



Department
for Environment
Food & Rural Affairs

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Thank you for your emails of 9, 11 and 30 October about bread labelling legislation and for sharing your organisation's latest report on supermarket loaves, which I have read with interest. I apologise for the delay in replying.

I share your clear desire for consumers to have clear and accurate information about the food that they buy. My commitment to maintaining a robust framework of food law remains steadfast. Our domestic rules should serve as an example of the high food standards we set both nationally and internationally, facilitating trade, providing consumer confidence and above all, ensuring consumer safety.

You begin your letter on an issue of huge importance to me and my department - the urgent, ongoing review of food allergen legislation following recent, tragic events. A thorough review is currently underway to determine how we can strengthen the current legislative framework on allergens. This review is being undertaken by Defra in partnership with the Department of Health and Social Care (DHSC) and the Food Standards Agency (FSA). We will be discussing with key patient groups and the relevant industry stakeholders to ensure all evidence is taken into consideration including new cases as they arise, to help inform where action is needed to improve allergen labelling. I take the provision of allergen information extremely seriously; it is imperative that all UK consumers have complete trust in the food they are eating.

You express some concerns around the use of additives and processing aids in UK bread. I want to reassure you that the conditions for use, purity criteria and labelling rules for all additives permitted for use are provided for within EU Regulation 1332/2008. This regulation was specifically developed to harmonise the rules across the EU around the safety and use of food additives in food. I appreciate that specialist bakeries may proudly display their use of just four key ingredients on signage, but of course these do not represent the full range of bread products on the market. Differing products offer different methods of production and of course price points to suit the diverse needs of UK consumers. Advancing technology allows industry to diversify and improve competitiveness in a fast paced environment but this does not prevent specialist bakers from promoting their traditional production methods and products.

Bread is the most popular item purchased by UK households, according to 2018 figures, with over 130 million slices of bread bought and made from British flour every day. When considering any legislative change, we must ensure we are regulating for the right reasons, to protect consumers and ensure a level playing field for industry and must avoid measures which could knowingly disrupt the market. It is important to note that the aforementioned review of allergen legislation will focus on the current approach to the labelling of non-pre-packed foods, and specifically pre-packed foods for direct sale like some bread loaves which are baked and packaged on site.

It is disappointing that an industry-wide approach involving the non-regulatory suggestions made in previous meetings with Minister Eustice and officials appear to be unpalatable. The wide-ranging views and interpretations of what 'traditional specialities guaranteed' status or an industry code of practice for defining a traditionally made UK sourdough are characteristic of a diverse marketplace. I anticipate similar difficulties of constructing and enforcing legislation around a strict definition of a currently unregulated term. Defra, like other Government departments, is engaged in an extensive programme of work focused on preparing for a range of scenarios around leaving the EU to make sure we are ready for the point of departure. Leaving the EU will provide us with opportunities to review our food rules, but at the moment we are rightly focussed on preparedness for leaving the EU. We want to maintain continuity for business whilst maintaining choice for the consumer. For this reason, we do not plan to introduce a legal definition of sourdough through the Bread and Flour Regulations at this time. However in the longer term, we have an opportunity to review this when the UK has left the EU so that consumers have the information they need to have full confidence in the food they buy and this is something my department has committed to.

As with all products, the use of additives in the production of sourdough breads are limited to the additives specified in regulation 1332/2008. The majority of foods do not have a legal definition, this is restricted to certain key foods which require a legal underpinning to ensure consumers are not mislead and a level playing field for business. In most cases the labelling rules laid down by EU regulation 1169/2011 and the Food Safety Act ensure sufficient protection but also allow for innovation. For example, labelling rules specify that where there is no name prescribed by law for a food, the name used must be sufficiently precise to inform the purchaser of the true nature of the food and must not mislead.

I have mentioned previously that we are aiming to review food labelling overall following our departure from the EU. The exact shape, scope and ambition of any changes will be impacted by the type of deal we negotiate with our key trading partners which is something that will become clearer in the months to come. We have also committed to looking again at the bread and flour regulations once we leave the EU but it is important that when we regulate we do so effectively for the entirety of the market and maintain consumer choice.

Thank you again for taking the time to raise with me the issues of concern to the "Honest Crust" campaign.

With every good wish,

*and thank you for your campaigning work,
Yours,*

Michael Gove

Michael