

Revisiting Natasha's Law

Are you compliant with Natasha's Law?
Is your solution working for you?

brother.co.uk/food-labelling




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What is Natasha's Law?

Food industry retailers including cafes, bakeries and delis all hope to delight customers with delicious food and drink that will have them coming back for more. But beyond the good food and positive atmosphere, safety is a vital component of any successful food industry company.



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.** Complying with food-safety and labelling rules is instrumental in creating a sense of trust and added loyalty amongst customers.

In October of 2021, we saw the introduction of Natasha's Law, known formally as Food Information (Amendment) (England) Regulations 2019, which came about in the wake of the tragic death of Natasha Ednan-Laperouse. Her fatality was caused by an allergic reaction to an allergen that wasn't listed in the ingredients of a sandwich.

In response to this incident, the UK government changed the law surrounding how food allergens need to be labelled in certain instances for customers. All businesses in England that produce pre-packaged for direct sale (PPDS) food to customers on-site must label food clearly with information on potential allergens present. These must stand out so a customer can tell at a glance what they're about to eat.

In the two years since the law was introduced, all businesses that prepare PPDS food have had to update operations to create adequate labels for their food.

What has the response been?

There has been overwhelming support from food retailers for the implementation of Natasha's Law across the UK.

A study of 100 food industry businesses launched by Brother UK in 2022 found that **100% agreed Natasha's Law will make customers with food allergies feel safer buying PPDS food**. However, research suggests that despite the enthusiasm, more support is required to drive compliance.

A 2023 study carried out by market leading source of accurate allergy, nutritional and technical product data, Erudus, explored the state of PPDS packaging since Natasha's Law's introduction. **An analysis of 116 PPDS labels revealed that more than half (54%) of products sampled failed to accurately declare the presence of allergen ingredients.**



Have you implemented changes to comply with Natasha's Law? If so, are you implementing them as seamlessly, efficiently and accurately as possible?

In this guide, we'll revisit the laws you need to follow, outline some of the hurdles that businesses have faced while striving to comply and offer guidance on the best practices for compliant labelling.

How do you comply?

For businesses who make PPDS food products, labels that clearly display the following information on the package are required for complying with Natasha's Law:

- Name of the food
- Full ingredients list, with allergen ingredients emphasised (for example: in bold, italics or a different colour)

There are 14 allergens that must be mentioned on the labels, these 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 a concentration of more than ten parts per million)
- **Tree nuts** (such as almonds, hazelnuts, walnuts, brazil nuts, cashews, pecans, pistachios and macadamia nuts)



The year's biggest hurdles

Natasha's Law has created a product labelling challenge for food retailers. While our research found that a majority agree the regulation makes consumers with food allergies feel safer, a couple of years on from its initial introduction, we're noticing that more support is needed in order to improve labelling and make compliance a simpler, more cost-effective task.

Amongst the most common examples of non-compliance that research by Erudus revealed in its 'year-on' report was lack of legibility and failure to properly emphasise the ingredients.

Erudus' 'year-on' report found that:



of products failed to include any form of product name on the label, packaging or both



of products sampled where an Ingredient Declaration and Allergen ingredients were present failed to emphasise allergens



of products sampled had no form of Ingredients Declaration



of labels on products were noted as not being legible, with top reasons including messy handwriting, patchy printing and printed text overlapping

One answer to improving how effectively PPDS items are labelled is through the help of reliable software.



Why you must comply

Natasha's Law has significant implications for all businesses that produce PPDS foods to customers on-site. The labelling can be lifesaving for customers, with clearly labelled allergenic ingredients emphasised within the list.

As well as putting customers' safety at risk, those who don't comply face the possibility of large fines and reputational damage, with longer-lasting consequences for customer numbers.

Businesses who are found by health inspectors to not be following the regulations could stand to face a fine of £5,000 per instance of non-compliance.



Compliant food labelling solutions

Creating a solution for ingredients labelling for PPDS food doesn't need to be complex, timely or expensive (nor should it be!). Choosing the right technology can help overcome the challenges of adapting your labelling processes while ensuring compliance.

There are a few solutions for producing the labels you need. Choosing the right one for you will depend on the size of your business and number of sites, your budget and volume of food being produced.

Some labelling options include:

1. Handwritten labels
2. Pre-printed labels
3. Label print solutions
4. Menu management systems.

1 Hand written labels

While many small food retailers start using handwritten labels to meet requirements and manage stock, Brother research found that handwritten solutions are on the decline. The number of businesses using them to manage the requirements for Natasha's Law has fallen from a third (32%) to a quarter (25%) since 2020.

