

Response ID ANON-3MRW-NSHR-4

Submitted to **Adding folic acid to flour**

Submitted on **2019-09-08 20:51:44**

Proposal to add folic acid to flour

Do you agree or disagree with the proposal for mandatory fortification of non-wholemeal wheat flour in the UK with folic acid to help prevent neural tube defects?

I disagree with the proposal

Please explain your answer

Can you explain the reasons why you agree or disagree?:

There needs to be an exemption for traditional heritage mills - wind and watermills for the reasons stated and explained in the document attached to this submission "Traditional Cornmillers Guild Folic Acid Consultation Response September 2019". See Impact Assessment Section.

Our views are supported by over 3,900 people who have signed a petition to Nadine Dorries MP, plus numerous MPs who have written in support of our campaign. These views are being presented in a separate submission to this consultation.

Which products should be included

Which of the following do you think mandatory fortification with folic acid should apply to? Please choose one.

there are no products that should have mandatory fortification with folic acid

Alternative approaches

Are there any alternative ways of helping reduce the number of neural tube defects that you may prefer, other than our proposal for mandatory fortification of flour with folic acid?

Are there any alternative ways of helping reduce the number of neural tube defects that you prefer, other than our proposal for mandatory fortification of flour with folic acid? :

This is not an area the Traditional Cornmillers Guild feels able to comment on - it is not in our area of expertise.

How individuals and businesses are affected

Are there any particular groups or individuals that might be negatively affected by mandatory fortification of flour with folic acid, or miss out on the benefits?

Are there any particular groups or individuals that might be negatively affected by mandatory fortification of flour with folic acid, or miss out on the benefits?:

How could we make sure these groups or individuals are supported or not affected negatively?

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Are there any businesses that might be negatively affected by mandatory fortification of flour with folic acid, or miss out on the benefits?

Are there any businesses that might be negatively affected by mandatory fortification of flour with folic acid, or miss out on the benefits?:

Yes, traditional wind and watermill businesses will be financially negatively impacted by any decision to fortify flour, whether white flour or all flours and, their future ability to operate producing flour may also be affected.

The financial impacts for traditional wind and watermills are explored in the document "Projected Financial Impact of Fortification of Flour with Folic Acid" - see Impact Assessment Section.

Of equal concern to the Traditional Cornmillers Guild is the fact that many of our member mills would not be able to install the equipment required to fortify flours other than white flour. This is because the mills are historic, often listed buildings with a) limited space to install such equipment and b) restrictions in terms of historic building listing constraints as to what alterations can be made within the mill building itself. As a result, if traditional mills are required to fortify flours in addition to white flour, they may be forced to cease flour production as they will not be able to meet the new requirements.

These issues are explored in the document "Folic Acid Consultation Historic England Response" - see Impact Assessment Section.

For the reasons stated in the above document, the Traditional Cornmillers Guild and SPAB Mills Section, the two national organisations representing the interests of traditional mills seek an exemption for traditional mills - wind and watermills producing less than 1000 tonnes per annum from the requirement to fortify, on the grounds of impracticality, potential risk to consumer health, and threat to the integrity, historic character and sustainability of buildings of importance to the national heritage.

If traditional mills were not exempted, there is a significant risk that the future viability of traditional mills would be put at risk, thus endangering the future of a significant number of the nation's listed buildings which rely on income from flour production to secure their futures.

How could we make sure these businesses are supported or not affected negatively?

How could we make sure these businesses are supported or not affected negatively?:

Having explored these issues with all the organisations representing traditional milling, in particular the Society for the Protection of Buildings, Mills Section and Historic England (Dr Vince Holyoak BA PhD MCIfA, Head of Rural Strategy, Historic England), the Traditional Cornmillers Guild has reached the conclusion that the only way to ensure traditional mills (wind & watermills) are not affected negatively is to introduce an exemption from any legislation to fortify flour with folic acid for all mills producing less than 1000 tonnes of flour per annum.

Such an exemption would need to be accompanied by clear labelling explaining that flours do not contain folic acid. As our paper explains, traditional mills produce an extremely small proportion of the UK's flour output (e.g. traditional mills unbleached white flour output is estimated at less than 0.013% of UK output), so the impact of such an exemption would be statistically insignificant.

