

The Natasha's Law User Guide

Getting Your Business Natasha's Law-Ready

By Planglow in partnership
with the Food Standards Agency (FSA)

Are you prepared for Natasha's Law? This October, new labelling laws will come into effect to help better safeguard people with food hypersensitivity (food allergies, intolerances or coeliac disease) which could mean big changes to your business and the ways in which you label your food and drink products. Working in partnership with the FSA, we've put together this guide to provide you with everything you might need ahead of the autumn deadline. In it you will find:

- What the law is and its impact on you
- How to manage allergens
- What to include on a PPDS label
- Getting your labelling up and running including possible pitfalls along the way
- How to print your own labels
- Additional resources including: How to print your own labels & FAQs

Plus plenty of tips and resources along the way...



Natasha's Law: Who, What, Why and When

On 1st October 2021, Natasha's Law will become just that. If you offer PPDS food or drink items then you'll need to include the name of the food plus a full ingredient declaration on pack with allergens highlighted in bold. Working in partnership with the FSA, we've put together this guide to provide you with everything you might need ahead of the autumn deadline.

What is PPDS?

(FSA) Prepacked for direct sale or PPDS is 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.

It can include food that consumers select themselves (e.g. from a display unit), as well as products kept behind a counter and some food sold at mobile or temporary outlets.

Who Does it Apply To?

(FSA) Food businesses packing their food products on site to sell to consumers. Prepacked for direct sale (PPDS) food can include the following:

- Sandwiches and bakery products which are packed on site before a consumer selects or orders them
- Fast food packed before it is ordered, such as a burger under a hot lamp where the food cannot be altered without opening the packaging
- Products which are prepackaged on site ready for sale, such as pizzas, rotisserie chicken, salads and pasta pots

Who Does it Apply To?

- Burgers and sausages prepackaged by a butcher on the premises ready for sale to consumers
- Samples of cookies given to consumers for free which were packed on site
- Foods packaged and then sold elsewhere by the same operator at a market stall or mobile site
- PPDS food provided in schools, care homes or hospitals and other similar settings will also require labelling

What About Take Away, Delivery, Plated Meals & Made to Order?

(FSA) Food that isn't PPDS

Any food that is not in packaging or is packaged after being ordered by the consumer. These are types of non-prepacked food and do not require a label with name, ingredients and allergens emphasised. Allergen information must still be provided but this can be done through other means, including orally.

What about food packed by one business and supplied to another business

This is prepacked food and already must have full labelling, including the name of the food and a full ingredients list, with allergenic ingredients emphasised within it.

What About Distance Selling?

Check if your business sells PPDS food with the FSA allergen and ingredients food labelling tool

The new labelling requirements do not apply to PPDS food sold by means of distance selling, such as food that can be purchased over the phone or on the 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 moment of delivery.

You must provide allergen information:

- before the purchase of the food is completed - this can be in writing (on a website, catalogue or menu) or orally (by phone)
- when the food is delivered - this can be in writing (allergen stickers on food or an enclosed copy of a menu) or orally (by phone)

Allergen information should be available to a customer in written form at a point between a customer placing the order and taking delivery of it.

Takeaway meals should be labelled clearly so customers know which dishes are suitable for those with an allergy.

<https://www.food.gov.uk/allergen-ingredients-food-labelling-decision-tool>

When Will the Legislation Come Into Force?

From 1 October 2021, the requirements for prepacked for direct sale (PPDS) food labelling will change in Wales, England, and Northern Ireland.

What About Scotland?

From the 1 October 2021, Scottish food and drink providers are also required by law, to include the product name, full ingredients list (including allergen information) on PPDS items.

Allergen Management

Risk assessments, best practice, staff training... what first? Well it might sound obvious but start at the beginning: it's a case of tracking each allergen's movements through your business from its point of entry to departure putting any new practices into place you might require along the way. Simply follow the seven 'S's':

Nutritional Information	
Typical Values	Per 100g
Energy	265 kcal
Fat	12.1g
of which Saturates	2.5g
Carbohydrate	26.0g
of which Sugars	1.1g
Fibre	1.8g
Protein	12.2g
Salt	1.4g

Ingredients: Brown Bread With **Oatmeal**, Mayonnaise, Red Leicester Cheese (with **Milk**), Cheddar Cheese (with **Milk**), Colour: Annatto (**Milk**), Cheddar Cheese (with **Milk**), Niacin, Thiamin, Water, **Oatmeal**, **Wheat** Bran, Flour (Wheat) Flour, Calcium Carbonate, Iron, Yeast, Salt, Emulsifiers (Mono- and Di-Acetyltartaric Esters of Mono- and Di-Glycerides of Fatty Acids), **Wheat** Protein, Spirit Vinegar, Vegetable Oil (Rapeseed Oil, Palm Oil), Malted **Barley** Flour, Flour Treatment Agent (Ascorbic Acid), Mayonnaise contains: Rapeseed Oil, Water, Egg, Cornflour, Spirit Vinegar, Sugar, Salt. For allergens, see ingredients in bold.

