

# Introducing Natasha's Law

Complying with The Food Information  
(Amendment) (England) Regulations  
2019 and keeping your customers safe.





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# Welcome

**Simon Brennan, senior end user client manager  
– Speciality Print Solutions at Brother UK**

**For millions of allergy sufferers, Natasha's Law can't come soon enough.**

**We all read the heart-breaking story of Natasha Ednan-Laperouse, the teenager who died after suffering an allergic reaction to an allergen, which wasn't listed in the ingredients of a sandwich.**

And we all followed the determined campaign by her parents Nadim and Tanya, which ultimately succeeded in introducing a new law requiring food businesses in England to include full ingredients labelling on food that is Pre-Packed for Direct Sale (PPDS).

By helping allergy sufferers to make clear, safe choices, the Food Information (Amendment) (England) Regulations 2019, commonly known as Natasha's Law, can save lives.

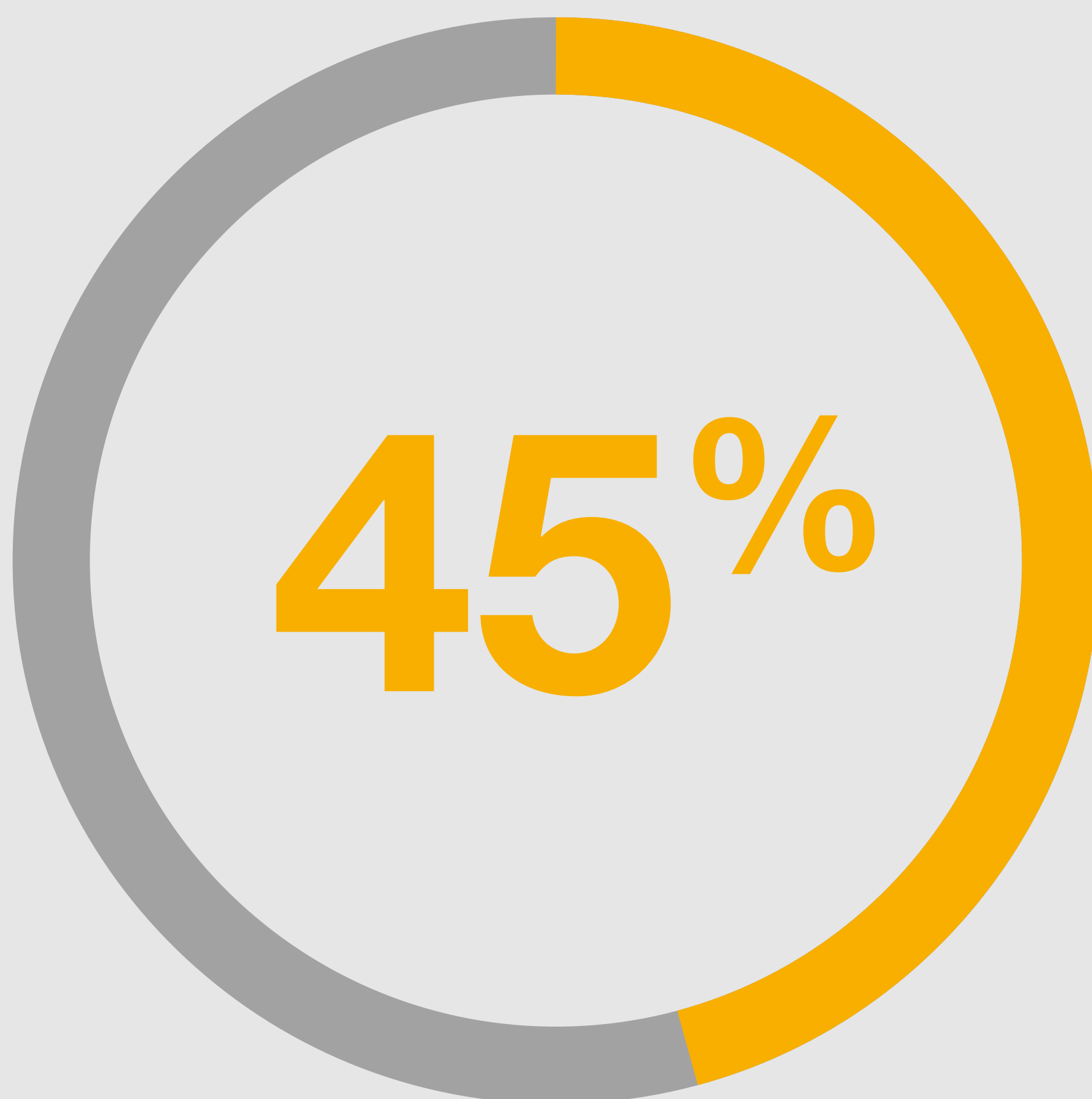
It comes into force across England in October 2021 and represents a landmark in food safety legislation that every food business will, I'm sure, support.

With that in mind, this report, which was informed by a survey of 100 food industry businesses, from cafés to supermarkets, is designed to gauge how prepared the sector is for the new law.

And, by shining a light on the solutions available, we hope to help food businesses make sure they are compliant, giving their customers complete transparency about what they are buying, so they can make informed decisions about what they eat.

Sadly, Natasha's death was not an isolated tragedy. There are two million allergy sufferers in the UK and studies show that the number of people living with allergies is rising by 5% every year. So, it's even more vital that food businesses are alert to the safety of all their customers.