Voluntary fortification

If the fortification of flour with folic acid is made mandatory, do you agree or disagree that there should be limits on voluntary fortification of other food products and/or supplements with folic acid?

I don't know if I agree or disagree

Please give reasons for your answer

Please give reasons for your answer:

The Traditional Cornmillers Guild does not have the knowledge or experience to comment on this point.

Impact assessment

Do you agree or disagree with the provisional cost/benefit analysis outlined in the impact assessment?

I disagree

Can you provide any additional evidence to inform the impact assessment?

Option to upload a file for the question Can you provide any additional evidence to inform the impact assessment?:

Traditional Cornmillers Guild Folic Acid Consultation Response September 2019.docx was uploaded

Text box for the question Can you provide any additional evidence to inform the impact assessment?:

The Traditional Cornmillers Guild submits three documents combined in one file for consideration:

- 1: Traditional Cornmillers Guild Folic Acid Consultation Response September 2019
- 2: Traditional Cornmillers Guild Folic Acid Consultation Response - Costings Paper September 2019
- 3: Folic Acid Consultation Historic England Response

The Impact Assessment fails to assess the financial and practical issues faced by Traditional Mills. Reference is made in Section 81 - stating "there may be some circumstances unique to small firms.

Examples may include:...

Different use of machinery (e.g. traditional grinding stones rather than modern equipment) and hence differing levels of wastage, ability to achieve uniform fortification and maintenance costs"

The attached documents detail our assessment of the real impact of proposed fortification on traditional wind and watermills, both from practical and financial perspectives.

As is explained, there is a real potential risk that the implementation of these proposals could cause many traditional mills to cease flour production and thus put a significantly greater risk this important part of our industrial heritage and a group of artisan businesses which are currently witnessing a significant renaissance given the increased interest and appetite amongst the public for artisan stoneground flour products.

Further, it is our considered view that any decision to require fortification of flour with folic acid would add yet another barrier to traditional wind and watermills being restored to working order.

For these and the other reasons stated in our submission, our recommendations are:

1. That, if flour is the preferred vehicle for fortification, whether white flour or all flours, traditional mills producing less than 1,000 tonnes of flour be exempt from the requirement to fortify.
2. That all wholemeal and specialist flours and grains be exempt from the requirement to fortify.
3. That any flours exempted from adding Folic Acid be clearly labelled.

Our views are supported by over 3,900 people who have signed a petition to Nadine Dorries MP, plus numerous MPs who have written in support of our campaign.

Do you think there are any other benefits, costs or wider impacts of this policy proposal that have not been mentioned yet?

Text box for the question Do you think there are any other benefits, costs or wider impacts of this policy proposal that have not been mentioned yet?:

The costs and wider impacts of this policy proposal on traditional mills are discussed in the documents attached to this section.

Practicalities for businesses

What are the practical issues that need to be thought about for mandatory fortification with folic acid?

What are the practical issues that need to be thought about for mandatory fortification with folic acid?:

Please see documents submitted.

Are there any further trade implications for industry that need to be considered?

Text box for the question Are there any further trade implications for industry that need to be considered?:

Please see documents submitted.

Are there any effects on small businesses and medium businesses that need to be considered?

Text box for the question Are there any effects on small businesses and micro businesses that need to be considered?:

Please see documents submitted.

All traditional milling enterprises come under this category. All are potentially affected. There are some 200 traditional mills producing flour in the UK.

About you

What is your name?

First name:

Jonathan

Surname:

Cook

What is your email address?

Email:

jon@fostersmill.co.uk

Contact you - Is it okay for the Department of Health and Social Care to send you updates about our consultations?:

Yes

Contact you - Is it okay for the Department of Health and Social Care to contact you about your response?:

Yes

In what capacity are you responding?

Other

If other, please specify:

The Traditional Cornmillers Guild

About you and your organisation

What is the name of your organisation

Name of organisation:

The Traditional Cornmillers Guild

Type of business/organisation:

Guild representing working / commercial wind and watermills

What is your role

What is your role in your organisation:

I am the Guild's lead on Folic Acid, co-ordinating our response and liaising with other bodies including:

Historic England

The Society for the Protection of Ancient Buildings (SPAB) Mills Section

How many employees does your business/organisation have?

Less than 10 employees

Where is your organisation based

Please enter the first part of your work post code :

CB25 0JZ

The whole of the UK