

Re: *Public consultation on bread composition, labelling and marketing regulations*

16 August 2022

By email

Dear Mr. Eustice,

As owners of, and workers in, small, independent bakeries, our livelihoods and the multi-faceted contribution we make to our local communities and economies rely on people choosing to buy from us. The Bread and Flour Regulations and other applicable legislation, however, fall short in protecting our ability to compete on fair terms for their custom.

Having not allowed adequate discussion of the Real Bread Campaign's Honest Crust Act proposals in Bread and Flour Technical Working Group meetings, Defra will now not commit to including these issues of fundamental importance in the imminent public consultation.

Please intervene to enable our knowledge and views to be heard.

Defra's current review of the Bread and Flour Regulations is a once-in-a-generation opportunity to help level the playing field for small, independent bakery businesses by better protecting us from being undercut by manufacturers and retailers with huge advertising budgets using marketing terms inappropriately. Improving outdated and inadequate loaf labelling and marketing laws will also be of huge benefit to shoppers, the majority of whom buy bread every week.

As a reminder, the problems we face include:

- Retailers do not have to display ingredients lists for products that are sold unwrapped, creating an unnecessary barrier to shoppers' ability to access this important information quickly and easily.
- Despite official guidance for us all to eat more wholegrain foods, there is no mandatory minimum percentage of unrefined grain ingredients in products marketed using the word wholegrain.
- Baked products are made many miles away, even overseas, then baked again (in what the Campaign calls a loaf-tanning salon) at supermarkets, petrol stations and elsewhere. There is nothing to stop retailers from marketing them as 'freshly baked', 'baked here today' or

similar, in direct competition with small bakeries that make and bake bread from scratch and sell it straight away.

- If deemed to be 'processing aids' some additives do not have to be declared (even if residues and by-products remain) denying shoppers their right to know what has been used to make their food.
- There is a growing body of evidence that strongly suggests a range of health and other benefits of making bread by the long-fermentation sourdough process. There is, however, nothing stopping manufacturers from using the word sourdough to name and market fundamentally different products made by fundamentally different processes (which the Campaign calls sourfaux) that greatly reduce, or eliminate, the necessary lactic acid bacterial fermentation.

In response to opt-in suggestions made by Defra and others, we still reject the sourdough code of practice, first proposed in 2019 by industrial manufacturers and others, believing it to be a cheats' charter. We also believe that a TSG (or UK equivalent) in lieu of a legal definition of sourdough would create unnecessary and disproportionate costs and other challenges for SME bakeries. More generally, while we would support Defra and/or FSA/FSS issuing official guidance, this should be in addition to, not instead of, legislation. In July, the Chartered Trading Standards Institute agreed with the Campaign that 'legislative provisions can provide opportunities to increase consumer confidence and support product innovation.'

Will you please ensure that the issues highlighted by the Campaign on numerous occasions to Defra and you personally are included in the public consultation?

If you require further information, Real Bread Campaign coordinator Chris Young will be happy to help: realbread@sustainweb.org

Your sincerely,

Alison Swan Parente, Chair of the Real Bread Campaign

Andrew Whitley, co-founder of Bread Matters, Scotland the Bread and the Real Bread Campaign

Signed by:

