

ABIM Draft Sourdough Code of Practice FAQ Document

This Frequently Asked Questions (FAQ) document is a working document created by the Association of Bakery Ingredient Manufacturers (ABIM), intending to aid the use of the ABIM Sourdough Code of Practice published 31 January 2023. The CoP supports the bakery industry to implement the best possible practice in relation to the labelling of sourdough bread and rolls. It provides guidelines on how to label packaged products in such a way that differentiates between sourdough as a skilled craft process, and sourdough that has been added as an ingredient to an artisanal bread recipe.

Creating the Code of Practice

1. Why did ABIM see the need to write a code of practice (CoP)?

There is no doubt that the successful manufacture of sourdough products involves a certain degree of skill. In recent years there has been a proliferation of bakery products labelled as sourdough, but not all of them are produced by following the same skilled bread making process.

Where space and skills are lacking, bakers have recourse to an increasing number of ingredients and raw materials which allow them to offer bread products that include an element of sourdough to their customers. However, it is important that these products are labelled in such a way as to differentiate them from those that are made using traditional craft processes so that due recognition may be given to the skilled craftsman, and the integrity of the term 'sourdough' may be maintained as a product descriptor.

Since sourdough ingredients have been available for a number of years, ABIM and industry partners have come together to develop a CoP for labelling to unite the UK bakery sector behind clear and concise definitions for sourdough to prevent misinformation and misleading of consumers.

2. Why did it take such a long time to publish a final version?

ABIM have had discussions with several relevant stakeholders within the baking industry over the years and as a result the CoP has gone through many drafts before a final version was agreed between supportive partners.

Furthermore, the ABIM association focuses on various topics such as technical and regulatory developments in both EU and GB; e.g., developments in the area of food safety; raw material shortages; etc, not just sourdough. Recent challenges for the whole industry have included the EU exit, Covid and Ukraine-Russia war so that there have been other topics that had to be given priority.

3. Did ABIM work with only the supportive partners mentioned in the final CoP?

No. ABIM discussed various draft versions with other stakeholders and some of the points raised have been included in the final version. However, some associations and/or groups did not see a reason to have a CoP for labelling purposes as they believed they were already taking the necessary actions to prevent misleading labelling information. Furthermore, there were some groups that

believed a genuine sourdough should not be allowed to have any amount of yeast, no matter how small the quantity, and could not agree on an alternative proposal.

About the Code of Practice

4. Should the CoP be treated as a UK regulation or a decree?

No. This CoP is a voluntary, self-regulatory code produced through industry collaboration. It provides a set of marketing terms and definitions regarding the labelling of sourdough bread and rolls.

5. Where can you find the final version of the Code of Practice?

On the ABIM website, under useful documents - <https://www.abim.org.uk/useful-documents>

6. Do sourdough regulations and codes or practice exist in other countries?

Yes, according to the information paper on sourdough in Europe issued by FEDIMA (Federation of the European Union Manufacturers and Suppliers of Ingredients to the Bakery, Confectionery and Patisserie Industries), few European countries have existing regulations or Codes of Practice relating to the composition of sourdough. For example, legislation in France and Codes of Practice in Germany and Austria.

7. Who is the intended target audience of the ABIM sourdough CoP?

This self-regulatory CoP is to be used voluntarily by any bakery industry stakeholder who wish to implement the best possible practice in relation to the labelling of sourdough bread and rolls. Stakeholders include but are not limited to, artisan bakers, craft bakers, industrial plant bakery manufacturers, bakery firms and related associations utilising sourdough, bread, dough and yeast.

Definitions for the purpose of labelling

8. What is sourdough – is it a technique or an ingredient?

As mentioned in the CoP, sourdough is both a bread making process and an ingredient. As sourdough is the name given to a mixture of flour and water that has been allowed to spontaneously ferment, it can be described as a technique or process.

However, as sourdough fermentation may also be initiated by inoculating the flour and water mixture with a previously made sourdough starter culture, it can also be thought of as an ingredient.

9. Why did ABIM include three definitions?

Initially, we did try to have just two definitions. However, during the stakeholder discussions it became clear that a third category would be needed to label those products where the sourdough itself contains raw material(s) that have been added to specifically enhance flavour or increase shelf-life.

10. Do 'Permitted Ingredients' within Schedule 3 of the 1998 Bread and Flour Regulations come under mandatory fortificants within category 'Sourdough (product)'?

Schedule 3 was removed from the Bread and Flour Regulations 1998 (BFR) in 1999 by virtue of The Miscellaneous Food Additives (Amendment) Regulations 1999 (S.I. 1999/1136). Therefore, only the mandatory flour fortificants listed within the most up to date Bread and Flour Regulations are permitted within this category and schedule 3 no longer exists in this regulation. **This means that use of the additives specified in the Bread and Flour Regulations are not permissible when it comes to naming 'Sourdough (product)**.

It should be noted that this applies to the Worked Example for Sourdough Bloomer in Section 6(i) of the CoP. The wording of this example will be updated for clarity when the CoP is next reviewed.

