



# Focus on Food Labelling

## Food Ingredients and Allergen Requirements

### How to provide food ingredient and allergen information

The rules for displaying food labelling, including allergen labelling vary depending on how food is being sold. Therefore, in order to determine the labelling required, you must first determine how food is being sold. The Food Standards Agency's food labelling decision tool will help with this.

Simply click on the tiles below to take you to the portal pages of interest to you



Remember, you may sell a range of foods that fall under different labelling requirements, so it is important to consider the labelling tool against your full product range. Similarly, you may sell the same food in a variety of ways, in these circumstances you will need to consider the most effective means of meeting the relevant food labelling information requirements.

#### Signposting Service

This document is being maintained as a portal to give East Riding food businesses easy access to the latest government advice and guidance on the legal requirements for labelling and food standards. Our aim is to help food businesses navigate the various Food Standards Agency webpages and provide links to other relevant regulatory guidance and associated sector advice.

## FSA Food Labelling Decision Tool

This food labelling tool will help you to identify the type of food your business provides and the allergen labelling requirements. You can use the FSA on-line tool at:

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

Food labelling requirements for [prepacked for direct sale food \(PPDS\)](#) changed on from **1 October 2021**. Use this labelling tool to find out whether the changes apply to your business and what you need to do.

or work through the questions and page links below:

### Q1. Does the consumer choose or order the food in person at the premises?

- Yes – Continue to Q2.
- No

This is distance selling. These products will fall into two categories:

- [Distance Selling of Prepacked foods](#).
- [Distance Selling of Non-prepacked foods](#) (e.g. loose foods)  
(These products are **exempt** from the PPDS labelling changes)

### Q2. Is the food presented to the consumer in packaging? The packaging should fully or partly enclose the food when presented to the consumer as the final product

- Yes – Continue to Q3
- No
  - [Non-prepacked](#) (e.g. loose)

### Q3. Is the food packaged before the consumer selects or orders it?

- Yes – Continue to Q4.
- No
  - [Non-prepacked](#): (e.g. packed at a consumers request)

### Q4. Is the food packaged at the same place it is sold?

- Yes
  - [Prepacked for Direct Sale](#) (PPDS)
- No
  - [Prepacked](#)



## Distance Selling of Prepacked Food

Distance selling means any sale that happens without face-to-face contact with the consumer. Methods of selling include:

- online
- phone calls
- text messaging
- interactive TV
- mail order

Food businesses selling prepacked foods through distance selling need to make the same level of information on allergens available to consumer as when the food is bought from a retail environment.

- a) Prepacked food sold by distance communication requires the mandatory information (apart from the durability indication) to be available, at no extra cost to the consumers, before they make a purchase. The information must be on the material supporting the distance selling or by other appropriate means clearly identified.
- a) All mandatory food information must be available at the moment of delivery and must appear directly on the package or label.

The mandatory food information for prepacked food sold via distance communications is as follows:

- The name of the food
- An ingredients list
- Allergen information
- Quantitative ingredient declaration (QUID) (if applicable)
- Net quantity
- Storage conditions (if applicable)
- Durability indication (e.g. best before or use by date)
- Name and address of manufacturer
- Country of origin or provenance (if applicable)
- Instructions for use (if applicable)
- Nutritional declaration (if applicable)

\* Durability indication must be on the food packaging or labelling when delivered to the consumer, (but is not required to be provided within the material supporting the sale).

