

Prepacked for Direct Sale (PPDS) Allergen Labelling Changes for **Event Caterers**

From 1st October 2021, the requirements for labelling prepacked for direct sale (PPDS) food will change. This applies to any food business that produces PPDS food including event caterers, hotels, bars 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 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 cling film).

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 event caterers this may mean changes to labelling for foods such as sandwiches, salads 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

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

- Packaged sandwiches, cakes, bread, pies and pastries
- Enclosed food platters
- Packaged salads
- Soup already in pots

Examples of food that is **not** PPDS

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.

Labelling Guidance

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.

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 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 (see guidance 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.

Specific 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.

Labelling Guidance

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.

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 be displayed is shown here:

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.

14 Allergens

Food businesses need to tell customers if any food they provide contains 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).

This also applies to additives, processing aids and any other substances which are present in the final product.

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

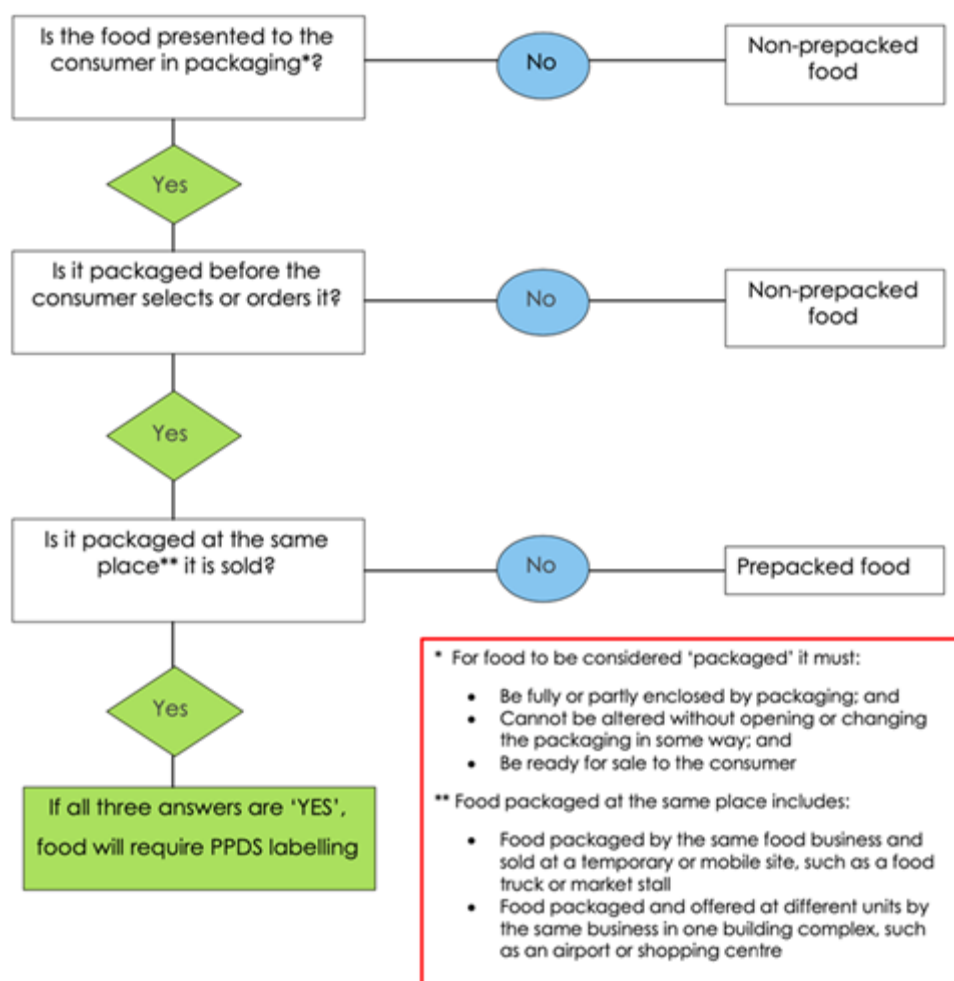
Examples of this kind of packaging would be:

- 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).

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-event-caterers>