We're sharing this report to support the food industry as it works towards compliance and a new era of food safety. Brother is "At your side".

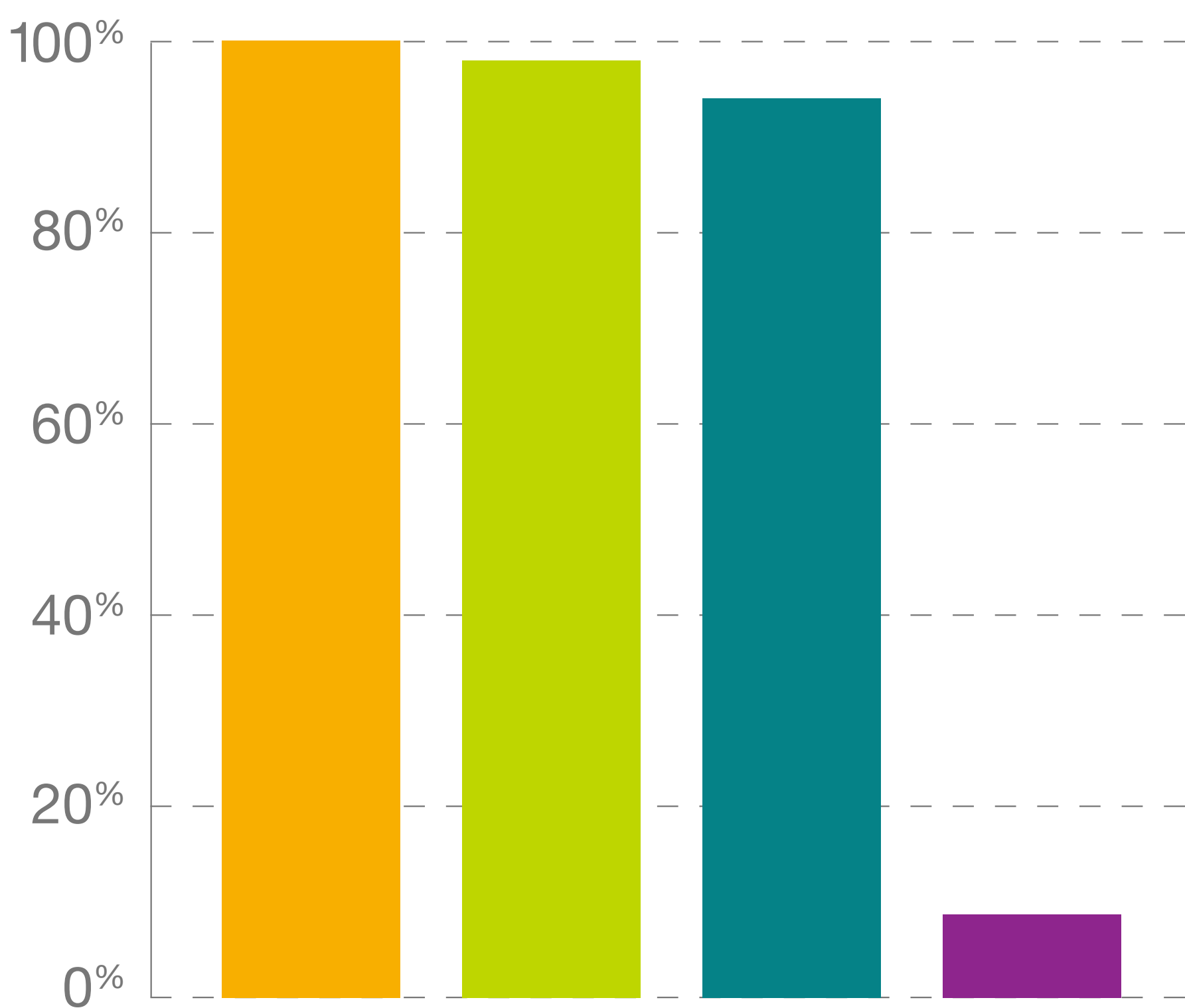


think 'the risk of not meeting  
Natasha's Law is very significant'  
for their business

