

## Annex B - Examples of prepacked for direct sale food

Version 2 – Issued October 2021

### **Key changes/additions to Version 2**

- Added advice on ‘offers for sale’ and the provision of free food
- Added advice on what a single item of food is
- Added a section on distance sales
- Added information on the definition of packaging
- Added additional text to existing examples of PPDS food to make them clearer
- Added new examples of PPDS food

### **Introduction**

This annex considers whether food that a food business operator offers for sale falls within the definition of prepacked for direct sale (PPDS). ‘Offers for sale’ should be interpreted in light of the definition of ‘placing on the market’ - see Article 3(8) of Regulation (EC) No 178/2002. Therefore, food supplied without charge falls within the meaning of ‘offered for sale’.

The examples in this annex are based on queries that have been received from food business operators, local authority officers, posts on Knowledge Hub and the PPDS webinars (held by the FSA in July and August 2021). Please note that these examples can only serve as a guide. Local authorities will need to determine whether the PPDS requirements apply based on the facts of each situation. Ultimately, whether a specific example of food is PPDS or not would need to be determined through a case going to court.

Due to the diverse nature of food business operations it’s not possible to cover every scenario. We have included a broad range of examples, but if you cannot find the answer to a particular query in this document then please email the PPDS policy team - [PPDS@food.gov.uk](mailto:PPDS@food.gov.uk)

### **Single item of food**

The PPDS requirements only apply to food presented to the consumer as a single item, which consists of the food and the packaging it was placed into prior to being offered for sale (see Article 2(2)(e) of Regulation (EU) No 1169/2011).

Single item refers to the food and the packaging as a whole, and not the number of food items within the packaging. For example, a single piece of prepacked cake would be a single item, as would a prepacked tuna salad with side dressing (i.e. multiple food types within the packaging).

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Examples of single items of PPDS food:

- A single packaged sausage roll
- A multi-pack of sausage rolls
- A whole cake in packaging
- A slice of cake in packaging
- Prepacked sandwiches

Examples of food in packaging that is not a single item and therefore not PPDS:

- Loose pork pies on display in a container. Customers can request a pork pie(s) from the container, they are not being offered the container and all the pork pies within it as a single item.
- A covered large cake that customers can only buy by the slice i.e. the whole cake is not for sale as a single item, only individual slices of the cake.

### Distance selling

Before considering whether a food is PPDS and should be labelled, it is worth establishing if the food in question is offered for sale by means of distance communication<sup>1</sup>.

The PPDS labelling requirements do not apply to PPDS food that is supplied by means of distance selling, such as food that is purchased over the phone, internet or via apps.

Below are some examples of when distance selling does and doesn't apply.

Scenario	Distance sale?	Reason
A hotel offers room service where guests order food over the phone or via an app.	<b>No</b>	We do not consider hotel room service to be a distance sale.

<sup>1</sup> 'Means of distance communication' means any means which, without the simultaneous physical presence of the supplier and the consumer, may be used for the conclusion of a contract between those parties (Article 14 and Article 2(2)(u), Regulation (EU) No.1169/2011)

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<p>Some of the food on offer is prepacked on the premises by the hotel.</p>		<p>Where products are packed or boxed in advance of an order, on the same premises at which guests are staying, this is PPDS, due to the simultaneous presence in one location of both the guest and business.</p>
<p>A food business has electronic order screens in store and a drive through service with electronic order screens. Customers can also place orders over an intercom at the drive through.</p>	<p><b>No</b></p>	<p>Order screens and intercoms at a drive through (or drive thru) are not ‘means of distance communication’ because of the simultaneous physical presence of the supplier and the consumer.</p>
<p>A food business sells ‘mystery bags’ of perishable food at the end of the day to mitigate food waste. The bags can only be ordered online (via a website or app).</p> <p>The content of the mystery bags will vary on a day-to-day and bag-to-bag basis due to the availability of the products involved.</p>	<p><b>Yes</b></p>	<p>Food such as this, if sold via an app or website, would be a distance sale and therefore not prepacked for direct sale.</p> <p>Businesses that adopt this model must ensure they have processes in place to make mandatory allergen information available to consumers, free of charge, before they purchase a mystery bag of food.</p> <p>This can include clear messaging that instructs consumers to contact the business directly for information ahead of placing an order.</p> <p>Allergen information must also be available at the moment the food is picked up by the customer.</p>
<p>Business X has a web site selling food made by local food businesses.</p> <p>Business X doesn’t see the food. Customers order and pay</p>	<p><b>Yes</b></p>	<p>This is a distance sale, so the PPDS labelling requirements do not apply.</p> <p>Allergen information should be made available in some form to the consumer, before the purchase is concluded and at the moment of delivery.</p>

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using their web site. Business X sends details of the order to the relevant food business, who sends the food to the customer.		
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### Food prepacked for direct sale

An online [decision tool](#) is available to help determine whether food is PPDS or not.