Gareth Roberts, Founder, Amazing-Grains, Olney, Milton Keynes

Lee Dodge, Owner / Baker, Ammonite Sourdough, St Keyne, Cornwall

Andrew Wright, Owner, Andys Bread, Llanidloes, Powys

Klaus Kuhnke, Owner, Artisan Foods, London

Tania Crescenzo, Owner, Artisan Loaf Makers, Wokingham, Berkshire

Sydney Aston, Owner, Astons Bakehouse, Hungerford, Berkshire

Charlotte Crockford, Owner, Bake88, Epsom, Surrey

Paul Rawlinson, Owner, Bakeri Baltzersen, Harrogate, North Yorkshire

Louise Williams, Owner, Bakerlou, Stockport, Cheshire

Dan Booth, Director / Head Baker, Bakerman, Darlington, Co. Durham

Sam Henley, Managing Director, Baltic Bakehouse, Liverpool, Merseyside

Andrew Weston, Owner, Banjo's Bread, Gosport, Hampshire

Sue Shaw, Owner, Barkby Bakehouse, Barkby, Leicestershire

Sarah Fraser Steele, Commercial Lead, Better Health Bakery, Haggerston, London
Zakiya Andrews, Owner, Blackbirds Micro Bakery, Birmingham, West Midlands
Emma Parkin, Director, Boatyard Bakery & Cafe, Exeter, Devon
Phoebe Boulanger, Owner / Baker, Boulanger Artisan Bakery, Presteigne, Powys
Andrew Smith, Director, Bread and Roses, Alnwick, Northumberland
Michael Gopfert, Owner, Bread Circle, Prenton, Merseyside
Graham Capper, Director, Bread in the Borders, Westruther, Berwickshire
Sam Cornish, Owner, Bread of Haven, North Walsham, Norfolk
Steven Winter, Owner, Bread Source, Norwich, Norfolk
Alison McTaggart, Owner, Breadonabike, Cambridge, Cambridgeshire
Jason Crockett, Owner, BredShed72, Markfield, Leicestershire
Deborah Rota, Co-owner / Baker, Buzzing Bee Baked Things, London
Toby Mitchell, Managing Director, Celtic Bakers, London
Daniel Burke, Owner, Charles Artisan Bread, Hackney, London
Paul Barker, Owner, Cinnamon Square, Rickmansworth, Hertfordshire
Julia Cross, Owner, Cold Cottage Craft Bakery, Upper Caldecote, Bedfordshire
Calum Black, Sourdough Baker, Company Bakery, City of Edinburgh
Petrina Traynor, Head Baker, Crust on a Bike, Kilcreggan, Argyll
Ildiko Toth, Owner, Cultured Bread Bakery, Chigwell, Essex
Tara Heron, Owner, Dainty Monkey Baking, City of Edinburgh
Sean Demaine, Owner, Demaine Artisan, Westbury, Wiltshire
Brian Noakes, Owner, Dervaig Village Bakehouse, Dervaig, Argyll
Ellie Burgos-Watkinson, Baker, Dough & Daughters, Crickhowell, Powys
David Stewart, Owner / Baker, Dr Dough, Prescot, Merseyside
Louise Lateur, Director, e5 Bakehouse, London
Julia Farkas, Owner, Eastsheenmicrobakery, East Sheen, London
Tina Hawkes, Owner, Eat Your Crusts, Pershore, Worcestershire
Eddy Sleiman, Founder, Ed Baker, Lewisham, London
Sylvester Spinelli, Owner, Elis Bakery, Newcastle upon Tyne, Tyne and Wear
Shona Rogers, Owner, Elsing Bakehouse, Dereham, Norfolk
Emma Parkin, Director, Emma's Bakery, Exeter, Devon
Liesbeth Bosschaert, Owner / Baker, Envie, Topsham, Devon
Rosy Benson, Owner, Field Bakery, Bridgwater, Somerset
Alfred Musasa Manziuala, Manager, Fimivita Free Bread, Birmingham, West Midlands
David Hoyle, Owner, Findhorn Bakery, Findhorn, Moray
Irina Ruseva, Owner, Flour & Soul Bakery, Manchester
Roman Jedlovec, Founder, Flour and Spoon, Leigh on Sea, Essex
Sue Brown, Owner, Forge House Bakery, Lower Heyford, Oxfordshire
Colin Trigg, Owner, Fountain View Bakery, Youlgreave, Derbyshire
Andy Walker, Owner, Gingerbread Bakery, Wistanswick, Shropshire
Mahala Le May, Baker, Granton Community Bakery, City of Edinburgh
David Smart, Owner and Managing Director, Greenhalgh's Craft Bakery, Bolton, Lancashire
Nick Allen, Owner, Greyhound Brewery + Bakery, Pulborough, West Sussex
Hannah Scott, Owner, Hempnall Village Bakery, Hempnall, Norfolk
Sara Ward, Owner, Hen Corner, Brentford, London
Tracey Law, Owner, Heritage Bakehouse, Oban, Argyll
Kate Langston and Sam Dennis, Head Bakers, Heyl Bakery, Plymouth, Devon

