

## Hovis 'White 'n' Fibre' marketing

Below is the response to the Real Bread Campaign's [trading standards complaint of 19 May 2026](#), sent by Hovis to Buckinghamshire & Surrey Trading Standards, the company's Primary Authority.

The 'Nutrition & Health Regulations' referred to by Hovis are [The Nutrition and Health Claims \(England\) Regulations 2007](#) and [Regulation \(EC\) No. 1924/2006 of the European Parliament and of the Council on nutrition and health claims made on foods](#)

July 2026

---

### BACKGROUND:

Hovis as a business is keen to provide products that meet consumer demands and lifestyles. One of these areas has been to look at how we can help consumers obtain more fibre in their diet, whilst still eating a product that they like. Consumption of white bread still equates to approximately 70%\* of the total bread market. So, to develop a soft white product with 50% more fibre was an obvious choice for the business, especially in today's world where fibre has become 'sexier', especially to younger consumers who are looking to enhance their health by eating the right kind of nutrients. This is also a message that DHSC has been highlighting, that the UK population is not consuming enough fibre per day, on average consumers are only eating 20g per day, rather than the recommended Government intake of 30g per day\*\*.

\* Federation of Bakers data

\*\* NHS

As you are aware, our business is committed to ensuring that all commercial communications relating to our products comply fully with applicable legislation and any relevant guidance. We do not intend to present or market our products in a misleading manner.

### LEGISLATION (The Nutrition & Health Regulations):

The claim that is being referenced by the Real Bread Campaign is an 'increased fibre' nutrition claim.

For a product to make a nutrition claim then we looked to the Nutrition and Health Regulation to ensure that we adhered to the requirements to make such a claim. Below I have laid out the key articles.

Under Article 8 (Specific Conditions) of the Regulation, only nutrition claims shown in the annex, meeting the conditions of use can be made.

In addition to the specific conditions mentioned in Article 8, the claim must also comply with the conditions laid out in Article 9 (Comparative claims) in which it states; '1) A comparison may only be made between foods of the same category, taking into consideration a range of foods in that category. The difference in the quantity of a nutrient and/or the energy value shall be stated, and the comparison shall relate to the same quantity of food. 2) Comparative nutrition claims shall compare the composition of the food in question with a range of foods of the same category, which do not have a composition which allows them to bear a claim, including foods of other brands'

Within the Annex of this regulation, it states what the requirements are to make an increased nutrient claim, meaning that the product must i) meet a 'source of' claim, in this case a source of fibre; and ii) the increased content must be at least 30% compared to a similar product.

The annex also supports a source of fibre claim, in which a product must contain at least 3g per 100g or at least 1.5g per 100 kcal.

### SUPPORTING EVIDENCE:

During the development of the product, part of our process is to obtain 3 sets of analytical nutrition results (on the approved recipe), ensuring that we have a good statistical range of results, which then creates an average for the back of pack nutritional information. From these results the product achieved a figure of 3.8g per 100g, thereby meeting the first requirement of ensuring the product meets a 'source of' claim.

To meet the conditions in Article 9, we looked at higher volume selling standard white breads (thereby looking at the majority of products being sold within the marketplace), with similar nutrition profiles & recipe make up, which included Branded products (Hovis / Warburtons / Kingsmill / Roberts), Retailer Brand products (Tesco / Sainsbury's / Asda / Morrisons) and also Discounters (Lidl), to ensure we had a wide spectrum of similar products to give a fair average. Thereby meeting the first part of Article 9 requirements. From this data, we ascertained that the average fibre content was 2.5g per 100g - giving us the base level to set the claim. From this, we could work out what the increase was in our product, and this equated to approximately 50% (actual reduction is 52%, however figure was rounded down).

The final set of conditions within the Regulations refers to the fact that the claim must state the difference in the quantity of the nutrient between the same quantities of the two foods, in which this data can be expressed as an average and as either a percentage or an absolute value. Please see enclosed screenshots taken from the artwork of White N Fibre, highlighting the conditions of use.

Side of pack and bum end - main flash:



Back of pack - substantiation:

freeze as soon as possible after purchase. Best within 3 months.

| NUTRITION INFORMATION |                    |                    |       |
|-----------------------|--------------------|--------------------|-------|
| Typical Values        | Per 100g           | Per Slice<br>44g   | % RI* |
| Energy                | 982 kJ<br>232 kcal | 432 kJ<br>102 kcal | 5%    |
| Fat                   | 1.6 g              | 0.7 g              | 1%    |
| of which saturates    | 0.2 g              | 0.1 g              | 1%    |
| Carbohydrate          | 43.5 g             | 19.1 g             | 7%    |
| of which sugars       | 3.1 g              | 1.4 g              | 2%    |
| Fibre                 | 3.8 g              | 1.7 g              |       |
| Protein               | 9.0 g              | 4.0 g              | 8%    |
| Salt                  | 0.89 g             | 0.39 g             | 7%    |
| Vitamin D             | 1.43 µg (29%RI)    | 0.63 µg (13%RI)    |       |

TO REAP THE BENEFITS OF THIS PRODUCT, PLEASE, KEEP IT IN THE BAG AND STORE IT IN A COOL, DRY PLACE. DO NOT REMOVE THE BAG UNTIL YOU ARE READY TO USE THE PRODUCT. FOR SCANNING, PLEASE, KEEP IT IN THE BAG.

††Look! Each 100g contains 3.8g of fibre. That's 50% more fibre than other sliced white loaves on the market, which typically contain 2.5g per 100g.

QUERIES OR COMMENTS: We'd love to hear from you. If you've any questions or comments, please do get in touch.