For food to be considered prepacked for direct sale, it must meet all three of the following criteria:

- Criteria 1 – Is the food presented to the consumer in packaging?
- Criteria 2 – Is the food packaged before the consumer selects or orders it?
- Criteria 3 – Is the food packaged at the same place it is sold? \*

\* Note: PPDS food also includes food packed at a different location if the food is offered for sale from a moveable and/or temporary premises (such as marquees, market stalls, mobile sales vehicles) and if the food is offered for sale by the same food business who packed it.

The definition of packaging is taken from the definition of prepacked food as defined in Article 2(2)(e) of Regulation (EU) No 1169/2011:

‘any single item for presentation as such to the final consumer and to mass caterers, consisting of a food and the packaging into which it was put before being offered for sale, whether packaging encloses the food completely or only partially, but in any event in such a way that the contents cannot be altered without opening or changing the packaging; ...’

Therefore, prepacked in the context of PPDS food means any single item, consisting of the food and its packaging, that is:

- ready for presentation to the final consumer; and
- is partly or fully enclosed by the packaging; and
- the food cannot be altered without opening or changing the packaging

**Catering/retail sector**

No.	Scenario	PPDS?	Assessment / comments	Status of food if not PPDS
1.	A baguette is placed in a cardboard sleeve that only partially covers the baguette. The baguette can be altered while it is still in the cardboard sleeve without opening or changing the packaging.	<b>No</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging?  <b>No: In this example the cardboard sleeve does not meet the definition of packaging that applies to PPDS food. The baguette can be altered without opening or changing the cardboard sleeve so the item is classed as non-prepacked food.</b></p> <p>Criteria 2 – Is the food packaged before the consumer selects or orders it?  <b>No: The form of packaging used does not meet the definition of packaging that applies to PPDS food. The baguette will likely be put into other packaging that encases the product after the customer orders it.</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold?  <b>No: The form of packaging used does not meet the definition required for PPDS food.</b></p> <p>To meet the criteria of prepacked, the food:</p> <ul style="list-style-type: none"> <li>• must fully or partly enclosed by the packaging; and</li> </ul>	Non-prepacked food

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No.	Scenario	PPDS?	Assessment / comments	Status of food if not PPDS
			<ul style="list-style-type: none"> <li>cannot be altered without opening or changing the packaging in some way</li> </ul> <p>If a baguette sleeve/bag completely encases the food, and is folded over, twisted or sealed, it would be PPDS.</p>	
2.	<p>Side dishes for takeaway meals are prepacked in anticipation of customer demand, e.g.</p> <ul style="list-style-type: none"> <li>prawn crackers in a sealed plastic bag</li> <li>coleslaw or other side dishes in lidded pots</li> <li>poppadom condiments such as spiced onion salad and chutney in lidded pots</li> </ul>	<b>Yes</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging? <b>Yes</b></p> <p>Criteria 2 – Is the food packaged before the consumer selects or orders it? <b>Yes</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold? <b>Yes</b></p> <p>There are specific rules for labelling small containers where the largest surface area is less than 10 cm<sup>2</sup>. The largest surface area might be the entire side of a square or rectangular package (i.e. height x width). The largest surface area of cylindrical container, such as a small pot, might be the whole of the curved surface, not necessarily the top or the bottom.</p> <p>If the customer orders their food over the internet or by phone, then it is a distance</p>	

