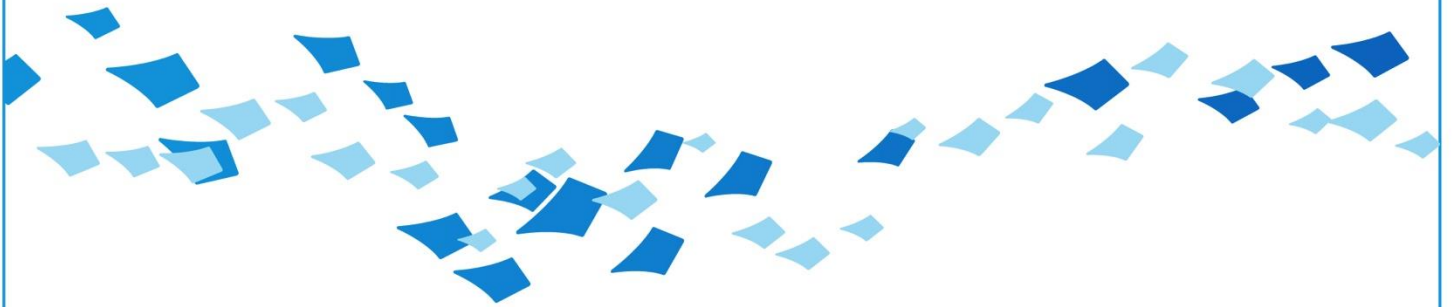


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Prepacked direct sale (PPDS): Allergen labelling guidance.



This guidance is for UK seafood businesses to help them comply with new legislation on allergen labelling from 01 October 2021.

17 September 2021, Version 1

About this guidance

From 01 October 2021 foods which are prepacked for direct sale to the consumer must be labelled with any allergenic ingredients.

Prepacked direct sale (known as PPDS) products are foods which a business, such as a fish and chip shop or a fishmonger, may package on site for sale later. This may be for convenience such as less mess handling foods, hygiene reasons, or to maintain quality. Foods packaged in this way can look identical to food that is prepacked in a production facility for the final consumer.

Consumers expect prepacked foods to be labelled with any allergens. Therefore, when they select PPDS foods which have been prepacked on site, they could assume that as there are no allergens declared on the label that the food does not have any allergenic ingredients.

This guidance is for hospitality and retail businesses who sell seafood and other associated products.

What is the new legislation?

To prevent this very serious health risk, the UK governments have introduced mandatory labelling of PPDS foods. This requires full ingredient labelling with the allergens highlighted.

The labelling requirements are not the same as for prepacked foods but will require:

- The name of the food – for seafood this must be the name permitted in the [fish labelling regulations](#);
- An ingredients list, and;
- Any of the 14 allergens emphasised in the ingredients list, if these are present in the food, emphasised every time they appear in the ingredients list;
- The 14 allergens are: celery, cereals containing gluten (such as barley and oats), crustaceans (such as prawns, crabs and lobsters), eggs, fish, lupin, milk, molluscs (such as mussels and oysters), mustard, peanuts, sesame, soybeans, sulphur dioxide and sulphites (if they are at a concentration of more than ten parts per million) and tree nuts (such as almonds, hazelnuts, walnuts, brazil nuts, cashews, pecans, pistachios and macadamia nuts).

Food is considered to be prepacked if it is enclosed in packaging so that its content cannot be altered or modified unless the packaging is opened or damaged.

You may choose to protect your foods from contamination or damage but doing this could be considered PPDS and therefore must be labelled in compliance with the new rules.

Examples of PPDS and non PPDS products or foods

The table below lists examples of what would and would not require allergen labelling.

Pre-packed for Direct Sale (PPDS)	Foods sold loose (not PPDS)
<p>Homemade tartar sauce placed in an individual container before a customer makes their purchase, which is sold to them in the same individual container.</p> <p>Full ingredients used to make the sauce should be listed and any allergens highlighted. If you use multi-ingredient foods (for example, mayonnaise) as an ingredient you must include the list of ingredients as shown on the label. If any of these ingredients are changed (for example, a different brand of mayonnaise) you must check the new ingredients list and amend your product label with any changes.</p>	<p>Homemade tartar sauce in a large individual container (pot/tub) before a customer makes their purchase which is then sold to them in a smaller individual container (pot/tub).</p>
<p>Mushy peas, curry sauce or gravy in an individual container (pot/tub) before a customer makes their purchase which is sold to them in the same individual container (pot/tub). Full ingredients used should be listed and any allergens highlighted.</p>	<p>Mushy peas, curry sauce or gravy in a Bain Marie before a customer makes their purchase which is placed in an individual container (pot/tub) with the customer's order.</p>
<p>A buttered bread roll, cob, barm cake, bread bun, teacake in a sealed or folded bag before a customer makes their purchase which is sold to them in the same sealed or folded bag. Full ingredients of the bread and any spreads would need to be listed and allergens highlighted. The spread used will also have to use the correct legal name. For example, butter or vegetable spread.</p>	<p>A buttered bread roll, cob, barm cake, bread bun, teacake stored loosely in a plastic lidded container/tub before a customer makes their purchase which is sold to them in a sealed or folded bag.</p>



