





## Legal Requirements

The Food Information Regulations (Amendments) comes into force on the 1st October 2021 across the UK requiring food businesses to label certain in unit made, pre-packaged food with allergen and ingredient information. This is commonly known as 'Natasha's Law' following the tragic death of a Pret-a-Manger customer in 2016. While this is not a legal requirement in Ireland, Ireland will be adopting this as best practice.

## Purpose

The purpose of this legislation is to ensure customers have access to full ingredient and allergen information on the label of the food in order to make an **informed choice** before purchase.

## Which foods require labelling

The regulations require allergen and ingredient labelling for all Pre-Packaged food for Direct Sale (PPDS)

This includes foods which are made or prepared in the unit from which it is sold, and it is packaged before being offered for sale. It can include food that consumers select themselves (e.g. from a display unit), as well as products kept behind a counter or food sold at mobile or temporary outlets.

PPDS food can include the following:

- Sandwiches and bakery products which are packed in unit before a consumer selects or orders them
- Fast food packed before it is ordered, such as a burger under a hot lamp
- Products which are pre-packaged on site ready for the lunchtime sale, such as pizzas, pasties, salads and pasta
- Foods packaged and then sold elsewhere on the premises at a mobile / temporary site or vending machine by the same food business
- Pre-made drinks placed into lidded containers before being ordered by a customer

**NOTE:** products which are packaged but sold through a pre-order service (schools / patient feeding / hospitality etc) are excluded from the legislation as the 'informed choice' has already been made



# Natasha's Law

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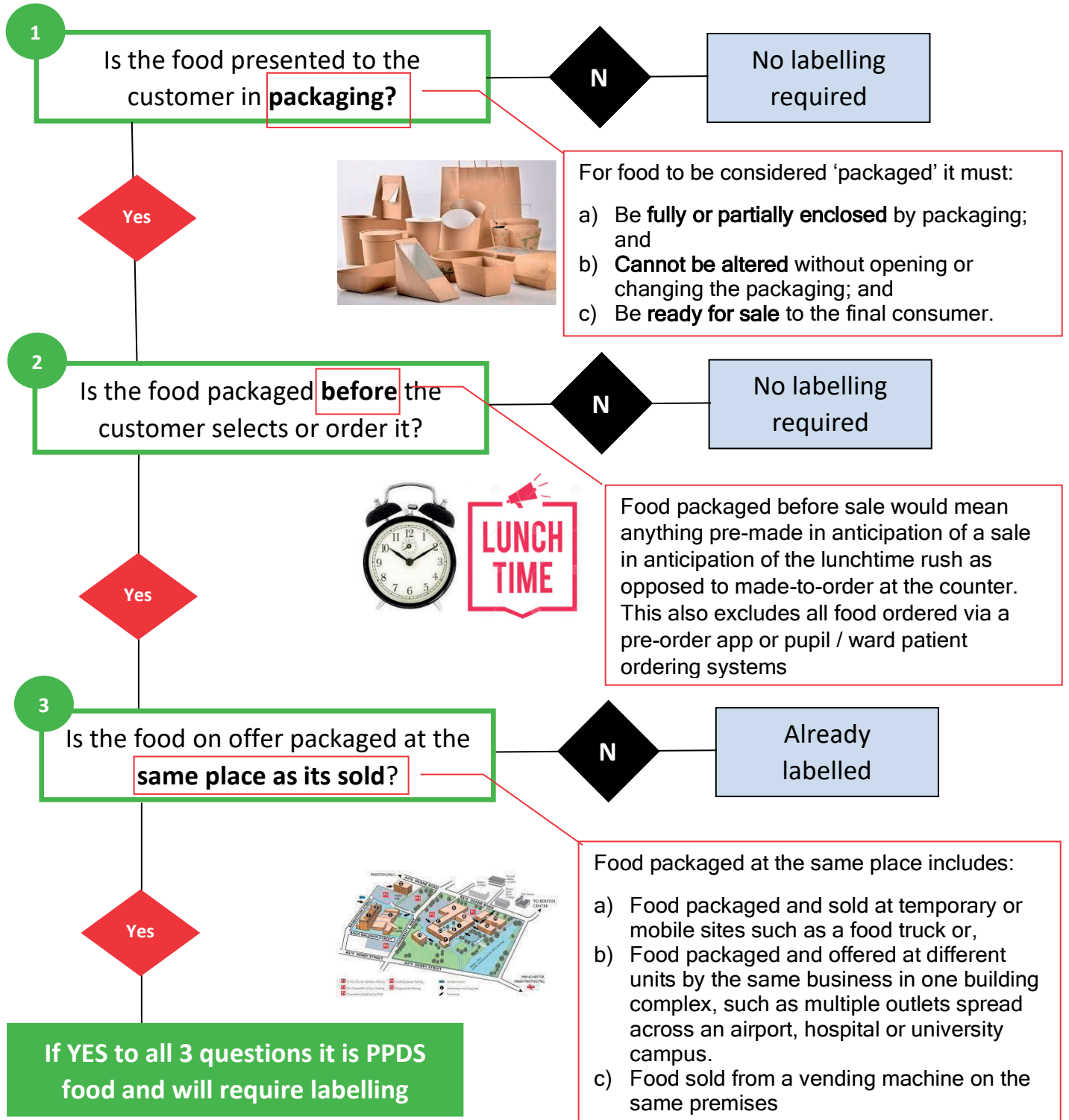