# Research

## Survey of 100 food retailers that package goods on site

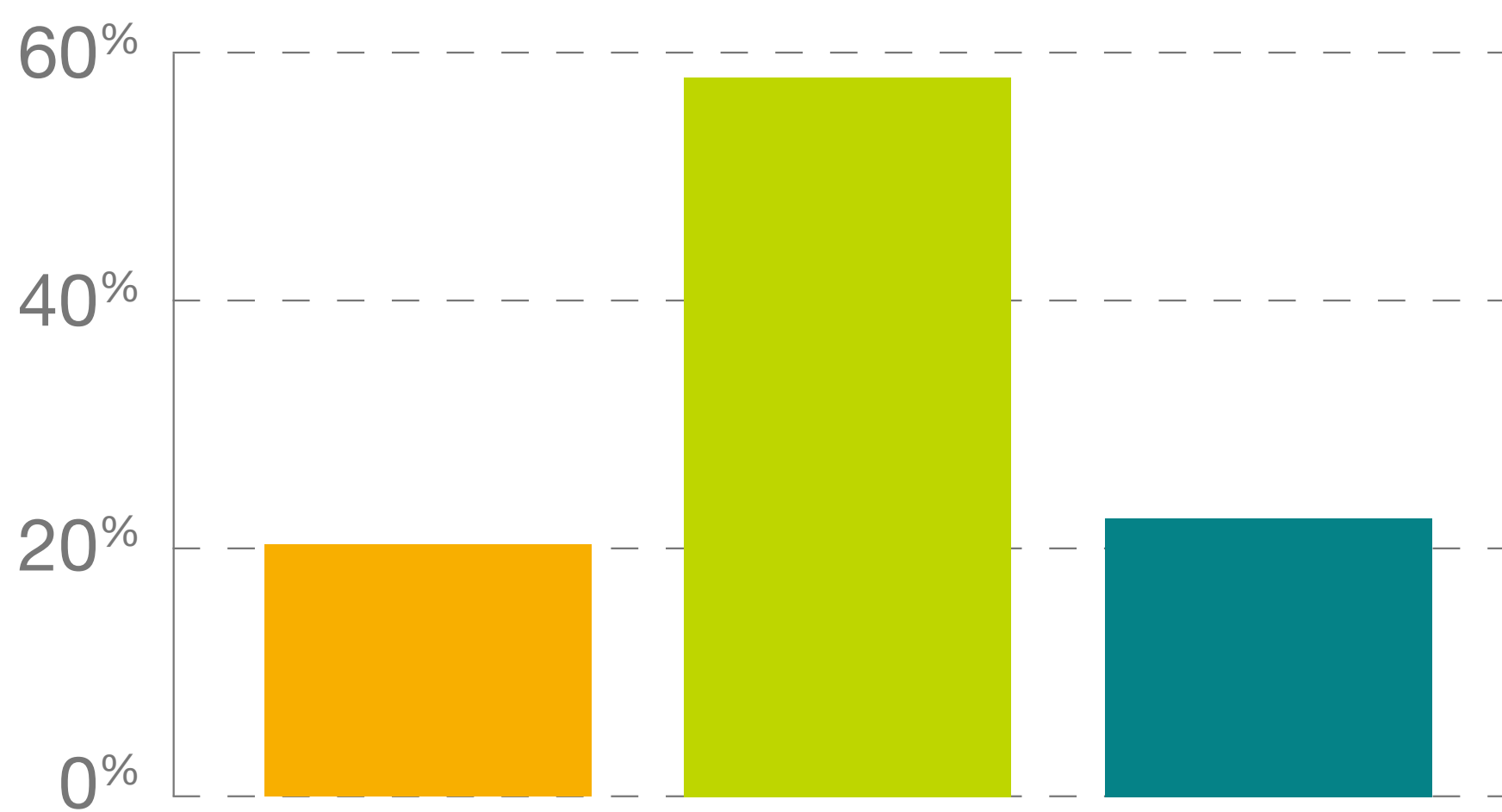
### The food industry's support for Natasha's Law




- 100%** say Natasha's Law will make customers with food allergies feel safer buying Pre Packed for Direct Sale (PPDS) food
- 99%** say Natasha's Law will make it easier for customers to find out the ingredients in PPDS food
- 94%** say their business takes allergens very seriously
- Just **9%** think Natasha's Law is an unnecessary extra cost to their business



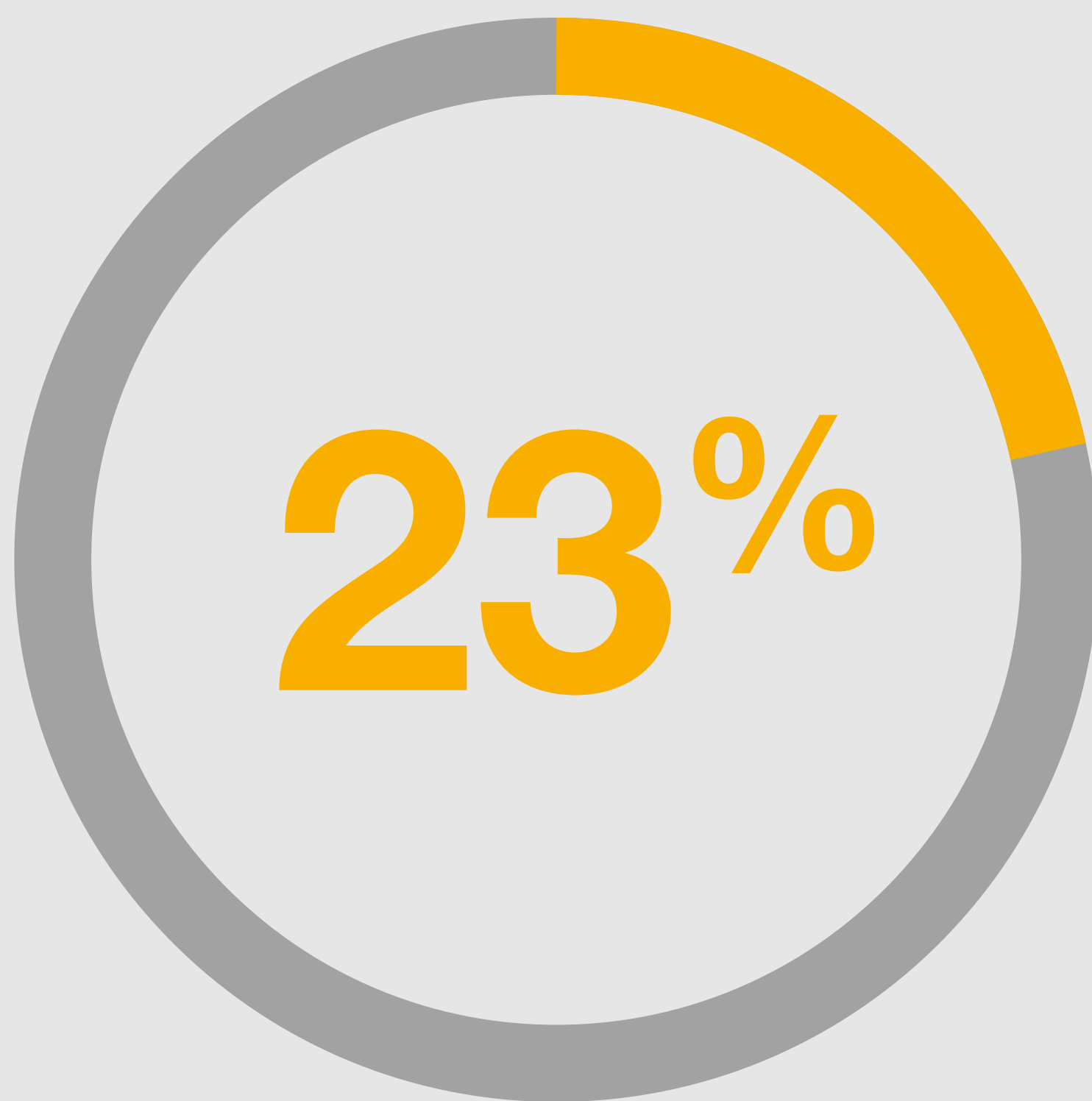
## Are you ready?