University Hospitals **NHS**
of Morecambe Bay
NHS Foundation Trust

Cheese & Tomato

Each 100g serving contains

Energy	Fat	Saturates	Sugar	Salt
1212 kJ 521 kcal	21g High	6g Med	6g Low	2.9g High
26%	29%	31%	6%	48%

Reference intake of any average adult (8400kJ/2000kcal)

Use By: 30.06.17

£1.80

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Source

Are you familiar with the 14 allergens cited in Natasha's Law? Are your staff? Get to know the allergens themselves then identify those entering your business. Unless you grow produce onsite, suppliers will be your first port of call so thoroughly check and verify all deliveries received and remain extra vigilant with substitutions and May Contain' items.



Store

Assess the risk of cross contamination, both where produce is stored and on it's flight path to prep areas - breakages from transit, the storage itself or even human error - minimise risk wherever possible and create a formal plan of action to tackle cross contamination should it ever occur.



Spaces & Spoons

Have you assigned dedicated equipment or prep areas in your kitchen for allergens? While this will not be an option for many businesses, separating resources wherever possible will help to minimise risk. Whatever your setup, develop procedures to help safeguard your kitchen and prevent cross contamination - especially where spaces and equipment are shared.



Scrub

Utilise cleaning and hygiene best practices across your entire business - thoroughly clean and disinfect wherever appropriate and use disposable materials (such as blue roll) for countertop spillages to further reduce the chances of cross contamination.



Staff

Operate regular, accountable (documented) staff training to ensure: every member of staff knows exactly what's in your products and how they have been prepared; to ask every customer about allergies and intolerances. Furthermore, encourage employee engagement regarding allergens to ensure the safest, most efficient environment for everyone.



Safeguard

regularly review your allergen practices to maintain diligence and streamline wherever possible.

What to Include On a PPDS Label

Coronation Chicken

Cooked chicken breast pieces in a seasoned mayonnaise with mango chutney, apricot, sultanas and spices.

INGREDIENTS: Chicken Breast, Water, Rapeseed Oil, Mango Chutney [Mango, Sugar, Salt, Acidity Regulator (Acetic Acid), Water, Ginger, Chilli], Apricot [Apricot, Rice Flour, Preservative (**Sulphur Dioxide**)], Sultanas, Cornflour (**Sulphites**), Pasteurised **Egg** Yolk, Salt, Spirit Vinegar, Sugar, White Wine Vinegar (**Sulphites**), **Mustard** Seed, Coriander, Cumin, Tomato Paste, Paprika, Fenugreek, Cayenne Pepper, Turmeric, Stabiliser (Pectin), Sunflower Oil, Gram Flour, Cinnamon, Acidity Regulator (Citric Acid), Cardamom, Lemon Juice from Concentrate, Clove.

Allergy Information
For allergens, see ingredients in **bold**.

(FSA) The label for PPDS food will need to show:

- the name of the food
- an ingredients list
- any of the 14 allergens emphasised in the ingredients list, if these are present in the food.

These criteria need to be displayed in line with the legal requirements that apply to naming the food and listing ingredients, as per food law.

Please see the FSA guide here for further information:

<https://www.food.gov.uk/business-guidance/labelling-guidance-for-prepacked-for-direct-sale-ppds-food-products>

How Does the Ingredient List Need to Be Presented?

(FSA) The list of ingredients must be headed or preceded by a suitable heading which consists of, or includes, the word 'ingredients'. The ingredients used must be listed in descending order of weight at the time the product was made. The allergenic ingredients within the food must be emphasised every time they appear in the ingredients list.

