

**Get Your Business  
Ready for October 2021**  
A step-by-step guide



**From 1st October 2021, the UK Food Information Amendment 2019 will apply in England, Wales and Northern Ireland to all businesses selling Prepacked for Direct Sale Foods (PPDS Foods). After determining whether or not your business fits this criteria, you'll need to look closely at four key areas - Suppliers, Stock, Training and Implementation - to effectively comply with the regulations.**

**Allergen management should be treated just like any other risk management process in your business. That means a full review of all processes, risk assessment and mitigation and training for all employees to ensure they understand the risks posed by allergens.**

# Communicating with Your Supplier

# 1

Food businesses are responsible for maintaining strong communication with **suppliers, who have a legal obligation to provide the exact ingredient composition of any foods** bought from them.

## What to do

1. **Get your suppliers in order, organise stock and document the various brands used** to deal with a flexible supply chain.
2. **Only buy products from your approved suppliers list.**
3. **Take time to meet your supplier** sales representatives. Next time you meet - **define your preferred brands and agree a substitution process in the event these are not available.** This is a critical element, as if a new product arrives at your premises without prior notification, it may cause challenges as it will need to be reflected on the food label as soon as it is used.
4. **Ask your suppliers to let you know if there is going to be a change to a product or fixed order** and use an electronic food information management system to make managing the information quick and easy.
5. **Once you are happy with the level of service provided from your supplier they should be listed on your HACCP plan as an 'Approved Supplier'.**

**If you are not happy with the level of service from your supplier,** which should include adequate communications regarding changes to your order and stock substitutions, **you should consider changing to a supplier who provides a more reliable service.**

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# 2

## Get Your **Stock** In Order

To ensure the information you are providing to consumers is accurate, look at your stock and what is used in each individual recipe. Note where you regularly use any substitutions or where a different option of a recipe is available. Plan ahead if you know there will be seasonal variations. Then look at how this information needs to be displayed on a label and make sure it is legible, meeting the correct format.

### What to do

- 1. Ensure all recipes and labels are up to date in your recipe management system.**
- 2. Don't forget to include any seasonal variations or designated alternatives in this audit.**
- 3. Double check all recipes and labels for allergens.** There are 14 allergens that must be declared by law:
  - Cereals containing gluten, Crustaceans, Eggs, Fish, Peanuts, Soybeans, Milk, Nuts, Celery, Mustard, Sesame Seeds, Sulphur Dioxide and Sulphites, Lupin, Molluscs
  - Note: The cereal name e.g 'wheat', must be declared and highlighted, not 'gluten'.
  - The name of the nut, e.g. 'almond', must be declared and highlighted, not 'nuts'.
  - [View the full list of allergens](#) from the FSA.
- 4. Ensure that ingredient lists are printed in the correct format** on the package or on the label in such a way as to ensure clear legibility.
  - In characters using a font size where the x-height is equal to or greater than 1,2 mm. In case of packaging or containers, the largest surface of which has an area of less than 80 cm<sup>2</sup> , the x-height of the font size referred to in paragraph 2 shall be equal to or greater than 0,9 mm.

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# Allergen Awareness Training

# 3

Food businesses must ensure proper allergen management systems are in place and staff have up to date allergen awareness training and understand the importance of the new allergen labelling requirements. An incorrectly packaged product or inaccurate label has the potential to result in serious health complications or death for the estimated 1-2% of adults and 5-8% of children living with food allergies.

## What to do

- 1. Make 'Allergen Management' a function of your business in the same way Food Safety Management is.**
- 2. Integrate allergen management with your existing HACCP plan.**
- 3. Make sure adequate training is given to empower all staff** with the knowledge they need to keep the system operating as expected.
  - Do they know what the 14 allergens are and how these are presented on an ingredient list?
  - Do they know what prepacked for direct sale food means?
  - Do they know where to go to or who to ask in the event of any questions either from themselves or from a customer?
  - Everyone in your business has a responsibility to ensure the provision of correct allergen information.
- 4. Define exact roles and responsibilities** and appoint a person who validates the ingredient formulas of every food used in your business on a regular basis.
- 5. Continually review and adjust your processes** to prevent avoidable incidents in the future.

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# 4

## Software & Implementation

It is likely that you already have some form of software in place to manage your stock and recipe information. Now is the ideal time to look at this and to identify what the available options are for you to transfer information to labels on your products. It could be that you will need to upgrade or you may be able to add a label printing function to your existing set up.

### What to do

- 1. Review your existing software and recipe management system to assess whether it is fit for purpose for Natasha's Law.**
- 2. Questions you need to consider are:**
  - What software are you using and what are its capabilities?
  - Does the software allow you to input ingredients directly from suppliers, build recipes that calculate all the information you need to display on PPDS foods and produce labels that meet the regulations for October 2021?
  - If not, what software does your business need to purchase?
- 3. When looking at new options, consider the following points to help you make the best decision for your business:**
  - The more automated a process is, the less room there is for human error. Manual transfer of data between software systems should be avoided at all costs.
  - Look for software that reduces risk of inaccuracies in the event of a change, by providing real time updates from the supplier to the label.
  - Look for software that simplifies the allergen management process by choosing one product that integrates from start-to-finish with the food chain.
- 4. Train employees thoroughly** and designate who has permission to make changes to recipe management and labels, to prevent any mistakes.

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# About The UK Food Labelling Resource Initiative



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The UK Food Labelling Resource aims to support the effective roll-out of new food labelling legislation in the UK. This group represents stakeholders from across food industry, academia and government, brought together by Nutritics, a food information and allergen management software company. The new amendment is coming into effect in England, Wales and Northern Ireland from October 2021.

The goal of the UK Food Labelling Resource is to help UK food businesses of all sizes to prepare and adapt to the changes brought about by the UK Food Information Amendment (Natasha's Law). The initiative was set up to aid businesses by first raising awareness of the Food Information Amendment 2019 and then providing them with access to support, frequently asked questions, advice, training, workshops, and resources related to new allergen labelling rules.

For more information, visit [natashas-law.com](http://natashas-law.com)

## Contact

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## About

The UK Food Labelling Resource is a non-profit information group set up by Nutritics, a global provider of allergen management and nutrition labelling solutions and other experts in food, nutrition and allergen research and labelling from Manchester Metropolitan University, EuroFIR and Quadram Institute.