 Just **20%** say their business is completely prepared for Natasha's Law

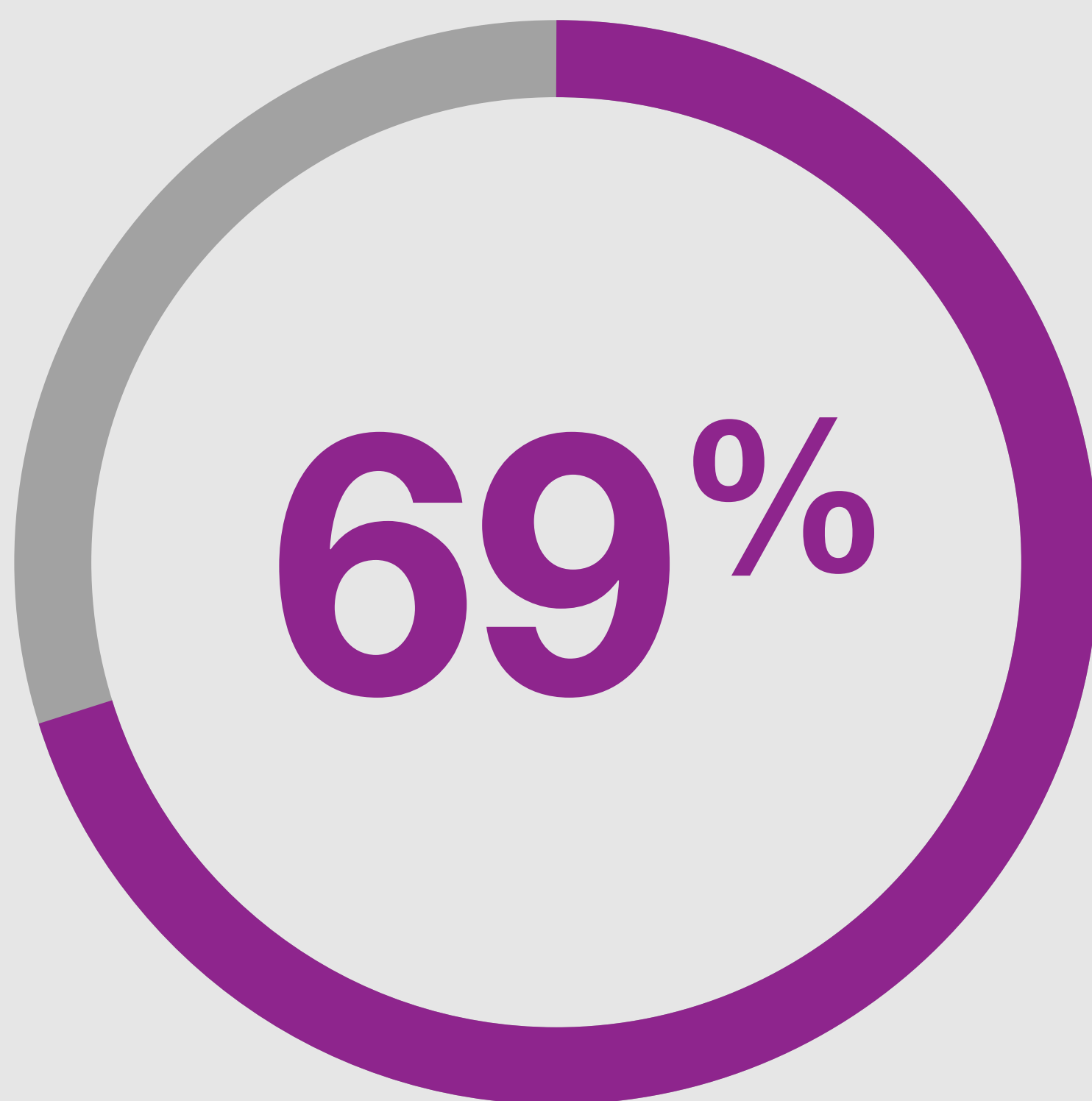
 **59%** say they are somewhat prepared

 **21%** say they are somewhat unprepared

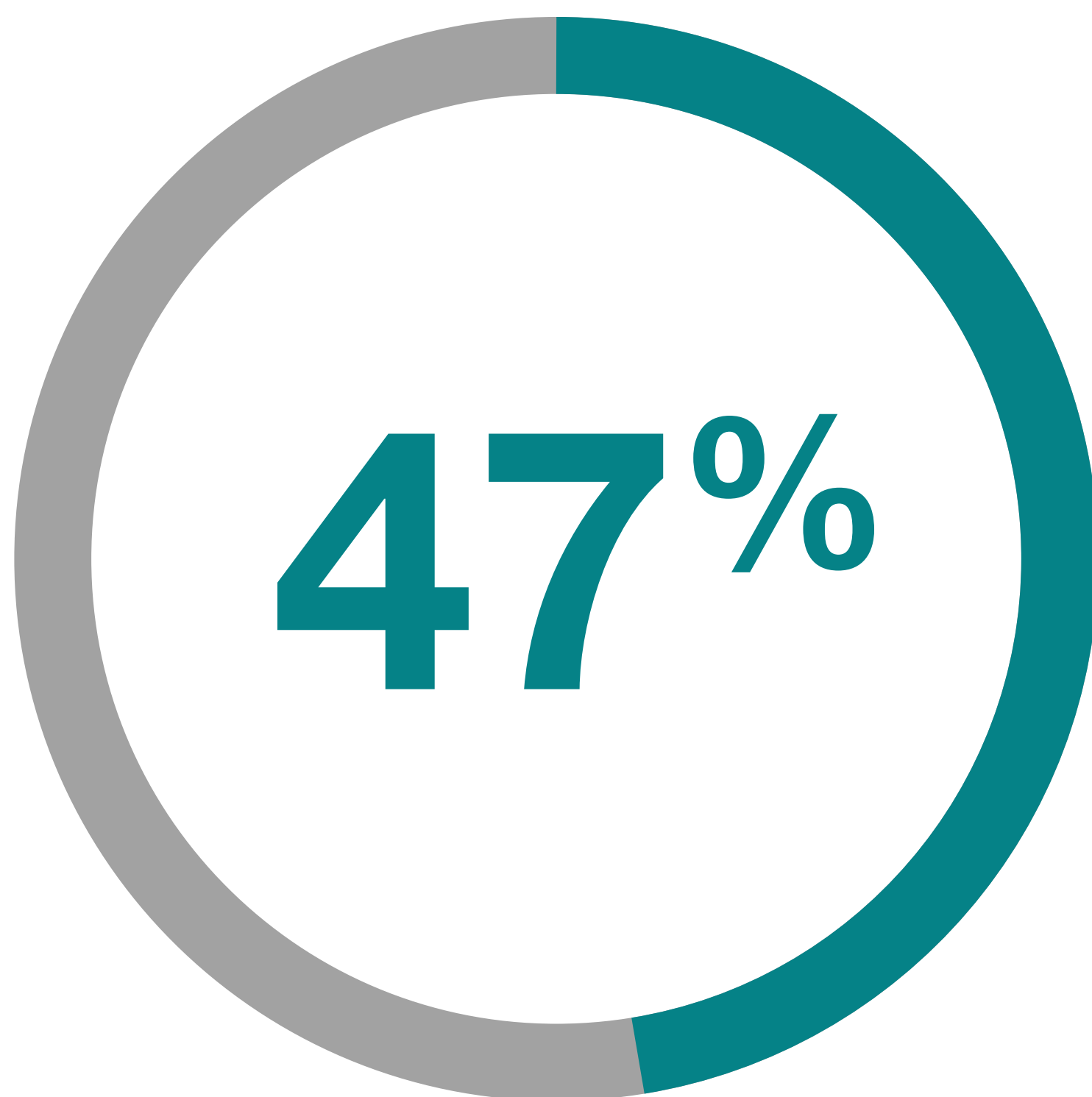


want more information

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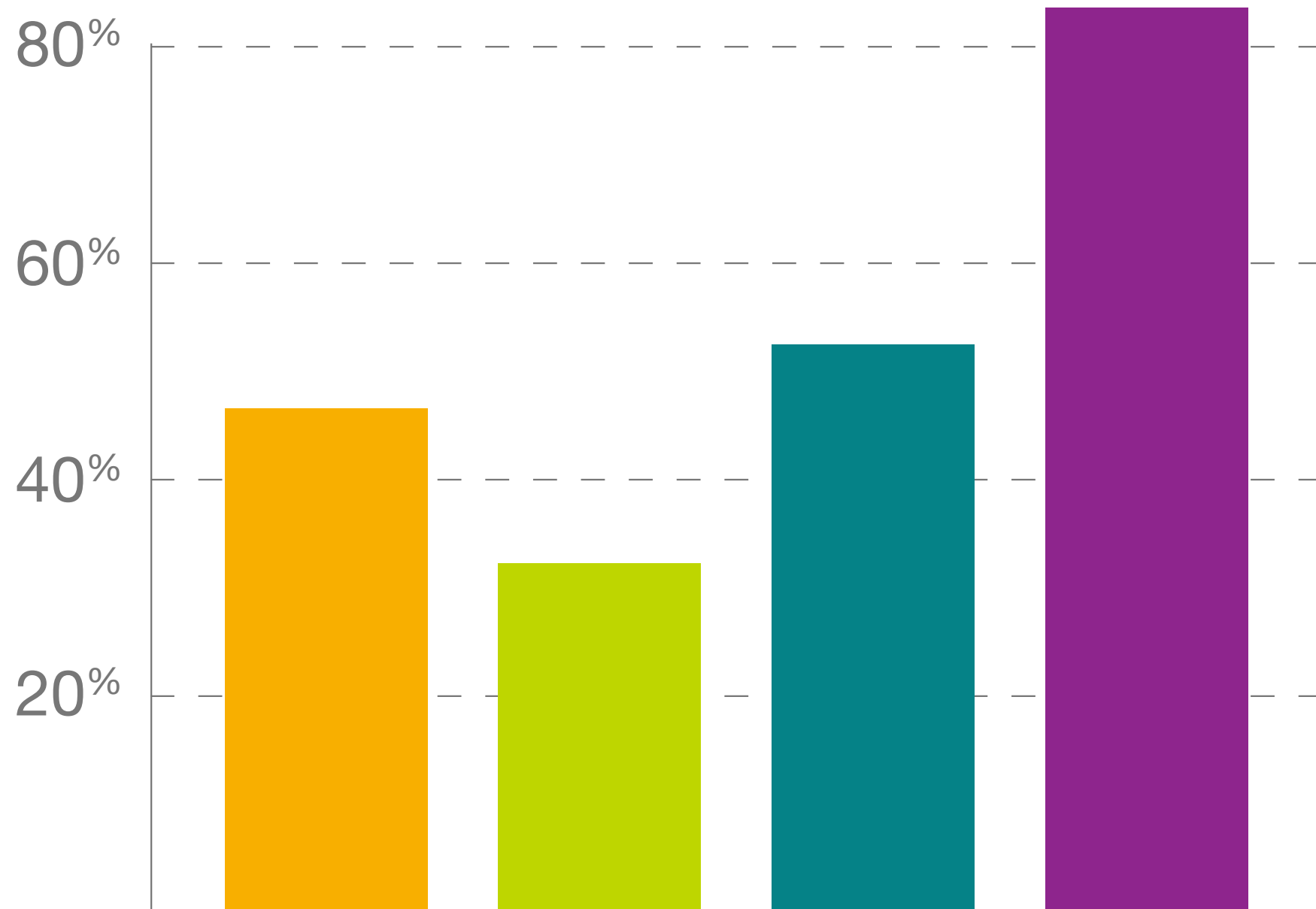
have trained some staff  
on Natasha's Law



Bigger firms (47%) are more likely to be completely prepared than smaller ones (13%)\*



## Labelling



**44%** already have a label printer in their kitchens

**32%** still use handwritten labels

**47%** don't have a labelling solution in place to address Natasha's Law

**82%** say the way their food is labelled affects how their brand is perceived

\*(Firms packing more than 500 PPDS items (per week) v firms packing less than 500)



## Introducing Natasha's Law

**Natasha's Law is designed to give those with allergies complete certainty that the PPDS food they are buying is safe for them to eat.**

At the moment, businesses selling food prepared on the same premises where it is sold don't need to put allergen information on the label, which means allergy sufferers have to ask staff for the information they need to buy with confidence.

Now parliament has tightened the rules, legislating so foods like these must come with a full list of ingredients.

