by using bold type, capital letters, contrasting colours or underlined text. This must be clear enough for the consumer to read.

Our [labelling guide for PPDS food](#) has detailed information on labelling requirements, including the name of the food, type size and precautionary allergen labelling such as 'may contain'.

## Communicating allergen information to your consumers

You can continue to provide consumers with allergen information orally or through displaying information on a menu, chalkboard or notice.

However, this is in addition to the requirement to provide labelling on PPDS food.

We have more information on providing allergen information in our [allergen guidance for food businesses](#).

## Example PPDS food label

Our [labelling guide for PPDS food](#) 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 PIE

**INGREDIENTS:** Pork (39%), Wheat Flour [**WHEAT** Flour, Calcium Carbonate, Iron, Niacin, Thiamine], Butter (**MILK**), Onion, Smoked Dry Cured Bacon (4.5%) [Pork, Sea Salt, Salt, Sugar, Preservatives (Sodium Nitrite, Sodium Nitrate), Antioxidant (Sodium Ascorbate)], Potato Starch, Pasteurised **EGG**, Salt, Yeast Extract, White Wine Vinegar, Onion Powder, Garlic Purée, Parsley, Thyme, Sage, White Pepper, Mace, Nutmeg, Black Pepper, Yeast.

## 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:

- a cake completely wrapped in cling film.
- bread placed in a paper bag with the bag folded over or twisted to encase the bread.
- 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 cake served on an open cardboard tray).

## **Frequently asked questions from mobile sellers about PPDS labelling**

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

Our [labelling guide for PPDS food](#) has detailed information on labelling requirements, including naming conventions, type size and precautionary allergen labelling such as 'may contain'.

### **Do hot drinks, such as tea or coffee, require PPDS labelling?**

Hot drinks made to order are not PPDS and do not require PPDS labelling.

But if you pour and lid drinks before consumers order them, in anticipation of a rush, the drinks would be PPDS and would need labelling.

### **Do I need to label food if I prepare and package food and keep it under a hot lamp before it is ordered?**

If you prepack food in anticipation of consumer orders, these products will require PPDS labelling.

### **If I display an allergen information sheet in my unit, do I still need to label PPDS food?**

Yes, using an allergen information sheet is not a substitute for PPDS food labelling.

PPDS food will still require a full ingredients list and allergen information on the label.

### **Can food labels be handwritten?**

Yes, as long as they meet the legal requirements for labels. Our labelling guide for PPDS food has detailed information on labelling requirements, including naming conventions, type size and precautionary allergen labelling such as 'may contain' Labels on PPDS food need to show the name of the food and the ingredients list.

This includes emphasising in the ingredients list any of the 14 allergens used in the product, as required by food law.

Emphasis can be added by using **bold** type, capital letters, contrasting colours or underlined text. This must be clear enough for the consumer to read.

### **Do I need to label food items if they are sold loose?**

Loose food which is not sold in packaging does not require a label even if you place them in packaging after the customer orders them. It must meet current requirements for non-prepacked food. 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 sauces, condiments and chutneys served as part of an order?**

If the largest surface area of the packaging is less than 10 centimetres squared (10cm<sup>2</sup>) you do not have to produce a PPDS label with all ingredients and the allergens emphasised. If you do not produce a full label you must still make the ingredients information available in some form (for example verbally or in writing that is not on the packaging). Mandatory allergen information must still be on the label as a 'contains' statement, for example 'Contains: Milk, Egg and Wheat'.

If the largest surface area of the packaging is more than 10 centimetres squared (10cm<sup>2</sup>), sauces, condiments and chutneys will require PPDS labelling.

## **Do I need to change labels for food sold online or by telephone for collection and delivery?**

The new labelling requirements do not apply to food sold by means of distance selling. This includes food that is purchased over the telephone or on the internet.

Businesses selling PPDS food this way will need to ensure that mandatory allergen information on the 14 major allergens is available to the consumer before they purchase the product and also at the moment of delivery.