

Prepacked for Direct Sale (PPDS) Allergen Labelling Changes for **Bakers**

From **1 October 2021** the requirements for labelling prepacked for direct sale (PPDS) food will change across the UK. This applied to any food business that produces PPDS food, including bakeries, cake shops, tea shops, cafés, in-store counters, and home bakers who sell food from home.

Introduction

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 bakers and cake-makers this many mean changes to labelling for foods such as cakes, bread, sausage rolls, sandwiches, and other products.



Changes to Allergen Labelling

The new labelling requirements will help protect consumers by providing potentially life-saving allergen information on packaging. This legislation is 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 other products kept behind a counter, or some food sold at mobile or temporary outlets.

Examples of food that is prepacked for direct sale

Foods that may be provided by a baker or related food business include:

- Sandwiches, cakes, bread, and pasties that are packaged on the premises prior to the consumer ordering or selecting them
- Multi-packs of cakes, sausage rolls, baps, cobs or rolls packaged on the premises prior to the consumer ordering or selecting them

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

PPDS does **not** include food that is not in packaging when the consumer orders it, such as loaves, buns or rolls displayed loose on shelves. Food made to order and food placed into packaging at the consumer's request is not PPDS.

This can include products such as:

- Unpackaged pasties, cakes, and croissants behind a glass display counter or in a hot hold cupboard
- Slices of cake packed at the consumer's request
- Sandwiches and bacon rolls made to order

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 consumers. You have some choice in how you provide this information to them.

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.

Labelling Guidance for Bakers

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.

Labelling Guidance for Home Bakers

Home bakers, who sell their food online or through other means of distance selling, will already be required to provide allergen information before food is ordered and when it is delivered.

Food sold through distance selling, without the physical presence of the consumer during the ordering process, will not be impacted by the new regulations.

However, this food will still be subject to requirements for distance selling.

One example of how a PPDS food label could look is shown here:

JAM DOUGHNUTS

INGREDIENTS: Wheat Flour, Water, Glucose Syrup, Sugar, Raspberry Purée, Sunflower Oil, Yeast, Whey Powder (**Milk**), Raising Agents (Disodium Diphosphate, Sodium Carbonates), Salt, Emulsifiers (E471, E481), Flavouring, Dried Skimmed **Milk**.

14 Allergens

Food businesses need to tell customers if any food they provide contain any of the listed allergens as an ingredient.

Consumers may be allergic or have intolerance to other ingredients, but only the 14 allergens are required to be declared as allergens by food law.

The 14 allergens 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).

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

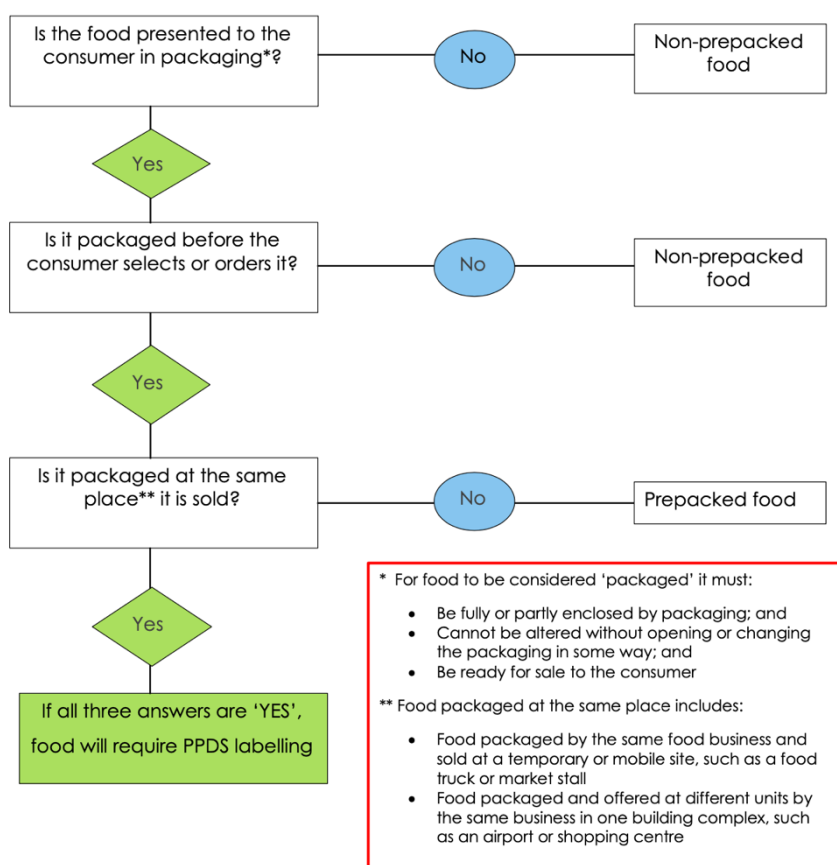
Examples of this kind of packaging would be:

- 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 or a baguette in an open sleeve).

PPDS Flow Chart

If you're still unsure what foods are considered PPDS, you can check using this simple flowchart:



Adpated from: <https://www.food.gov.uk/business-guidance/prepacked-for-direct-sale-ppds-allergen-labelling-changes-for-bakers>