### Further guidance:

How to manage a food business if you sell products online, for takeaway or for delivery

<https://www.food.gov.uk/business-guidance/distance-selling-mail-order-and-delivery>

Advice to businesses selling food online

[https://www.food.gov.uk/sites/default/files/media/document/advice-to-businesses-selling-food-online\\_0.pdf](https://www.food.gov.uk/sites/default/files/media/document/advice-to-businesses-selling-food-online_0.pdf)

Selling and buying food online – Q&A

<https://www.food.gov.uk/sites/default/files/media/document/selling-food-online-qa.pdf>

## Distance Selling of Non-prepacked Food

Distance selling means any sale that happens without face-to-face contact with the consumer. Methods of selling include:

- online
- phone calls
- text messaging
- interactive TV
- mail order

Non-prepacked foods sold by distance communication is likely to include:

- Take away food ordered via phone or internet
- Foods made to order via phone or internet (e.g. celebration cakes)

The mandatory food information for non-prepacked food sold via distance communications is as follows:

- Name of the food
- Allergen information (e.g. contains: **milk, mustard**)
- QUID for meat ingredients\*

\* This requirement does not apply to mass caterers preparing food ready for consumption by the final consumer (e.g. takeaway foods).

Food information for non-prepacked food (including PPDS) sold by distance communication must be provided both:

- **before the purchase of the food is completed** - this can be in writing (on a website, catalogue or menu) or orally (by phone)
- **at the moment the food is delivered** - this can be in writing (package labelling, stickers on the food or an enclosed copy of a menu) or orally (by delivery driver).

### Further guidance:

How to manage a food business if you sell products online, for takeaway or for delivery

<https://www.food.gov.uk/business-guidance/distance-selling-mail-order-and-delivery>

Advice to businesses selling food online

[https://www.food.gov.uk/sites/default/files/media/document/advice-to-businesses-selling-food-online\\_0.pdf](https://www.food.gov.uk/sites/default/files/media/document/advice-to-businesses-selling-food-online_0.pdf)

Selling and buying food online – Q&A

<https://www.food.gov.uk/sites/default/files/media/document/selling-food-online-qa.pdf>

# Pre-packed Food Labelling Requirements

Pre-packed food is any food that's put into packaging before being put on sale and that cannot be altered without opening or changing the packaging.

All prepacked food requires a food label that displays certain mandatory information. All food is subject to general food labelling requirements and any labelling provided must be accurate and not misleading.

A summary of the main mandatory particulars are:

- The name of the food
- An ingredients list
- Allergen information
- Quantitative ingredient declaration (QUID)
- Net quantity
- Storage conditions (if applicable)
- Durability indication
- Name and address of manufacturer
- Country of origin or provenance (if applicable)
- Instructions for use (if applicable)
- Nutritional declaration

The mandatory food information must appear directly on the package or label. It must also be marked in a conspicuous, clearly legible and must not be hidden or obscured by any other written or pictorial material.

Further details regarding the labelling of prepacked food can be found at:

<https://www.food.gov.uk/business-guidance/packaging-and-labelling>

## **Food labelling: giving food information to consumers**

<https://www.gov.uk/guidance/food-labelling-giving-food-information-to-consumers>

## **Labelling of prepacked foods: general**

<https://www.businesscompanion.info/en/quick-guides/food-and-drink/labelling-of-prepacked-foods-general>

## **Labelling of prepacked foods: ingredients list**

<https://www.businesscompanion.info/en/quick-guides/food-and-drink/labelling-of-prepacked-foods-ingredients-list>

## **Labelling of prepacked foods: nutrition declaration**

<https://www.businesscompanion.info/en/quick-guides/food-and-drink/labelling-of-prepacked-foods-nutrition-declaration>

## **Labelling of prepacked foods: product name**

<https://www.businesscompanion.info/en/quick-guides/food-and-drink/labelling-of-prepacked-foods-product-name>

## **Labelling of prepacked foods: QUID**

<https://www.businesscompanion.info/en/quick-guides/food-and-drink/labelling-of-prepacked-foods-quad>

## **Food allergens and intolerance**

<https://www.businesscompanion.info/en/quick-guides/food-and-drink/food-allergens-and-intolerance>

# Non-prepacked Food Labelling Requirements

Non-prepacked food is any food presented to the final consumer or mass caterer that does not fall within the definition of 'prepacked food'.

Non-prepacked foods include:

- foods sold loose in retail outlets
- foods which are not sold prepacked, such as meals served in a restaurant and food from a takeaway
- food packed on the sale's premises at the consumers' request, such as a sandwich prepared in front of the consumer.