Raw fish fillets, cold smoked seafood or hot smoked seafood which is vacuum packed before a customer makes their purchase which is sold to them in the same packaging. Any ingredients must be listed and any allergens highlighted. This could be the legal name followed by the allergen. For example, Cod **(fish)**.

Raw fish fillets, cold smoked seafood or hot smoked seafood which is loose before a customer makes their purchase which is sold to them in a sealed or folded bag, or vacuum packed to order.



Examples of ingredients listings

We have listed some of the typical PPDS foods found in seafood hospitality and retail businesses such as fish and chip shops and fishmongers. There may be other examples not listed.

Tartare sauce (typical ingredients)

Mayonnaise (Vegetable oil, **eggs**, distilled white vinegar, **mustard**, water, salt, sugar, lemon juice)

Capers (Capers, water, white wine vinegar, salt)

Gherkins (Gherkins, water, spirit vinegar, sugar, salt, dill, **mustard** seed, firming agent (Calcium Chloride), dill extract.)

Shallots

Lemon juice

Bread and Vegetable spread (typical ingredients)

Bread (**Wheat** flour (with added calcium, iron, niacin, thiamin), water, yeast, **soya** flour, salt, preservative: E282, emulsifiers: E472e, E471, E481, flour treatment agent: ascorbic acid)

Vegetable spread (water, rapeseed oil, palm oil, reconstituted buttermilk (**milk**), salt, emulsifiers (mono- and di-glycerides of fatty acids, sunflower lecithins), stabiliser (sodium alginate), preservative (potassium sorbate), acidity regulator (lactic acid), vitamin E, colour (beta carotene), flavouring)

Mushy peas (typical ingredients)

Marrowfat peas, water, sea salt, ground white pepper

Cold Smoked (typical ingredients)

Haddock (**fish**) (98%), salt, colours (curcumin, annatto norbixin)

Fish Fillet (typical ingredients)

Cod (**fish**)

Further Information

If you are selling PPDS foods, the Food Standards Agency and Food Standards Scotland have full guidance available on their websites.

For businesses in England, Wales and Northern Ireland visit www.food.gov.uk or follow this link directly to the guidance [Introduction to allergen labelling changes \(PPDS\) | Food Standards Agency](#)

For businesses in Scotland, visit www.foodstandards.gov.scot or follow this link directly to the guidance [Prepacked for direct sale allergen labelling | Food Standards Scotland | Food Standards Scotland](#)

Foods that are sold loose but are not considered PPDS must still provide allergen information to the consumer. This information is also available on the Food Standards Agency and Food Standards Scotland websites.

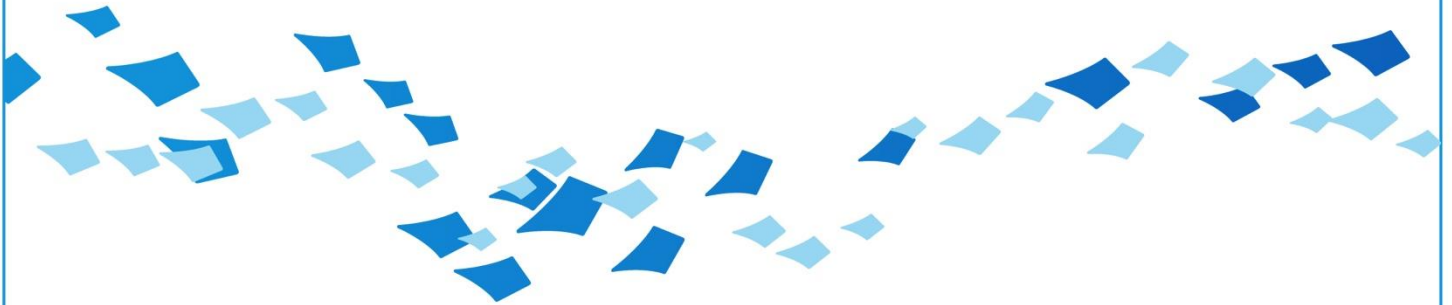
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