

Natasha's Law PPDS & Emerging Allergen Control Issues

Monday 6 September 2021

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1



Top London restaurant goes gluten and dairy free... and no one notices

Could you tell the difference? By Laura Edwards @lauraedwards 12 November 2015



Amazing Silver Wedding Anniversary

"We booked for a night here on the first day they reopened to celebrate our anniversary. Everyone at the hotel were so friendly and great, we couldn't fault anything. They upgraded us to the magnificent Dome Suite and we had treats to make our day so special. The lounge is beautiful, with delicious cocktails. We booked a spa treatment each, which was so relaxing and along with everything else, perfect. Dinner at Indigo restaurant was great, as was breakfast, being Coeliac it is nice to go somewhere and not to worry about being gluten free. Indigo is totally gluten and dairy free, but still the highest quality. Thank you to everyone for making our Silver Wedding Anniversary so special."

ONEALDWYCH LONDON

- 25% increase in 1st year
- 10% Y on Y increase
- Customer loyalty
- Recommendation



The executive chef at one of London's top restaurants has revealed how he made his à la carte lunch and dinner menus gluten and dairy free months ago – and nobody has noticed.

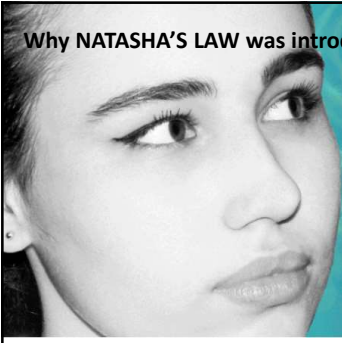



2

Why NATASHA'S LAW was introduced

Pret allergy death: parents describe final moments with their daughter

Natasha Ednan-Laperouse, 11, died after suffering an allergic reaction to a baguette








3

How did change happen?

A consultation took place in 2019 on labelling of foods which are 'prepacked for direct sale food' (PPDS)






Law from 1 October 2021
England, Wales & Scotland

Consultation on amending allergen information provisions contained within domestic food information legislation for food prepacked for direct sale
 January 2019

THE CATERER

Natasha's Law enacted in parliament requiring full labelling of pre-packed food

10 September 2019 by Emma Lake

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Current allergen labelling – PPDS

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Examples






See the FSA's [Food Allergen Labelling & Information: Technical Guidance](#) for more information

Changes from 1 October 2021
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5

The 14 Specified Allergens

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❖ 14 allergens specified in EU FIC regulations which have to be indicated in both prepared and pre-packaged foods

✓ Cereals containing Gluten	✓ Soy and Soybeans
✓ Crustaceans	✓ Milk
✓ Molluscs	✓ Celery
✓ Eggs	✓ Mustard
✓ Fish	✓ Sesame
✓ Peanuts	✓ Lupin
✓ Nuts (Tree)	✓ Sulphur Dioxide



True allergens are protein based and cannot be destroyed by cooking, washing or sanitizers

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6

What is pre-packed for direct sale [PPDS]

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Food that is packed before being offered for sale by the same food business to the final consumer:

- on the same premises; or
- on the same site*; or
- on other premises if the food is offered for sale from a moveable and/or temporary premises (such as marquees, market stalls, mobile sales vehicles) if the food is offered for sale by the same food business who packed it
- it does not include food packed at a consumer's request, food not in packaging or food in packaging that can be altered without opening or changing the packaging

**In this instance 'site' refers to a building complex such as a shopping centre or airport terminal in which the same food business operates from more than one unit within the building complex.*

See the FSA's [Food Allergen Labelling & Information: Technical Guidance](#) for more information

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What is pre-packed for direct sale [PPDS]

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Foods Considered PPDS

- Food which is fully or partly enclosed by packing
 - When the contents cannot be altered without opening or changing the packaging
- Food is a single item consisting of food and its packaging that is ready for final sale

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8

Example – cheese & pickle sandwich

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Name of the food

- Must be descriptive and inform the customer of the true nature of the food
- Customary names which are commonly understood can be used, such as 'BLT sandwich'
- Where names are prescribed in law they must be used. This mainly applies to food containing certain seafood, fish and meat ingredients.