HACCP Chart Reference

Food Service / Vending / Hospitality

## Pre-Packaged for Direct Sale (PPDS) Decision Tree

Use the following labelling checking tool to help determine if what you sell is classified as PPDS and therefore will require a food information label





## Foods which do not require labelling

Certain foods are exempt from the new labelling requirements. These are:

### 1. Traditional Counter Service

Typical over the counter meal service whereby the customer selects what they wish to eat from the food on offer and it is then plated or boxed up after their choice has been made. **Note:** Allergen information must still be provided verbally or through your printed allergen report.



### 2. Deli Bar / Salad Bar

Any food to go offer where the customer selects from an open food display or requests a bespoke order which is then packaged after the customer has chosen.



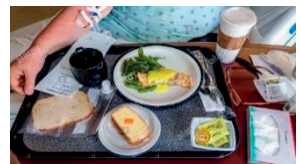
### 3. Pre-ordered School Meals

Primary School pre-packaged meals (including medical diet meal choices) which are pre-selected and purchased by the parents before collection or consumption within the school by the pupil at a later point.



### 4. Patient / Resident Meal Service

Any form of hospital or care home patient feeding service whereby the food is ordered ahead of consumption either by the patient or through a medical professional on behalf of the patient. **Note:** Allergen information must still be provided and available via allergen report or diet grid at point of order



### 5. Hospitality

Any form of food which is pre-ordered by the client for an event or meeting whereby an informed choice is made about the food at the point of ordering before it is consumed at a later point. The packaging of the food thereafter is not relevant with respect to PPDS labeling requirements.



### 6. Packed Lunches / Picnics / Hampers

Any pre-ordered food whereby an informed choice is made before the food is then packaged and delivered to the final consumer.



### 7. Distance Selling

Any food purchased or pre-ordered via a website or mobile app, e.g. Time2Eat / Feeder in which the customer is making an informed choice at point of ordering before collection and consumption. Full ingredient information is not required however allergen information must be provided to the customer both at point of purchase (via the ordering platform) and at point of collection (via a label or printed report attached to their order).



### 8. Bought In Food

Food packed by one business and supplied to another business, e.g. via suppliers or CPU is prepacked food and already must have full labelling, including the name of the food and a full ingredients list with allergenic ingredients emphasised.



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HACCP Chart Reference

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## PPDS Examples

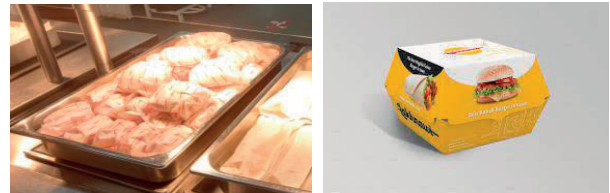
### NOT PPDS (No Label)

Fast food which is sold open or not fully wrapped or packaged before the customer chooses it



### PPDS (Label Required)

Fast food which is wrapped or boxed before the customer chooses it whether displayed as grab & go product or kept in a hot cupboard



Sandwiches / baguettes / Paninins which are sold open and packaged or wrapped after the customer has chosen it - e.g. at a Deli Bar



