The Real Bread Campaign Response to the FSA consultation on the Enforcement of European Parliament and Council Regulations on Additives and Enzymes

The campaign

The Real Bread Campaign is a national not-for-profit initiative of the charity Sustain: the alliance for better food and farming. Through Sustain, we represent around 100 local and national organisations in the food and farming sectors. In addition, we have an ever-growing number of supporters (currently over 1200) drawn from the craft baking sector, millers, educators, cereal growers and the wider population.

The aim of the campaign is to stimulate and promote the production and consumption of Real Bread, which we define as made with all natural ingredients and without the use of any artificial additives, improvers or processing aids. Beyond this, we are fighting for a return to bread and bread production that is better for our health, our communities and our planet.

Whilst the issues we will now raise have implications for the wider food industry, we will draw our examples from industrial baking.

Introduction

There can be little argument that it is just and right for the customer to be in a position to make free and fully informed decisions about what he/she chooses to buy and eat. To allow this, there is not only a legal but also an ethical responsibility upon manufacturers to make available on food labels full information about their composition, including provenance of all ingredients and additives, with the purpose of the latter expressed in plain language.

In reference to food enzymes, Paragraph 6 of the introduction to EU Regulation 1332/2008 outlines that:

- There must be a technological need for their use
- Their use must not mislead the consumer. Misleading the consumer includes, but is not limited to, issues related to the nature, freshness, quality of ingredients used, the naturalness of a product or of the production process, or the nutritional quality of the product.
- The approval of food enzymes should also take into account other relevant factors, including those ethical and environmental

The EU Regulation represents a positive step in the legislation of food enzymes and other additives, demanding that safety requirements are met before they can be authorised for use. It also addresses much-needed clarification on classification and labelling of all food additives.

Conversely, it continues to exclude processing aids from labelling requirements.

The Real Bread Campaign believes that the UK’s decision to oppose broadening the proposal to include all processing aids, is a gross failure in consumer protection. Whilst in keeping with the letter of the EU Regulation, continuing to allow processing aids to be exempt from the labelling requirements is inconsistent with its general aims, as exemplified above.

Transparent labelling

Present (non)labelling regulation of processing aids enshrines deceit by non-disclosure. Simply by claiming that a food additive has no technological effect in the finished foodstuff, a manufacturer is able to deem it a processing aid and therefore is freed from the obligation of declaration. There is not even the requirement for a processing aid and/or its residues to be absent from the end product.

To us, the terms ‘clean label’ and ‘label friendly’, as used by certain manufacturers and suppliers of some such processing aids, do not seem indicative of a commitment to open and honest labelling, rather a collusion with food manufacturers to mislead consumers into thinking that the making of a product has involved fewer additives.
Technological effect in the end product

Whilst it is true that some processing aids used in factory baking just to allow dough to survive the unnatural rigours it faces during industrial manufacture (e.g. one function of the enzyme hemicellulase is to ease mechanical handling), many are used specifically for their post-baking influence on loaves. For example, the enzyme phospholipase A2 can be used to increase volume and prolong softness of the end product; a function of L-cysteine (an amino acid, rather than an enzyme but can be used as a processing aid) is to delay staling effects in the end product; alpha amylase can increase volume, give a darker crust and prolong softness in the end product.

We should also state that, although we understand the technological functions of certain food enzymes used in the manufacture of industrial loaves, we dispute there to be a technological need. The commercial production of Real Bread has always been and continues to be possible without the use of food enzymes.

Misleading consumers

Though in relation to bread, fresh means just baked, at present manufacturers can use the word ‘fresh’ when referring to a loaf that has had its shelf life prolonged by crumb softening enzymes. Enzymes also can be used to push the volume of the end product beyond that which its natural ingredients would allow. Although bread is sold by weight, we believe that a more voluminous loaf will have a bearing on a consumer’s perception of value.

