



Natasha's Law – What does it mean for food businesses?

Sarah Howarth: FIFST C.Sci., FRSPH



Agenda

- Background
- What is Natasha's Law?
- Impact for businesses
- Future considerations





Background



- Evidence that food allergy and intolerance is on the rise
- On average, 2 children per school class will have a food allergy
- 10 people each year die in England and Wales as a result of having a food allergy.
- Food hypersensitivity is responsible for more hospitalisations each year than foodborne disease.





Grim Statistics

Food Allergy Deaths in 2021:

Cason Hallwood, 12, Dies from Suspected Anaphylaxis on Christmas Day. <u>Full Story</u>

Food Allergy Deaths in 2020:

Alexandra Erokhova, 25, passed away after suffering a reaction to a dessert at her wedding. Full Story

Nick Kelly, 16, passed away after suffering a suspected allergic reaction to takeaway. <u>Full Story</u>

Alexander Hall, 37, dies from an undiagnosed fish allergy after dining with his wife. Full Story & Full Story

Tom Morton (age unknown), suffered from an anaphylactic reaction to food and passed away. Full Story



Natasha's Law

- Impacts PPDS (Pre Packed for Direct Sale) foods
- Ingredient declaration will need to follow the rules for packaged goods
- Comes into force on 1st
 October 2021







What are PPDS foods?

Definition: "Food that is packed <u>BEFORE</u> 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 offered for sale from a moveable and / or temporary premises (e.g. mobile vans, market stalls) if offered for sale by the same food business who packed it."
- It <u>does not</u> include food packed at the customers request, food not in packaging or packaged food not packed as described above known as packaged food.



An example of PPDS from an in-store bakery









Prepacked food v PPDS

Packaged in a different location by the same or a different business



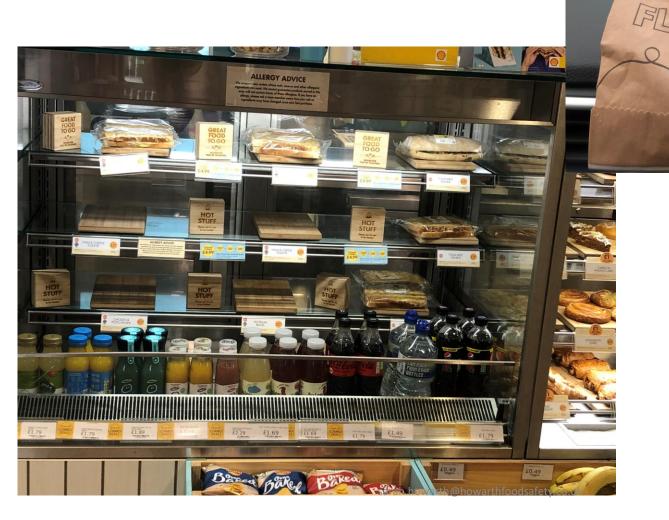
Packaged on site by the same business







More examples of PPDS





deli by Shell Bacon & Cheese Bap

> Use By: 19/04/2021 09:42

> > ESC Group BS27 3EB



Natasha's Law

Due to come into effect on 1st October 2021

All PPDS food must have on the package or on a label attached to the package:

- The name of the food and
- An ingredients list emphasising allergenic ingredients.

The ingredients list must follow the same rules as packaged goods with an **emphasis of allergenic ingredients** each time they appear in the list.





Current PPDS labelling



- Name
- Allergens (EU14)
- Quid (meat products)
- Any special warnings





Future PPDS labelling



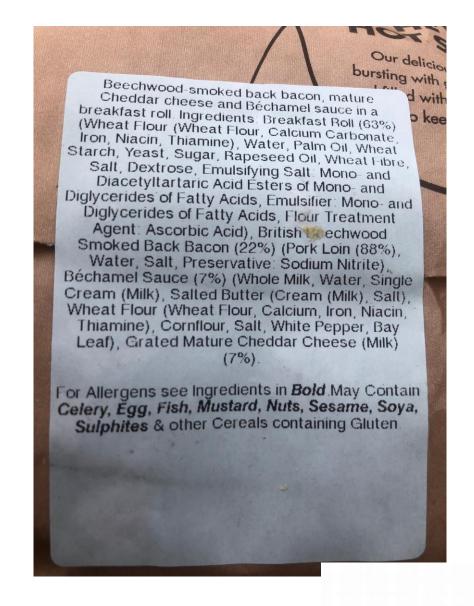
- Name
- Allergens (EU14)
- Quid (meat products)
- Any special warnings
- Full ingredients list to be added





An example of PPDS food full ingredient labelling – Can you spot the mistake?









