

## A submission from the Real Bread Campaign to the National Food Strategy call for evidence

### Our big idea is: An Honest Crust Act

For the benefit of all, the Real Bread Campaign would like to see the National Food Strategy include reviewing and updating British loaf labelling and marketing legislation to safeguard people's right to make better-informed choices about the food they buy and eat. We think this could help you deliver on your objectives of delivering safe, healthy affordable food, contributing to local economies and delivering well-paid jobs and delivering in an efficient, cost effective way.

It is also in line with two of the three consumer rights that the Food Standards Authority highlight in its strategic plan for 2015-20, namely: The right to make choices knowing the facts, and the right to the best food future possible.<sup>1</sup>

### What impact would it have?

Our proposed Honest Crust Act would help create a more level playing field within the sector than (for example) industry self-regulation and governmental guidance, on which small, local, independent bakeries will stand a better chance of thriving. In producing healthy, honestly priced, delicious loaves, these community-centric bakeries create many skilled jobs, help to keep our high streets alive and more money circulating in their local economies. The cost to the taxpayer would be minimal, limited mainly to restoring (and, ideally, improving) support for woefully under-funded trading standards departments.

### Is there any evidence of success?

Small, local, independent bakeries help to support more jobs per loaf support more jobs per than large, industrial loaf fabricators. According to figures from the Office of National Statistics for April 2018- March 2019, around 31,000 people in the UK were employed as 'bakers and flour confectioners'.

Baking industry consultant (and former bakery owner) Andrew Whitley estimates that an individual artisan/craft baker can produce around 200 loaves per day. If the 12million loaves currently baked in the country every day (most by large-scale industrial operators) were evenly distributed across artisan/craft bakeries, it could create an additional 30,000 baking jobs, perhaps rising to 45,000 extra jobs if an extra 25% are added to cover days off for holidays and sickness.

Furthermore, we believe that the skills and knowledge accumulated and used by Real Bread bakers are likely to make their jobs more fulfilling than overseeing a fully-automated, computer-controlled industrial loaf production line or feeding part-baked products into a supermarket 'loaf tanning salon', therefore better supporting their mental wellbeing.

### Background

We began campaigning on these issues in 2009, since when two key steps have been made towards what we call for, though only after EU intervention (mandatory labelling of so-called fortificants in flour) and the tragic death of Natasha Ednan-Laperouse (full ingredient labelling of all loaves, sandwiches and all other food pre-packed for direct sale).

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<sup>1</sup> Food We Can Trust, the FSA Strategic Plan 2015-20.

[www.food.gov.uk/sites/default/files/FSA%20strategy%20document%202015-2020\\_April%202015\\_interactive%20\(2\).pdf](http://www.food.gov.uk/sites/default/files/FSA%20strategy%20document%202015-2020_April%202015_interactive%20(2).pdf)

In 2018, the then Secretary of State for Environment, Food and Rural Affairs, Michael Gove, wrote a letter in response to the Real Bread Campaign's call for an Honest Crust Act, agreeing that "consumers have the right to be informed about the products they buy."

In October that year, the Parliamentary Under Secretary of State for Food and Animal Welfare told the Campaign that he was "fully committed to delivering informative food labelling and promoting robust food standards", that he believed that "choice is important to consumers" and that they should have "complete trust in the food they're eating".

To protect these rights, the Real Bread Campaign calls upon Defra to amend and update the relevant legislation and adequately fund the relevant bodies to enforce them. The provisions of the improved regulations would include:

- The requirement of full ingredient labelling and listing (including any so-called 'processing aids' and other additives used) to be made mandatory for *all* loaves sold by *all* retailers.
- In light of the deaths of people due to (currently legal but self-evidently) inadequate provision of ingredient information, we want to highlight that the above should include the requirement for full allergen declarations on labels, wrapping and/or at point of sale, including for those products still currently exempt from such requirements. This is vital for consumer information and food safety.
- Legal definitions of bakery terms including (but not limited to) freshly-baked, wholegrain, sourdough, artisan, craft and ancient grains; and criteria for their use.

### **What does this big idea need to succeed?**

The main element of our big idea is a change in policy. This would be supported by investment in revived consumer protection bodies. In terms of ingredient/allergen declaration, large food businesses would simply have to revise the wording on the labels, point of sale materials and websites they publish already. As small Real Bread bakeries follow simple recipes and don't use additives, they typically have less to communicate (eg flour, water salt), and this can be done simply and cheaply – eg chalk boards, shelf labels and menus, as now happens in Ireland: [www.fsai.ie/legislation/food\\_legislation/food\\_information\\_fic/allergens.html](http://www.fsai.ie/legislation/food_legislation/food_information_fic/allergens.html)

### **What we can offer the National Food Strategy team**

We would be happy to arrange a visit for you to one or more of the hundreds of small and microbakeries in the Real Bread Campaign network. We could also ask bakers to send you their own stories in writing, outlining the challenges and opportunities for small business owners and employees. We would also be happy to arrange a gathering of industry professionals who can reaffirm things we have written in this submission and to answer questions.

### **Who is submitting this big idea**

This is being submitted by the Real Bread Campaign with the support of many people who back the right to everyone being able to make better-informed choices about the food they buy and eat. They include hundreds of the country's small, independent bakery owners and employees, plus many of their customers.

In late 2017, more than 1500 people took action in support of our call for an Honest Crust Act by writing to the then Secretary of State for Environment, Food and Rural Affairs, Michael Gove.

In summer 2018, 12 MPs from the three largest parties (a quarter of whom were Conservatives) wrote to the Secretary of State calling upon him to improve loaf labelling and marketing legislation:

[www.sustainweb.org/news/jul18\\_cross\\_party\\_support\\_for\\_better\\_bread\\_labelling/](http://www.sustainweb.org/news/jul18_cross_party_support_for_better_bread_labelling/)

In November 2018, the Secretary of State gave written assurance that Defra would review this after Britain leaves the EU. [www.sustainweb.org/news/nov18\\_goves\\_defra\\_honest\\_crust\\_act\\_commitment/](http://www.sustainweb.org/news/nov18_goves_defra_honest_crust_act_commitment/)

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