

Advertising Standards Authority  
Mid City Place  
71 High Holborn  
London  
WC1V 6QT

3 November 2015

Dear Sir or Madam,

The food to go chain EAT is advertising 'sourdough toasties' in print, online, A boards in the street and posters in their shop windows.

The Real Bread Campaign believes that wording and imagery used in this advertising campaign might be in breach of rules 3.1 and 3.3 on misleading advertising of The CAP Code.

### **Advertisement 1**

A print advertisement in a September issue (date not shown on page) of Time Out London.

EAT is also using variations of this advertisement as A board and shop window posters – example attached to email.

### **Advertisement 2**

An online advertisement [eat.co.uk/madewithlove](http://eat.co.uk/madewithlove)

### **Advertisement 3**

An online video advertisement [youtube.com/watch?v=hfTuSwG96bU](http://youtube.com/watch?v=hfTuSwG96bU)

### **Issues**

- 1) The key issue is EAT's use of the word sourdough across this multiplatform advertising campaign.

We contacted EAT by email to confirm the ingredients but as they repeatedly they refused to do so, we are concerned that the product is not in fact genuine sourdough.

- 2) Advertisement 2 includes the following claims:
  - a) 10 years of crafting a Full Flavour
  - b) Mingled with flour, water, rye and malt
  - c) Knead me, by hand
  - d) Proof of the bread is in the proving 36°
  - e) Up up up rising for 6 hours

The Real Bread Campaign's believes that these statements are intended to lead the average shopper to believe that:

- a) There is a decade-long heritage to the product.
- b) That the only ingredients of the product are flour, water, rye and malt.
- c) The loaves are made by an entirely manual process.

- d) The loaves are made by a long, slow fermentation process.
- e) There is authenticity to the product, reinforced by the double use of 'proof' and 'proving'

Our concerns:

- a) How can this be when the product is being marketed as new? We asked EAT to name the bakery in order to be able to ascertain whether they have been making sourdough loaves for ten years but EAT refused to.
- b) Given that the ancient recipe for genuine sourdough is hardly a trade secret, we are concerned that EAT might be withholding, and perhaps even diverting attention from, certain facts they'd rather shoppers did not know.
- c) We believe that a bakery of the size that would be supplying a chain such as EAT must use mixers, rather than hand-kneading, and might use machines for some or all of the shaping process as well.
- d) Six hours of proving seems rather short for genuine sourdough, which typically will take days from start to finish, including an overnight proof, followed by two or more proofs of several hours each.
- e) EAT has refused to give any proof that this product is what they claim it to be. Furthermore, 36°C is at least ten degrees higher than the desired dough temperature generally considered optimal by expert artisan bakers for proving sourdough. We question whether this claim is based on the bakery's practices or a marketing department's error.

Rather than genuine sourdough Real Bread, we ask are the loaves EAT uses to make its toasties manufactured using any or all of the following?

- commercial yeast
- dried sourdough powder
- sourdough concentrate
- yoghurt, vinegar, or other non-sourdough acidifier
- flavourings, preservatives, processing aids and other artificial additives

If so, then we believe the use of the word 'sourdough' would be misleading.

### **What is genuine sourdough?**

Far from being a fad, fashion, trend, lifestyle choice or marketing bandwagon to be jumped upon, genuine sourdough is the oldest form of leavened Real Bread.

By definition, the only ingredients necessary to make genuine sourdough are flour and water. From this a skilled baker will nurture the yeasts and lactic acid bacteria (LAB) that occur naturally on cereals, and therefore in the flour, to make a live starter culture. A pinch of salt is a useful addition and bakers may include other natural ingredients for variety.

### **Why this matters**

Over the longer fermentation time needed by 'wild' yeasts in the starter to leaven the dough, the LAB bring about changes that improve the texture and flavour of the finished Real Bread.

Until relatively recently, sourdough was the sole preserve of Real Bread bakeries. Typically they use high quality ingredients and employ bakers with genuine artisanal skills to craft their loaves, controlled largely by hand and the knowledge of experience. Together, they have built up considerable goodwill for sourdough, for which people are prepared to pay a premium.

The average consumer is, therefore, likely to understand 'sourdough' to denote a high quality, premium product. This is reason enough for some people to make a purchasing decision based on a loaf being marketed with the word sourdough and so for the ASA to prevent its misuse.

Of greater concern is the risk to people who seek genuine sourdough on health grounds. A growing number of studies suggest that longer fermentation in the presence of LAB may also have nutritional and other health benefits, including:

- Sourdough LAB can modify and reduce levels of the fractions of gliadin and glutenin protein in wheat flour that trigger the coeliac auto-immune response and non-coeliac gluten sensitivity. This is not to say that sourdough is safe for people with coeliac disease, but some with non-coeliac gluten sensitivity report that they can tolerate genuine sourdough.
- Sourdough LAB produce beneficial compounds: antioxidants, the cancer-preventive peptide lunasin, and anti-allergenic substances, some of which may help in the treatment of auto-immune diseases. Interestingly, these by-products seem able to survive heating, suggesting that baked sourdough bread may have probiotic potential by stimulating immune responses in the gut.
- Real Bread is a significant source of dietary minerals such as iron, calcium, magnesium and zinc, but phytic acid, naturally present in the bran layers of cereals, can 'lock up' these important minerals. Several hours of fermentation with LAB neutralise phytic acid and make the minerals more bioavailable.
- Sourdough LAB produce organic acids that, under the heat of baking, cause interactions that reduce starch availability and so lower the finished loaf's glycaemic index (GI). This is of value to people with diabetes and concerns over certain diet-related conditions.

These can *only* happen in loaves made with a live sourdough starter culture and fermented for a prolonged period, not one that has been by commercial yeast.

We are aware that EAT has made no such claims in its advertising, however feel that the ASA Council should take this information into consideration when making its decision on the use of the word sourdough.

For the sake of shoppers and of the bakers of genuine sourdough, we ask the Advertising Standards Authority to please investigate the claims made by the advertiser and urge the Council to rule against any use of 'sourdough' it finds to be misleading, and other language and imagery that does not represent the reality of the production content of the advertised products.

I confirm that the Real Bread Campaign agrees to be named as the complainant, and we do not intend to initiate any legal action in relation to this complaint.

Yours faithfully,

**Chris Young**

Real Bread Campaign coordinator