Non-prepacked food must be labelled with:

- The name of the food
- Allergen information
- Quantitative ingredient declaration (QUID) for meat ingredients (except for mass caterers preparing food ready for consumption by the final consumer).

Allergen information can be provided by different means, including, orally. Where a business provides allergen information orally, then at the place where a purchaser chooses their food, written details must be provided indicating that allergen information can be obtained by asking a member of staff.

The name of the food and QUID for meat declaration (where required) must appear:

- On a label attached to the food, or
- On a notice, menu, ticket or label that is readily discernible by an intending purchaser at the place where the intending purchaser chooses that food.

Further details regarding the labelling of non prepacked food can be found at:

## Labelling of non-prepacked food

<https://www.food.gov.uk/business-guidance/packaging-and-labelling#food-labelling-non-prepacked-foods>

## Food labelling: giving food information to consumers

<https://www.gov.uk/guidance/food-labelling-giving-food-information-to-consumers>

Further information:

## Labelling of non-prepacked food

<https://www.businesscompanion.info/en/quick-guides/food-and-drink/labelling-of-non-prepacked-foods>

## Food allergens and intolerance

<https://www.businesscompanion.info/en/quick-guides/food-and-drink/food-allergens-and-intolerance>

## Pre-packed for Direct Sale (PPDS) Food Labelling Requirements

PPDS food is food that is packed before being offered for sale (e.g. prepacked) by the same food business to the final consumer:

- i) on the same premises; or
- ii) on the same site; or
- iii) on other premises if the food is offered for sale from a moveable and/or temporary premises (such as marquees, market stalls, mobile sales vehicles) and the food is offered for sale by the same food business who packed it.

and the contents cannot be altered without opening or changing the packaging.

The FSA provides examples of PPDS foods in part 3 of the [Food allergen labelling and information requirements technical guidance](#).

Common foods include sandwiches, salads and pies sold from the premises in which they are made. It is expected that the customer is able to speak with the person who made or packed the product to ask about ingredients.

Food does not have to be in sealed packaging to be caught by the PPDS definition, just that the food cannot be altered without opening or changing the packaging. Therefore, food in closed but unsealed packaging is likely to be caught by the PPDS definition.

Prepacked for Direct Sale food must provide the following mandatory written food information:

- The name of the food
- List of ingredients
- Allergen information (emphasised within the ingredient list)
- Quantitative ingredient declaration (QUID) for meat ingredients (except for mass caterers preparing food ready for consumption by the final consumer).

The name of the food, list of ingredients and allergen information must be provided directly on the packaging or on a label attached to the packaging.

The QUID for meat declaration (where required) must appear:

- Directly on the packaging or on a label attached to the food, or
- On a notice, menu, ticket or label that is readily discernible by an intending purchaser at the place where the intending purchaser chooses that food.

Further details regarding the labelling of prepacked for direct sale food can be found at:

### **Introduction to allergen labelling changes (PPDS)**

<https://www.food.gov.uk/business-guidance/introduction-to-allergen-labelling-changes-ppds>

### **Food allergens and intolerance**

<https://www.businesscompanion.info/en/quick-guides/food-and-drink/food-allergens-and-intolerance>

# Providing Food Allergens Information

Compound Ingredients

How to obtain food and allergen information

HACCP Controls and Procedures

'Free-from' Allergen Claims (incl Gluten-free)

Training & Resources

Schools & Care Homes

Further Food Allergens Guidance

Simply click on the tiles above to take you to the portal pages of interest to you

Click here to go direct to the FSA guidance on allergen labelling for Prepacked for Direct Sale

