

# Natasha's Law: The Importance of Accurate Labeling in the Food & Beverage Industry

A White Paper from Kallik

**NUTS**



**LERY**



**MUSTARD**



**SUGAR**



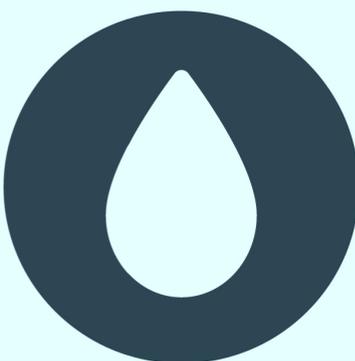
**MEAT**



**FICIAL  
TENERS**



**ARTIFICIAL  
COLOR**



**TRANS  
FATS**



**CORN**



**SESAME**



**SOY**



**KALLIK**

In highly regulated industries, label inaccuracies can have potentially fatal consequences. The food and beverage sector is no exception to this. Following the tragic death of a young girl in 2016, new legislation known as Natasha's Law will be implemented on 1st October 2021, aiming to provide optimal transparency regarding all product ingredients by enforcing clearer labeling information. Here, we take a look at these regulatory changes and the trigger behind them, the dangers of non-compliance and explain what can be done to drive better product labeling practices within the food and beverage market to keep consumers safe.

## The need for more stringent food labeling standards is all too clear

In 2016, Natasha Ednan-Laperouse suffered a severe allergic reaction after eating a baguette from a ubiquitous UK sandwich shop chain, Pret a Manger, which consequently led to her death. The 15-year-old teenager had a serious sesame allergy, but the packaging of the baguette she purchased did not contain any information disclosing that it may contain this ingredient. It was this tragic event which ultimately resulted in the introduction of the aptly named 'Natasha's Law'.

In short, this new legislation states that from 1st October 2021, **all prepared-in-store food must carry a full list of ingredients**. The Food Standards Agency (FSA) first published new regulatory information on 1st October 2019, allowing a 2 year adjustment period to ensure that businesses of all sizes can prepare and adapt to these changes. Prior to this, it has not been mandatory to include allergen information labels on food prepared and packaged in store, only fillings need be disclosed. Despite this, Pret promptly responded to their situation in 2016 by putting detailed ingredient labels on their food, though it is important to note that in not listing the sesame cooked into the baguette, they had not broken any food laws. In his lobbying for the new legislation, Natasha's father compared this legal loophole to playing 'Russian Roulette' with the lives of allergy sufferers.

The introduction of Natasha's Law reflects a growing epidemic of allergies, which have risen five-fold in the UK between 1995 and 2016 (EAT Study). This surge is attributed to environmental factors which impact our immune systems, such as pollution, dietary changes and less exposure to microbes. Allergies are subsequently becoming far more common in Western society, specifically in urban areas, and they will only become more prominent. According to CPD Online, **on average, ten people in Britain die every year from food-induced anaphylaxis**. The tragic case of Natasha Ednan-Laperouse acts as a stark reminder that adequate labeling can sometimes be a life or death situation. New legislation will aim to protect the estimated 2 million allergy sufferers in the UK from a similar fate.



# New label regulations will drive better consumer protection

As outlined by the FSA on 20th June 2020, some of the changes primarily applicable to England, Wales and Northern Ireland (with Scotland in review) include:

- ➔ A duty will be placed on food businesses to **label prepacked for direct sale (PPDS) food with a list of ingredients containing emphasised allergens**, bringing the provision of allergen information in line with labeling for prepacked food and reducing consumer confusion. Currently, until 1st October 2021, food businesses can provide mandatory allergen information for PPDS food by any means that they choose, including orally by a member of staff.
- ➔ All food business operators (FBOs) **must declare the presence, whether for use as an ingredient or a processing aid, of any of the 14 major allergens. Information must be easily accessible, in a conspicuous place, easily visible and clearly legible.**
- ➔ The use of icons or symbols to indicate the presence of allergens is permitted as long as it is accompanied by words and numbers to ensure uniform consumer understanding and to avoid misleading the consumer. Currently there is no single agreed set of icons or symbols for indicating the presence of allergens in prepacked, non-prepacked, and prepacked for direct sale food.

It is important to note that this list is not exhaustive, and the FSA are continuing to release information regarding the new food regulations imposed by Natasha's Law. However, the implications of this legislation for FBOs are clear. Though previously there has been no need to declare allergen information on prepacked goods, accurate and consistent labeling will now be essential for PPDS food. At the end of this transitional period, non-compliance will become a criminal offence.

## Consumers and employees are demanding better allergen information labeling

Natasha's story demonstrates how essential it is to have food products clearly labeled with allergen information. A study conducted by Mintel in January 2019 found that **only 37% of consumers agree that it is easy to identify which allergens a product is free from by its label**. Accurate labeling is integral to customer safety, trust and satisfaction, and this research suggests that much more can be done to improve this.