Debbie Ross, Owner / Baker, Highland Home Cook, Nigg, Ross-shire
Anna Herbert, Marketing Director, Hobbs House Bakery, Chipping Sodbury, Gloucestershire
Ruth Redgate, Owner, Hunnypot Cottage Bakery, Elford, Staffordshire
Johanna Bottrill, Owner, Jo's Loaves, Luton, Bedfordshire
Juliet Colli, Baker, Juliet's Bread, Ugborough, Devon
Karen Marie Drury-Peppercorn, Owner, Kbroffee, Cambridge, Cambridgeshire
Lizzie Fellows, Co-owner / Co-op Member, Leeds Bread Co-op, Leeds, West Yorkshire
Natalie Gray, Co-op Member, Leeds Bread Co-op, Leeds, West Yorkshire
Keith Kirby, Founder, Lekito, Guildford, Surrey
Luke Fowler, Owner, Levain and Grain, Solihull, West Midlands
Malcolm Williams, Founder and Baker, Little Eye Sourdough Bakery, West Kirby, Merseyside
Neil Holland, Director, Loaf Bakery & Cookery School, Stirchley, West Midlands
Pete Ashton, Director, Loaf Bakery and Cookery School, Birmingham, West Midlands
Nancy Langfeldt, Director, Loaf Bakery and Cookery School, Birmingham, West Midlands
Douglas Mui, Owner, London Road Craft Bakery, Kettering, Northamptonshire
Lucy Johnson, Owner, Lucy's Loaves, Twickenham, Greater London
Jay Matic, Owner / Baker, Manila Artisan Breads, Birmingham, West Midlands
Sam Grinsted, Senior Baker, Mark's Bread, Bristol
Megan Charnock, Owner, Mini Miss Bread, Saffron Walden, Essex
Leo Campbell, Co-founder, Modern Baker, Oxford, Oxfordshire
Patrick Moore, Director, more? the artisan bakery, Staveley, Cumbria
Adrian Clarke, Baker / Carer, Mowbray Bakes, Choppington, Northumberland
Steve Bath, Owner, Myloaf, Cardiff, Vale of Glamorgan
David Nizi, Owner, NIZI Bakery, Hereford, Herefordshire
Sonia, Bakery and Retail Assistant, Novabakehouse, Leeds, West Yorkshire
Maggie Rich, Owner, Off the Rails, Glaisdale, North Yorkshire
Boudicca Woodland, Owner, One Mile Bakery Exeter, Exeter, Devon
David Brewer, Owner / Baker, Orchard Hills Bakery, Walsall, West Midlands
Catherine Paxton, Owner, Painsdemain Bakehouse, Tiddington, Oxfordshire
Paul Merry, Owner, PANARY, Shaftesbury, Dorset
Roxanne Beckles, Owner, Pantry to Plate, Barry, Vale of Glamorgan
Peter Cook, Owner, Peter Cooks Bread, Bishops Cleeve, Worcestershire
Eddie Abbott, Owner, Phoenix Bakehouse, Inverbervie, Angus
George Fuest, Founder, Populations Microbakery, London
Joanna Brennan, Owner, Pump Street Bakery, Orford, Suffolk
Alice Brown, Owner, Raised in Rampton, Rampton, Cambridgeshire
Mark Stevens, Director, Riverside Sourdough, Cardiff, Cardiff
Roger Haycock, Director, Rogers Artisan Bakery, Marsden, West Yorkshire
Tony Wetherall, Head Baker, Roots Bakehouse, Rushwick, Worcestershire
Rose Fiddler Orchard, Owner / Baker, Rosebuds Farm Bakery, Rufford, Lancashire
Matt Warrilow, Owner, Rough Edge Bakehouse, Colwyn Bay, Conwy
Annette Salter, Managing Director, Salt Bakehouse, Stonehouse, Gloucestershire
Anneliese Varley, Director, Salt Bakehouse, Cheltenham, Gloucestershire
Peter Holtmeyer-Cole, Shop Manager, Salt Bakehouse, Stroud, Gloucestershire
Steve Wilson-Fforde, Bread sales, Salt Bakehouse, Stroud, Gloucestershire
Joanna Bailey, Owner, Sourdough by Jo, Northampton, Northamptonshire
David Sargent, Owner / Head Baker, Sourdough Dave, Matlock, Derbyshire