11. What can aid the categorisation of Sourdough definition when labelling a product using this guide?

The decision tree located at the end of the CoP has been developed to aid the user determine which sourdough definition should be applied to label a product when following the CoP.

Producing Sourdough

12. If sourdough can be made with just flour and water possibly with added salt, why is there a need to add yeast?

Sourdough can be made without the addition of yeast when given the right conditions and enough time to spontaneously ferment. However, during cold weather conditions (e.g., winter) the process would take much longer, which may cause a baker to miss a customer's deadline. Furthermore, the addition of a very small amount of yeast can help to produce a consistent product that complies with a customer's exacting specification for size and shape.

13. Why does the CoP limit the addition of yeast to 0.2% in the "Sourdough (product name)" category?

As mentioned above, yeast can enhance fermentation during the sourdough making process. However, it should not be so overused that it devalues the characteristics and flavour of a sourdough product, nor the skill required to make it successfully. Therefore, addition of maximum 0.2% compressed bakers' yeast, or the equivalent level of cream, liquid, dried or frozen yeast, as calculated on the total flour weight of the final dough is allowed – but this addition is completely at the discretion of the baker.

14. Can a product be named "Sourdough (product name)" when the main leavening agent is from a non-yeasted Motherdough with the addition of a small percentage of deactivated liquid sourdough?

Yes, in this case the bread can be labelled as "sourdough (product name)" since the main leavening agent used is non-yeasted sourdough (i.e., <0.2% yeast in the recipe). Deactivated liquid sourdough can be used in the recipe as long as it doesn't contain any additional organic acids or anything else that would impart sourdough flavour to the bread.

15. Does the CoP allow for Sourdough breads to be made with flour which contains processing aids, for example enzymes? i.e., where enzymes are considered processing aids and not additives

Yes, sourdough can be made using flour which contains processing aids, for example enzymes. The [‘EU Guidance Document on Criteria For Categorisation of Food Enzymes’](#) when used in conjunction with [REGULATION \(EC\) No 1333/2008](#) provides criteria for determining the status of a food enzyme either as an ingredient (additive) or as a processing aid in a given context of use. If the enzyme is not present in the final food after manufacture/processing or has been irreversibly denatured in manufacturing/processing it is declared a processing aid and therefore allowed.

16. Does the CoP allow for back-slopping, where a portion of the fully fermented sourdough is used from the previous fermentation to inoculate the next batch?

Yes, the CoP allows for back-slopping within a “sourdough (product)”, as this involves non-yeasted sourdough from the previous fermentation to be used as the starter to ferment a new mixture of flour and water. As long as no more than 0.2% yeast and no additives or flavourings apart from the mandatory fortificants required by the Bread and Flour regulations are used in the recipe, the bread can be labelled “Sourdough (product name)”. Back-slopping is allowed within the other two sourdough labelling categories: “(product name) with sourdough” and “sourdough flavour (product name)”. However, considerations regarding % of yeast and other ingredients differ for these sourdough breads.

Health Benefits

17. Are there specific health benefits or health claims associated with sourdough?

There are some studies which have indicated nutritional and/or health benefits of sourdough. However, more research is needed in this field before these are substantiated. Even if a sourdough is made with just flour and water, the benefits to consumers could vary depending on the type of flour species/varieties used.

Currently there are no EU or GB approved health claims for sourdough.

18. Does addition of yeast (any quantity) negate any health benefits of sourdough?

Extensive research is being carried out in this field. Even a spontaneously fermented sourdough culture always contains at least one species of yeast, so any type of sourdough bread should not be thought of as “yeast free”.

Post Publication

19. What responses did ABIM receive following the publication?

Overall, we have received positive responses, although there are groups that do not agree on the addition of any quantity of yeast to a product that is labelled ‘sourdough’.

Even some of those who are fundamentally against the use of yeast in sourdough products have seen the CoP as a positive step in the right direction for the category and for consumers, noting it would have a significant impact in reducing misleading labelling information.

20. What would the ABIM response be to those who say “the authors of the CoP have written their own rules” or “the CoP is an insult to bakers who make genuine sourdough”

ABIM and/or the supportive partners have not changed the “rules” for sourdough production. We have only written some helpful voluntary guidelines regarding the clear labelling of such breads that might contain one of a number of sourdough ingredients that are only available from business to business, and not visible to general consumers.

The permitted 0.2% yeast addition, in the first category, is optional not mandatory. Bakers who choose to make sourdough bread from scratch are to be applauded for doing so. Bakers who choose to use the ingredients that are available to them should not be vilified or prevented from doing so provided that their products are meaningfully labelled to ensure that the consumer is not misled.

21. Would ABIM be willing to re-open the conversation or amend the Code of Practice?

ABIM recognises that the CoP may need to be reviewed and amended as the industry and/or regulations evolve in the coming years. However, currently ABIM do not foresee the need to do so in the immediate future.

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