

# Prepacked for Direct Sale (PPDS) Allergen Labelling Changes for **Schools, Colleges and Nurseries**

From **1 October 2021** the requirements for labelling prepacked for direct sale (PPDS) food will change. This applies to any food business that produces PPDS food, primary and secondary schools, colleges, universities, and nurseries that provide food.

## 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.

For food provided within a school setting, this may mean changes to labelling for foods such as pizza or sandwiches which are packaged on the premises before the consumer orders them.



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

For schools, this may mean changes to labelling for foods such as pizza or sandwiches which are made and packaged on the premises before the consumer orders them.

## 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.

## Examples of PPDS food

Examples of PPDS food that may be provided by schools include:

- Fruit pots
- Breakfast pots
- Boxes of chips or chicken nuggets placed under a hot lamp in anticipation of a lunchtime rush
- Packaged sandwiches or salad boxes
- Packaged burgers

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

PPDS does not include food that is not in packaging. Food placed into packaging or plated at the consumer's request is not PPDS.

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

- Unpackaged cakes, and unpackaged food behind a glass display counter or in a hot hold cupboard
- Meals made or plated to order

Non-prepacked (loose) food does not require a label and must meet current allergen information requirements for non-prepacked food.

## 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 is 'prepacked' food. Prepacked food 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 by 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 could look 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).

## School Packed Lunches

PPDS allergen labelling changes only affect food that is packed and sold or offered at your site.

If packed lunches are made on school premises in anticipation of an event, such as a school trip, the allergen information requirements may vary. If the lunches are made and packed to order, these are not prepacked, and are therefore **not** PPDS.

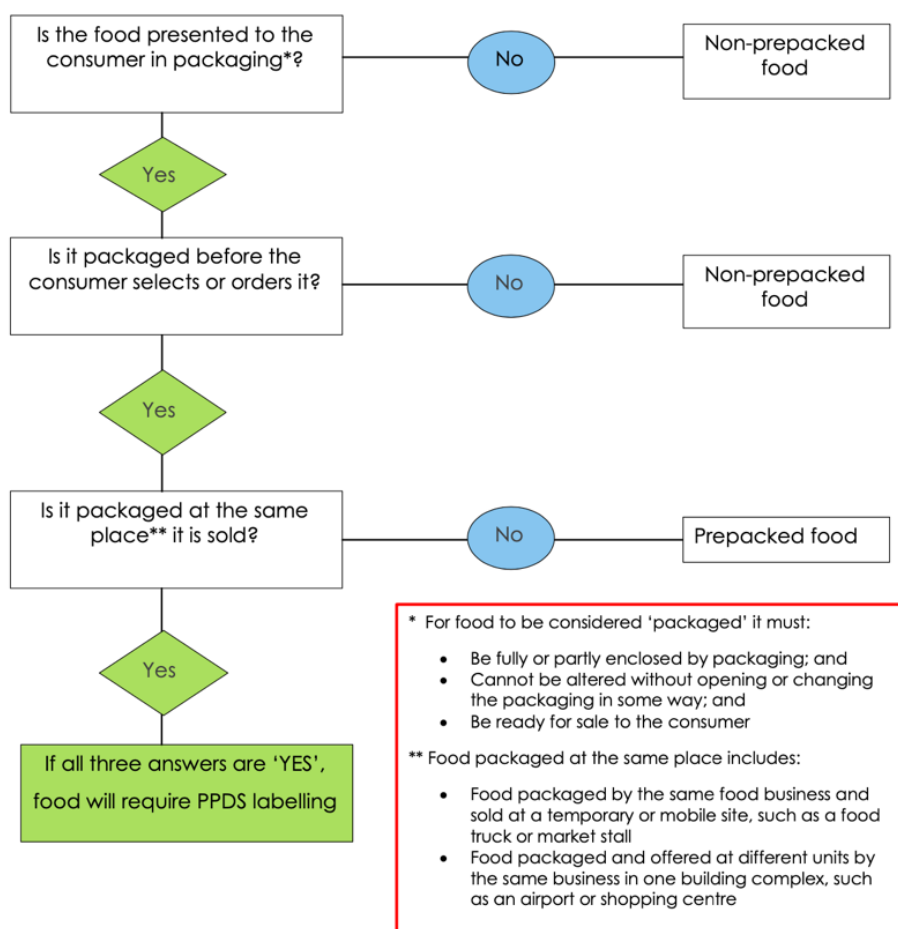
If, however, the school lunches are made and packed without specific orders from individual children, then these would need to comply with the new PPDS labelling requirements.

If there are multiple items in a packed lunch you will need to provide allergen information for each item. You will need to label each PPDS item individually.

Any prepacked items you have bought from elsewhere (that is food packed at a different location by another business) will already have full ingredients labelling.

## 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-schools-colleges-and-nurseries>