An example of PPDS food full ingredient labelling – Allergens have not be bold typed in the ingredients list



bursting with Beechwood-smoked back bacon, mature Cheddar cheese and Béchamel sauce in a breakfast roll. Ingredients: Breakfast Roll (63%) o kee (Wheat Flour (Wheat Flour, Calcium Carbonate, Iron, Niacin, Thiamine), Water, Palm Oil, Wheat Starch, Yeast, Sugar, Rapeseed Oil, Wheat Fibre, Salt, Dextrose, Emulsifying Salt: Mono- and Diacetyltartaric Acid Esters of Mono- and Diglycerides of Fatty Acids, Emulsifier: Mono- and Diglycerides of Fatty Acids, Flour Treatment Agent: Ascorbic Acid), British (echwood) Smoked Back Bacon (22%) (Pork Loin (88%), Water, Salt, Preservative: Sodium Nitrite), Béchamel Sauce (7%) (Whole Milk, Water, Single Cream (Milk), Salted Butter (Cream (Milk), Salt), Wheat Flour (Wheat Flour, Calcium, Iron, Niacin, Thiamine), Cornflour, Salt, White Pepper, Bay Lean, Crated Mature Cheddar Cheese (Milk) For Allergens see Ingredients in Bold May Contain Celery, Egg, Fish, Mustard, Nuts, Sesame, Soya, Sulphites & other Cereals containing Gluten





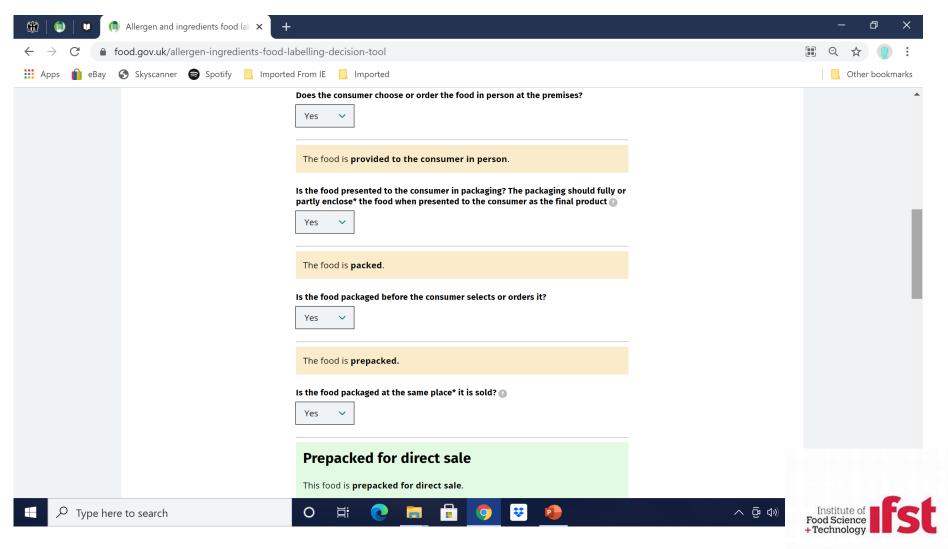
Further examples of PPDS

- •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 pre-packaged on site ready for sale, such as pizzas, rotisserie chicken, salads and pasta pots
- •Burgers and sausages pre-packaged 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 to the similar settings.



FSA Tool to determine PPDS foods

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





Future considerations

- How will you get accurate information ?
 - Don't forget precautionary "may also contain" labelling
- Are you using the correct form of allergen declaration?
 - Annex II EU No. 1169/2011
 - e.g. salmon (fish)
 - e.g. crab (crustacean)
- Check label machines are emphasising the allergen information correctly
- Ensuring up to date information?
 - NPD
 - Supplier changes





Thank you.

