



The Guild of Jam and Preserve Makers
The Old Smithy
Langham Lane
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18 April 2013

Dear Sirs

ref: Changes in the Jam and Similar Products (England) Regulations 2003

There have been numerous articles in the press recently regarding the proposed changes in sugar content for 'Jam' and I would like to put forward a point of view which has some bearing.

Fundamentally what is being missed here is the reason there is a minimum regulation of 60% sugar solids in the first place - and that is to PRESERVE food. This is derived from 50% sucrose and 10%+ derived naturally from the fruit. Less than that and the product needs to be refrigerated after opening. If the products are not refrigerated then yeasts, mould and bacteria can grow and spoilage of the product will occur. I don't believe that the consumer should be expected to differentiate between the finer points of percentages of sugar when buying their jam and we believe that this issue is very far from being 'ridiculous red tape' as Vince Cable has suggested.

We represent a number of Artisan producers in our membership, making preserves by an open pan method, supplying farm shops and delis, farmers markets and direct at food fairs and shows. Their customers understand the quality of their products - it can only be made with the ratios of fruit to sugar to ensure a set and safe preservation of the fruit. Refrigeration is unnecessary - just as it has been for hundreds of years.

If the minimum %SS is altered down then there will be a confusion of what needs to be refrigerated and what doesn't and next to a commercially made product with a large volume of inexpensive apples, single whole fruit, traditionally made jam is going to look abnormally expensive. A large number of thriving, artisan businesses could suffer as a result of the confusion.

The labeling laws are supposed to give clear, transparent information to enable the consumer to make an informed choice. This move will be to the detriment of this - the way forward is to keep 'Jam' as jam and everything else either 'Fruit Based Spread' or 'Reduced Sugar Jam' Why is this not acceptable? The only possible argument is down to marketing but I would counter that these days offering a Reduced Sugar product is actually very desirable and would not harm sales at all. By all means attack the Regulations but raise the Reduced Sugar levels to accommodate the apple based products - or take more sugar out of these products so they fit the existing Reduced Sugar criteria. They are already set with gelling agents so it won't make any difference to the end result. They would all need refrigeration which can clearly be stated on the packaging .

Alternatively , the problem would be solved by having a new designation of Artisanal Jam made by the Open Pan Method - which would be fairer to those makers who have to charge more for their product because of the high fruit content - and we wouldn't have to adhere to the refrigeration laws either. The consumer would be absolutely clear about what they were paying for. Let us make something better for a change instead of dumbing everything down to one mediocre level.

Rosemary Jameson

Rosemary Jameson
The Guild of Jam and Preserve Makers
MAKE A NOISE!

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