Sandwiches / baguettes / Paninins which are fully wrapped or packaged before being presented for sale to the customer



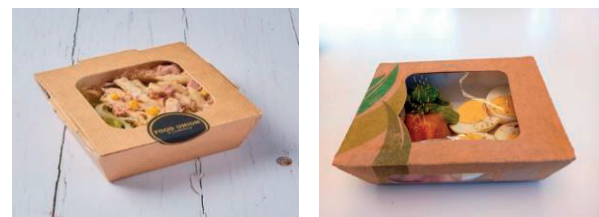
Sandwiches / baguettes / Paninins which are offered for sale with minimal packaging



Pasta & Salads sold open or as part of a self service buffet



Pre-made pasta or salads which are boxed and sealed and presented for sale ahead of service



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## NOT PPDS (No Label)

## PPDS (Label Required)

Cakes & pastries stored under a dome before selection by customer



Individually wrapped bakery, cakes & pastries on display for selection by customer



Cakes & pastries presented for sale with minimal packaging



Retail cakes & pastries will already be fully labelled



Individually wrapped un-prepared single fruit or vegetable items



Multiple fruit or veg items prepared and packaged



Where the bakery product is displayed with no packaging and bagged after the customer has chosen it



Multiple or single bakery items packaged or wrapped before being presented for sale



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## NOT PPDS (No Label)

Pre-ordered meals or snacks which have been selected by the customer before they are presented for consumption wrapped or packaged

Example 1:  
school packed lunches



Example 2:  
Patient / resident dining within a hospital or care home or senior living facility



## PPDS (Label Required)

Food which is pre-packaged and offered for sale within a school or patient care facility



Pre-packaged hospitality food which is pre-ordered against a known menu offer or where individual customer dietary requirements are clearly communicated as part of the order request



Pre-packaged hospitality food which is not personally pre-ordered by the customer but available for consumption as part of a meeting or event they are attending



Made in unit drinks / shakes self served by the customer into a lidded container or cup



Made in unit fruit smoothies / drinks / shakes

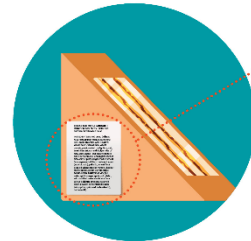




## PPDS label Information

Any food which falls into the category of pre-packaged food for direct sale must, from the 1st October 2021, include a label displaying the following information:

- Legal descriptive name of the food.
- The list of ingredients headed by a suitable heading which consists of or includes the word ingredients.
- Allergens suitably highlighted per ingredient in bold.
- Composite ingredients expanded within brackets ().
- Requirement to put ingredients in weight order.
- Additional voluntary information, e.g. May Contain.



### CHEESE AND PICKLE SANDWICH

Mature Cheddar cheese, pickle and butter in sliced malted bread

INGREDIENTS: Malted bread ( **wheat** flour (**wheat** flour, calcium carbonate, iron, niacin, thiamin), water, malted **wheat** flakes, **wheat** bran, **wheat** protein, yeast, malted **barley** flour, salt, emulsifiers (mono- and diglycerides of fatty acids, mono- and diacetyl tartaric acid esters of mono- and diglycerides of fatty acids), spirit vinegar, malted **wheat** flour, rapeseed oil, flour treatment agent (ascorbic acid), palm fat, **wheat** flour, 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**).

All the necessary information required will be held on the Source behind each recipe. Working closely with our assured vendors and food manufacturers we will capture the food specification data for each product and ingredient used within our recipes. This information will then be verified and re-ordered into the correct format within each recipe and loaded onto the Source. As units select a recipe for use within the menu plan the data is automatically loaded into the allergen report and can be exported to the label printing function within Source for printing in unit.

It is important each unit follows the steps below to produce the required label:

### 1. Source

- Log onto Source using your unit log in details
- Build your menu plan using Source recipes

### 2. Production

- Make the product exactly to the Source recipe
- Do not substitute ingredients without amending the Source recipe

### 3. Label Printing

- Select the unit menu plan in Source
- Select the relevant recipe from within the menu plan
- Select the number of labels required within the print box option
- The recipe will determine the type of label (small / medium / large) based upon the ingredient string size
- Tick the options to hide the price and/or Use By date if required
- Check the print summary on the screen before confirming print





## Printing From Source

There have been a number of dynamic changes to the functionality of the Source and how it works. It is important that all Unit Managers and Head Chefs responsible for menu planning and label printing are familiar with the changes

Please access the short demo video hosted on the HSE website (link ..... ) which demonstrates the new functionality and helps guide the user through the use of the system for label printing and manual allergen builder recipe creation.

