

Dear David,

Though I can't find an email trail, I think we've been in contact before. I'm also aware that you are on the Bread and Technical Working Group, so am sorry if I'm repeating anything you know already.

I coordinate [the Real Bread Campaign](#) for the food and farming charity Sustain. We define bread as made without the use of additives. From this simple, universally-accessible starting point, our mission is finding and sharing ways to make bread better for us, better for our communities and better for the planet.

A key element of the Campaign's work is calling for an [Honest Crust Act](#) of improved loaf labelling and marketing regulation to better protect shoppers and help to create a more level playing field on which small business owners and their employees stand a better chance of thriving.

I'm interested to know if the Trading Standards Institute, and trading standards officers in general, might find what we are calling for useful and support our proposals.

Our proposals

Key points include:

- Mandatory full ingredient labelling (or display at point of sale) for all loaves, rolls, wraps etc. including those that are sold unwrapped / not prepacked.
- Mandatory declaration of all additives, including ones referred to as 'processing aids'.
Legal definition of the word wholegrain, ensuring that it is only used to name or market products in which at least 51% by weight of the dry ingredients are unrefined grains, flakes, meal or flour.
- Legal definition of 'fresh', 'freshly baked', 'baked today' and similar claims, limiting their use to products made from scratch in the past 12 hours and without the use of preservatives.
- Legal definition of sourdough bread as made without additives and leavened only using a live sourdough culture.
- Meaningful legal definitions for other words commonly used to name and market grains, flour, bread and industrial baked products, including: artisan, craft, ancient, heritage.

The need for legal definitions

As I'm sure you know, at present, a product can be:

- Made with highly-refined flour as the main ingredient, with a very small percentage of wholemeal flour, and yet marketed under the healthy halo of 'wholegrain'.
- Made, baked, frozen, transported a great distance (even from another country), then baked for a second time, and yet marketed as 'freshly baked', 'baked in store' or similar.
- Made using additives, with little to no live sourdough starter culture, and leavened using baker's yeast or baking powder, and yet marketed as 'sourdough bread'.
- Made in large quantities in a factory, using a computer-controlled, highly-mechanised process, using additives that no true artisan baker would use, and yet be marketed as 'artisan bread'.
- Made with highly-refined, modern wheat flour as the main ingredient, with a very small percentage of another grain, and yet marketed using terms such as 'heritage wheat' or 'ancient grains'.

None of these terms has a legal definition, leaving companies free to use them as they see fit in product names, front of pack descriptions and other marketing designed to steer shoppers into make buying decisions.

Guidance and regulation

We recognise the value of FSA guidance in helping consumer protection bodies to prevent shoppers from being misled. An example was [Pret a Manger being banned](#) by the Advertising Standards Authority and the trading standards department of the company's Primary Authority from using the word 'natural' to market sandwiches and other food made using a range of additives.

This case, however, also demonstrates one of our concerns about non-binding guidance – that it is open to interpretation. From our initial complaint, it took around a year and a half for the decision to be made. We believe that the issue would have been resolved more quickly (and perhaps not even arisen) had a simple and unambiguous, legal definition been in place.

More directly related to our Honest Crust Act proposals, despite [existing FSA guidance](#), 'freshly baked', 'baked in store' and similar claims are still commonly made to market loaves that have been re-baked (rather than made fresh from scratch) in store.

My question for you / the TSI is: Do you believe that the proposed regulation I have outlined above would assist trading standards officers in pursuing complaints and preventing shoppers from being misled?

Regards,

Chris Young
Real Bread Campaign coordinator