The screenshot shows the top of the Food Standards Agency website. At the top right, there are language options for 'English' and 'Cymraeg'. Below this is a search bar with the text 'Search Food Standards Agency...' and a magnifying glass icon. On the left, there is the FSA logo and navigation links for 'Contact' and 'Food hygiene ratings'. A grey banner below the search bar contains a warning icon and text: 'Coronavirus (COVID-19): It is very unlikely that you can catch coronavirus from food. We're here to help food businesses with guidance on how to work safely during COVID-19 and reopen after lockdown.' Below this is a dark purple navigation menu with links for 'HOME', 'NEWS AND ALERTS', 'FOOD SAFETY AND HYGIENE', 'BUSINESS GUIDANCE', and 'ABOUT US'. The main content area features a large blue banner with the text: 'Allergen labelling changes for prepacked for direct sale (PPDS) food'. Below this text is a dotted line and a sub-headline: 'Guidance to support businesses meet changes in allergen labelling requirements for PPDS food.'

To label food with the correct ingredients and allergen information it is very important that this information can be obtained.

Food information and allergen information must be provided with all foods, however the information can vary and be provided in a number of ways which needs to be considered when producing food labelling. Examples of how food information may be supplied:

- On the food packaging or label attached to the food
- On a notice or sign near the food
- Orally
- Within commercial documents e.g. specifications (business to business sales)

Ingredient information is often supplied on the food packaging with allergens emphasised within the ingredients list. If this information is not provided on the food labelling, then it may be provided within commercial documentation (e.g. product specification).

If a supplier fails to provide food information for an ingredient, then it is important to request the information from the supplier. Food suppliers are obliged to provide food information to other businesses.

However, if a non-prepacked ingredient is purchased from a business intending to supply the final consumer (e.g. supermarket or deli) then there may be inadequate food information to label your product correctly (e.g. no ingredient information). The information can be requested, but because the business was intending to supply the final consumer (not another business) it may not be readily available. Where the required food information cannot be obtained then the ingredient should not be used.

### **Ingredients list**

Once all the required food information has been obtained for each ingredient, this can be used to produce an ingredients list (where required), provide other mandatory food information, or record allergen information (e.g. allergen matrix).

### **Labelling of prepacked foods: ingredients list**

<https://www.businesscompanion.info/en/quick-guides/food-and-drink/labelling-of-prepacked-foods-ingredients-list>

### **Food allergens and intolerance**

<https://www.businesscompanion.info/en/quick-guides/food-and-drink/food-allergens-and-intolerance>

### **Using multiple ingredient suppliers**

It is common practice for some businesses to source similar ingredients (e.g. margarine) from multiple suppliers (often taking advantage of in store offers). However, different products will have different ingredients and potentially different allergens. Therefore, it is important that labelling and/or allergen information is updated to correctly reflect the ingredients and allergens. If labelling cannot be changed then the method of purchasing ingredients will need to be considered so that the ingredients remain the same.

Please ensure ingredients are listed in descending order by weight and headed: 'Ingredients', on your packaging.

Compound ingredients (the ingredients of the ingredients) may be included in the list of ingredients under its own designation and immediately followed, in brackets, by a list of its ingredients.

Therefore, an example label may look something like this:

**Chicken and Ham pie**

Ingredients: Pastry (Butter (**MILK**, salt), lard (pork lard, antioxidant), flour (**WHEAT**), water), Filling (Chicken (25.5%), Ham (10%), onion, carrot, potato, **MILK**, flour (**WHEAT**), butter (**MILK**, salt), chicken stock (**WHEAT** flour, Dried glucose syrup, salt, sugar, flavouring (**CELERY**), chicken fat, potato starch), **EGG**, black pepper, thyme, marjoram, oregano, parsley, sage, basil).

Where several compound ingredients are used the ingredients list can become quite lengthy. This is perfectly acceptable so long as all the ingredients are included.

If a smaller ingredients list is desired, please remember there is a minimum font size for mandatory food labelling (see guidance below). Alternatively, you could consider using different ingredients with fewer compound ingredients.

**Food labelling: giving food information to consumers**

<https://www.gov.uk/guidance/food-labelling-giving-food-information-to-consumers>

Hazard Analysis Critical Control Point (HACCP) is a way of managing food safety hazards. Food safety management procedures should be based on HACCP principles.

