

Prepacked for direct sale (PPDS) allergen labelling changes for schools, colleges and nurseries

Information for schools, colleges, and nurseries on the changes to allergen labelling for prepacked for direct sale (PPDS) food, also known as Natasha's Law.

From 1 October 2021 the [requirements for labelling prepacked for direct sale \(PPDS\) food](#) changed across the UK.

Also known as Natasha's Law, this applies to any food business that produces PPDS food, primary and secondary schools, colleges, universities, and nurseries that provide food.

PPDS food is food that is packaged at the same place it is offered or sold to consumers. It is a single item, consisting of the food and its packaging, that is ready for presentation to the consumer before it is ordered or selected.

For food provided within a school setting, this may mean changes to labelling for foods such as pizza or sandwiches which are packaged on the premises before the consumer orders them.

The changes mean that food made and packaged before the consumer orders or selects them, and sold on the same premises (or site where a business operates from more than one location) it is packaged at, will require labelling.

For schools, this may mean changes to labelling for foods such as pizza or sandwiches which are made and packaged on the premises before the consumer orders them.

TIPS

Our [introduction to prepacked for direct sale \(PPDS\) allergen labelling changes](#) provides more information on the requirements food businesses must meet after 1 October 2021.

In this guide you will find examples of PPDS food commonly found in schools, as well as example labels and answers to frequently asked questions from the sector.



Changes to allergen labelling for schools, colleges and nurseries

The changes to labelling requirements helps to 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.

Examples of food that is prepacked for direct sale

Examples of PPDS food that may be provided by schools include:

- fruit pots
- breakfast pots
- boxes of chips or chicken nuggets placed under a hot lamp in anticipation of a lunchtime rush
- packaged sandwiches or salad boxes
- packaged burgers.

Examples of food that is not prepacked for direct sale

PPDS does not include food that is not in packaging. Food placed into packaging or plated at the consumer's request is not PPDS.

This food is not PPDS and can include products such as:

- unpackaged cakes, and unpackaged food behind a glass display counter or in a hot hold cupboard
- meals made or plated to order.

Non-prepacked (loose) food does not require a label and must meet current allergen information requirements for non-prepacked food.

Prepacked food

You may also sell pre-packaged food that was packed by another food business 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. Prepacked food requires a label with a name, ingredients list, allergens and other mandatory details.

We have [further information on labelling prepacked food](#) and the requirements food labels must meet.

TIPS

Use our [allergen and ingredients food labelling tool](#) to check if your school provides PPDS food.

Labelling guidance for schools, colleges and nurseries

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.

Our [labelling guide for prepacked for direct sale food](#) has detailed information on labelling requirements, including the name of the food, type size and precautionary allergen labelling such as 'may contain'.

School packed lunches

PPDS allergen labelling changes only affect food that is packed and sold or offered at your site.

If packed lunches are made on school premises in anticipation of an event, such as a school trip, the allergen information requirements may vary. If the lunches are made and packed to order, these are not prepacked, and are therefore not PPDS.

If, however, the school lunches are made and packed without specific orders from individual children, then these would need to comply with the new PPDS labelling requirements.

If there are multiple items in a packed lunch you will need to provide allergen information for each item. You will need to label each PPDS item individually.

Any prepacked items you have bought from elsewhere (that is food packed at a different location by another business) will already have full ingredients labelling.

Example PPDS food label

Our [labelling guide for PPDS food](#) has detailed information on what to include on a food label, and how to present and produce it.

One example of how the label could look can be found below, but you could choose to present it differently as long as you meet the legal requirements. You must include the name of the food, a full ingredients list and emphasise any of the [14 allergens](#) present in the food.

CHEESE AND PICKLE SANDWICH

Mature Cheddar cheese, pickle and butter in sliced wholemeal bread

INGREDIENTS: Wholemeal bread (wholemeal **wheat** flour, water, **wheat** bran, **wheat** protein, yeast, salt, emulsifiers (mono- and diglycerides of fatty acids, mono- and diacetyl tartaric acid esters of mono- and diglycerides of fatty acids), spirit vinegar, rapeseed oil, flour treatment agent (ascorbic acid), palm fat, 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**).

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 enclosed 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).

Frequently asked questions from schools about PPDS labelling

Where can I find the specific requirements for what to include on a PPDS food label?

Our [labelling guide for prepacked for direct sale food](#) has detailed information on labelling requirements, including naming conventions, type size and precautionary allergen labelling such as 'may contain'.

Do the PPDS changes affect school meals that are plated to order?

No. If you are plating food (not prepacked before the point that it is ordered) there is no need to list ingredients. You must be able to provide information, in writing or orally, on the presence of any allergens in the food you are serving.

Do the PPDS changes affect packed lunches?

PPDS allergen labelling changes only affect food that is packed and sold or offered at your site.

If the lunches are packed to order, these are not prepacked, and are therefore not PPDS.

If, however, the school lunches are packed without specific orders from individual children, then these would need to comply with the new PPDS labelling requirements.

Do the PPDS changes affect school meals ordered by parents on a menu cycle?

This would not be considered PPDS if the food has been ordered before being packaged for the individual. You should continue to make allergen information available to parents and students as you do now.

However, if parents are paying for food in advance and have not made specific orders, the food could be considered PPDS depending on if and how it is packaged before being chosen by a student.

Do the PPDS changes affect prepacked tuck that is provided to younger years pupils by the school?

It is understandable that pupils at the younger end of school may not be able to make informed decisions about the food provided to them and that schools will currently have a safeguarding responsibility in respect of this.

However, the changes to PPDS labelling mean that any food that is packed on the same site before being ordered by the consumer will need to provide PPDS labelling.

Schools may currently manage this through school health records or catering staff who are aware of pupils' allergen requirements.

Do I need to label food wrapped in cling film?

If the food is completely or partially enclosed by cling film or other packaging before it is ordered (and is ready for presentation to the consumer), and the food cannot be altered without opening or changing the packaging, it is PPDS food.

If an item is removed from cling film before it is presented to the consumer then this is not PPDS food. This is non-prepacked food and so allergen information must be provided in some form.

Do I need to label food items if they are sold loose?

Loose food which is not sold in packaging does not require a label. It must meet current allergen information requirements for non-prepacked food.

Do I need to label food if I prepare and wrap food and keep it under a hotlamp before it is ordered?

If you prepack food in anticipation of consumer orders, these products will require PPDS labelling.

Do I need to provide labels for a salad bar or self-service buffet?

If the salad is packaged before being ordered, it would require a PPDS food label. However, if the salad bar is self-service, and the student plates it onto a plate or into a box themselves this is non-prepacked food.

Allergen information for non-prepacked food can be communicated through a variety of means to suit your business model. You are required to provide information about the use of the 14 allergens if they are present in a food. You are not required to provide a full ingredients list.

If I display allergen information on a menu or on our website to inform parents, do I still need to label PPDS food?

Yes, using an allergen information sheet is not a substitute for PPDS food labelling.

PPDS food will still require a full ingredients list and allergen information on the label.

Do hot drinks, such as tea or coffee, require PPDS labelling?

Hot drinks made to order are not PPDS and do not require PPDS labelling.

But if you pour and lid drinks before consumers order them, in anticipation of a rush, the drinks would be PPDS and would need labelling.