

Conclusions - PPDS evaluation

The PPDS legislation was brought in following the death of Natasha Ednan-Laperouse to ensure that a similar tragedy could not happen again. It was intended to reduce the risk of consumers with food hypersensitivities (FHS) suffering an adverse reaction due to having consumed a food without knowing the allergens it contains. This research has looked into how the legislation has been implemented to date and its effects on FHS consumers as well as on those charged with enacting and enforcing the legislation; Food Business Operators (FBOs) and Local Authorities (LAs).

The legislation has led to positive change for some consumers, though there is room for further change. Two fifths (42%) of consumers saw an improvement in the availability of information they need to identify whether PPDS foods may cause an unpleasant (or dangerous) reaction for them. Some consumers (40%) feel more confident in buying PPDS foods, giving them an increased quality of life (39% of consumers). This was particularly the case among younger consumers (47% of 18-34 year olds) and those who purchased PPDS foods more often (48% who buy PPDS often/sometimes). In addition, around one in five consumers (18%) with a severe allergy or intolerance have started buying PPDS foods more often as a result of the legislation.

However, there is still some way to go in ensuring that the availability of necessary labelling information is consistent for FHS consumers. Almost a quarter (24%) of FBOs reported not being compliant with all aspects of the PPDS legislation, with smaller independent businesses and those in the catering sector, particularly takeaways, more likely to be struggling. These types of businesses tended to have lower awareness of the types of food covered by the labelling requirements. They also face shifting supply chains and, for takeaways especially, a mixture of direct and indirect sales channels and language barriers.

There have also been some unintended consequences of the legislation. Almost a fifth (17%) of FBOs have started to sell food that was previously PPDS as non-prepacked, meaning FHS consumers are missing out on the benefits of better labelling for these foods. And almost three-quarters (72%) of FBOs have started to apply Precautionary Allergen Labelling to their PPDS foods, which carries a risk of reducing the food available to FHS consumers, who are often very concerned about cross-contamination.

FBOs and LAs have invested time and money into supporting the legislation. LAs have focussed on providing support and advice to FBOs rather than enforcement action against non-compliant businesses while the legislation is still in its infancy, and FBOs have found this support useful. LAs feel that further action is still needed to improve compliance among FBOs however, including general training, guidance on compliant packaging and best practice in terms of labelling (respectively, 75%, 67%, and 65% of LAs who think FBOs didn't find compliance easy). One in five LAs (22%) would also welcome being provided with greater clarity on what food products are covered by the PPDS legislation.

In terms of potential refinements to the legislation, two thirds of LAs (67%) felt that suppliers and wholesalers should be mandated to notify businesses about recipe changes. Around half (55%) of LAs also felt that the requirement to label PPDS foods with full ingredient lists should be removed, with the emphasis instead being put on allergens.

It will be important to monitor the implementation of the PPDS legislation over the long-term to see if any refinements to the legislation and support provided to FBOs and LAs result in improved understanding and compliance, with resulting benefits for the lives of FHS consumers.

