

Prepacked for direct sale (PPDS) Food – Our Approach

What is Prepacked for direct sale (PPDS) food?

From the 1st October 2021 the allergen law is changing (Natasha’s Law). All ‘prepacked for direct sale’ (PPDS) food must be labelled with the name of the food, a full ingredient list in weight order, with top 14 allergenic ingredients emphasised within the list each time they appear. This brings the provision of allergen information in line with labelling for prepacked food.

To enable a smooth transition to the new legislation we’re implementing this change in all of our businesses from 1st September 2021. From this date we are required to identify any foods which are prepared, packaged, and sold at our sites as PPDS. These foods must be labelled in line with our updated company policy and the new label requirements, which means all PPDS foods must have a label which provides;

1. The name of the product
2. A list of ingredients, in weight order highlighting the 14 known allergens. The list must be prefixed by the word **INGREDIENTS**.

What has changed?

Previously, food businesses could provide mandatory allergen information for PPDS foods by any means. This new legislation means we must label PPDS food. To support this change in legislation, we have updated our Allergen policy and procedures which has been provided to all sites and offices. Our updated Food Safety Policy which includes a detailed procedures to manage food safety including allergens as well as a register for recording information have been reviewed by our Primary Authority and have received assured advice.

What is our approach?

We have ensured that these requirements can be met by working collaboratively with key internal expertise from our teams in Dietetics, Health & Safety, Food Team, Digital and purchasing as well as our Primary Authority. We have developed PPDS menus suitable for our business and used digital solutions to enable sites to print product specific labelling. Under the new legislation, where we cannot produce a company approved PPDS label, we cannot sell PPDS food. Where this is not possible, we will provide a prepacked or deli style food offering or a distance selling approach, such as online via an APP. In all cases allergen information is available to our customers

We have developed PPDS specific eLearning which was auto allocated to all operational colleagues and support teams in August as well as a target communications campaign, to create awareness. We have also produced recorded webinars with Q&A as well as a FAQ document and video recording.

In our education sites we have;

Agreed no PPDS requirements in primary education and defined our approach in secondary and further education sites which do sell PPDS food;

- Defined our product range, to include all grab and go and all other items pre-packed ready for sale
- Worked with core supply partners and purchasing teams to ensure accurate ingredient data uploads to StarChef
- Created PPDS specific menu items in our recipe management system StarChef
- Implemented our updated Allergens policy
- Trained our colleagues

Where sites cannot print PPDS labels then they must not serve PPDS food and must alter the style of offer, for example use of bought in prepacked products or a deli style service.

How will we validate implementation?

We already undertake food safety audits with a third party food safety consultancy in all of our sites to ensure our food safety standards remain robust. From 1st September, we will include PPDS within our audit scope. Sites and Operations Managers are also required to carry out daily briefings and checks.

