

# Natasha's Law: Compass UK's Approach to PPDS Labelling

July 2021



## Background

Food safety and allergens has always been at the forefront of our approach within Compass however Natasha's Law (or the Food Information (Amendment) Regulations 2019) come into force on the 1<sup>st</sup> October 2021 making it a legal requirement for all food businesses to display full ingredient and allergen labelling on every food item they sell which is pre-packaged for direct sale.

The legislation implemented throughout the UK (England, Wales, Scotland & Northern Ireland) follows the tragic death of a young woman (Natasha Ednan-Laperouse) from a sesame allergy after the consumption of an in-unit made sandwich. Following campaigning and media coverage the eponymous law passed in her memory aims to protect allergy sufferers and give them confidence in the food they buy by allowing them to make an informed choice.

The rationale is that within a typical food hospitality setting it is easy for our colleagues to check for allergen requirements when serving customers, however it is much harder to do this within a high foot fall grab & go style environment where customer churn is greater and interaction between them and our colleagues is significantly lower. This is where the benefit of a food information label applies.

## The Legal Requirements

The new law will require all food businesses who prepare and package food on the same premises from which they are sold (Pre-Packaged for Direct Sale) to apply a food information label including:

- The name of the food.
- Shelf life information.
- A list of all ingredients (in descending weight order).
- Any allergen ingredient suitably emphasized.



---

Pre-packaged food for direct sale (PPDS) is the terminology used to describe the type of food requiring labelling. This typically includes anything made or prepared within our kitchens and which is packed before sale to the customer. The legislation is aimed at giving customers an 'informed choice' by helping them to understand what ingredients and allergens are within any pre-packaged food before they select and pay for it.

## **PPDS Examples**

Compass provide a wide range of food offers across its portfolio of businesses and sectors and therefore due to the service style some foods will require labelling while others will not.

Typically PPDS food will include:

- Sandwiches or bakery products which are packed on site before being selected / ordered by the customer.
- Products which are pre-packaged on site ready for the lunchtime sale, such as pizzas, pasties, salads and pasta.
- Foods packaged and then sold elsewhere on the premises at a mobile / temporary site by the same food business
- Pre-made drinks placed into lidded containers before being ordered by a customer

Equally it is important to understand that certain types of food will not require labelling under the new legislation whereby the food is not pre-packaged before the sale or where the 'informed choice' has already been made. Examples include:

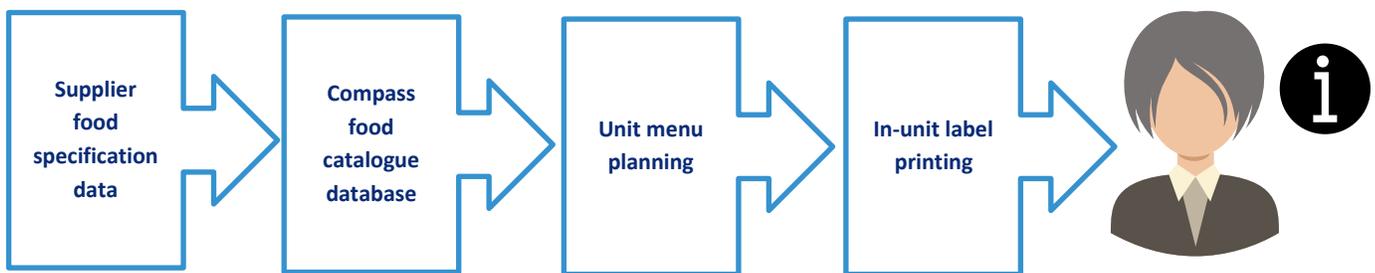
- Traditional counter service whereby the customer selects what they wish to eat from an open counter selection
- Deli bar whereby the customer can select or requests a bespoke order which is then packaged after the sale has been made.
- Pre-ordered school meals which are pre-selected and purchased by parents before collection or consumption within the school by the pupil.
- Hospitality including any form of food which is pre-ordered by the client for an event or meeting whereby an informed choice is made at the point of ordering before it is consumed
- Packed lunches / picnics / hampers which are pre-ordered in advance of the food being made, packaged and delivered to the final consumer.
- Distant selling including any food purchased and pre-ordered via a website or mobile app, in which the customer is making an informed choice at point of ordering before collection.

---

## The Compass Approach

Working with our Food Safety Primary Authority Compass has fully reviewed the impact of the new legislation upon the organization to ensure we are compliant around what part of our food offer will require labelling under the new legislation.

Working closely with our food vendors and manufacturers Compass has a fully synchronized supply chain system which captures real time food specification data (ingredients and allergens) which are checked and verified every 30 days. Our in-unit menu planning tool automatically extracts and compiles the food ingredient information (in weight order) and allergen information for each recipe within our menu database. Menu's are set and agreed with client's and the correct food ingredients ordered through our approved supply chain. Our unit teams would then follow the recipe exactly to ensure this matches the information held against the recipe in their menu plan. The same data can then be exported to a food label and printed in unit on the day of production.



## The Customer

Full ingredient and allergen labelling will confidently be applied to all PPDS foods served via direct sale from 1<sup>st</sup> October 2021 within our catering sites. We will also continue to provide printed or digital allergen reports for the full menu offer and remain committed to training our frontline catering teams to be knowledgeable around allergens, promote dialog with customers who have concerns or questions over the safety of the food they are about to eat.

## Further Information & Training

Compass has developed a range of internal communication and e-learning training for our catering teams to ensure they are fully briefed and trained in delivering our solution.

For more information regarding Natasha's Law or allergen management please contact the Compass HSE team at [HSE@compass-group.co.uk](mailto:HSE@compass-group.co.uk)