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No.	Scenario	PPDS?	Assessment / comments	Status of food if not PPDS
			sale and the PPDS requirements do not apply.	
3.	<p>A sushi restaurant has a conveyor belt that carries individual dishes. The individual dishes are covered by a clear dome for hygiene purposes and so customers can see what they are selecting (i.e. each sushi dish under a dome is presented as a single item to consumers).</p> <p>These dishes are not pre-ordered. Customers self-select dishes from the conveyor belt.</p>	<b>Yes</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging? <b>Yes</b></p> <p>Criteria 2 – Is the food packaged before the consumer selects or orders it? <b>Yes</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold? <b>Yes</b></p> <p>Sushi dishes covered with domes on the conveyor belt are considered to be prepacked because they are not pre-ordered and the packaging would have to be opened to alter the food i.e. removing the dome equates to opening the packaging.</p>	
4.	<p>A selection of cupcakes are on display in a covered cake stand. Customers can request a cupcake(s) from the stand i.e. the cupcakes and cake stand together are not being offered for sale as a single item.</p> <p>When a customer orders a cupcake, a member of staff</p>	<b>No</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging?</p> <p><b>No: Although the cupcakes are in packaging (the covered cake stand), they are not being presented as a single item of food i.e. the cakes and the covered cake stand are not being presented as whole lot. Therefore, the cakes and the covered cake stand do not meet the definition of prepacked.</b></p>	Non prepacked food

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No.	Scenario	PPDS?	Assessment / comments	Status of food if not PPDS
	removes the cake stand cover and selects a cupcake(s). This is served to the customer on a plate or placed in a paper bag to takeaway.		<p><b>If the cupcakes and cake stand were being offered for sale as one single item, this would be PPDS.</b></p> <p>Criteria 2 – Is the food packaged before the consumer selects or orders it?  <b>No: The cupcake selected is served on a plate or packaged after being ordered by the consumer.</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold?  <b>Yes: If the cupcake will be placed into packaging after it is selected</b>  <b>No: If the cupcake is served on a plate.</b></p>	
5.	Alcoholic drinks are pre-poured and lidded in anticipation of customer demand e.g. in preparation for half-time demand at a sporting event.	<b>Yes</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging? <b>Yes</b></p> <p>Criteria 2 – Is the food packaged before the consumer selects or orders it? <b>Yes</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold? <b>Yes</b></p> <p>If the drinks contain &gt;1.2% alcohol they are exempt from the requirement to be labelled with an ingredients list, but they will still need to be labelled with the presence of any allergens. This should</p>	



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No.	Scenario	PPDS?	Assessment / comments	Status of food if not PPDS
			<p>be done using a “contains” statement e.g. “Contains barley”. Best practice is to emphasise the allergen(s), but this is not a mandatory requirement in this instance.</p>	
6.	<p>A prepacked ready meal is made by business A and sold to business B. The meals are prepacked food and meet full labelling requirements.</p> <p>Business B serves these meals to consumers. They remove the lid of the ready meal, heat the contents and then replace the lid.</p> <p>The heated ready meal is placed in a hot hold display cabinet. Customers choose a meal from the display cabinet.</p>	<b>Yes</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging? <b>Yes</b></p> <p>Criteria 2 – Is the food packaged before the consumer selects or orders it? <b>Yes</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold? <b>Yes</b></p> <p>After heating, the ready meal is effectively re-packaged by the business when they replace the lid. This is done before customers select a meal from the hot hold display cabinet and therefore the ready meals are PPDS.</p>	
7.	<p>Platters of food on a buffet are covered with one piece of cling film.</p> <p>The clingfilm is for hygiene purposes and is removed</p>	<b>No</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging? <b>No: The clingfilm is removed before consumers have access to the buffet, so it is not presented to consumers in packaging.</b></p>	Non-prepacked food.

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No.	Scenario	PPDS?	Assessment / comments	Status of food if not PPDS
	before customers are given access to the buffet.		<p>Criteria 2 – Is the food packaged before the consumer selects or orders it?  <b>No: The food is presented to the consumer as ‘non-prepacked’ food. Also, the platters of food are not a single item.</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold?  <b>No: The food is presented to the consumer as ‘non-prepacked’ food.</b></p>	
8.	<p>A food business operator makes individual sandwiches that are placed on plates and covered in clingfilm.</p> <p>The sandwiches are put on display in a chiller cabinet for customers to select.</p>	<b>Yes</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging? <b>Yes</b></p> <p>Criteria 2 – Is the food packaged before the consumer selects or orders it? <b>Yes</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold? <b>Yes</b></p> <p>A single item of food (that is ready for presentation to the final consumer), such as a sandwich, on a plate that is covered with cling film, before being ordered by a customer, will need to comply with the new PPDS rules.</p> <p>This item does meet the definition of packaging that applies to PPDS food –</p>	

