How could UK Flour Millers not question a government plan to mandate a synthetic additive in flour?

Elizabeth Hart <elizmhart@gmail.com> Wed, Oct 28, 2026 at 6:55 PM
To: Alistair Gale <alistairgale@ukflourmillers.org>
Cc: Joe Brennan <JoeBrennan@ukflourmillers.org>

For the attention of:

Mr Alistair Gale – Chief Executive Officer
UK Flour Millers
21 Arlington Street
London SW1A 1RN
United Kingdom

Copy to be forwarded to:
Mr Mike Peters – President

Cc:
Mr Joe Brennan – Head of Technical and Regulatory Affairs

Dear Mr Gale,

In your response to me about the UK Government's imminent mandatory synthetic folic acid intervention in the food supply [1], you stated:

> "We made no comment on whether the government should proceed with the policy or not on the basis of health merits as this is not our area of expertise."

How could UK Flour Millers not question a government plan to mandate a synthetic additive in flour?

The question raised by this policy is not one of health merits alone. This is a government-mandated alteration of a basic food, adding a synthetic substance to products consumed by much of a population of some 69 million people [2], most of whom have no demonstrated personal need for it [3], and none of whom has been asked for their individual informed consent.

On the Government's own figures, the policy is projected to prevent around 200 of the approximately 1,000 pregnancies affected by neural tube defects each year, with approximately 800 therefore still expected annually [4].

Whether that projected benefit justifies imposing this intervention on the wider population is a question of public policy and ethics, not one for medical experts alone to determine. It is a question the flour milling industry is entitled, and in my view obliged, to ask.

Moreover, UK Flour Millers has publicly endorsed the health merits of this policy. Its website states that fortification "has been shown to be safe and effective" [5], and your President, Mr Mike Peters, has stated that "The public health rationale for this policy is supported by decades of evidence in other countries" [6].

If the association can speak publicly in support of the policy's rationale, it can also raise the ethical objections to it.

Has UK Flour Millers challenged the justification for this intervention, and if not, why not?

You also stated:

> "We can speak to the practicalities of folic acid fortification of flour, but your queries regarding ethical responsibility must be directed at government as it was ultimately their decision to legislate this requirement."

I challenge your assertion.

Your members are being compelled by government, ultimately under threat of criminal sanctions [7], to implement this policy. **That compulsion does not remove their ethical responsibility for what they are being required to do.** It makes it all the more important that the association representing them raises the ethical objections.

The legislation obliges millers to comply. **It does not oblige UK Flour Millers and its members to endorse the policy, remain silent about its ethical implications, or refrain from seeking its reconsideration.**

The Government itself has acknowledged the need to monitor both the positive and "postulated negative impacts" of this policy [7]. If even the Government recognises possible adverse effects that require monitoring, the intervention cannot be treated as a matter of practical implementation alone.

Mr Peters has also described the association's role as "advocating for the industry, representing millers to Government and addressing specific policy issues" [8]. **Why does that role not extend to raising the ethical objections to this policy?**

You also stated:

> “Crucially, it is the role of medical and public health experts to decide on policy such as this.”

Medical and public health experts may have come to exert considerable influence over public policy, but **expertise does not confer the authority to determine what interventions should be imposed on entire populations.**

UK Flour Millers and its members should not surrender their independent critical judgement to the authority of medical and public health experts. Your members may not be public health experts, but they are expert millers, with professional responsibility for the integrity of the flour they produce and the trust placed in the food supply.

I request specific answers to the following questions:

1. What discussions has UK Flour Millers undertaken with its member companies about the ethical implications of mandatory synthetic folic acid fortification, as distinct from the practicalities of implementation?

2. The Government’s consultation response records that opposition to the policy came not only from consumers, but from “a few industry representatives from the milling sector” [7]. Did any of your member companies, or their food-manufacturing customers, raise objections or concerns with UK Flour Millers? If so, what were those concerns, and how did the association respond?

3. Did UK Flour Millers raise any questions or concerns with government about the justification for imposing synthetic folic acid on the wider population, including people with no demonstrated personal need for it?

4. What consideration has UK Flour Millers given to the independent ethical responsibilities of the individual flour milling businesses that will be adding synthetic folic acid to flour?

5. Has UK Flour Millers obtained legal advice on its members’ liability arising from compliance with this requirement, including the scope and limitations of the statutory defence in section 4(1)(a) of the Consumer Protection Act 1987 [9]?

6. Will UK Flour Millers make written representations to Defra, the Department of Health and Social Care and the devolved administrations before 13 December 2026, raising these ethical objections and seeking reconsideration or postponement of the requirement? If so, please provide copies.

Mr Gale, your response to me implies that the association and its members can set aside independent ethical judgement because government has legislated a requirement. I challenge that position.

What responsibility does UK Flour Millers accept for its own participation in implementing this population-wide intervention?

I have published your response, with my commentary [1], and attach a copy. Given the public interest in this policy, I will continue to publish this correspondence, including any further response you provide.

I request your substantive response addressing my questions directly. As I do not have direct contact details for Mr Peters, I ask that you forward this correspondence to him.