INGREDIENTS: Malted Wheatgrain Bread (55.56%) (80g) **WHEAT** flour (with added calcium, iron, niacin and thiamine), water, malted **WHEAT** grains (7.5%), yeast, **Barley** malt flour, salt, toasted **WHEAT**, **WHEAT** GLUTEN, emulsifier: E472e, sugar, **SOYA** flour, preservative: E282, buckwheat flour, rapeseed oil, flour treatment agent: E300 Mature Cheddar (27.78%) (40g) (**MILK**, starter culture, vegetable rennet, colour: E160b; salt, E509) Sandwich Pickle (13.89%) (20g) onions, carrots, rutabaga, cauliflower, marrow, gherkins, sugar, **BARLEY** malt vinegar, spirit vinegar, salt, chopped dates, apple pulp (apple, preservative: SODIUM METABISULPHITE, tomato paste, dried spices, lemon juice concentrate, onion powder, colour (SULPHITE ammonia caramel), flavouring Spread (2.78%) (4g) Vegetable oils (rapeseed-, palm-, coconut-, sunflower oil), water, reconstituted **BUTTERMILK**, 1% salt, emulsifier: mono- and diglycerides of fatty acids, wheypowder (**MILK**), preservative: potassium sorbate, acid: citric acid, flavouring, colour: beta carotene, vitamins: A, D.

Allergy Information: For allergens, see ingredients in **bold**.

Getting Your Labelling Up & Running

1. Decide How You Are Going to Capture the Information

- Determine how you are going to capture the ingredient and allergen information for your products and print this onto a label
- Create recipes for each product - including the quantities - so that the ingredient declaration is in descending weight order
- Review any existing software to make sure it meets your needs both now and in the future
- In terms of printing, some solutions require you to invest in specialist label printing machines. Consider the costs of these - especially if you want to have a backup printing solution

Getting Your Labelling Up & Running

2. Review Your PPDS Products

- Identify all of your products considered to be PPDS and look at how they are packaged
- Determine each container shape and your smallest size pack requiring a label
- Create your 'worst case' ingredients list - eg. a coronation chicken sandwich with lots of compound ingredients
- Review the available label templates with your labelling supplier and assign the shape that fits :
 - your worst case ingredients
 - And works across your other products to minimise the number of labels you need to stock

Getting Your Labelling Up & Running

3. Possible Pitfalls:

Below are some danger zones & contingency plans to consider...

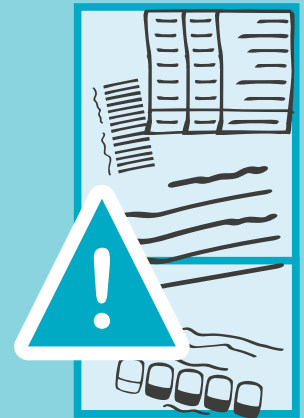
Technical malfunctions

- Do you have a back up printer should your printer fail?
- Are you able to access your labelling program and data from any device or do you require back up equipment as well?



Layout and font size issues

- Does the font size meet the legal requirements?
- Is the layout correct and can you use predefined templates?



Getting Your Labelling Up & Running

3. Possible Pitfalls Continued:

Future proofing

- What happens if there is a compliance change?
- How easily can you change your labels fonts, fields, label templates etc.
- Businesses with 250+ employees will soon have to include calorie information on pack
 - How easy is this to implement and roll out with your current system?



Getting Your Labelling Up & Running

3. Possible Pitfalls Continued:

Risks with the data itself

- Are any of the ingredients missing or not broken down correctly?
- What if a member of the team doesn't follow the recipe or uses a different product?
- What if the ingredients haven't been entered correctly or there has been an ingredient or recipe change that hasn't been reflected in the label data?
- Could members of the team confuse which labels are for which PPDS items?

Any of these failures could result in allergen information being missed from the labelling. Automation can help reduce these risks however there is still a responsibility for the caterer to have robust systems in place to ensure the accuracy of the data.

How to Print Your Own Labels

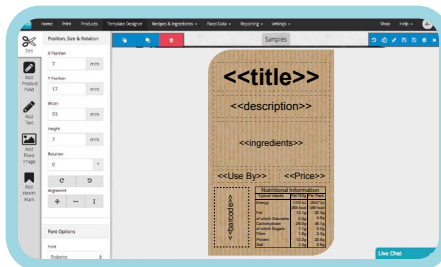
Planglow's multi-award winning labelling app - LabelLogic Live - is here to help



1

Create Labels Online

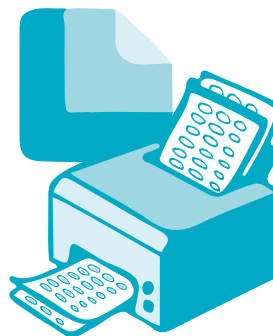
Using any internet connected device such as your computer, laptop, tablet or mobile phone



