

Mrs Anne Syred
Bursar
Dane Court Grammar School
Broadstairs Road
BROADSTAIRS
Kent
CT10 2RT

23rd June 2021

Dear Mrs Syred,

Harrison Update – The Food Information (Amendment) (England) Regulations 2019

Harrison Catering Services has always been committed to protecting the health and welfare of our clients and customers by ensuring we have effective robust food allergy processes and procedures in place. As a result, we have always been fully prepared to adapt to any changes in the legislation.

In 2014, The Food Information Regulations required companies to provide accurate information to their clients and customers, when requested, in relation to the presence of any of the 14 common food allergens (*celery, cereals containing gluten, crustaceans, eggs, fish, lupin, milk, molluscs, mustard, nuts, peanuts, sesame, soybeans, sulphur dioxide*), in the food being served over the counter or within their display equipment.

This year, we see the introduction of The Food Information (Amendment) (England) Regulations 2019 which come into force on 1st October 2021, often referenced as Natasha's Law. This relates to food which is pre-packed for direct sale (PPDS).

Under the new law, foods are classified as Pre-Packed for Direct Sale (PPDS) when it:

- is presented to the consumer in packaging
- is packaged before the consumer selects it is packaged at the same place where it is sold
- is either fully or partly enclosed by the packaging
- the food cannot be altered without opening or changing the packaging
- the food is ready for sale to the final consumer

This law will require all food which is pre-packed for direct sale or service (PPDS), to be labelled with a full list of ingredients. Allergenic ingredients must be emphasized in some way every time they appear in the ingredients list. Harrison Catering Services have decided that the best method is to use **bold** print.

The Food Standards Agency has produced additional guidance. The decision whether a food is classified as (PPDS) depends on when and where it is packed in relation to the point at which it is offered for sale.

After reviewing our service offering, we can confirm the new law will apply to the following Harrison products. These items are packaged in either a sandwich wedge, sealed paper bag, sealed paper wrapping, salad box or a disposable pot with a fitted lid, and therefore will require allergenic ingredients listed on each.

- Sandwiches
- Baguettes
- Wraps/Filled rolls
- Salad boxes
- Hot pots with lids (pasta, chicken wings, jacket wedges etc)
- Fruit/Dessert pots with lids
- Home baked cakes and pastries or par-baked frozen items finished in the kitchen such as:
 - Flapjack
 - Muffins



- Brownies
- Danish pastries
- Croissants

However, the new law does not apply to any food items which are placed on the servery counter ready for the customer to select. These items may be served on a china dish, plate, napkin which is not covered or a disposable pot which is not fitted with a lid. The new law also does not apply to any food item which is selected by the customer and we place the food item in packaging after the customer has made their choice. In both instances, the existing legislation continues to apply and the Company policy is to display notices reminding customers to ask for allergy information before they decide on their food selection and to provide this information orally directly to the customer.

Any food in packaging which allows the food to be altered without opening the packaging is exempt from the new requirements and *does not* require a label with a full list of ingredients showing allergenic ingredients in bold print. Food which is pre-ordered is also exempt, for example, if a customer pre-orders a packed lunch which is made to order and prepared specifically for them, it will not require a label.

The FSA also reference "It is expected that the customer is able to speak with the person who made or packed the product to ask about ingredients. Therefore, should anyone be unsure, they must speak with a member of our team.

As a fresh food catering provider, we have been working closely with Trading Standards, legal experts and industry representatives, to ensure that we are fully informed and are following the correct government guidance to make the necessary changes to our catering service.

To support and implement these new guidelines, we will be updating our comprehensive Label Logic Software. All our teams who are involved with food labelling and delivery, will be fully trained on the new requirements through our cluster workshops and bespoke training courses.

To date, we have conducted a soft rollout of our updated allergen process at a number of our establishments that serve (PPDS) food. This has given us the opportunity to overcome any challenges and establish practical solutions to ensure we are fully compliant when the law comes into force.

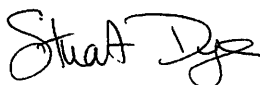
We are confident our timely review of our existing processes will enable us to continue to deliver the best experience for our customers and minimise any operational impacts through this transitional phase.

We would like to assure all our clients that we are continuing to monitor any further updates on this new legislation and will adapt our processes to support the needs of our clients and customers

If you have any further questions regarding food labelling for PPDS, please contact your Manager Client Services. You can also visit the FSA website for more information.

https://www.food.gov.uk/sites/default/files/media/document/fsa-food-allergen-labelling-and-information-requirements-technical-guidance_0.pdf

Yours Sincerely



Stuart Dye
Hygiene and Safety Manager