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No.	Scenario	PPDS?	Assessment / comments	Status of food if not PPDS
			<p>the packaging encases the product so that the food cannot be altered without opening or changing the packaging (in this instance it is opened or changed by removing the clingfilm from the plate).</p> <p>We do not have a definition of packaging that says that packaging is only made of certain materials, or that stipulates that PPDS products are only those that are taken off-site. So this example is considered to meet the definition of PPDS.</p>	
9.	<p>A restaurant has soup on their menu. The soup comes with a bread roll.</p> <p>The bread rolls are individually wrapped in clingfilm for freshness and are stored in the kitchen (i.e. the customer does not have sight of these).</p> <p>When an order for soup is received , a bread roll is removed from its cling film and placed on the customers plate alongside the bowl of soup.</p>	<b>No</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging?  <b>No: The FBO removes the cling film from the bread roll before presenting the food to the consumer on a plate. Therefore, the bread roll is not presented in packaging.</b></p> <p>Criteria 2 – Is the food packaged before the consumer selects or orders it?  <b>No: The food is presented to the consumer as a non-prepacked item.</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold?  <b>No: The food is presented to the consumer as a non-prepacked item.</b></p>	Non-prepacked food.

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No.	Scenario	PPDS?	Assessment / comments	Status of food if not PPDS
10.	A fish and chip shop sells buttered bread rolls. The rolls are individually wrapped in clingfilm and placed on the counter ready for customer demand. They are served to customers in the cling film.	<b>Yes</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging? <b>Yes</b></p> <p>Criteria 2 – Is the food packaged before the consumer selects or orders it? <b>Yes</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold? <b>Yes</b></p>	
11.	Fish and chips are wrapped in paper to takeaway after a customer places their order.	<b>No</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging? <b>No: It is non-prepacked when the consumer places their order. It is subsequently packaged to order.</b></p> <p>Criteria 2 – Is the food packaged before the consumer selects or orders it? <b>No: The fish and chips are only packaged after the customer places their order.</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold? <b>Yes: But after the consumer has ordered it.</b></p>	Non-prepacked food
12.	A food business makes and packages paninis	<b>Yes</b>	Criteria 1 – Is the food presented to the consumer in packaging? <b>Yes</b>	

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No.	Scenario	PPDS?	Assessment / comments	Status of food if not PPDS
	<p>which are put on display in a chiller cabinet.</p> <p>Customers select a panini from the cabinet and can hand it to a member of staff who removes the panini from its packaging before toasting it.</p> <p>After toasting, the member of staff either places the panini back in the original packaging and hands it back to the consumer, or if the customer is eating-in, places the panini on a plate.</p> <p>There is nothing to prevent a customer taking the panini from the premises in its packaging</p>		<p>Criteria 2 – Is the food packaged before the consumer selects or orders it? <b>Yes</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold? <b>Yes</b></p> <p>The panini is prepacked by the business before being presented for sale to the customer.</p> <p>The fact that the FBO removes the panini from its packaging before toasting it does not change the PPDS status of the food; it was initially presented to the customer in packaging.</p> <p>How the panini is served to the customer after heating is also not relevant as the panini was initially presented to the consumer in packaging.</p>	
13.	<p>A bakery has loose food on display, ready for sale to consumers.</p> <p>This includes a tray of flapjacks and loaves of</p>	<b>No</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging? <b>No: The food is not in packaging when the customer chooses or selects the product</b></p>	Non-prepacked food

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No.	Scenario	PPDS?	Assessment / comments	Status of food if not PPDS
	<p>bread, neither of which are in packaging.</p> <p>Portions of flapjack are taken from a tray and placed in a bag when a customer requests a piece.</p> <p>Likewise, loaves of bread are placed in a bag when a customer requests one.</p>		<p>Criteria 2 – Is the food packaged before the consumer selects or orders it? <b>No: The food is not in packaging before the customer chooses or selects it.</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold? <b>Yes: But after the consumer has ordered it.</b></p> <p>Open bakery products, such as a tray of flapjacks, are not prepacked so are not PPDS.</p>	
14.	<p>In a deli, customers select loose bakery products that are on display, such as croissants or loaves of bread, and place them into a bag.</p>	<b>No</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging? <b>No: The products are not presented to consumers in packaging.</b></p> <p>Criteria 2 – Is the food packaged before the consumer selects or orders it? <b>No: The bakery products are not prepacked. The customer selects the products themselves and places them in packaging.</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold? <b>Yes: But after a consumer has selected them.</b></p>	Non-prepacked food