Sophia Handschuh, Owner, Sourdough Sophia, London
Kelly Davies, Owner, South By West, Worthing, West Sussex
Laszlo Kovacs, Head Baker, St. John Bakery, London, Bermondsey
Trevor Gulliver, CEO, St. John Bakery, Bermondsey, London
Nikky Burdekin, Owner / Baker, Strathpeffer Artisan Bread, Strathpeffer, Ross-shire
Sharon Graham-Law, Owner, Sunset Bakehouse, Roade, Northamptonshire
Tim Nash, Owner, Tensheds Bakehouse, Sible Hedingham , Essex
Stephen Michael, Owner, The Bakehouse, London
Clare Barton, Owner / Head Baker, The Bakehouse at 124, Tonbridge, Kent
AnColedy, Owner, The Bakery, Felixstowe, Suffolk
Tanya Young, Head Baker, The Bakery by Knife & Fork, Deddington, Oxfordshire
Steven Rule, Owner, The Billowing Loaf, Stonehouse, Gloucestershire
Gary Derham, Owner, The Bristol Loaf, Bristol
Catherine Vulliamy, Owner, The Conquest of Bread, Hull, East Yorkshire
Alexandra Vaughan, Owner, The Crow's Rest Bakehouse, Wakefield, West Yorkshire
Anne Keenan, Owner / Head Baker, The Culinary Kiwi Bird, Inch, Aberdeenshire
Kirsty Reader, Head baker, The Farm Deli Bakery, Winslow, Buckinghamshire
Rob Paton, Owner, The Fat Batard Bakery, Peebles, Peebleshire
Alyson Chaney, Head Baker, The Flour House, Southwellp, Nottinghamshire
Darrin Romp, Owner, The Hampshire Real Bread Company, Waterlooville , Hampshire
Jane Todd and Sarah Cripps, Owners, The Kitchen Front, Harpenden , Hertfordshire
Caroline Marazzi, Owner, The Little Artisan Bakery, Great Dunmow, Essex
Eszter Faulkner, Owner / Baker, The Little Sourdough Bakery, Farnborough, Hampshire
Richard Scroggs, Head Baker, The Old Post Office Bakery, London
David Carter, Baker / Tutor, The School of Artisan Food, Welbeck, Nottinghamshire
Caroline Lyall, Owner, The Three Bees Bakery, Maidenhead, Berkshire
Anna Bryan, Front of House Staff Member, The Wee Boulangerie, City of Edinburgh
Yanru Xiong , Front of House Staff Member, The Wee Boulangerie, City of Edinburgh
Mark Garry, General Manager, The Welbeck Bakehouse, Worksop, Nottinghamshire
James Thorn, Owner, The Wild Bread Bakehouse, Faversham, Kent
Rob Mackinder, Baker, Tied Up In Notts, Nottingham, Nottinghamshire
Alex Bettler, Owner, TODAY BREAD, Walthamstow, London
Kate O'Shea, Owner, Tough Mary's Bakehouse, Nottingham, Nottinghamshire
Hannah Parnell, Owner, Two Dales Bakery, Reeth, North Yorkshire
Philip Cardwell, Owner, Uppercrust Bakery, Lytham, Lancashire
Dara O'hArtghaile, Co-owner and baker, Ursa Minor Bakehouse, Ballycastle, County Antrim
Henrietta Inman, Owner / Baker, Wakelyns Bakery, Fressingfield, Suffolk
Hayley England, Baker, The Welbeck Bakehouse, Worksop, Nottinghamshire
Sheila van Lieshout , Owner, Wester Lovat Loaves, Beaulieu , Inverness-shire
Bethan o'reilly, Baker, Wild Hearth Bakery, Comrie, Perthshire
Ben Hackett, Head Baker, Wildbread Bakehouse, Faversham, Kent
Simon Spence, Owner, Worton Kitchen Garden, Oxford, Oxfordshire
Andy Elder, Proprietor, Wrington Bakery, Wrington, North Somerset