2

Add Product Information

From price to full ingredients declarations and barcodes, you can also highlight allergens in bold



3

Print With a Home/Office Printer

Print sheet labels with a standard desktop printer. Roll labels are also available (roll printer required)



4

Easy Legal Labelling

Simple, legally compliant labelling ahead of Natasha's Law and any further changes that might come

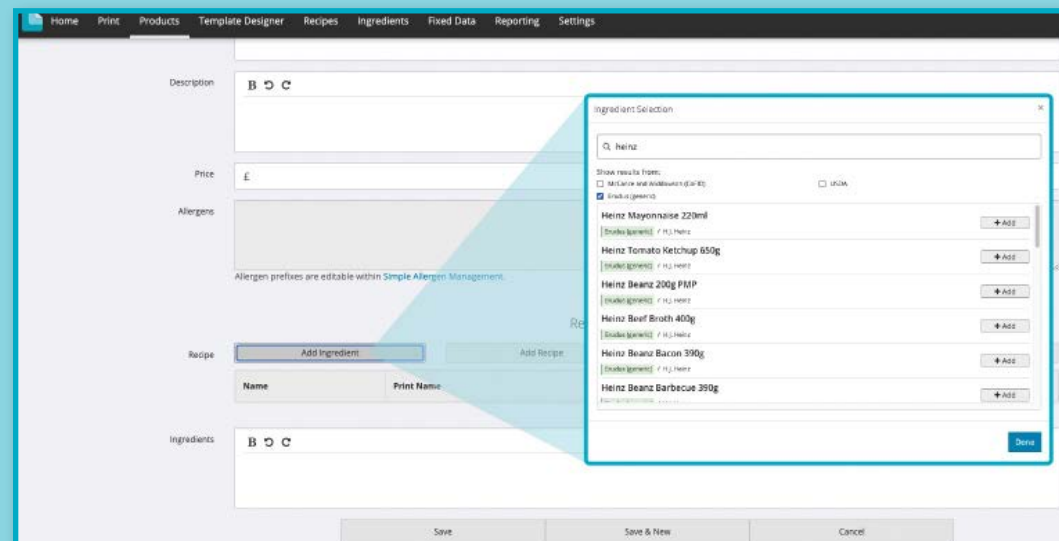
Will I Have to Enter All My Product Data Manually?

With LabelLogic Live you can add nutritional data - including the full ingredients declaration and allergens in bold from thousands of branded items - directly to your food labelling, utilising the built in Erudus database. That's a whopping 42,000+ branded products from 800 manufacturers and 140 regional and national wholesalers right there at your fingertips.



erudus
United around food data

Please contact support@planglow.com
to access your wholesaler's data



Synching With 3rd Party Recipe Platforms

If you already use a 3rd party recipe management system you will be pleased to know that we have integrations with all of the leading providers to ensure seamless data integration and compliance with latest legislation. We are delighted to be working in partnership with the following organisations:



Please contact Support@planglow.com to find out how to access your data from your recipe management system.

Industry Leading Support

- Free technical support on hand to help with upgrades, maintenance, changes and to offer advice
 - Contactable through: phone, email or live chat
- Detailed video tutorials that can be accessed through our LabelLogic Live website or Planglow YouTube channel
- Dedicated account managers
- Beginner's set up guide available upon request



Our Amazing Features

Planglow



No need to install

Web-based for your convenience



User-Friendly

Our label software saves you time



Multi-Platform

Works on any device, anywhere



Comply With Food Law

Automatic updates in line with labelling legislation



Auto Allergens

Auto Allergens detects and highlights allergens



Recipe Nutritional Labelling

Easy to use Recipe Builder



Erudus Database

Access to over 42,000 branded products and over 140 wholesaler ingredients



Software Speed

Our Labelling software is the fastest on the market



Low Cost Solution

All you need is a box of labels and a subscription to the app

www.labellogiclive.com

Additional Resources

Visit Our YouTube Channel For:

- Our Natasha's Law Labelling Masterclass
- Tutorials including
 - Getting Your Labelling Natasha's Law-Ready
 - Print User Tutorial
 - Creating Templates

And much, much more: youtube.com/planglow

FAQs

Working with the Food Standards Agency (FSA), we tackled some of the most commonly asked Natasha's Law queries. You can read these at our blog: planglow.com/blog

Our Experts:



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Want To Get Started?

Get in contact, we're here to help:
call on 0117 317 8600 or email us at info@planglow.com