



Pre-packed foods for DIRECT SALE labelling changes 2021

“PPDS – what you need to know NOW”

Introduction

In June 2020 new, updated, Technical Guidance from the Food Standards Agency was issued to businesses to begin preparations for the new enhanced labelling requirements effective 1 October 2021 for businesses in the UK.

This will result in a **full ingredients list** needing to be produced on all pre-packed for direct sale items (PPDS). As **WELL** as the **PRODUCT NAME** on the packaging.

Key points:

PPDS food is considered pre-packed when it is put into packaging **BEFORE** being offered for sale and:

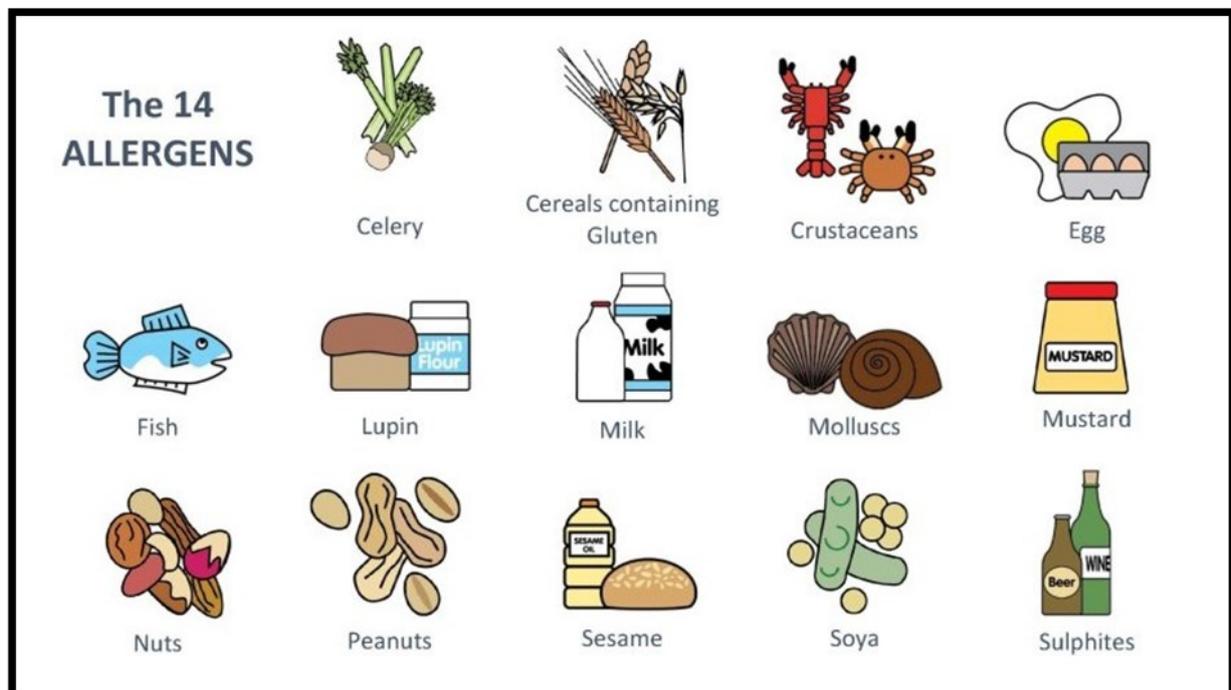
- **Is either fully or partly enclosed by the packaging; and**
- **Cannot be altered without opening or changing the packaging and**
- **Is ready for sale to the final customer**

It does not cover food which is packaged only when the customer selects or order it for e.g. in a sandwich/ deli bar, a label is not required.

Quick refresher

From 13 December 2014 new rules on allergen labelling and consumer information were applied to all food and drink businesses in the EU. The **Food Information for Consumers Regulation (1169/2011/EC) (FIR)**.

This entailed information about the top **14** allergens being made available (for all loose foods and beverages) to any customer on request.