### LABEL PRINT

The screenshot shows the 'LABEL PRINT' interface with several green callout boxes:

- Select Unit:** Points to the dropdown menu showing 'G20201 - Parklands Restaurant - Main'.
- Select Menu:** Points to the dropdown menu showing 'Parklands New Offer Wk 2 June 2021'.
- Select Recipe:** Points to the 'Noshi Cute Vegetable Noodle Cup' item in the list.
- Select No to print:** Points to the 'Print' field for the 'Noshi Cute Vegetable Noodle Cup'.
- Check label size:** Points to the 'Description:' field.
- Check print summary:** Points to the 'Print Selection' row in the summary table.
- Click to print:** Points to the 'Save & Print' button.

**Summary Table:**

Total	6
Print Selection	4
Waste Count	2
Error Count	0

**Recipe List:**

- All Day
- Breakfast
  - Noshi Cute Vegetable Noodle Cup (Sell For: 2.60 | Planned: 1 | Print: 1 | Use by: 23/10/2019)
  - Crispy Belly Pork with Spicy Noodles & Prawn Crackers Pot (Sell For: 3.50 | Planned: 1 | Print: 1 | Use by: 23/10/2019)
  - Egg Noodles (Sell For: 0.90 | Planned: 1 | Print: 1 | Use by: 23/10/2019)
  - Noodle Bar Long Grain Rice (Sell For: 0.75 | Planned: 1 | Print: 1 | Use by: 23/10/2019)



## Printing Labels

When printing labels in unit please ensure you have the following:

- A working printer
- Sufficient supplies of black ink
- The correct label sheets from Planglow (see below)

Step 1: Select the correct recipe you require a label for.

Step 2: Select the label type you require

Step 3: Select the label size you require. **Note:** if the label size selected is too small to fit the ingredient data

upon the system will display an error message and instruct you to select an alternative size option.

Step 4: Select whether you want to display the product price and shelf life on the food information label or leave separate on a customer facing point of sale label.

Step 5: Select the number of labels required to be printed. **Note:** smaller label sizes will fit more to a page than larger label sizes

Step 6: Ensure you have selected the correct printer settings - A4 paper and select "fit to paper" on the source setting. This will ensure the text will print in alignment to the sticker shape on the page.

## Label Types

The following labels are available through Planglow for the use within Natasha's Law food information labelling and can be ordered in packs of 500 sheets

Review the label options listed below to determine the most suitable design and size to fit your products. You may need more than one design and size to accommodate the range of different products you have within your grab & go offer.

**Sticker guidance:** The size of the label dictates the amount of ingredients and the ingredient string length. Not all PPDs products will fit on Small, Medium or Large. So a range of stickers is recommended.

- Small / Medium stickers would be primarily only used for very simple products with minimal ingredients, e.g. fruit salad pots, protein pots, breakfast pots and simple sandwiches etc.
- Large stickers would be primarily used for unit made sandwiches, baguettes, hot bacon rolls etc.
- The existing allergen "lollipop" stickers will remain as a label option on The Source as "large" sticker type until unit stocks full deplete.
- XL stickers, Sticker-Rectangular (6) COM006 are required for any hot food box (5 item breakfast, fish, chips & peas) and complex sandwiches etc.
- In Ireland your labels can be purchased from Cafe Brands

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HACCP Chart Reference

Food Service / Vending / Hospitality

## 1 Keyhole

Size: **Large**  
Dimensions: 64mm (w) x 134mm (L)  
Order Code: COM017

Size: **Medium**  
Dimensions: 50mm (w) x 87mm (L)  
Order Code: COM017

Tuna Niçoise Salad  
£4.50  
use by: 17/08/2021

Each 100g contains				
Energy	Protein	Carbohydrate	Fibre	Salt
2000kJ	6.7g	2.2g	1g	0.06g
2%	10%	1%	1%	1%