Yours sincerely,

Elizabeth Hart
Independent researcher on medical ethics

References

[1] Alistair Gale, CEO, UK Flour Millers, email response to Elizabeth Hart, 19 October 2026, published in full in: Elizabeth Hart, *UK Flour Millers, mandatory folic acid and deference to ‘experts’ and government...*, Substack.
https://elizabethhart.substack.com/p/uk-flour-millers-mandatory-folic

[2] Office for National Statistics, *Population estimates for the UK, England, Wales, Scotland and Northern Ireland: mid-2025*, 1 October 2026. UK population estimate: 69,483,900.
https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualmidyearpopulationestimates/mid2025

[3] NHS, *B vitamins and folic acid*, section ‘Folate and folic acid’: “Most people should be able to get the amount of folate they need by eating a varied and balanced diet.”
https://www.nhs.uk/conditions/vitamins-and-minerals/vitamin-b/

[4] Department for Environment, Food & Rural Affairs and Department of Health and Social Care, *Folic acid added to flour to prevent brain and spinal conditions in foetuses*, 1 September 2022. The Government states that neural tube defects affect around 1,000 pregnancies annually in the UK, and that fortification is expected to “actively help avoid” around 200 each year. The figure of approximately 800 is calculated from these two estimates.
https://www.gov.uk/government/news/folic-acid-added-to-flour-to-prevent-brain-and-spinal-conditions-in-foetuses

[5] UK Flour Millers, *Folic acid*, Knowledge Hub – Standards & Regulations.
https://www.ukflourmillers.org/knowledge-hub/standards-regulations/bread-flour-regulations/folic-acid

[6] World Grain, *Q&A with UK Flour Millers president Mike Peters*, 24 November 2025.
https://www.world-grain.com/articles/22120-q-and-a-with-uk-flour-millers-president-mike-peters

[7] Defra and DHSC, *Summary of responses and government response: Amending the Bread and Flour Regulations 1998*, 17 January 2024. Chapter 2: opposition to the policy came predominantly from consumers, “as well as a few industry representatives from the milling sector”; Government response: monitoring of “both positive and postulated negative impacts.” Chapter 5, Enforcement: “The existing enforcement regime provides for criminal sanctions to address non-compliance.”

https://www.gov.uk/government/consultations/amending-the-bread-and-flour-regulations-1998-and-the-bread-and-flour-northern-ireland-regulations-1998/outcome/summary-of-responses-and-government-response

[8] Milling and Grain, *Interview with Mike Peters, President, UK Flour Millers*, 2 June 2026. https://millingandgrain.com/interview-with-mike-peters-president-uk-flour-millers-uk/

[9] Consumer Protection Act 1987, section 4(1)(a). https://www.legislation.gov.uk/ukpga/1987/43/section/4

On Mon, Oct 19, 2026 at 9:59 PM Alistair Gale <alistairgale@ukflourmillers.org> wrote:

> Dear Ms Hart,
>
> Thank you for your email. It is worth emphasising at the outset that we are not public health or medical experts. Our involvement with government was to provide an overview of the practical considerations, i.e. to inform the 'how' but not the 'should' with regards to implementation of this policy.
>
> We made no comment on whether the government should proceed with the policy or not on the basis of health merits as this is not our area of expertise. We did not object to the exemption of small scale mills from the fortification requirement and worked with government to implement this in a practically sensible manner.
>
> We can speak to the practicalities of folic acid fortification of flour, but your queries regarding ethical responsibility must be directed at government as it was ultimately their decision to legislate this requirement. It is worth noting that flour fortification has been a policy in the UK since the 1940s. Crucially, it is the role of medical and public health experts to decide on policy such as this.
>
> Yours sincerely,
>
> Alistair Gale

Alistair Gale

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UK FLOUR MILLERS

UK Flour Millers is the trade association for the flour milling industry, representing businesses of all sizes across the UK and Ireland.

www.ukflourmillers.org

From: Elizabeth Hart <elizmhart@gmail.com>
Sent: 15 October 2026 05:16
To: Alistair Gale <alistairgale@ukflourmillers.org>
Cc: Joe Brennan <joebrennan@ukflourmillers.org>; UK Flour Millers <info@ukflourmillers.org>
Subject: Mandatory synthetic folic acid in the food supply – UK Flour Millers' ethical responsibility

You don't often get email from elizmhart@gmail.com. Learn why this is important

For the attention of:

Mr Alistair Gale – Chief Executive Officer
UK Flour Millers
21 Arlington Street
London SW1A 1RN
United Kingdom

Cc:
Mr Mike Peters – President
Mr Joe Brennan – Head of Technical and Regulatory Affairs

Dear Mr Gale

I am writing to question UK Flour Millers about the ethical implications of the UK Government using its legislative powers to effectively conscript flour millers into adding synthetic folic acid to non-wholemeal wheat flour.

This interference with a common food component will affect much of a population of 69 million people,[1] **most of whom have no demonstrated personal need for this mandated intervention**.[2] Consumers who wish to continue eating familiar foods made with this flour must now accept the synthetic additive.

This raises fundamental questions about coercion, individual autonomy, informed consent and the ethical responsibilities of those implementing the policy.