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No.	Scenario	PPDS?	Assessment / comments	Status of food if not PPDS
15.	<p>An ice cream manufacturer uses 5 litre tubs for their products. These 5 litre tubs are sold to other businesses and comply with the labelling requirements for prepacked food.</p> <p>The manufacturer decants ice cream from these 5 litre tubs into 500 ml tubs for direct sale to members of the public who visit the manufacturing premises.</p> <p>These tubs are lidded and displayed in a freezer for customers to select.</p>	<b>Yes</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging? <b>Yes</b></p> <p>Criteria 2 – Is the food packaged before the consumer selects or orders it? <b>Yes</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold? <b>Yes</b></p> <p>The 500 ml tubs of ice cream are PPDS. They are prepacked at the same premises they are sold, so will need to comply with the PPDS labelling requirements.</p>	
16.	<p>An FBO owns a food factory and a number of retail outlets.</p> <p>They manufacture food that they prepack. This prepacked food is sold in their retail outlets across the UK.</p>	<b>No</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging? <b>Yes</b></p> <p>Criteria 2 – Is the food packaged before the consumer selects or orders it? <b>Yes</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold? <b>No: The food is not packaged at the same place it is sold.</b></p>	Prepacked food

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No.	Scenario	PPDS?	Assessment / comments	Status of food if not PPDS
			<p>In this scenario the products are prepacked food, not PPDS. Although the food is packaged by the same food business, they are not sold at the same place.</p>	
17.	<p>To meet demand during busy periods, a food business prepares and prepacks burgers in anticipation of customer demand.</p> <p>The packaging meets the definition of prepacked.</p>	<b>Yes</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging? <b>Yes</b></p> <p>Criteria 2 – Is the food packaged before the consumer selects or orders it? <b>Yes</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold? <b>Yes</b></p> <p>Examples of burger packaging that would meet the definition of prepacked include:</p> <ul style="list-style-type: none"> <li>• a closed cardboard/polystyrene lidded box.</li> <li>• a burger that is fully wrapped in paper.</li> </ul> <p>The length of time the burgers are in the packaging prior to being sold is irrelevant. If they are presented to the consumer in packaging and are packed <u>before</u> the consumer selects them, they are PPDS food.</p>	



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No.	Scenario	PPDS?	Assessment / comments	Status of food if not PPDS
18.	The same business (see above) makes burgers to order during quite service periods.	<b>No</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging? <b>Yes</b></p> <p>Criteria 2 – Is the food packaged before the consumer selects or orders it? <b>No: The burgers are made to order and are packaged after the consumer orders them.</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold? <b>Yes: But after a consumer has ordered it.</b></p> <p>Burgers that are made to order are not PPDS. The FBO can choose to use the same packaging as the PPDS burgers (assuming the ingredients and allergens remain the same) or use different packaging. This will be a business decision for the FBO.</p>	Non-prepacked food
19.	<p>A food business offers PPDS food to its customers.</p> <p>Something goes wrong with the labelling machine and they are unable to label the PPDS food that is already prepacked.</p>	<b>Yes</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging? <b>Yes</b></p> <p>Criteria 2 – Is the food packaged before the consumer selects or orders it? <b>Yes</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold? <b>Yes</b></p>	

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No.	Scenario	PPDS?	Assessment / comments	Status of food if not PPDS
			<p>In this scenario the business will need to find an alternative way of labelling the prepacked food.</p> <p>Alternatively, they could consider removing the PPDS food from its packaging and offering it for sale without packaging or packaging it at the request of a consumer.</p> <p>If the food is presented as 'non-prepacked' food the business will need to decide how to provide mandatory allergen information to consumers e.g. orally or in some form in writing.</p>	

**Schools and colleges**

No.	Scenario	PPDS?	Assessment / comments	Status of food if not PPDS
20.	<p>A parent pre-selects their child's school lunches (see note about pre-payment).</p> <p>Items of food that make up the lunch will include food prepacked by the school kitchen e.g. a sandwich, side salad in a container or a dessert in a lidded pot.</p>	<b>No</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging? <b>Yes</b></p> <p>Criteria 2 – Is the food packaged before the consumer selects or orders it? <b>No: The food is pre-ordered (made to order) so is not packaged before it is ordered.</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold?</p>	Non-prepacked food