INGREDIENTS: Tuna ; Water, Salt, Dextrase, Potato Starch, Stabilisers (Diphosphates, Triphosphates), Acidity Regulators (Sodium Acetate, Sodium Citrate), Pepper, Mixed Sated Leaf - Escarole (40%), Pain De Sevre (15%), Radicchio (15%), Curly Endive (12%), Rocket (5%), Red Multifleaf (5%), Spinach (5%), Baby Red (3%), Broccoli, Free Range Liquid **(Egg)**, Free Range **(Egg)** Broccoli, Butter Beans in Water - Butter Beans, Water, Antioxidant(Ascorbic Acid), Broccoli, Plum Tomato, Onion, Lemon Infused Oil, Lemon Infused Olive Oil (Olive Oil, Lemon, Salt) (64%), Sunflower Oil,

**Allergen advice** For allergens, including Cereals containing Gluten, see ingredients in **bold** May Also Contain (Rye) . Keep refrigerated or consume in next 4 hours



Example

## 2 Watch Strap

Size: **Large**  
Dimensions: 63mm (w) x 140mm (L)  
Order Code: COM011  
6 labels per A4 sheet

Coronation Chicken Sandwich on Wholemeal Bread  
£3.00  
use by: 17/08/2021

Each 100g contains				
Energy	Protein	Carbohydrate	Fibre	Salt
2000kJ	6.7g	2.2g	1g	0.06g
2%	10%	1%	1%	1%

INGREDIENTS: White Bread **(Wheat)** Flour (With Calcium, Iron, Nicotin, Thiamin, Riboflavin, Folate, Sugar, Salt, Chicken, Flora Margarine Plant oils (sunflower, rapeseed, palm), dried yeast, salt based emulsifier (sunflower lecithin), vinegar, natural flavourings, vitamin A, Light Mayonnaise, water, salt, plant based emulsifier (sunflower lecithin), vinegar, natural flavourings, vitamin A, Water, rapeseed oil 20%, salt, vinegar, modified starch, pasteurised **(Egg)**, sugar, salt, pasteurised **(Egg)** yolk 1%, thickener (carboxymethyl cellulose), preservative (potassium sorbate) antioxidant (calcium disodium EDTA), acid (malic acid), natural flavour "White Black Pepper".

**Allergen advice** For allergens, including Cereals containing Gluten, see ingredients in **bold** Keep refrigerated or consume in next 4 hours



Example

## 3 Circle Split

Size: **Large**  
Dimensions: 64mm (w) x 64mm (L)  
Order Code: COM003  
6 labels per A4 page

Size: **Medium**  
Dimensions: 64mm (w) x 38mm (L)  
Order Code: COM004  
9 labels per A4 sheet

Size: **Small**  
Dimensions: 40mm (w) x 40mm (L)  
Order Code: COM005  
12 labels per A4 sheet

Walnut & Banana Cake  
£4.50  
use by: 17/08/2021

Each 100g contains				
Energy	Protein	Carbohydrate	Fibre	Salt
2000kJ	6.7g	2.2g	1g	0.06g
2%	10%	1%	1%	1%

INGREDIENTS: 00 Flour ; Soft **(Wheat)** Flour Granulated Cane Sugar, Flora Original Spread ; Ingredients Plant Oils (Sunflower, Rapeseed, Palm 1, Linseed), Water, Salt, Plant Based Emulsifier (Sunflower Lecithin), Vinegar, Natural Flavourings, Vitamin A, Free Range Liquid **(Egg)** ; Free Range **(Egg)**, Water, Bicarbonate Of Soda ; Sodium Bicarbonate, Coconut **(Milk)** Powder Mix ; Coconut **(Milk)** Powder (78%), Maltodextrin, **(Milk)** Protein (Sodium Caseinate), Stabiliser (Trisodium Phosphate), Cooking Salt ; Salt, Anti-Caking Agent E535.

