
Natasha's Law – Compass UK&Is Approach to PPDS Labelling

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Allergen Steering Group



see



care



share



Background

Following the tragic death of a young woman (Natasha Laperouse) from a sesame allergen after the consumption of an in-unit made sandwich the Food Information (Amendment) Regulations 2019 or more commonly known as ‘Natasha’s Law’ has been adopted by Parliament and will come into force across the U.K. on the 1st October 2021, with the aim to protect allergy sufferers and give them confidence in the food they buy.

Outline

The new law will require all food businesses who make food which are prepared and packed on the same premises from which they are sold (Pre-Packaged for Direct Sale) to apply a food information label which includes: on foods.

- The name of the food.
- Shelf life information.
- A list of all ingredients (in descending weight order).
- Any allergen ingredient suitably emphasized.

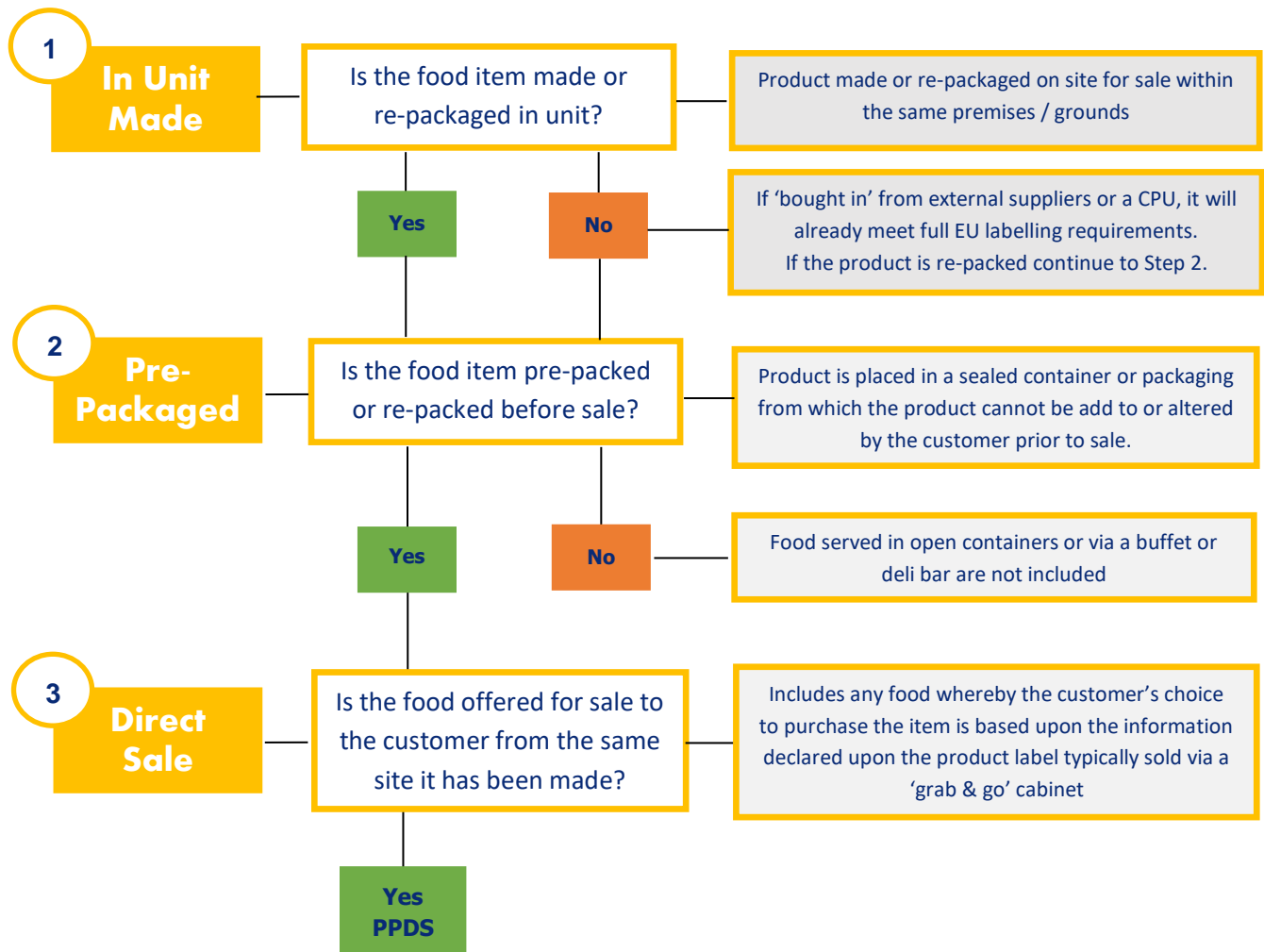
PPDS Definition

Pre-Packaged food for Direct Safe (PPDS) is defined as ***food which is prepared and packaged before being offered for sale to the final consumer from the same premises that it is sold from.*** This typically would include items such as sandwiches, baguettes, salads, pasta pots, desserts, cakes and general takeaway foods such as burgers etc.



PPDS Decision Tree

The following decision tree is based upon the current interpretation of the definition of pre-packaged food for direct sale as part of the Food Information (Amended) Regulations 2019 and can be used to help determine what is and is not in scope



Food that is not classified as PPDS includes:

- Food not in packaging, i.e. plated food.
- Food packaged at the customer’s request e.g. at a deli bar.
- Bought in pre-packed food (packaged at a different premises).
- Distance sales (e.g. foods ordered via online apps).

Labelling Requirements

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 allergen information, e.g. May Contain.

Example label



Granary Egg Mayonnaise & Cress Sandwich

INGREDIENTS: Granary Bread; Malted Bread Flour (Wheat flour with calcium, iron, niacin, thiamin flour treatment agent - ascorbic acid e300malted Wheat flakes malted **Barley** flour, flour treatment agent - ascorbic acid) yeast salt improver (full fat SOYA flour, acidity) Spelt, **Kamut, Soybeans**), **Medium Egg, 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.*, **Flora Margarine**; Plant oils (sunflower, rapeseed, palm1, linseed) water, salt plant based emulsifier (sunflower lecithin), vinegar, natural flavourings, vitamin A, **Cress**.