CHEESE AND PICKLE SANDWICH
Mature Cheddar cheese, pickle and butter in sliced malted bread

INGREDIENTS: Malted bread (fortified wheat flour (wheat flour, calcium carbonate, iron, niacin, thiamin), water, malted wheat flakes, wheat bran, wheat protein, yeast, malted barley flour, salt, emulsifiers (mono- and diglycerides of fatty acids), mono- and diacyl tartaric acid esters of mono- and diglycerides of fatty acids), spirit vinegar, malted wheat flour, rapeseed oil, flour treatment agent (ascorbic acid), palm oil, wheat flour, palm oil, wheat starch), mature Cheddar cheese (milk), pickle (carrots, sugar, seeds, onion, barley malt vinegar, water, spirit vinegar, apple pulp, dices, salt, modified maize starch, rice flour, colour (sulphite ammonia caramel), onion powder, concentrated lemon juice, spices, spice and herb extracts), butter (milk).

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Example – cheese & pickle sandwich

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Ingredients

- The list of ingredients shall be headed by a suitable heading which consists of or includes the word **'ingredients'**
- It shall include **all the ingredients of the food**, in **descending order of weight**, as recorded at the time of their use in the manufacture of the food
- If the product contains any of the **14 allergens** they must be clearly **highlighted** on the listed ingredients
- They can be in **bold** type, CAPITAL letters, **contrasting colours** or **underlined**. Alternative allergen statements, such as 'Contains: wheat, egg and milk' are not permitted.

CHEESE AND PICKLE SANDWICH

Mature Cheddar cheese, pickle and butter in sliced malted bread

INGREDIENTS: Malted bread (fortified wheat flour (wheat flour, calcium carbonate, iron, niacin, thiamin), water, malted wheat flakes, wheat bran, wheat protein, yeast, malted barley flour, salt, emulsifiers (mono- and diglycerides of fatty acids, mono- and diglycerides of fatty acids), spirit vinegar, malted wheat flour, rapeseed oil, flour treatment agent (ascorbic acid), palm fat, wheat flour, palm oil, wheat starch), mature Cheddar cheese (milk), pickle (carrots, sugar, swede, onion, barley malt vinegar, water, spirit vinegar, apple pulp, citric acid, modified maize starch, rice flour, colour (edible ammonium carboxymethyl cellulose), concentrated lemon juice, spices, spice and herb extracts), butter (milk).

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Labelling

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How labels are presented

- The **information must appear** on the package or on a label attached to the package
- Must be **easily visible and clearly legible**
- On the **outside of the product** and **not obscured** in any way
- Must **not be difficult to read** due to poor lettering or colour contrast
- The ingredient list has to be a **minimum font size where x-height is 1.2mm** or more. If products have a packaging surface less than 80 cm², in which case the x-height can be reduced to 0.9mm
- Labels can be **handwritten as long as they meet the requirements of being easily visible and clearly legible**

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Labelling

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Printed Labels

There are multiple options for a business to consider when deciding how to label PPDS products.

- Software solutions or labelling programmes** with printers could be used as well as pre-printed packaging
- Businesses may want to **proactively plan for any incidents** such as malfunctions, taking account of their particular business model. For example, they may wish to **consider having some pre-printed labels** to use in these circumstances that accurately describe the allergens and ingredients.

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How do you know your food is PPDS?

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Decision Tree

1. Is the food presented to the customer in packaging?

2. Is it packaged before the customer selects or orders it?

3. Is it packaged at the same place it is sold?

If all three answers are "Yes", food will require PPDS labelling.

Food Standards Agency

The FSA have an [Allergen & Ingredients Food Labelling Decision Tool](#) on their website help you to identify the type of food your business provides and the allergen labelling requirements.

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Definitions

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Prepacked food	Prepacked for direct sale (PPDS) food	Non-prepacked food
Food packed by one business and supplied to another business or packed by the same business at different site.	Food which is packaged at the same place it is offered or sold to consumers and is in this packaging before it is ordered or selected.	Any food that is not in packaging or is packaged after being ordered by the consumer.

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PPDS options

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From 1 October

Pre- 1 October

No lid

Labelled

Non-prepacked food Standard

Plated

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Examples of PPDS foods

- Sandwiches packaged by the food business and sold or offered from the same premises.
- Fast food which is wrapped or packaged before a customer selects or orders it.
- Bakery products which are packaged before a customer selects them.
- Supermarket products which are produced and packaged in store, such as pizzas, rotisserie chicken, pre-weighed and packed cheese and meats and baked products.



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Food that is NOT PPDS

- Food not in packaging (loose).
- Pre packed food (packaged at a different premises).
- Food packaged at the customer's request.
- Distance sales (e.g. foods ordered online).