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No.	Scenario	PPDS?	Assessment / comments	Status of food if not PPDS
			<p><b>Yes: But following an order by the consumer.</b></p> <p>It is important that schools have all the information needed to develop their own procedures and practices to minimise the risks for children with allergies. Schools should have plans in place to ensure the safety of pupils with food allergies. This will include arrangements to ensure staff, such as cooks and lunch time supervisors, know the dietary needs of pupils.</p> <p>NOTE: In scenarios such as this, it is important to distinguish between food that is pre-paid and food that is pre-selected/pre-ordered. Many schools will take prepayments for school lunches e.g. they operate an online system that parents can add money to (but the individual food items might not be selected in advance). The pre-payment for food is not considered to be the same as specific food items being pre-ordered or pre-selected. As such, officers will need to understand the specific arrangements before deciding whether food is PPDS or a distance sale which is made to order.</p>	

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No.	Scenario	PPDS?	Assessment / comments	Status of food if not PPDS
21.	<p>Packed lunches are prepared for a school trip. These lunches are placed in a bag/box that meets the definition of packaging .</p> <p>The contents of the packed lunches are pre-selected by parents.</p>	<b>No</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging? <b>Yes</b></p> <p>Criteria 2 – Is the food packaged before the consumer selects or orders it? <b>No: The food is pre-ordered (made to order) so is not packaged before it is ordered.</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold? <b>Yes: But after it has been ordered.</b></p> <p>If the school lunches are made and packed to order, these are not prepacked, and are therefore not PPDS.</p>	Non-prepacked food
22.	<p>A secondary school canteen has open trays of hot food under heat lamps.</p> <p>Students select which food they would like from the various trays. Kitchen staff plate portions of the food from the different trays and pass the plate to the students.</p>	<b>No</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging? <b>No: The food is not presented in packaging.</b></p> <p>Criteria 2 – Is the food packaged before the consumer selects or orders it? <b>No: The food is not packaged before it is selected.</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold? <b>No: The food is not packaged.</b></p>	Non-prepacked food

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No.	Scenario	PPDS?	Assessment / comments	Status of food if not PPDS
	The food is not pre-ordered or selected by the students or their parents.			
23.	<p>A school canteen prepacks sandwiches for the lunch time rush.</p> <p>The sandwiches are placed on display and students make their own selection from what's on offer.</p>	<b>Yes</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging? <b>Yes</b></p> <p>Criteria 2 – Is the food packaged before the consumer selects or orders it? <b>Yes</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold? <b>Yes</b></p>	
24.	<p>A primary school offers food prepacked by the school kitchen at morning break.</p> <p>Pupils choose from the selection on offer i.e. food is not selected or ordered in advance.</p>	<b>Yes</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging? <b>Yes</b></p> <p>Criteria 2 – Is the food packaged before the consumer selects or orders it? <b>Yes</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold? <b>Yes</b></p> <p>In this example, the school and kitchen staff should be aware of the allergies children have and have arrangements in place to minimise the risks for children with allergies</p>	

## Annex B - Examples of prepacked for direct sale food

No.	Scenario	PPDS?	Assessment / comments	Status of food if not PPDS
25.	<p>A college has a deli bar from which students can order a freshly filled baguette.</p> <p>The baguettes are put into packaging after the student orders it.</p>	<b>No</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging? <b>Yes: The baguettes are placed in packaging before being passed to the student, but after being ordered by the consumer.</b></p> <p>Criteria 2 – Is the food packaged before the consumer selects or orders it? <b>No: The baguettes are made to order, so are not packaged before being selected by the students</b></p> <p>Criteria 3 – Is the food packaged at the same place it is sold? <b>Yes: But after being ordered by a consumer.</b></p>	Non-prepacked food

## Caring establishments

No.	Scenario	PPDS?	Assessment / comments	Status of the food if not PPDS
26.	<p>A hospital trust produces meals onsite for patients using the cook freeze model.</p> <p>The meals are delivered to the wards where they are reheated in multi portion</p>	<b>No</b>	<p>Criteria 1 – Is the food presented to the consumer in packaging? <b>No: The food is presented to patients on a plate, there is no packaging.</b></p> <p>Criteria 2 – Is the food packaged before the consumer selects or orders it? <b>No: As above</b></p>	Non-prepacked food

Annex B - Examples of prepacked for direct sale food

No.	Scenario	PPDS?	Assessment / comments	Status of the food if not PPDS
	trays and then plated and served to the patients.		Criteria 3 – Is the food packaged at the same place it is sold? <b>No: As above</b>	