Allergen Advice: For allergens, including Cereals containing Gluten, see ingredients in bold

May Contains; Milk

Contingency

The regulation is a strict requirement and does not provide scope for alternative options or non-compliance. If a unit can-not provide the Source label it must either:

- a) Remove the item from sale, or
- b) Present the food open and not within enclosed packaging.

Methodology

The production of legally compliant labels will require the following process to be adopted to ensure accuracy and consistency of the food labels.

Catering units should not attempt to produce hand written labels for any PPDS foods sold in unit

Step 1:
Supplier Data Into EPSYS
Working with our suppliers we will upload via the Foodbuy Portal all the necessary food specification data including sub ingredients and allergens. The data is then checked and validated

Step 2:
SAP
The correct ingredient string is created within SAP for each recipe and updates the AWS Cache in real time

Step 3:
Source
SAP feeds the data in real time into Source. As a unit selects Source recipes and builds their menu plan full ingredient and allergen information will be presented

Step 4:
Emergency Menus
Source menu plans will also be able to receive and attach one off emergency recipe builders created within the Source

Step 5:
Label App
Source will export the label information from a selected recipe into the label app template to create desired label design (size / logos / font / colour)

Step 6:
Print Label
App created PDF of label to print in-unit label using PlanGlow pre-formatted label sheets

Step 7:
Apply Label
Unit apply label to each PPDS item on sale



Next Steps

Further information will be provided over the course of the next few months and additional frontline operator training will be available as part of the roll out process

Please use this brief to cascade to your operational teams / clients as necessary

Timelines

- April / May – design & build phase
- June – System testing
- July – Trial in live test venues
- July / Aug – Unit training & communication program
- Aug / Sept – Roll out (UK&I)
- Oct – Legal requirement commences

Further Information

For further information on Natasha's Law or the associated labelling solution please contact either:

- Christopher Moore – HSE Director
- Nicola Varney – Head of Systems
- Nicky Martin – Head of Nutrition