

The Polaris Continuous  
Compliance Framework™

# Natasha's Law

PPDS Labelling, Allergen Governance &  
Inspection Readiness

Aligned with The Food Information (Amendment) (England) Regulations 2019



## Does Natasha's Law Apply?

- Prepared on the same premises
- Packaged before the customer selects it
- Sold directly to the final consumer



**Polaris Cloud**

Continuous Compliance for Food Producers



## Summary

Natasha's Law has materially strengthened allergen transparency requirements across the United Kingdom.

The legislation applies specifically to food classified as **Prepacked for Direct Sale (PPDS)** — not to all food.

UK food law broadly recognises three categories:

- **Prepacked for Direct Sale (PPDS)**
- **Fully Prepacked Food (manufactured elsewhere)**
- **Non-Prepacked (loose or made-to-order) food**

Only PPDS falls within the specific allergen labelling requirements introduced under The Food Information (Amendment) (England) Regulations 2019.<sup>1</sup>

Where food is:

- Prepared on the same premises
- Packaged before customer selection
- Sold directly to the final consumer

It must carry:

- The name of the food
- A full ingredients list
- Clear emphasis of all 14 regulated allergens

Fully prepacked and non-prepacked foods remain subject to retained Regulation (EU) No 1169/2011 and the Food Information Regulations 2014.<sup>2 3</sup>

Understanding these distinctions is fundamental to compliance.

For small producers, risk does not arise at the point of printing.

It arises when ingredients, suppliers, or recipes change without structured control.

This guide provides:

- A precise explanation of PPDS requirements
- A legally grounded outline of obligations
- Practical operational guidance
- A scalable governance model
- A clear pathway to inspection readiness

The objective is not simply to understand the law — but to implement it confidently and sustainably.

### Footnotes

1. The Food Information (Amendment) (England) Regulations 2019 (SI 2019 No. 1218).
2. Regulation (EU) No 1169/2011 on the provision of food information to consumers, as retained in UK law.
3. The Food Information Regulations 2014 (SI 2014 No. 1855).



## 1. Understanding Natasha's Law

### 1.1 Legislative Background

Natasha's Law refers to amendments introduced under:

#### The Food Information (Amendment) (England) Regulations 2019<sup>1</sup>

These amendments modified retained EU Regulation (EU) No 1169/2011 on the provision of food information to consumers ("FIC").<sup>2</sup>

The amendments require certain food classified as **Prepacked for Direct Sale (PPDS)** to carry a full ingredients list with allergens clearly emphasised.

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### 1.2 What Is Prepacked for Direct Sale (PPDS)?

Food is classified as PPDS where all three of the following conditions apply:<sup>3</sup>

1. It is **packaged at the same place** it is offered or sold to consumers (including permanent sites, mobile units, and temporary outlets).
2. It is **in that packaging before** the customer orders or selects it.
3. The **packaging fully or partially encloses** the food so the contents **cannot be altered without opening or changing** the packaging.





If all three conditions are met, Natasha's Law applies: **the label must show the name of the food, a full ingredients list, and allergens emphasised within that list.**

If all three conditions are satisfied, the product must display:

The name of the food

- A full ingredients list in descending weight order
- Clear emphasis of allergens listed in Annex II of Regulation (EU) No 1169/2011<sup>2</sup>

## Core PPDS Labelling Requirements

 <b>Product Name</b>	 <b>Full Ingredient List</b>	 <b>Allergen Emphasis</b>	 <b>Accurate Formulation Data</b>
Accurate product name required	List Ingredients in descending order by weight	Clearly emphasise any of the 14 regulated allergens	Maintain current and exact formulation.

Manual systems allow risk to accumulate silently. Compliance must therefore be continuous, not static.





### 1.3 What Natasha's Law Does Not Automatically Require

Natasha's Law does **not** automatically require:

- A nutrition declaration
- Net quantity
- QUID declarations
- Storage instructions
- Business address
- Lot identification

These requirements arise under broader food information legislation applicable to fully prepacked food.<sup>24</sup>

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## 2. Fully Prepacked Food (Non-PPDS)

Food that is prepacked and supplied to retailers or other businesses is regulated under:

Regulation (EU) No 1169/2011 (retained EU law)<sup>2</sup>, The Food Information Regulations 2014<sup>4</sup>. **Fully prepacked food generally requires:**

- Name of the food
- Full ingredients list + allergen emphasis
- QUID declarations (where applicable)
- Net quantity
- Date of minimum durability or use-by
- Storage conditions
- Business name and address
- Lot identification
- Nutrition declaration (subject to exemptions)<sup>2</sup>

Understanding whether a product is **PPDS or fully prepacked** is essential to applying the correct compliance framework.