At the time of writing, the industry is still working to absorb and interpret much of the precise detail of Natasha's Law, but what do we know so far?

## **What food businesses are affected?**

The reforms cover any business that is preparing, packing and selling food from the same premises, or food that is packed centrally and sold from a mobile stall or vehicle belonging to the same business.

The new rules will only apply to businesses in England at first, though Scotland, Wales and Northern Ireland are expected to quickly adopt Natasha's Law too, so food businesses there are also encouraged to become compliant by the October 2021 deadline.

## **What types of foods are covered?**

The kind of foods covered by Natasha's Law are categorised as pre-packed for Direct Sale (PPDS).

This would include products like sandwiches or salads made by staff in-house, wrapped or placed in packaging and then put on display.

## **What information must be displayed?**

All PPDS products will need to clearly display the name of the food and a full list of all ingredients. Any allergens must be highlighted within the ingredients list, for example by printing them in bold or a different colour.

It won't be acceptable just to have a list of allergens after October, 2021.

Under current EU legislation, there are 14 allergens that must be identified if they have been used as ingredients, or if ingredients derived from one of the allergens has been used, which are likely to be replicated in Natasha's Law.

## **What are the penalties for non-compliance?**

Any business failing to follow the new rules could be hit with a fine of up to £5,000 per offence.

# The 14 allergens



Nuts



Peanuts



Eggs



Milk



Fish



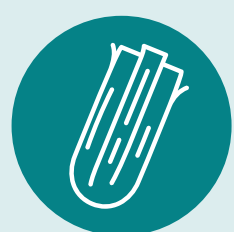
Crustaceans



Molluscs



Cereals  
containing gluten



Celery



Lupin



Mustard



Sesame seeds



Soya



Sulphur dioxide  
(above 10mg/kg)



# Achieving compliance

**Under Natasha's Law, food businesses of all sizes that are selling PPDS food will have to make changes to their products and practices.**

Brother's research found that just a fifth (20%) of firms believed their business was completely prepared for the new rules, with 59% feeling somewhat prepared and 21% feeling somewhat unprepared.

The key to compliance will be providing consumers with clear, accurate information about all the ingredients in the food on sale.

But Gary Lunney, managing director of Labelling Solutions, which supplies the food sector from independent retailers to national chains, says he worries compliance isn't being taken as seriously as it should be.