The exclusion of processing aids from the proposed Regulation will continue to give an unfair competitive advantage to those choosing to carry out the practices of simulating characteristics of genuinely fresh loaves or increasing loaf volume by undeclared means, over those producing what we define as Real Bread.

At the most basic level, the non-declaration of the use of food enzymes is deception in itself.

Safety issues

As outlined above, the current and proposed legislation permits processing aids and/or their residues to remain in finished food products. The perpetuation of the processing aids loophole means that those with food allergies still will not be able to watch for allergenic enzymes (or their residues) to eliminate them from their diet. This could leave affected consumers open to unnecessary health risks.

For example, the food enzyme fungal alpha amylase is a known allergen and its residues have been found in finished loavesv.

Food enzymes and other additives are subject to individual testing before being passed as generally recognised as safe, though not guaranteed as such. There is not and never will be the possibility to test the safety of multiple additives in the innumerate combinations in which they can appear in individual products (let alone across diets) in humans over a lifetime. Though only a ban on additives will properly address this issue, at least transparent labelling will allow customers to avoid them.

Moral rights

The continued exclusion of processing aids also denies citizens their moral rights to know what has been used in the production of food. Regardless of whether such substances and/or their residues are present in finished products, moral beliefs of many people demand they avoid any food when its manufacture has involved substances of particular origins, such as GMO or animal sources.

As highlighted earlier this year by the Real Bread Campaign and The Real Food Festival, a possible source for phospholipase A2 is porcinevi, whilst L-cysteine from chicken feathers or even human hair is availablevi. The reaction to this was widespread, prompting articles in national mediavj and to date attracting over 500 signatures on a petition calling for labelling transparency.

Though The Federation of Bakers eventually stated that if a product label declared it to be vegetarian, nothing of animal origin will have been involved in its manufacture, the processing aid loophole allows them to leave customers in the dark as to which processing aids from other origins might have been used, or if indeed they have been used at all.
The Real Bread Campaign asserts our belief in the right of citizens to know exactly what has been used in food production.

**Recommendations and conclusions**

Though we believe that bread should be made with natural ingredients, until adulterants are banned, we believe that those choosing products made using additives have the right and deserve to know what substances have been involved.

We believe that the continuation of the processing aids loophole is only of benefit to those involved in the production and marketing of food enzymes and to food manufacturers using such substances. It is to the detriment of all others, including the producers not using them and to all consumers.

Further we believe that the UK should lead by example in improving upon the inadequate basic standards as laid down by the EU.

The Real Bread Campaign makes these final recommendations for the new UK Regulations and amendments to relevant existing legislation:

1. The classification 'processing aid' is to be scrapped and such substances be subject to the same labelling regulation as other food additives
2. All substances used in the manufacture of a food product must be listed in the ingredients panel
3. The origin, classification and purpose of any and all food additives is to be listed
4. Further to the *function* of a food additive, manufacturers should be required to prove the actual *need* for its use
5. The terms ‘fresh’ and ‘freshly baked’ should only be permitted when referring to a product that has been baked from scratch with a use by cut-off not more than 18 hours after baking. Very specifically, the terms must not be used in relation to a product whose characteristics have been affected or effected by food additives.

Iain Loe  
Chair  
Real Bread Campaign working party

**References**

1. “Baking Enzymes are used as flour additives and in dough conditioners to replace chemical ingredients and to perform other functions in a label-friendly way.” Lallemand, distributor of enzyme concentrate Novamyl. Source: [www.lallemand.com/](http://www.lallemand.com/)
3. "Bakels offer a range of ingredients which are clean label. They are free from emulsifiers and Hydrogenated fats, allowing bakers to produce quality products with as clean a label as possible.” Bakels, suppliers of ingredients to the baking industry. Source: [http://www.britishbakels.co.uk/products.cfm?section=healthyeatingandcleanlabel](http://www.britishbakels.co.uk/products.cfm?section=healthyeatingandcleanlabel)