Key points to note:

- It is the cereal that is the allergen containing ingredient, therefore the cereal itself must not be named just 'GLUTEN'
- It is the actual tree nut that is the allergen containing ingredient, therefore the nut itself must be named not just 'NUTS'

Currently

The industry best practice for all food produced for 'Grab and Go', takeaways, self-help stations or to be served by staff members, to be consumed on or off the premises, that is pre-packed in advance of being offered for sale, **should be labelled as per the below example.**

GrabbaCiabbatta

Cheese and Homemade Pickle Sandwich

Contains (allergens): **Wheat, Milk**

Use by: XX/XX/XX

The label requires the name of the product as well as the allergen contents (highlighted, in bold or distinguishable).

What is changing?

What we all need to do from 1 October 2021, or earlier, to get ahead of the competition!

1. The **PRODUCT NAME** must be included
2. A **FULL** list of ingredients with allergens in bold, or highlighted, or distinguishable
3. Label starting stock of items before service e.g. burgers, fried chicken, packaged and boxed anticipating a rush
4. Samples e.g. cake pieces to be individually wrapped
5. Pizza slices on card and wrapped
6. Hot dogs displayed in an open container, do not require labelling as this '**can be altered without opening or changing the packaging**'
7. Generally, all prepared drinks and food items that are packed before service will require a full ingredients list with allergens in bold or highlighted
8. Business operators must still offer signposting to where full allergen information (in writing) can be found
9. Signposting will **STILL** be required for **LOOSE FOODS**

Examples and scenarios - New PPDS Labels

1.

GrabbaCiabbatta

Cheese and Homemade Pickle Sandwich

Ingredients: strong white flour (**wheat**), calcium carbonate, iron, niacin, thiamine, salt, yeast, olive oil, water, cheese (**milk**), butter (**milk**), onions, non-iodised salt, golden castor sugar, **mustard** powder, **mustard** seeds, **celery** seeds, dried chilli, turmeric

Use by: XX/XX/XX

2.

GrabbaCiabbatta

Cheese and Pickle Sandwich

Ingredients: **Wheat** Flour (with added Calcium, Iron, Niacin, Thiamin), Water, Yeast, **Soya** Flour, Salt, Preservative: E282, Emulsifiers: E472e, E471, E481, Flour Treatment Agent: Ascorbic Acid. cheese (**milk**), butter (**milk**), Branston Pickle: Vegetables in variable proportions (51%) (Carrot, Rutabaga, Onion, Cauliflower), Sugar, **Barley** Malt Vinegar, Spirit Vinegar, Water, Tomato Purée, Date Paste (Dates, Rice Flour), Apple Pulp, Salt, Modified Maize Starch, Colour (**Sulphite** Ammonia Caramel), Onion Powder, Concentrated Lemon Juice, Spices, Colouring Food (Roasted **Barley** Malt Extract), Herb and Spice Extracts

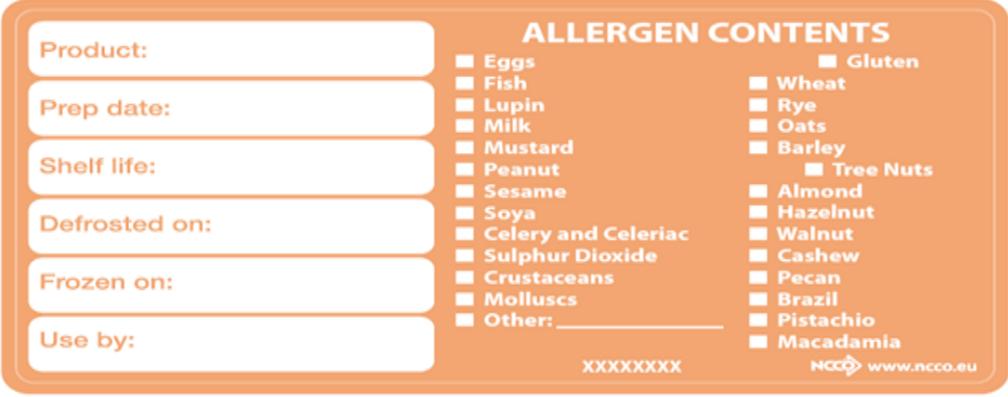
Use by: XX/XX/XX

Notice the difference between these two examples?