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## 3. Non-Prepacked (Loose Food)

**Not packaged before sale.**

Example:

- Fresh bread on open display
- Deli counter cheese
- Food made to order


→ Must provide allergen information

But ingredients list on pack is not required Information can be provided verbally or in writing

## 1.4 Understanding the Difference: PPDS vs Prepacked vs Non-Prepacked”

### Understanding the Difference: PPDS vs Prepacked vs Non-Prepacked

Not all wrapped food is PPDS.  
Understanding these distinctions is critical to compliance.

Prepacked for Direct Sale (PPDS)	Prepacked (Manufactured Elsewhere)	Non-Prepacked (Loose Food)
		
Prepared and packaged on the same premises	Packed before arriving at your premises	Not packaged before sale
<b>✓ Examples:</b> <ul style="list-style-type: none"><li>• Sandwich made in your kitchen</li><li>• Salad boxed in your cafe</li><li>• Cake wrapped and priced in your shop</li></ul>	<b>✓ Examples:</b> <ul style="list-style-type: none"><li>• Branded biscuits from a supplier</li><li>• Wholesale, prepacked pies</li><li>• Bottled sauces made in a factory</li></ul>	<b>✓ Examples:</b> <ul style="list-style-type: none"><li>• Fresh bread on open display</li><li>• Deli counter cheese</li><li>• Food made to order</li></ul>
<b>Must carry:</b> <ul style="list-style-type: none"><li>• Product name</li><li>• Full ingredients list</li><li>• Allergens emphasised</li></ul>	Governed by full prepacked food labelling rules, not specifically PPDS rules.	<b>Must provide allergen information</b> info can be verbal, signposted or written.

**PPDS Must Meet Natasha’s Law**

### Key Principle

PPDS is a specific legal category.

If food is prepared and packaged on the same premises before selection and sold directly to the consumer, it falls under Natasha’s Law.

Misunderstanding this distinction is one of the most common compliance errors among small food producers.



# Understanding the difference: PPDS vs Prepacked vs Non-Prepacked

	PPDS (Prepacked for Direct Sale)	Fully Prepacked (Non-PPDS)	Non-Prepacked (Loose / Made to Order)
Where prepared?	Prepared on the same premises where	Manufactured and packed elsewhere	Prepared on site or elsewhere
When packaged?	Packaged before customer selects it	Packaged before arriving at premises	Not packaged before sale (or packaged after selection)
Sold to whom?	Directly to the final consumer	Retail sale via distribution	Directly to the consumer
Full ingredient list required?	Yes	Yes	No (not mandatory on packaging) Yes – but may be provided verbally, in writing, or signposting
Allergen declaration required?	Yes – must be emphasised within ingredient list	Yes – must be emphasised within ingredient list	Yes – but may be provided verbally, in writing, or via signposting
Legal basis	Food Information (Amendment) (England) Regulations 2019	Retained Regulation (EU) 1169/2011	Retained Regulation (EU) 1169/2011 + Food Information Regulations 2014
Typical examples	Sandwich made & wrapped in farm shop kitchen	Branded biscuits from wholesaler	Bread on open display, deli counter food

**⚠️ PPDS is a defined legal category.** If food is:

- Prepared on the same premises
- Packaged before selection
- Sold directly to the final consumer
- Sold directly to the final consumer

Then it must comply with Natasha’s Law labelling requirements.

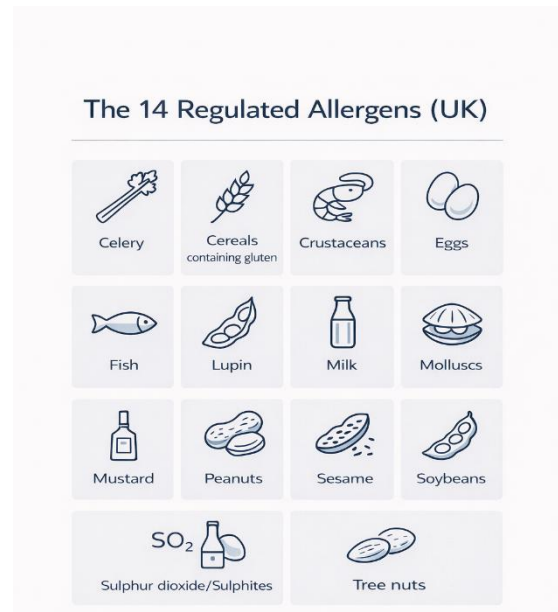
- 1 The Food Information (Amendment) (England) Regulations 2019 (Si 2019 No. 1219).
- 2 Retained Regulation (EU) No 1169/2011 on the provision of food information to consumers, as retained in UK law.
- 3 The Food Information Regulations 2014 (Si 2014 No. 1855).

