

# Prepacked for direct sale (PPDS) allergen labelling changes for event caterers

Information for event caterers 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 event caterers, hotels, bars and pubs.

PPDS food is food that is packaged at the same place it is offered or sold to consumers. It is a single item in packaging and is ready for presentation to the consumer before it is ordered or selected. It does not include food packaged in larger quantities (such as platters of sandwiches covered in clingfilm).

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, requires labelling.

Food sold from mobile outlets can also be PPDS. See our guide to [PPDS allergen labelling changes for mobile sellers](#) for more information.

For event caterers this may mean changes to labelling for foods such as sandwiches salads and other products.

## TIPS

Our [introduction to prepacked for direct sale \(PPDS\) allergen labelling changes](#) guide provides more information on the requirements food businesses must meet after 1 October 2021.

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



## Changes to allergen labelling for event caterers

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 will be 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 foods that may be provided by an event caterer or related food business include:

- packaged sandwiches, cakes, bread, pies and pasties
- enclosed food platters
- packaged salads
- soup already in pots.

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

PPDS does not include food that is not in packaging, such as sandwiches, cakes or rolls displayed loose. Food placed into packaging at the consumer's request is not PPDS.

The following examples of food are not PPDS food:

- open foods, such as bowls of fruit or crisps
- unpackaged pizza, lasagne, roast meats or other unpackaged hot foods on hot counters.

Non-prepacked (loose) food does not require a label and must meet current allergen information requirements for non-prepacked food where you must provide information on the 14 mandatory

allergens in some form in writing or verbally.

## 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 prepacked for direct sale food but is 'prepacked' 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 event caterers

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 14 allergens 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.

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'.

## Responsibility for food labelling at catered events

Food businesses operators have a responsibility to ensure the food they provide is safe. Caterers supplying food should provide allergen information to enable consumers to make safe and informed food choices.

## Food ordered by a company to be provided at an event

If the food has been ordered before an event by a person or organisation on behalf of other individuals, then it is non-prepacked food. If the food you sell is considered non-prepacked then you do not need to provide full ingredients labelling but should provide mandatory allergen information to anyone consuming the food and make this available orally or in writing.

Food would only be PPDS if it is sold to the consumers from the same premises it is packed on (but see the rules for mobile sellers). This requires both parties to be present at the point of ordering.

Food is PPDS where it is packaged before it is ordered by the 'final consumer'. In legal terms a 'final consumer' may be a 'legal or natural person' who will not use the food as part of a food business.

Therefore, if the company who orders the food for an event is not itself a food business, it can be considered to be the 'final consumer' for the purposes of determining whether the food was packed before it was ordered.

If the food is sold by distance selling, such as over the phone and internet then the new PPDS rules do not apply. 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.

## **Meals prepared for attendees with particular dietary requirements**

If a specific food has been ordered in advance, it is not PPDS. You still need to provide mandatory allergen information in some form to the consumer.

If an individual has given an indication of their dietary requirement in advance but has not ordered a specific food in advance and is presented with food options that are in packaging on the day, this is PPDS food.

## **Communicating allergen information to your customers**

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

However, this is in addition to the requirement to label PPDS foods. 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 packaged 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 event caterers about PPDS labelling**

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

Our [labelling guide for prepacked for direct sale food](#) has detailed information on labelling requirements, including the name of the food, 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.

### **How do I correctly label food at a buffet?**

Whether food at a hot counter or buffet is PPDS depends on if, where, and when it was packed.

The new PPDS rules apply to food that is packed before the consumer orders it at the site at which it is sold. If this is not the case, and the food is packed to order on site, or is not in packaging when the consumer orders it, the food is considered non-prepacked. If this is the case, the allergen information requirements for non-prepacked food apply. You should provide information on the 14 major allergens in some form verbally or in writing.

You can provide this information by labelling the allergens contained in individual dishes, or by displaying a sign directing consumers to ask staff for allergen information.

If you offer food in the form of a buffet, you need to provide allergen information for each food item separately. You should not provide it for the buffet as a whole.

If the buffet food is packed before it has been ordered by the consumer, this is PPDS food, and a full ingredient list is required to be provided directly on the product packaging or a label attached to the packaging with allergens emphasised within the ingredients list.

PPDS food is food that is presented as a single item for the consumer, so will include individually packaged items but not platters of food that are intended for serving to different consumers or sharing by a group of people. So individually packaged sandwiches would be PPDS but not one large platter of sandwiches intended for different consumers attending a buffet.

### **Do I need to label food if I prepare and wrap 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.

### **Do I need to label individual food items wrapped in cling film?**

If you have chosen to package individual items in cling film and it meets the definition of packaging (see above) then it is PPDS food and must be labelled.

### **Do I need to label a food platter covered in cling film before an event if the protective layer is removed when the food is served?**

No, if the clingfilm is removed before the food is presented to the consumer then it is not caught by PPDS labelling requirements. However, if food is provided to the consumer still packaged, and it meets the definition of PPDS then it will need to have PPDS labelling.

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

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

Our [labelling guide for prepacked for direct sale food](#) has detailed information on labelling requirements.

### **Do I need to label food displayed under a protective dome?**

If the food under a dome is a single item, consisting of food and the packaging it is placed in, and it is ready for presentation to the consumer, then this is PPDS food.

If the dome is removed before the food is presented to the consumer then this is not PPDS, this is non-prepacked food.

As an example, if you have a sushi dish covered with a protective dome that is presented to the consumer with the dome on, this is PPDS food.

If you have a large cake under a dome, where the intention is to slice it into individual portions, and serve on a separate plate, this would not be PPDS as the large cake and the packaging it was stored in is not a 'single item'. This is non-prepacked food.