Unsealed or sealed ?

16

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Delicatessen products

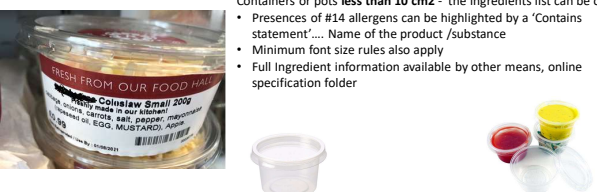


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Small pots



Containers or pots **less than 10 cm²** - the ingredients list can be omitted

- Presences of #14 allergens can be highlighted by a 'Contains statement' Name of the product /substance
- Minimum font size rules also apply
- Full ingredient information available by other means, online specification folder

Where an ingredient list is supplied on the product/ substance the addition of **'Contains Statement'** is not permissible on PPDS labelling

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Spot the error

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Distance selling

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The new labelling requirements **DO NOT** apply to PPDS food sold by means of **distance selling**, such as food that is **purchased through telephone/internet**.

Businesses selling PPDS food this way will need to ensure that mandatory allergen information is available to the consumer **before they purchase** the product and also at the **time of delivery**.

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Summary

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Foods packed by a food business to be sold in its retail units located within the same building complex as the premises where the food was packed such as a train station, hospital, university or holiday park.

Sandwiches placed into packaging by the food business and sold from the same premises.

Foods packaged and then taken by the same operator to their market stall to sell.

A café giving away packaged samples of a new range of cakes they have made on the same premises.

A butcher who makes burgers or sausages which are prepacked to be sold on the same premises.

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Resources to help with the PPDS changes Chartered Institute of Environmental Health



Food allergen labelling and information requirements
Technical Guidance
Published: June 2021

Welcome to the Food Standards Agency's **Food labelling e-learning course**

This e-learning course has been developed by the Food Standards Agency with the Department for Environment, Food & Rural Affairs (Defra) and the Department of Health. It will provide you with a general understanding of current food labelling legislation. Modules can be completed in any order.

<https://labellingtraining.food.gov.uk>

<https://allergytraining.food.gov.uk/>

Welcome to the Food Standards Agency's food allergy online training

Study the modules and pass the tests to get a continuing professional development (CPD) certificate. This training has been developed by the Agency for enforcement officers, however, it will also be of interest to other food business operators who are involved in ensuring the production of food or anyone wanting to learn more about food allergies.

Step 1: Study the modules
There are six modules to study, each with a test. These modules cover:

- Module 1:** General and mandatory labelling requirements
- Module 2:** The allergens that allergen have to be listed
- Module 3:** Consideration of allergen in the supply chain
- Module 4:** How allergen ingredients should be displayed on the label
- Module 5:** Handling of allergen in a workplace of food business
- Module 6:** How food businesses should be prepared to respond to allergen-related incidents

Step 2: Register and complete the tests
Once you have registered and are logged into the site you will be able to access the tests, either by clicking on the banner at the bottom of each module page or via your CPD dashboard.

See the FSA's [Food Allergen Labelling & Information: Technical Guidance](https://foodallergyaware.co.uk/resources/food-standard-agency/) for more information

Links Accessible via
<https://foodallergyaware.co.uk/resources/food-standard-agency/>

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22

Why NATASHA'S LAW was introduced

Pret allergy death: parents describe final moments with their daughter

Natasha Edmon-Laperriere, 15, died after suffering an allergic reaction to a baguette



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Emerging Allergen Control Issues - Near Miss Reporting

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Poll

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Should an App be created to facilitate the capture of information from customers who wish to report allergen issues at a venue?

- Yes the information should be captured **centrally (UK)**
- Yes -the information should be captured **locally to help EHO/EHP /TS** to manage local issues
- No- it should not exist as it could be misused
- No - It would involve too much admin and make workload unmanageable

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25

Airline vs Hospitality

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Top London restaurant goes gluten and dairy free...and no one notices
Could you tell the difference? @FoodAllergyAware2021 @FoodAllergyAware2021



The restaurant is one of London's top restaurants and has been awarded the Michelin star for three years. The chef is a food allergy expert and has been helping customers with allergies for years. The restaurant is a great example of how to handle food allergies and ensure a safe dining experience.

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Near miss reporting

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A near miss is an undesired event that, under slightly different circumstances, could have resulted in harm to people or damage to property, materials or the environment.