HACCP involves:

- looking closely at what you do in your business, what could go wrong and what risks there are to food safety
- identifying any critical control points the areas a business needs to focus on to ensure those risks are removed or reduced to safe levels
- deciding what action you need to take if something goes wrong
- making sure that your procedures are being followed and are working
- keeping records to show your procedures are working

It is important to have food safety management procedures that are appropriate for your business.

The control of allergenic ingredients is a significant hazard within food businesses and as with all food hazards, food businesses must have adequate controls and systems in place to safely and effectively manage the hazard that allergenic ingredients pose.

Things to consider include:

- System to correctly identify allergens within ingredients (keep up to date)
- System to provide customers with accurate allergen information
- System to ensure the correct ingredients are used in recipes (potential allergen contamination)
- System to identify allergens if recipes are changed
- System to avoid allergen cross-contamination
- System to check the correct ingredients are delivered
- System to manage ingredient substitutions (e.g. reject or update allergen information)
- System to identify allergens in unpackaged / decanted ingredients
- System to identified allergens within prepared and stored ingredients
- Appropriate staff training

A simplified approach to HACCP may be taken if food production processes are themselves simple and for most businesses use of the FSA's 'Safer Food Better Business (SFBB)' pack will suffice. Details can be found at: <https://www.food.gov.uk/business-guidance/safer-food-better-business-sfbb>

General guidance on HACCP is available at:

<https://www.food.gov.uk/business-guidance/hazard-analysis-and-critical-control-point-haccp>

### **Allergen checklist for food businesses**

Guidance on allergen for food businesses in the retail and catering industry. Includes advice on providing allergen information and avoiding cross-contamination in the kitchen.

<https://www.food.gov.uk/business-guidance/allergen-checklist-for-food-businesses>

### **Describing or advertising food as 'free from' an allergen(s)**

A 'free from' allergen claim is an absolute claim that a food is free from the specific allergen (with the exception of gluten which has a very low limit) and such claims should only be used following a rigorous assessment of the ingredients, process and environment.

Businesses may elect to make 'free from' claims in a variety of ways, including:

- Agreeing to a customer's request to provide a food, free from a specific allergen(s)
- Advertising that a food is '*free-from*' a particular allergen(s)

Further guidance can be found at:

**Food & drink federation – Guidance on "free-from" allergen claims**

<https://www.fdf.org.uk/fdf/resources/publications/guidance/guidance-on-free-from-allergen-claims/>

#### **Agreeing to a customer's allergen '*free from*' request**

You must provide accurate allergen information but there is no legal obligation to provide allergen free food.

If you agree to provide an '*allergen free*' meal you must ensure that the meal is free of the allergenic ingredient AND ensure that the food is not contaminated with the allergen in question.

If you cannot remove the risk of cross-contamination through segregation by time and space, you should let the customer know, and you should not make a '*free-from*' claim.

Further guidance can be found at:

<https://www.businesscompanion.info/en/quick-guides/food-and-drink/food-allergens-and-intolerance#Allergenfreerequests>

#### **'Gluten-free' claims**

The only claims that may be made in relation to gluten are:

- 'Gluten free' – max 20 mg per kg of gluten
- 'Very low gluten' – max 100 mg per kg of gluten

Statements such as '*made with gluten free ingredients*' is the same as a 'gluten free' claim (see above)

Statements such as 'No gluten containing ingredients' are not permitted (other than as a menu heading)

Further guidance can be found at:

<https://www.businesscompanion.info/en/quick-guides/food-and-drink/food-allergens-and-intolerance#Glutenfreeclaims>

Food business operators must make sure that staff receive training on managing allergens effectively.

Your staff should:

- Know the procedures when asked to provide allergen information
- Be trained to accurately handle allergen information requests
- Be able to guarantee that allergen-free meals are served to the right customer
- Know the risks of allergen cross-contamination when handling and preparing foods and how to prevent this.