He said: "At the moment I'm seeing many food businesses dragging their feet on this. The message doesn't seem to be getting across and I think that, ultimately, we will see prosecutions and food businesses rushing to catch up."

“We can make it very easy for firms to make themselves compliant, but there needs to be a greater sense of urgency or we will see firms getting into trouble and paying the price for that.”

Here, Phil Dalton, head of regulatory at food safety consultants NT Assure, has identified three main challenges for firms to overcome:

- Getting ingredients information from suppliers
- Combining that information to produce an accurate ingredients list
- Presenting that information clearly to consumers

Clearly, any food labelling system is only as good as the information that is fed into it.

To that end, it is crucial for food businesses to work with trusted suppliers to make sure they are providing accurate information about what's in the ingredients they are selling, as well as effectively communicating any changes to recipes, for example.



## The first step

Phil said: “The presumption on which Natasha’s Law is based is that PPDS should be equivalent to pre-packed foods in terms of how information about allergens is presented to consumers. For food businesses, the first step is to make sure you’re getting accurate information from everyone in your supply base.

“Then you’ve got the challenge of combining all that information into an ingredients list. There are technical solutions that enable you to do that; specification systems that will take an input from a diverse supply base and combine it for you.

“If your system isn’t capable of that, you’ll have to rely on a manual process and, depending on the complexity of the product, that could be quite a challenge.”

## Affordable, scalable systems

While installing an electronic labelling system like this may sound like an expensive proposition, particularly for smaller operators, there are affordable, scalable options available.

Just under half (44%) of the businesses we surveyed already have a mobile labelling solution in their kitchens, though a third (32%) are still using a handwritten labelling approach.

Sticking with handwritten labels after Natasha’s Law comes into force would be a time-consuming process with a far higher possibility of human error and potentially fatal consequences, as well as producing less attractive, professional looking packaging.

Stephen Nolan, chief operating officer at nutrition analysis software developer Nutritics, said: “In any food business there will be things that change at the last minute, like substituting one ingredient for another.

“That means food businesses can’t rely on pre-printed labels, or have a system using handwritten labels, which isn’t scalable in any shape or form. Instead they will need to be able to print labels in real time, which will be more-or-less impossible without some kind of electronic food labelling solution.”



## Tried-and-tested technology

So, how do electronic food labelling systems work?

Unlike PPDS foods, pre-packed foods like sandwiches and salads sold in major supermarkets, which are not prepared and packaged in the same premises where they are sold, have had to display full ingredients lists including allergens for many years.

This means there are already tried-and-tested technologies in place to create accurate, reliable ingredients lists for food businesses, and they can have added benefits beyond ensuring safety and compliance, boosting efficiency too.

They typically work as a software package using a database of ingredients combined with a label printer to produce bespoke food labels, including branding and a barcode, wherever food is being prepared and packaged.

The database contains allergen and nutritional information about every ingredient being used, so whoever is preparing the product can record whatever ingredients they use on a tablet



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**Customers will spend their money at the places that make it easy for them to find the information they want.**

**Stephen Nolan, chief operating officer, Nutritics**

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## Tackling training

All food business operators will have to make sure their staff are properly trained, not just on how to operate any new technology, but also on allergen awareness.

So, it was reassuring that our research found 69% of those surveyed had at least trained some staff to ensure compliance with Natasha's Law, while a further quarter (25%) have training planned.

That training must include food firms' legal obligations regarding allergen labelling and declaration, communicating effectively with customers, how to spot symptoms of allergic reactions and good practice in food preparation, including preventing cross-contamination.

There are numerous training providers available who can come into your business to hold short training sessions, or training can be conducted online.

It's a good idea to look out for training providers or courses that are endorsed or accredited by the Institute of Hospitality, which are independently evaluated as meeting recognised standards.

## An opportunity to grow

Supporting the finding that 82% of those surveyed said the way their food is labelled affects how their brand is perceived, Stephen Nolan added: "While some food businesses may view Natasha's Law as another regulatory hurdle, firms can achieve compliance without having to spend a lot of money and cost shouldn't be a barrier at all.

"In fact, it's an opportunity to grow. Customers, particularly younger customers, want to know what they are eating and they welcome transparency. There's value in going further than just the letter of the law, providing details of nutrition and provenance too.

"Customers will spend their money at the places that make it easy for them to find the information that they want. Food labelling systems can provide this information and can also work to analyse your costs, working out which dishes are most profitable and helping you develop your menu to maximise profits."

# Beyond Natasha's Law



Natasha's Law represents a significant step forward in food safety regulation and can undoubtedly save lives, however, some have argued that it isn't necessarily a complete solution for people with severe food allergies.

While consumers will be able to check ingredients lists on food packaging to see if a product contains an allergen as an intended ingredient, it doesn't tackle the potential for cross-contamination in busy kitchens.

For some allergy sufferers, even small amounts of less than one milligram of an allergen may cause a severe and dangerous reaction.

## A good start

Phil Dalton at NT Assure said: "Natasha's Law is about the actual ingredients in the food and doesn't deal at all with issues around the production environment and cross-contamination. Someone with an allergy can react to a trace contamination just like an ingredient."

“Giving consumers information about ingredients is great, but what if there is also a potential risk from other allergens that are inadvertently present in the environment? Natasha’s Law has provided a focal point and a lot of good things have happened in the industry as a result of the campaign, but the legislation itself only answers one specific aspect of the problem of allergens.

“It’s a good start, but I think it’s inevitable that there will be more legislation.”