Considering that a top example of noncompliance uncovered in Erudus' report was illegibility, it's clear that this option can leave retailers open to the risk of human error. It is also more challenging to train employees to hand write labels, requiring in-depth knowledge of both the product and compliant labelling requirements. As labelling legislation becomes more complex, it's likely the use of handwritten labels will continue to decline in favour of simpler, digital solutions.

2 Pre-printed labels

Rather than handwritten labels, retailers can purchase pre-printed labels for their products. While these can be a quick solution to getting products labelled with the right information, there are some considerations to keep in mind.

Firstly, most pre-printed labels must be ordered in bulk, which can increase costs and take up valuable storage space. It also limits a retailer's ability to make any changes to the ingredients list – so any errors made could mean discarding quite a lot of labels and increasing waste.





Label printing solutions options

Brother's simple label printing solution

If you're considering incorporating technology to make the task of compliant labelling easier, a single-site solution that uses free software and a label printer can be very beneficial.

Brother has delivered tailored solutions for the food service and hospitality sectors for many years. Our label printers make it easy to create labels for allergen content, ingredients, barcodes, branding, pricing and expiry dates quickly and accurately.

The simplest of digital systems, this uses a Brother TD thermal printer connected to a laptop or PC alongside Brother's free P-touch Editor label design software to create legible, accurate labels.

Here's why we love it

- ⌘ **Minimal software:** your business' products and ingredients in Microsoft Excel are all we need
- ⌘ **No need for inks or toners:** Brother label printers utilise thermal print technology
- ⌘ **Easy formatting:** the label design software formats data in Excel to be used in your own designed layout or on a pre-set template
- ⌘ **Make it mobile:** you can eliminate the need to plug it in by adding a battery pack
- ⌘ **Creates on demand access via the touch display unit (TDU)** where the data is uploaded.



Menu management systems

Integrating food labelling with a menu management system is a solution especially suited to businesses that have multiple sites.

Brother recommends a solution which combines a TD thermal printer with tablet holder and third-party software and applications, accessed through a tablet, creating a standalone solution that can be used anywhere on a site to create, edit and print labels.

Brother printers are compatible with a variety of menu management systems including Food Alert, Nutritics, Planglow, Marka, MyDill, Food Management Systems and many more to create a modern, holistic solution to food labelling.



Why we love them:

- ⌘ Gives the ability to create clear, accurate food labels including calorific content, unit price, allergens and even details of the staff involved in production
- ⌘ Creates ease in managing any changes centrally
- ⌘ Provides easy access to any information on each product
- ⌘ Works using a central database, meaning all the ingredient, allergen and nutritional information is in one place.



Marka is an out of the box menu management solution which allows you to easily print fully compliant labels including nutrition information, allergens, costs and ingredient declaration. Whether you run a single store or a chain, Marka has a competitively priced option for you.



In the first year of Natasha's Law coming into effect, businesses were simply focused on becoming compliant. A few years on from its introduction, there is now a greater understanding of not just what the law requires, but why it matters and what businesses need to do.

As we suspect that food regulations will continue to evolve, a solution that makes compliance today as simple as possible, but that will also offer flexibility to businesses for the future is needed. This is what we strive to achieve with Marka.

Simplifying the food labelling process, business owners can centrally set up and manage their list of allergens and input menu ingredients with confidence. Our solution will then automatically emphasise allergens on the food label which can be printed on-demand with a Brother printer.

***James Ussher-Smith,
Managing Director, Marka***



Dill is a specialist mobile food labelling solution for any business size and type. Whether it is Stock Rotation or Natasha's Law labelling, Dill has got you covered. Create your menu or design the cycles you need for stock rotation and automate your daily labelling, which means less manual work for your team.

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As more businesses work to comply with Natasha's Law, we want to focus our efforts on helping them to do so in a way that is as simple and affordable as possible.

To get around costs, we've seen businesses relying on handwritten labels or even printing labels on A4 paper and manually printing, cutting and pasting on to packaging. Although it may seem more affordable in the short term, it increases working time, risk of human error through excessive manual input which could cost businesses much more in the long run.

In the past couple of years, Dill has been focused on offering automated systems that are mobile, user friendly, cost efficient and easy to connect in any environment. Our solution is automated through dynamic templates fitting as much content on a label as legibly as possible, with the goal of saving any excess paper, and as a result, saving costs. Our partnership with Brother UK ensures we're equipped with top-notch printers, seamlessly integrating to fulfil all of our end users' labelling needs. It also means we get to integrate with a variety of label printers and support our end-users whether they're using Android or iOS.