1. The first example is where you have baked your own bread and made your own pickle
2. The second example is where you have extracted the label information from the pre-purchased bread and pickle

Additional useful notes

- Prepared Smoothie in disposable lidded cup: "Celery and Apple Crush"
Ingredients: Cucumber, apple juice, **celery**, chopped apple
- Muffin in partial packaging: "Blueberry and Chocolate Chip Muffin"
Ingredients: self-raising white flour (**Wheat**), calcium carbonate, iron, niacin, thiamine, **eggs**, sugar, blueberry, vegetable oil, cocoa powder, coconut oil, honey, vanilla, sea salt, **milk**
- Grab bag with 2-4 packaged items enclosed in one bag e.g. school trip
Each item will require it's own label for ingredients, allowing these items have been prepared before being offered for sale
- It does not apply for finished packaged goods where the largest surface area is less than 10cm²
Allergen information must always be available, however, in the normal fashion.**
- Question?** * Will Kitchen stores labelling as per below example - **be sufficient post PPDS?**



The image shows a template for an allergen label. It is a rounded rectangle with a width of 100 mm and a height of 50 mm. On the left side, there are six input fields for product information: Product, Prep date, Shelf life, Defrosted on, Frozen on, and Use by. The main area is titled "ALLERGEN CONTENTS" and contains a grid of checkboxes for various allergens. The allergens listed are: Eggs, Fish, Lupin, Milk, Mustard, Peanut, Sesame, Soya, Celery and Celeriac, Sulphur Dioxide, Crustaceans, Molluscs, Other, Gluten, Wheat, Rye, Oats, Barley, Tree Nuts, Almond, Hazelnut, Walnut, Cashew, Pecan, Brazil, Pistachio, and Macadamia. At the bottom right, there is a logo for NCCO and the website www.ncco.eu.

Answer: *For prepared products e.g. sandwich fillings for use in PPDS products, there is no requirement for all products in storage to have their own full ingredient labelling.

However, this information will be required to produce customer facing labels to meet with PPDS. Therefore, for fillings and other composite ingredients, that will be assembled and put into packaging for PPDS products, full and accurate ingredients will be required.

This applies in the same way for non PPDS food and drinks, i.e. to produce general allergen information that is made available for our customers.

Key point to note:

- Colleagues in Wales, who choose to label in the Welsh language, also need to list the ingredients in English

Label standards (unchanged) and link to the FSA Technical Guidance (June 2020)

- Font sizes: a label that will be smaller than 80cm² must have a font size of at least “x” 0.9mm. Larger labels must use “x” 1.2mm. See also Fig 1. below for “x”
- Labelling must not be obscured in any way. If you do use a symbol for an allergy - this must always be accompanied by the written word
- Very least: product name and use by date as well as all ingredients



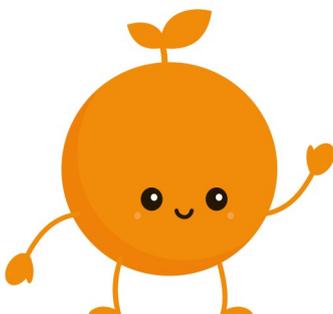
Food allergen labelling and information requirements Technical Guidance Published: June 2020

www.food.gov.uk/sites/default/files/media/document/fsa-food-allergen-labelling-and-information-requirements-technical-guidance_0.pdf

For more information on the new PPDS labelling legislation, please visit the FSA's PPDS page here: www.food.gov.uk/ppds

Go the extra mile

Ensure your staff and teams are well trained in allergy awareness, empower your staff with the knowledge to increase your diner's choices, widen your client base with enhanced food safety and take your business to the next level.



<https://www.catercloud.com/allergy-training/>