Correct labeling not only helps customers make better informed decisions when purchasing pre-packaged food made in-store, but it is a vital piece of information for employees when advising customers that have food allergies. An article released on Morning Advertiser in 2019, concluded that **almost 70% of UK hospitality employees revealed they need more information about allergies** due to a lack of understanding. The same article shares the findings from CGA Business Confidence Survey, whereby 58% shared that they feel apprehensive when customers inquire about allergens or specific ingredients in their food. The proposed legislative change from oral allergen information to enforced product labeling is undoubtedly influenced by this figure, highlighting the current shortcomings of the food industry in this regard.

It is becoming increasingly clear that labels and packaging are no longer just part of branding, product identity and product differentiation. Labels contain essential information that can help to save lives, whether in the food industry or any other, and it is vital that these are as detailed as possible.

## The heightened importance of an intelligent label management software

### New rules mean new processes

From large chains to independent stores, new labeling rules will apply to any foods prepared and packed on the same premises to where they are sold. A common challenge for FBOs regarding Natasha's Law is locating where the labeling will take place. Previously in the food and beverage industry, labeling has existed primarily for factory-prepared products, where goods are manufactured in a highly controlled environment and the allergen risk is well understood. The new law means that establishments who pre-package food for direct sale who do not yet have the staff, time, technology or infrastructure to undergo a PPDS food labeling process may struggle. They also may not properly understand all the allergen risks posed by their goods.

**Food and beverage businesses will subsequently need to invest and put in place processes, systems and resources in advance of the legislation that makes them compliant for when the legislation comes into force.** Most notably, there must be a system in place to quickly update any ingredient changes with immediate effect; if a recipe changes, FBOs would need to alter the labeling for it. It would also need to be made clear on the label that the recipe has changed, as customers who regularly buy that product may not check the ingredients again. An automated labeling software would make this process seamless, making the update of a label to highlight a recipe change, perhaps by adding a new starburst graphic to draw attention to the updated ingredients, possible in minutes without the need to involve expensive design agencies or artworkers. . The ability to find and update affected labels quickly and efficiently is invaluable, and by storing these in an asset manager, with detailed metadata to drive search results, this can be done with ease.

Natasha's Law vastly changes the scope of labeling within the food industry. Rapidly evolving regulations require a corresponding solution to introduce quick and efficient label creation, management, and ensure any future changes can be made easily. It is crucial that labeling is consistent and accurate. Such high stakes require that mistakes, when made, are rectified as quickly as possible. An example of this could easily include the discovery of an undisclosed ingredient on a food-product label. As shown in the case of Natasha, **a seemingly simple mistake or minor detail can have vastly tragic consequences.**

### Speed to market

Most FBOs will look to introduce new products to the market, and do seasonal variations of existing products in order to capitalise on changing consumer tastes and industry trends. Here, speed to market is essential for retailers, but getting product labels created using traditional artwork methods can take time. A computer-generated label, where the content is determined by pre-built rules, created from pre-existing imagery and phrases would enable FBOs to produce new labels for new products with minimal effort.

## Printing solutions

Furthermore, many FBOs will not have the capability to print the newly required labels in house. When it comes to third-party printers, it is essential that they are kept up-to-date with label changes; the label must always match the product so as to avoid legal repercussions. For printers to maintain accurate information, FBOs need to ensure their suppliers are informed of any label changes. However, there are no guarantees that printers will ensure their records are kept in alignment with your current labels, and there is a risk they may inadvertently print an old version of a label which may have out-of-date allergen information. By granting your printer access to your labeling system, you can ensure they only print the most recent approved version of your label, giving you peace of mind that only the correct version will be printed and that old versions of the label are not available. A true end-to-end labeling solution which is capable of managing printing processes, as well as artwork creation and management, is the optimal way to ensure full control over your labeling lifecycle.

An intelligent labeling software can impose centralised structure and control for the FBO, the benefits of which include certainty that the right information is going out on every product. Through label automation, FBOs can maintain safety, compliance and market confidence, while reducing the risks of mislabeling. With the use of a label management system, regrettable and avoidable situations such as Natasha's death are now easier to prevent than ever.



### About Kallik

Kallik, the enterprise labeling company, provides regulated industries with a responsive, end-to-end label management platform they can trust.

Its cloud-based labeling platform, Veraciti™, delivers definitive compliance and supply chain efficiency for all the content assets that make up product packaging, labeling and customer information documents. From barcodes to safety symbols and text, Veraciti manages any format, in any territory, on any material and via any channel - with complete reliability and traceability.

Medical device manufacturers, pharmaceutical firms, chemical and cosmetics companies use Kallik to deliver trust in their labeling, confidence in their brand and integrity in their process.

To find out how we can support label and artwork management transformation in your business, please get in touch by emailing us at [enquiries@kallik.com](mailto:enquiries@kallik.com).