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***Alex Coldea,
Co-Founder and Director, Dill***

In practice: Digitising food labelling

Seoul IN a Bottle is a new Korean food concept that has launched at KRAFT Dalston. With a focus on modern flavours, the business has developed a diverse and captivating cuisine. Seoul IN a Bottle also prepares fresh Korean sauces bursting in flavours which it sells online at AllPrepped.



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Due to us having a large amount of ingredients to prepare, having to hand write dates and labels caused a huge amount of wasted time throughout service. I'd estimate we save around half an hour each day, which sounds small, but it all adds up on a busy Saturday! Equally, the large text means each ingredient is easy to find even in a cramped fridge.

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*Kyle, Head Chef,
Seoul IN a Bottle*

With allergens and ingredients sitting as a top priority when it comes to Natasha's Law compliance, Seoul IN a Bottle wanted to have its meals served in the right way from the very beginning with an emphasis on food safety compliance and information accuracy.

The business was faced with two key challenges. Firstly, manual food safety labelling was taking more operational time, effort and further checks to make sure the due by dates were displaying correct information. Secondly, as the chain is Korean, food safety labels containing Korean characters are difficult to be encoded and printed on labels by a labelling machine.

Seoul IN a Bottle implemented Dill Print to overcome these challenges. Dill can tailor bespoke and compliant templates to suit any daily operational model. The software helps members of staff maintain food labelling operations with minimal human errors saving them time and streamlining processes through automated food safety and PPDS templates.

The Brother TD-4550DNWB printer was integrated into the solution with the support of Brother UK. The Wi-Fi enabled device means members of staff can print labels from a tablet or even their mobile phones, making the process more flexible.

Dill's software solution and integrated Brother TD-4550DNWB hardware have shown increased productivity, accuracy and confidence when printing labels. Since the implementation of Dill, Seoul IN a Bottle has noticed half an hour saved daily in labelling operations.

Best practice beyond regulations

Natasha's Law provides clear guidance for PPDS products, but there are many other scenarios allergy sufferers face that are not yet covered by regulations that give them the confidence the foods they are eating are safe for them.

By providing more clarity on ingredients and allergens, your customers will know they've found a place they can trust and be more likely to return.

Here's how you can further support your customers and give them the best possible experience:



Takeaways

While labelling is not legally required for takeaway food that isn't pre-packaged, being transparent shows those with special requirements that you are serious about their needs.

A consideration in the years to come is to include a printed label on each meal, highlighting allergens or dietary preferences. For complete clarity, make sure that the allergen warnings are distinct – for instance with a brightly coloured label – to help avoid mistakes on delivery and unpacking.

The added step will create even more trust between you and your customers, which will certainly pay off in the years to come.



Chilled for heating and eating, and cook-at-home kits

If you are selling pre-prepared meals for customers to heat at home, or meal kits for them to recreate your recipes, you must follow PPDS rules. Make sure you include a label with the name of the food and the full ingredients list. It's also a good idea to provide cooking instructions, as well as tips on how customers can avoid cross contamination when preparing the food themselves. How hot and chilled foods are transported is also key. For a more in-depth look at storage and temperature regulations, the Food Standards Agency has lots of helpful information.

For all three options, takeaways, heating and eating, and cook at home – it's good practice to include a receipt and order summary on the bag. Using a printed, adhesive label not only provides clarity here, but can also be used as a tamper-evident seal, giving customers added peace of mind.

The future for Natasha's Law and food labelling

Natasha's Law represents a significant step forward in food safety regulation and has undoubtedly already helped to save lives.

However, it's likely that requirements for wider food labelling may become more stringent in the future. Changes to both the types of food requiring a label, and to what information a menu at a restaurant should include will continue to evolve in the years to come.

As food labels become more detailed, management of that information will be increasingly important. Those businesses that have prepared by implementing a scalable, accurate digital food labelling system will be well placed to adapt to changing requirements and remain compliant now, and in the future, keeping their businesses and their customers safe.



brother

at your side

**Get in touch for more information on Brother
and how we can help futureproof your food labelling needs.**

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Sources:

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

<https://www.gov.uk/government/news/natashas-legacy-becomes-law>

The Brother research referenced throughout the report consists of a study of 100 food industry businesses, carried out in 2020, in partnership with research company Coleman Parkes, and again in 2022.

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