Online training is available using the web links below:

#### **Allergy training for food businesses**

<https://www.food.gov.uk/business-guidance/allergy-training-for-food-businesses>

#### **Food Allergy and intolerance training**

<https://allergytraining.food.gov.uk/>

#### **E-Seminar: Introduction to food allergen risk assessment**

<https://www.gov.uk/government/news/e-seminar-introduction-to-food-allergen-risk-assessment>

#### **Resource / Signage**

The FSA provides allergen related resources and signage to assist food businesses:

#### **Food allergens notice**

<https://www.food.gov.uk/document/allergy-and-intolerance-sign-colour>

#### **Allergen information for loose foods guide**

<https://www.food.gov.uk/sites/default/files/media/document/Allergen-Information-For-Loose-Foods.pdf>

#### **Allergens: Chef recipe card**

[https://www.food.gov.uk/sites/default/files/media/document/recipe-sheet\\_0.pdf](https://www.food.gov.uk/sites/default/files/media/document/recipe-sheet_0.pdf)

#### **Allergens matrix for food dishes**

<https://www.food.gov.uk/sites/default/files/media/document/allergen-chart.docx>

When food is provided by institutions, it is their responsibility to protect the individuals in their care. For these consumers to be safe, pre-existing food allergies or intolerances should be made known and processes in place to ensure they can obtain safe food options.

Further guidance on allergens for caterers in school, hospitals and care homes can be found at:

**Allergen guidance for institutional caterers**

<https://www.food.gov.uk/business-guidance/allergen-guidance-for-institutional-caterers>

**Secondary school poster:**

[https://www.food.gov.uk/sites/default/files/media/document/fsa-dfe-eu-fic-schools-posterv2%20\(1\).pdf](https://www.food.gov.uk/sites/default/files/media/document/fsa-dfe-eu-fic-schools-posterv2%20(1).pdf)

**(Primary school) Allergy adventure poster:**

[https://www.food.gov.uk/sites/default/files/media/document/allergy-adventures-full-colour-opti%20\(1\).pdf](https://www.food.gov.uk/sites/default/files/media/document/allergy-adventures-full-colour-opti%20(1).pdf)

[https://www.food.gov.uk/sites/default/files/media/document/allergy-adventures-print-friendly-opti%20\(1\).pdf](https://www.food.gov.uk/sites/default/files/media/document/allergy-adventures-print-friendly-opti%20(1).pdf) (printer friendly)

**Further  
Food Allergens  
Guidance**

**Food Standards Agency - Allergen guidance for food businesses**

Guidance for food businesses on providing allergen information and best practice for handling allergens

<https://www.food.gov.uk/business-guidance/allergen-guidance-for-food-businesses>

**Food Standards Agency – Allergen labelling for food manufacturers**

How to label allergens and avoid allergen-cross contamination when producing pre-packed foods.

<https://www.food.gov.uk/business-guidance/allergen-labelling-for-food-manufacturers>

**Food Standards Agency – Food allergen labelling and information requirements Technical guidance – June 2020**

[https://www.food.gov.uk/sites/default/files/media/document/fsa-food-allergen-labelling-and-information-requirements-technical-guidance\\_0.pdf](https://www.food.gov.uk/sites/default/files/media/document/fsa-food-allergen-labelling-and-information-requirements-technical-guidance_0.pdf)

(NB: Part 1: Guidance for businesses providing prepacked food

Part 2: Guidance for businesses providing non-prepacked food

Part 3 Guidance for businesses providing food prepacked for direct sale)

**FDf Guidance on ‘Allergen-free’ and Vegan claims**

<https://www.fdf.org.uk/fdf/resources/publications/guidance/allergen-free-and-vegan-claims-guidance/>

**MenuCal – Calorie and allergen tool**

MenuCal is a free online tool which helps food businesses put allergen and calorie information on the menu.

<https://www.food.gov.uk/business-guidance/menucal-calorie-and-allergen-tool>