

---

# Natasha's Law: Q&A

---

## Definition of PPDS

Within the Food Information (Amendment) Regulations the definition of Pre-Packaged food for Direct Sale is defined as ***food which is prepared and packaged before being offered for sale to the final consumer from the same premises or the same site from that which it is sold***

When breaking down the above definition it is important to understand some of the key words used to help determine if foods are / are not classified as PPDS

## Food

This includes both food and drink consumed by a customer

Alcohol over 1.5% volume does not require full ingredient labelling

## Prepared

Where a catering unit assembles ingredients to make a food item ready for sale (e.g. sandwich or salad), or re-packages food ingredients together into its final state before being offered for sale (e.g. assembling a scone, butter and jam together into packaging)

## Pre-packaged

Food is considered pre-packed when it is put into sealed container or packaging before being offered for sale to the customer which 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 consumer in its current state

Some fast food (Grab & Go) may be considered PPDS where it has been prepared and packed by the unit before being offered for sale in anticipation of an order, for example, a wrapped burger or boxed fried chicken placed under a hot lamp of which the contents cannot be altered without opening the packaging.

---

## Offered for sale

The point at which the customer makes an informed choice to purchase the food. This would also cover 'free' food offered as part of a giveaway or promotional event.

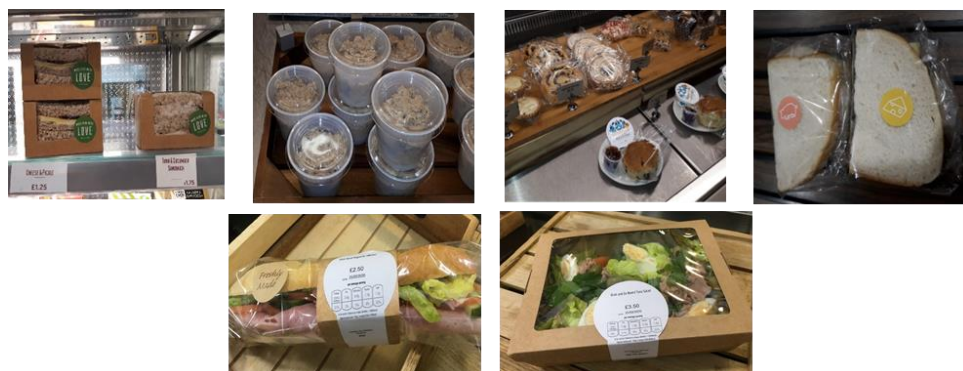
## Premises or site

Under the regulations 'site' refers to a building complex such as a shopping center or airport terminal in which the same food business operates from more than one unit within the building complex.

## Examples of PPDS foods

Only foods which fall under the definition of PPDS will require full ingredient labelling. The list below is not exclusive and is aimed as an example:

- Sandwiches, salads, pasta placed into sealed packaging and sold from the same premises via a retail or vending offer
- In-unit made deserts, fruit pots, jacket potato toppers placed into sealed packaging and sold from the same premises
- Boxed wet dishes pre-prepared, packaged and sold on a 'grab & go' counter
- Foods packed by a food business and sold in its retail units located within the same building complex as the premises where the food was packed – e.g. hospital or university complex, military base or airport terminal
- Cakes, bakery goods and patisseries which are re-packaged into sealed packaging for freshness and quality purposes sold via a retail or café format
- Pre-prepared drinks sealed with a lid made in anticipation of a sale



---

## What does not constitute PPDS foods?

Any food presented to the final consumer not within any packaging, or food packaged at the consumers request **does not** classify as pre-packaged food

The following are examples of food service which do not constitute PPDS

- Open self-service buffets
- Over counter plated or boxed food service
- Restaurant or cafe table service
- Pre-ordered food e.g. hospitality, hampers, takeaway
- Pre-purchased school meals
- Deli bar where customer orders bespoke food product

## Is pre-ordered food included under PPDS?

No. Article 14 of the Food Information for Customers regulations (FIC) states that the requirement for a list of ingredients does not apply to PPDS food sold online.

Food businesses selling food via distant selling will need to ensure that mandatory allergen information is available to the consumer (for free) before they buy the product, in order that they can make an informed choice, and is also presented at the point of delivery or collection.

Any on-line or app based food pre-ordering systems used by a food business will need to clearly present mandatory allergen information upon the ordering platform or signpost the customer to a place where they can easily obtain this information for the food they intend to purchase.

The mandatory allergen information will also need to be presented to the customer at the point of collection or delivery and can be presented in a number of ways:

- By placing stickers on the food container to clearly identify any allergenic ingredients used in that food (e.g. Chicken satay: Contains: wheat, soy, peanut)
- A menu is provided with the order which allows the customer to clearly identify allergenic ingredients in the food.
- Printed allergen information is presented to the customer, by the member of staff which clearly links the written information to each food item.

---

## Where should the label go?

The required label must be easily accessible, in a conspicuous place, easily visible and clearly legible, whereby the information on the label is not hidden, obscured or interrupted by other labels or pictorial matter placed on the packaging.

## Can I hand write a label?

No. The ingredient and allergen information must be accurate and provided in a particular format (i.e. an ingredient string in descending weight order with allergens suitably highlighted in bold) such that any hand written labels may not comply.

## Can I pre-print PPDS food labels?

No. It is strongly advised that pre-printing PPDS food labels in advance of the food being made and sold is not undertaken due to the possibility of ingredient or allergen changes to the food used within the recipe between the time of printing the label and the production of the food.

PPDS food labels should be printed at the point of production and/or packaging of the food intended to be sold.

## What happens if I can-not print a label?

If the unit cannot print Source labels for PPDS foods intending to be sold it must either:

- a) Not sell the food, or
- b) Remove the food from its packaging and sell in an open format.

As an example, selling a cake or bakery goods without packaging on an open plate under a dome cover would not constitute PPDS and not require full labelling.

## Should I not pre-package the food to avoid labelling?

Although the absence of packaging may mean the food does not fall under the scope of the regulations and therefore not require a full ingredient and allergen label, this should not be done at the expense of the risk of contamination of the food due to its absence of packaging.

---

## More Guidance

For more information please contact one of the following:

- **Food Information Regulations & legal definition**  
Chris Moore – HSE Director ([Christopher.moore@compass-group.co.uk](mailto:Christopher.moore@compass-group.co.uk))
- **Compass systems (SAP / Source)**  
Nicola Varney – Head of Systems ([Nicola.varney@compass-group.co.uk](mailto:Nicola.varney@compass-group.co.uk))
- **Compass I.T.**
- **Ian Hughes – I.T. Manager** ([ian.huges@compass-group.co.uk](mailto:ian.huges@compass-group.co.uk))