



This Food Science Fact Sheet is one of a series compiled by Institute of Food Science and Technology, providing clear, concise and scientifically reliable information on key food science topics for consumers.

## UK Allergen Labelling Amendment 2021

### What is Natasha's Law?

From 1 October 2021, the requirements for prepacked for direct sale (PPDS) food labelling change in UK. This applies to food and drinks prepared on site, packed and displayed ready for later orders, or for selection by consumers. This enables consumers, including those with food hypersensitivities, to identify ingredients they need to avoid by referencing the packaging. Labels will include the name of the food (product or dish) and a full ingredients list, with the 14 EU-regulated allergenic ingredients emphasised.

### Why is this change being made?

To ensure that consumers can access necessary information, particularly if they have food allergies, intolerances or coeliac disease. It follows the death of 15-year-old Natasha Ednan-Laperouse in 2016 who selected from a chilled display, purchased and ate a wrapped, filled baguette, which contained unlabelled sesame, to which she was allergic.

### Where are the relevant regulations?

Each UK nation controls its own food regulations. The amendments should be read in conjunction with the **Food Information for Consumers Regulation (EU) No 1169/2011** and the **Food Information Regulations 2014 (FIR)** relevant to the UK nation in which a food business operates:

[Food Information \(Amendment\) \(England\) Regulations 2019](#)

[Food Information \(Wales\) \(Amendment\) \(No. 2\) Regulations 2020](#)

[Food Information \(Amendment No. 2\) Regulations \(Northern Ireland\) 2020](#)

[Food Information \(Scotland\) Amendment Regulations 2021](#)

### Where is the official guidance?

['Introduction to allergen labelling changes \(PPDS\)'](#) - The Food Standards Agency (FSA) for businesses in England, Wales and Northern Ireland

['Food allergen labelling and information requirements - Technical Guidance'](#) - Food Standards Scotland (FSS)

### What is the impact for different business activities?

A food business needs to decide if the dishes or products they sell are prepacked for direct sale (PPDS). If so, it needs to determine how to label each item, with the name of the product or dish, full ingredients list and 14 EU-regulated allergens highlighted.

### Which items are definitely not prepacked for direct sale (PPDS)?

**Packed foods/drinks:** manufactured, packed and sealed at a production site, and delivered to another food business where they may be used in catering or sold directly to consumers (e.g. supermarket, shop, other retail) - in which case they must be fully labelled (product name, full ingredients, 14 allergens highlighted and other legally required information)

**Non-prepacked foods:** sold loose to another business (e.g. tray of baked bread), or by staff to a customer. Includes restaurant meals, drinks, takeaways, self-service open and unwrapped snacks, loose fruit and vegetables, pick and mix confectionary etc. Staff and customers may select, serve and pack these. Businesses are required to keep, and make available, information regarding the 14 regulated allergenic ingredients, in every product/dish, and have signage, on menus and on display, inviting customers to request it



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### Which foods/drinks may be PPDS?

**Staffed supermarket, bakery and delicatessen counters:** items requested by a customer and then packed by staff are not PPDS. However, if items are packed for later display and customer selection when the counter is unstaffed, these are PPDS, so must be labelled accordingly

**Cafés and counters selling sandwiches and snacks:** made on site then packed and sealed for display are PPDS and must be labelled as such. Items served directly by staff following a customer request are not

**Site catering from a central kitchen (e.g. events, conferences, universities, hospitals, care homes):** if catering staff accompany the food and are available to unpack and serve it to the consumer, it is non-prepacked so they should be ready to provide allergen information on request. When food is wrapped, sealed, delivered and left for non-catering staff or customers to collect and/or consume, it is PPDS

**Eat in, takeaway and drive-through meals and snacks:** including drinks packed before the customer places an order are PPDS so must be labelled, whereas those prepared or packed following the customer's request are not

### What particular challenges may food hypersensitive consumers face?

Some may not be familiar with the new rules or understand how critical ingredients and allergen information should be made available. They will also need to know about precautionary allergen labelling, if there is a risk of allergen cross-contamination (labelled 'may contain ... or 'not suitable for someone with ... allergy'), which is out of scope of this amendment. To avoid having to label, some items may be displayed together and there may be new risks from cross-contamination, or from picking up the wrong item, if items are no longer individually wrapped prior to being displayed.

### What particular challenges may food businesses face?

Staff may be unfamiliar with the rules and need support to understand when and how items need to be labelled. It is important that everyone involved

understands how ingredients and regulated allergen information must be provided on prepacked and non-prepacked items.

### How to label PPDS foods

They have to clearly display the following information on the packaging, or on a label attached to it:

- name of the food or drink
- full ingredients list, with the 14 allergenic ingredients emphasised (for example in **bold**, *italics* or a different colour)

Ingredient lists, including the emphasis of any of the 14 categories of allergens, must be printed on the package, or on the label, in such a way as to ensure clear legibility in characters using a font size where the 'x-height' is equal to, or greater than, 1.2 mm. For small packets, i.e. packaging or containers where the largest surface has an area of less than 80 cm<sup>2</sup>, the 'x-height' of the font must be equal to, or greater than, 0.9 mm.

### Labelling best practice

- Labels well attached or stuck down
- Clear font and layout
- Easy to read colour contrast
- Surfaces which are not too shiny
- Plain background; no text over a pattern/ image
- Mention 'may contain' information underneath the ingredients and allergen list
- Do not cover essential information with promotional or price reduction stickers
- Labels not creased or folded

### Additional references

[www.gov.uk/government/news/natashas-legacy-becomes-law](http://www.gov.uk/government/news/natashas-legacy-becomes-law) (DEFRA press release)

[www.food.gov.uk/allergen-ingredients-food-labelling-decision-tool](http://www.food.gov.uk/allergen-ingredients-food-labelling-decision-tool) (FSA decision tool)

<https://www.foodstandards.gov.scot/business-and-industry/safety-and-regulation/food-allergies-2/prepacked-for-direct-sale> (FSS information)

[www.judiciary.uk/wp-content/uploads/2018/10/Natasha-LAPEROUSE-2018-0279.pdf](http://www.judiciary.uk/wp-content/uploads/2018/10/Natasha-LAPEROUSE-2018-0279.pdf) (Coroners report)

[www.ifst.org/sites/default/files/Food%20allergy.pdf](http://www.ifst.org/sites/default/files/Food%20allergy.pdf) (IFST Food Allergy Fact Sheet)