## Complaint submitted to the ASA

## 20 December 2016

From its own website, to social media (including Flickr and Facebook) to etched wooden boards in store, through sandwich cartons to napkins and window displays, Pret a Manger repeatedly makes claims such as "we shun the obscure chemicals, additives and preservatives common to so much 'prepared' and 'fast' food." Elsewhere, Pret appears to imply that the absence of ingredient labelling is because its own sandwiches are additive-free, saying that "factory produced long-life sandwiches are plastered with labels containing lots of boring numbers, names, dates and symbols. No label is good. Pret sandwiches etc are fresh. They have no labels." The company even goes as far as to state "Now you know how to spot the difference."

Even though the company insists that "avoiding preservatives and obscure chemicals is sacred to Pret," the reality is that it does use them. In May 2015, an email from the company's customer services department responding to a query from the Campaign revealed that 'malted wholemeal' loaf it uses has 15 listed ingredients and unnecessary additives. Across Pret's range, the artificial additives used in baked products include: E920 (I-cysteine hydrochloride) E472e (diacetyl tartaric acid esters of mono- and diglycerides), E471 (mono- and diglycerides of fatty acids), E422 (glycerol), E330 (citric acid) and E300 (ascorbic acid). None of these appears on product packaging, labels or point of sale signs.

After nearly a year and a half of correspondence with Pret's CEO Clive Schlee, the Real Bread Campaign believes that the company has no intention of resolving this apparent discrepancy by either removing all artificial additives from its products, or by declaring them on product/shelf labelling and removing the natural and anti-additive claims from its marketing.

The Food Standards Agency criteria for the use of the word notes that "Natural means essentially that the product is comprised of natural ingredients, e.g. ingredients produced by nature, not the work of man or interfered with by man. It is misleading to use the term to describe foods or ingredients that employ chemicals to change their composition or comprise the products of new technologies, including additives and flavourings that are the product of the chemical industry or extracted by chemical processes."

www.food.gov.uk/sites/default/files/multimedia/pdfs/markcritguidance.pdf

Another pillar of Pret's marketing is 'freshness'. This includes highlighting that some of their "shops have a wonderful baker's oven (indeed, some have two). We bake our baguettes throughout the day, the fresher the better." However, not one of the company's outlets uses its "big, fancy baker's oven" to make "baguettes, pastries, croissants and savouries in house every day" from scratch. While insisting that "'we don't sell 'factory' stuff," Pret in fact use its ovens merely as what the Campaign calls 'loaf tanning salons' to bake off mass-produced items pre-made elsewhere at some point in the past.

The Food Standards Agency's Criteria For The Use Of The Terms Fresh, Pure, Natural Etc. In Food Labelling, states that: "Terms such as "freshly baked", "baked in store" and "oven fresh" may mislead consumers into believing that they are being offered products that have been freshly produced on site from basic raw materials." It adds that use of such terms for bake-off products "could potentially infringe" relevant legislation.

In October 2016, Schlee wrote that the company had declined to switch to using a Real Bread bakery as "their prices were two to three times our current price and moving would cost Pret several million pounds". He claimed that they were "making progress in moving to cleaner bread" but it was not clear whether additives would be removed, or replaced by so-called 'clean label' (i.e. undeclared) processing aids.

As at December 2016, Pret's 'natural' and 'fresh' marketing messages were still in use alongside artificial additives and part-baked products.