**Allergen advice** For allergens, including Cereals containing Gluten, see ingredients in **bold** May Also Contain (Celery, Fish, Barley) . Keep refrigerated or consume within 4 hours



Example

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4

Rectangle

Size: **Large**  
Dimensions: 63mm (w) x 140mm (L)  
Order Code: COM006  
6 labels per A4 page

Size: **Medium**  
Dimensions: 65mm (w) x 90mm (L)  
Order Code: COM007  
9 labels per A4 sheet

Size: **Small**  
Dimensions: 64mm (w) x 67mm (L)  
Order Code: COM008  
12 labels per A4 sheet

Coronation Chicken  
Sandwich on  
Wholemeal Bread  
£3.00  
use by: 17/08/2021

INGREDIENTS: White Bread: **(Wheat)** Flour (With Calcium, Iron, Niacin, Thiamin), Water, Yeast, Sugar, Salt, Chicken, Flora Margarine, Plant oils (sunflower, rapeseed, palm), Inseed) water, salt plant based emulsifier (sunflower lecithin), vinegar, natural flavourings, vitamin A, Light Mayonnaise, water, salt, plant based emulsifier (sunflower lecithin), vinegar, natural flavourings, vitamin A, Water, rapeseed oil 25%, spirit vinegar, modified starch, pasteurised **(Egg)** \*3.5%, sugar, salt, pasteurised **(Egg)** yolk \*1%, thickener (xanthan gum), lemon juice concentrate, preservative (potassium sorbate), antioxidant (calcium disodium EDTA), acid (malic acid), natural flavour: \*Whole Black Pepper.

**Allergen advice** For allergens, including Cereals containing Gluten, see ingredients in **bold**  
Keep refrigerated or consume in next 4 hours.



Example

## Display

The food label produced must be applied to the product in order to effectively inform the customer of its contents as they choose and select the product for purchase. The Food Information Regulations require the label to be applied to the food packaging so that it is:

- Easily accessible by the customer
- Easily visible and clearly legible
- In a place whereby the information is not hidden or obscured



If the split sticker design is chosen then ensure the customer facing part of the label is positioned on the top of the product facing the customer and the food information part can then be placed on the side or bottom of the product packaging

If the keyhole or watchstrap design is chosen then ensure the circle part is positioned on the top customer facing side of the product and then wrap the tail part of the label containing the food ingredient information around the side / rear of the product.

Any sector or contract specific point of sale stickers can still be used to display the product name / price / shelf life as these attributes can be disabled within the Source label printing function.



## Contingency Measures

Due to certain circumstances such as system failure, loss of internet, or printer malfunctions the opportunity to print a label on the day of production may be limited. In such situations the following guidance must be noted:

- The creation of food labels in advance of food production should not be undertaken as there is a possibility for ingredients or allergens to have changed within the recipe
- The legislation places a strict onus on food businesses to label the food packaging only and alternative means for informing customers of ingredients and allergens is not permitted as a replacement for labelling
- Changing the service style to offer the food in a more open counter style offer whereby the food is packaged after the sale would remove the need to label the item with a full ingredient & allergen label under the definition of the law.
- Consider if a neighbouring unit or regional support can help to print the required labels off site at an alternative location and courier the labels over to the affected unit.
- In the event of a printer failure could an alternative printer be acquired from another unit or from your regional support team



## Help & Support

Additional help and support can be obtained from the following people:

- Legal interpretation of the law - contact your sector HSE Manager
- Source user access issue - send employee name, number, unit number & unit name to BE Team
- System I.T. issues (Source / Symphony / Nexus etc.) contact IT support via Connect (<https://www.compassconnect.com/communities/community/ITHelp>)
- Ink availability - Foodbuy Helpdesk ([foodbuyhelp@foodbuy.co.uk](mailto:foodbuyhelp@foodbuy.co.uk))
- Printer replacement - IT Orders via Connect (<https://www.compassconnect.com/communities/community/IT.Orders>)
- Labels - Order via unit Foodbuy online accounts. Escalation to Foodbuy helpdesk ([foodbuyhelp@foodbuy.co.uk](mailto:foodbuyhelp@foodbuy.co.uk)) / Cafe Brands in Ireland
- Allergen data discrepancy - Escalate to Foodbuy helpdesk ([foodbuyhelp@foodbuy.co.uk](mailto:foodbuyhelp@foodbuy.co.uk)) Ireland Nutritionist / Source Owner in Ireland

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## Further Information & Training

Additional information and guidance around Natasha's Law is available via the Compass HSE website including a client communication and a Q&A document

A bespoke e-learning module is also available for all frontline catering colleagues to complete to assist in their understanding.

Further guidance around allergens can be found within Good Hygiene Guide No13: Allergens which is part of the Compass Food Safety Management System.

Please contact your sector HSE manager should you have any further questions.



