

# Prepacked for Direct Sale (PPDS) Allergen Labelling Changes for **Restaurants, Cafés and Pubs**

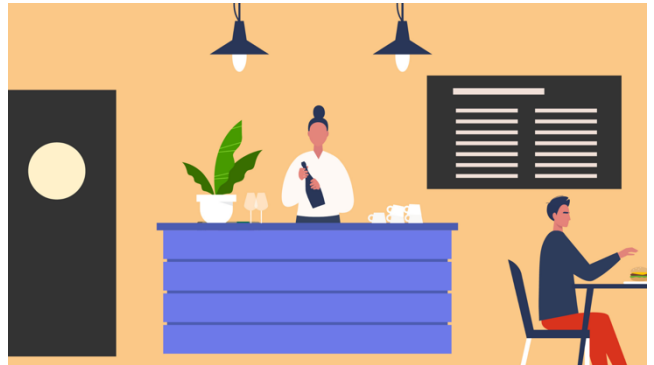
From **1 October 2021**, the requirements for labelling prepacked for direct sale (PPDS) food will change across the UK. This applies to any food business that produces PPDS food, including coffee shops, restaurant chains, independent restaurants, supermarket and department store cafés, and pubs.

## 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 restaurants, cafés and pubs, this may mean changes to labelling for food such as pasties, soup, sandwiches, cakes 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 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 PPDS Food

Examples of PPDS food that may be provided by a restaurant, café, pub or related food business include:

- Prepacked paninis or boxes of pizza which can be reheated at the consumer's request
- Prepacked sandwiches or salad boxes
- Pies in packaging
- Soup already in pots

## 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. Food made to order and food placed into packaging at the consumer's request is not PPDS.

Examples of foods that are not PPDS that may be provided by a restaurant, café, pub or related food business include:

- Unpackaged cakes on display
- An open salad bar
- Unpackaged complementary bread placed on tables

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 by another food business 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 it still requires a label with a name, ingredients list, allergens and other mandatory details.

## Labelling Guidance

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

One example of how a PPDS food label can be displayed is shown here:

### CHEESE AND PICKLE SANDWICH

Mature Cheddar cheese, pickle and butter in sliced wholemeal bread

**INGREDIENTS:** Wholemeal bread (wholemeal **wheat** flour (**wheat** flour, calcium carbonate, iron, niacin, thiamine), 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**).

## 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).

## Labelling guidance for food sold online

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. If you sell food in this way you are already required to provide allergen information before food is ordered and when it is delivered.

Businesses may decide that it is easier to label all products rather than distinguish between distance and non-distance sales. This has the advantage that the business does not have to manage different information and labelling provisions.

## 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

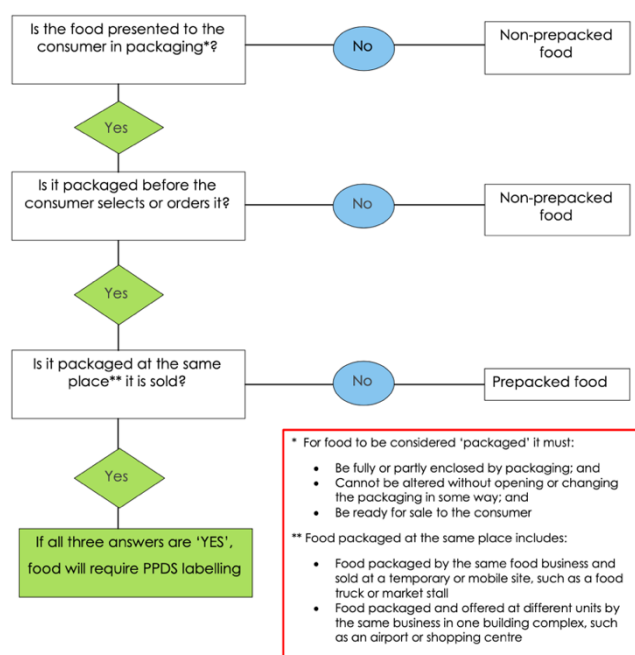
Examples of this kind of packaging would be:

- A cake packaged in cling film
- Sandwiches placed in a paper bag with the bag folded over or twisted to encase the sandwiches
- 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 burger served on an open cardboard tray).

## PPDS Flow Chart

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



Adapted from: <https://www.food.gov.uk/business-guidance/prepacked-for-direct-sale-ppds-allergen-labelling-changes-for-restaurants-cafes-and-pubs>