

Since the Real Bread Campaign began in 2009, it has called for new UK loaf labelling and marketing legislation (see below) to give greater protection for shoppers, and create a level playing field for all bakers.

Following two meetings with Defra, it is apparent that the current government has no appetite for this, and little for even issuing guidance.

As a Real Bread Campaign supporter, what do you believe we should do next?

Campaigning for new regulations

The requirements of the new regulations proposed by the Campaign include:

- All bakers and retailers to print full lists of loaf ingredients (plus any processing aids or other artificial additives used) on packaging or to display them clearly at point of sale.
- Meaningful, legal definitions for a range of terms used to market loaves, including sourdough, artisan and wholegrain.
- Meaningful, legal definitions for 'fresh', 'freshly baked' and related terms and regulation of their use in loaf marketing.

In the meantime, we will continue to press the government to issue guidance, which would be of value not only to bakers and retailers, but also to bodies including the Food Standards Agency, the Advertising Standards Authority and local authority Trading Standards departments.

Further details can be found in the additives and labels section of realbreadcampaign.org

This is the Campaign's preferred option. If we were to go ahead, we would consult Campaign supporters with regard to the detail of the proposed legislation and guidance, and the form the campaigning should take.

Baking industry self-regulation

At meetings to discuss these issues, representatives of Defra (Department for Environment, Food & Rural Affairs) made clear that the current government is against introducing new legislation and in fact seeks to deregulate where possible.

Defra's preferred option was that 'the baking industry' comes to a consensus and self-regulates. For this to be meaningful, it would require the agreement of at least the Federation of Bakers and The Craft Bakers Association. Ideally, the major supermarket chains and a dozen or more baking industry organisations would also need to agree.

This is the Campaign's least preferred option, as industry self-regulation is likely to work in favour of big players, rather than shoppers and small enterprises. Also, having participated in meetings of 17 baking-related organisations (which sadly made little progress in unifying 'the baking industry' even on promoting bread as a good thing or baking as a career of choice), the Campaign coordinator is doubtful of a consensus being reached.

EU protected name

On the issue of sourdough, Defra suggested that the Campaign considers applying to have a name protected under EU law using the Traditional Speciality Guaranteed (TSG) scheme. This is the non-geographic member of the protected name schemes, which sits alongside PDO and PGI.

ec.europa.eu/agriculture/quality/schemes/index_en.htm
gov.uk/guidance/eu-protected-food-names-how-to-register-food-or-drink-products

Considerations:

- An auditing process has to be established and auditing body created/appointed to handle applications from producers wanting to use a name with TSG protection. This work will almost certainly necessitate a charge, though the applicant has control over selecting/creating the process and auditing body, and therefore the charge.
- It is very likely that an application to protect the name 'sourdough' would be challenged by those with commercial interest in selling concentrates/mixes etc, or those using the word to charge a premium for other types of loaf. It might even be challenged by Real Bread bakers elsewhere in the EU (eg in France) whose sourdough traditions permit the use of baker's yeast.
- An alternative is to add a qualifier to the name, eg 'real', 'traditional', or 'genuine' sourdough. Again, however, these are still likely to attract similar challenges from bakers who believe their method is equally 'real', 'traditional', 'genuine' etc. Perhaps the one allowing least grounds for objection is 'original sourdough', after all, the original method did not involve any of the things we believe has no place in a loaf marketed as sourdough.
- A further potential obstacle to using a qualifier is that to be eligible for TSG protection, the applicant has to show that the name is in current commercial use and recognised by consumers.
- TSG very much puts the onus on the baker, who would have to apply, submit to and pay for the auditing process to be able to use the name. Conversely, legal protection for the word sourdough as part of national regulations would require any baker wanting to use it simply to make bread in the prescribed way.

Whilst only a partial solution, and far from ideal, if there is appetite amongst Campaign supporters to investigate this further, the Campaign would be willing to do so. If we were to go ahead, we would consult Campaign supporters with regard to the detail, in particular the chosen name and auditing process.