### Going beyond the basics

Work is currently underway by the World Health Organisation and the United Nations to review international allergen labelling standards with a view to introducing a global framework that will protect consumer health and give the food industry greater clarity on how allergens should be presented on food labels.

Phil added: “My advice is that you must think about other aspects of the management of allergens in your business and how you are going to present information to consumers about things not in the scope of Natasha’s Law, like the production environment.



“I’ve seen lots of evidence of food businesses taking a lot more care and talking to their suppliers about the level of detail in the information they are providing, including excluding allergens from the manufacturing environment, if at all possible.”

With that in mind, it’s worth researching electronic labelling systems that go beyond just listing the basic ingredients in a food product.

### **Gaining a competitive advantage**

Food businesses that can also provide their customers with detailed information about a product’s nutritional and calorific value, including salt, sugar and vitamins, will find they can gain a competitive advantage over rivals.

Indeed, 95% of the firms Brother spoke to for this report said they thought Natasha’s Law would have a positive effect on their business overall.

In the run up to October 2021, when it comes into force, Natasha’s Law will continue to shine a light on the issue of transparency in the food sector.

It’s a growing concern with the public, and not just because of the rising numbers of people suffering from allergies.

The number of vegans in Great Britain quadrupled between 2014 and 2019 and vegans and vegetarians look set to make up a quarter of the British population in 2025, for example.

Consumers are increasingly aware of the impact that their diet can have on their health and wellbeing, and they are better informed than ever before about the food they eat.

It’s an opportunity for businesses who can provide the detailed information that customers want to boost their reputation, win new business and improve customer loyalty, so why wait?

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**Food businesses that can also provide their customers with detailed information about a product's nutritional and calorific value will find they can gain a competitive advantage over rivals.**

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# Brother's technical solutions

TD BAKERIES LTD

CROISSANTS

PACK DATE:  
13/02/19

SELL BY DATE:  
20/02/19

PRICE:  
€1.89



NET WEIGHT:  
100g

CONTAINS: EGGS, MILK and WHEAT  
Some of the ingredients we produce our products from may contain allergens including wheat, milk, eggs.

Typical Values	Per 100g
Energy	kJ
Energy	kcal
Fat	44g
of which saturates	26g
Carbohydrates	43g
of which sugars	5g
Fibre	3g
Protein	1.2g
Salt	0.3g
	0.4g

## **Brother has worked to create tailored solutions for the food service and hospitality sectors for many years.**

Its label printers make it easy to create durable labels for allergen content, ingredients, barcodes, branding and expiry dates quickly and accurately, without the need for inks or toners.

The printers are compatible with a variety of food labelling solutions including NT Assure, Nutritics, Planglow, Food Management Systems and many more. Brother can also support customers with seamless integration into their existing software.

### **A scalable solution**

An example where Brother has worked with a menu management software company to create a comprehensive solution is its partnership with Nutritics, which helps foodservice companies of all sizes achieve compliance and boost efficiency.

The Nutritics recipe management solution is already used by high street names including Starbucks, Shake Shack and Leon, but is just as suitable for smaller independent businesses.

The solution includes a cloud-based database of thousands of ingredients to provide accurate labelling information, managing ingredients lists, calculating nutrition and identifying allergens. Data on each ingredient is either sourced directly from the manufacturer or researched by qualified nutritionists.

Combined with any Brother TD compact label printer, this system can produce bespoke food labels at the touch of a button.

### **Fully integrated**

Fully integrated systems like these go above and beyond the standards demanded by Natasha's Law, giving consumers access to all the information they want and freeing up staff to focus on acquiring new customers and driving loyalty.





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**Firms of all sizes can now manage the preparation and labelling of all their dishes in one easy-to-use platform, and allergy sufferers can make informed, safe choices when buying food.**

**Simon Brennan, senior end user client manager -  
Speciality Print Solutions, Brother UK**

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Simon Brennan, senior end user client manager – Speciality Print Solutions at Brother UK, said: “Our joint solutions minimise the potential for human error in food labelling, as the information is calculated automatically and sent straight to the printer.

“Firms of all sizes can now manage the preparation and labelling of all their dishes in one easy-to-use platform, and allergy sufferers can make informed, safe choices when buying food.”

### **Business benefits**

The business benefits of systems like Nutritics go far beyond just complying with the law. They can protect margins by analysing recipes to work out the RRP or improve the nutrient profile of your products by suggesting changes to recipes.

They can also streamline workflows in the kitchen, ensuring consistency and creating opportunities to upsell your products based on their nutritional value.

So, while Natasha’s Law is set to bring some peace of mind to food allergy sufferers, it seems it is also set to usher in a new regime of compliance for food businesses. However, this shouldn’t be seen as an administrative burden.

Rather, food businesses should grab this chance to futureproof their operations, make their processes more efficient and create new opportunities to grow revenues and margins.

# Methodology and contacts

## Methodology

The study focused on businesses that would be affected by the implementation of Natasha's Law. Respondents were senior level individuals working in food retailers that package goods on site, including restaurants, bars, eateries, supermarkets and wholesale food distributors. Data collection was carried out through research agency Coleman Parkes and was collected from a total sample of 100 respondents between 24th February and 3rd April 2020.

## Contact us



Find out more about Brother's professional food labelling print solutions:

[brother.co.uk/business-solutions/mobile-print-and-label/food-labelling](https://brother.co.uk/business-solutions/mobile-print-and-label/food-labelling)