## 1.5 The 14 Regulated Allergens

Under Annex II of Regulation (EU) No 1169/2011<sup>2</sup>, the following allergens require declaration when present as ingredients:

Allergens must be clearly emphasised within the ingredients list using a typographical distinction (e.g., bold type).<sup>2</sup>

- Celery
- Cereals containing gluten (e.g. wheat, barley, rye, oats, spelt, kamut)
- Crustaceans
- Eggs
- Fish
- Lupin
- Milk
- Molluscs
- Mustard
- Peanuts
- Sesame
- Soybeans
- Sulphur dioxide / Sulphites (SO<sub>2</sub> above 10mg/kg or 10mg/L)
- Tree nuts (e.g. almonds, hazelnuts, walnuts, cashews, pecans, Brazil nuts, pistachios, macadamia)









## 6. The Polaris Continuous Compliance Framework™





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## 7. Inspection Readiness & Regulatory Expectations

Environmental Health Officers assess:

- Ingredient traceability
- Allergen control procedures
- Change management
- Label accuracy
- Documentation records
- Governance structure

Regulators assess process integrity — not intention.

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## 8. Governance Maturity & Risk Exposure

Manual Approach	Governance-Based Approach
Spreadsheets	Centralised system
Copy & paste updates	Automated recalculation
Reactive fixes	Controlled workflow
Inspection stress	Inspection readiness
Data duplication	Single source of truth

Compliance maturity directly influences risk exposure.

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## 9. Polaris Cloud: Operationalising Continuous Compliance

Polaris Cloud operationalises structured compliance within small and mid-sized production environments.

It enables:

- Ingredient-level governance
- Allergen intelligence
- Nutrition support where required
- Compliant PPDS label generation
- Version-controlled documentation
- Inspection readiness

under broader FIC regulations

**Polaris Cloud is positioned not as a label creation tool —  
but as a compliance governance platform.**



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## Conclusion

Natasha's Law establishes clear allergen transparency obligations for PPDS food.

However, sustainable compliance requires structured governance across ingredient data, recipe control, and change management.

By embedding controlled processes and verification mechanisms into operational workflows, producers can transition from reactive compliance to proactive risk management.

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## Legal References

<sup>1</sup> The Food Information (Amendment) (England) Regulations 2019

<sup>2</sup> Regulation (EU) No 1169/2011 on the provision of food information to consumers (retained EU law)

<sup>3</sup> Food Standards Agency Guidance on Prepacked for Direct Sale (PPDS)

<sup>4</sup> The Food Information Regulations 2014 (as amended)

**Food Standards Agency — “Introduction to allergen labelling for PPDS food”** (core PPDS definition; distance sales rules)

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

**Food Standards Agency — “Labelling guidance for prepacked for direct sale (PPDS) food products”** (what PPDS labels must show; legal context)

<https://www.food.gov.uk/business-guidance/labelling-guidance-for-prepacked-for-direct-sale-ppds-food-products> [[kent.gov.uk](https://www.kent.gov.uk)]

**Kent County Council — “Natasha's Law: New labelling requirements for PPDS food”** (plain-English explanation of “prepacked” and packaging test)

[https://www.kent.gov.uk/\\_\\_data/assets/pdf\\_file/0020/212375/Natashas-Law.pdf](https://www.kent.gov.uk/__data/assets/pdf_file/0020/212375/Natashas-Law.pdf)

**NCASS — “Pre-Packed for Direct Sale (PPDS)”** (industry explainer distinguishing prepacked vs PPDS with examples)

<https://www.ncass.org.uk/resources/legal-compliance/the-allergen-hub/pre-packed-for-direct-sale/> [[food.gov.uk](https://www.food.gov.uk)]

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## Disclaimer

This document provides general regulatory guidance and does not constitute legal advice. Producers should consult the Food Standards Agency or local Environmental Health authority for case-specific interpretation.