Good health and safety management requires monitoring of your health and safety performance. Reporting of near misses can reduce accidents and improve safety.

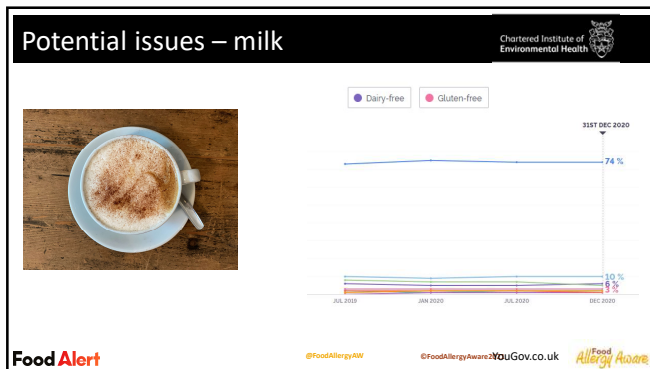
Research has shown that for every 90 near misses an accident will occur. The ultimate goal of near miss reporting is to address the incident, and take action to prevent recurrence and remove the potential of an accident.

(Haspod.com)

What Hospitality can learn from ACE

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27



28

HACCP - Hazard Analysis and Critical Control Point

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HAZARD
Anything with the potential to cause harm e.g., cross contamination

RISK
The likelihood that something will cause harm

CONTROL MEASURES
Actions or activities required to prevent or eliminate a food safety hazard or reduce it to a safe or acceptable level

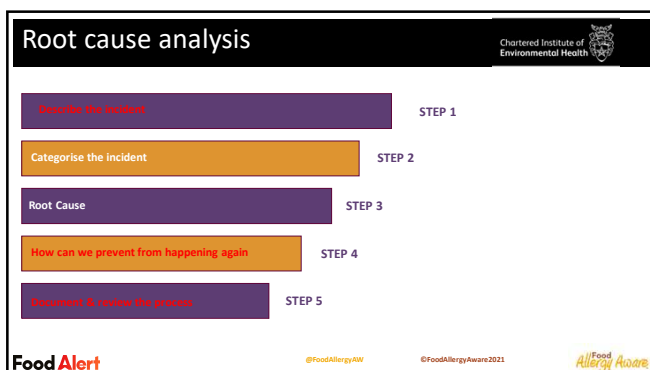
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29



30

Root cause analysis – training Chartered Institute of Environmental Health



<https://rcatraining.food.gov.uk/#home>

FREE - ONLINE



An introduction to Root Cause Analysis Course

Welcome to this online learning experience!

Please select the right course for you:

For Enforcement Authorities For Food Businesses

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34

What can you do when you spot an issue? Chartered Institute of Environmental Health

Mention it to the venue?

- Will they listen
- Will they take action and make changes
- Will they think you are not experienced

More often than not they will probably ignore you

- Why should they make a change
- Resent the interference <https://www.hse.gov.uk/pubns/books/hsg245.htm>

Investigating accidents and incidents
A workbook for employers, unions, safety representatives and safety professionals

Investigating accidents and incidents is a workbook for employers, unions, safety representatives and safety professionals. It provides a structured approach to investigating accidents and incidents, and includes a checklist for employers to use when investigating accidents and incidents.

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35

What can you do when you spot an issue Chartered Institute of Environmental Health

Would you welcome an **accredited scheme** where verified trainers / consultants can register and can show a card which verifies their knowledge?

Would you welcome a reporting scheme / central data base / App where you can register the issue for the LA to manage as appropriate.

Would you be prepared to do this voluntarily? Not as a sales pitch!

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36

Poll
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Would you welcome an **accredited scheme** where as a verified trainer / consultant you register and can show a card which verifies your knowledge when out and about?

- Yes I would be keen to get involved – voluntary to just report
- Yes I would be keen to get involved – be paid to follow up
- No I would not feel comfortable reporting in social setting

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#NearMissReporting Campaign 4Q21
Chartered Institute of Environmental Health

We are looking for supporters of our
#NearMissReporting Campaign
After the roll out of Natasha's Law in 4Q21

Will you support?

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**Bitesize training:
food allergen precautionary
advice and labels**
7 September
10 October
Book now

**Bitesize training:
food allergen enforcement
and compliance**
19 September
19 October
9 November
Book now

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39