The fact that the intervention is legally mandated does not resolve those questions. **What is lawful is not necessarily right, and legal compulsion *does not remove the ethical responsibility of those who will physically introduce the synthetic additive into the common food supply – that is, the flour millers*.**

The late British epidemiologist Geoffrey Rose, a leading figure in preventive medicine who chaired the steering committee of the Medical Research Council's 1991 Vitamin Study,[3] distinguished measures that remove or reduce harmful exposures from those "adding some other unnatural factor in the hope of conferring protection", among which he included "high-dose folic acid". For such additions, he warned that there could be "no prior presumption of safety"; the required evidence of benefit and particularly of safety must be more stringent; and this "effectively rules out" such measures except where the offered benefit is "rather large", as in high-risk groups or for common or serious hazards. **He also said it should be a condition of their use that "the recipients are aware of the known facts and uncertainties".**[4] Rose was referring to high-dose folic acid, rather than the lower-dose addition to flour now being mandated in the UK. Nevertheless, his principles raise important questions about the mandatory addition of synthetic folic acid to a common food ingredient consumed by millions of people who have no demonstrated personal need for it.

When the Government announced its intention to mandate folic acid addition in September 2021, UK Flour Millers' then Director, Alex Waugh, stated that "flour millers will do all they can to overcome any practical challenges to make it happen".[5] When the legislation was introduced in November 2024, your Head of Technical and Regulatory Affairs, Joe Brennan, stated that "the UK flour milling sector has been working closely with government to facilitate this public health initiative for some years".[6]

Mr Gale, I request your answers to the following questions:

1. The Government's consultation response states that the regulations mandate fortification *"for public health reasons"*.[7] **Does UK Flour Millers consider it ethically acceptable** that, by legal mandate, its members will introduce synthetic folic acid into a common food ingredient for a public health purpose, so that consumers can no longer buy familiar foods made with that ingredient without it – *when most have no demonstrated personal need for it, and none has been asked for their individual informed consent?* **If so, on what ethical basis?**
2. UK Flour Millers states that its membership covers almost all UK roller flour mills, and that its committees are "the main mechanism for discussion and development of policy".[8] **Did UK Flour Millers discuss with its member companies the ethical implications of mandatory folic acid addition**, including *the restriction of consumer choice for familiar foods and the absence of individual informed consent for this synthetic additive?* **Did it raise these ethical implications with the Government?** If so, please provide the relevant representations.
3. Asked what support patients would be given to avoid added folic acid in their diet, the Government pointed to alternative flour choices and ingredient labelling, alongside general public information.[9] Does UK Flour Millers consider that merely listing 'folic acid' among the ingredients of packaged foods **adequately informs consumers** that this is a *government-mandated intervention intended principally to benefit a specific, much smaller group within the population*, particularly when foods sold loose, such as unwrapped bakery bread, are **not generally required to carry a full ingredients list**?[10]
4. The Government's consultation response states that "A trade association representing large millers suggested that the exemption proposals diverged from the central aim of the policy, which is to provide the population with key nutrients". The same response records that "Many consumers were supportive of the proposal on the basis that it creates further choice

or saw the exemption as vital for the continued operation of local mills".[7] **Was UK Flour Millers that trade association?** If so, **what consideration did it give to *consumer choice and the continued operation of local mills* when arguing against the exemption for small mills?**

5. If adverse health consequences were ever alleged to have resulted from the mandatory addition of synthetic folic acid to flour, **what is UK Flour Millers' understanding of its members' potential liability?** In particular, does the association consider that its members could rely on section 4(1)(a) of the Consumer Protection Act 1987, which provides a defence where a defect is attributable to compliance with a legal requirement?[11] And **does UK Flour Millers consider that compliance with a legal mandate relieves its members of *ethical responsibility* for their part in introducing the synthetic additive into the food supply?**

I would also be grateful for a complete copy of UK Flour Millers' submission to the 2022 consultation on the amendments to the Bread and Flour Regulations.

I have written about this policy in my Substack article, ***Why is the UK mandating a synthetic food additive for millions of people who don't need it?*** (copy also attached), and intend to publish this letter and your response.

I would be grateful if you could also ensure that this correspondence is brought to the attention of Mr Mike Peters, President of UK Flour Millers.

Yours sincerely,

Elizabeth Hart
Independent researcher on medical ethics

References

1. Office for National Statistics (ONS), *Population estimates for the UK, England, Wales, Scotland and Northern Ireland: mid-2025*, 1 October 2026. UK population estimate: 69,483,900.
   https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualmidyearpopulationestimates/mid2025
2. National Health Service (NHS), *B vitamins and folic acid*, section 'Folate and folic acid'. Under the heading 'What does the Department of Health and Social Care advise?', states: "Women who cannot get pregnant and men should be able to get all the folate they need by eating a varied and balanced diet."
   https://www.nhs.uk/conditions/vitamins-and-minerals/vitamin-b/
3. MRC Vitamin Study Research Group, 'Prevention of neural tube defects: Results of the Medical Research Council Vitamin Study', *The Lancet*, 1991; 338(8760): 131–137. Steering committee listing identifies Geoffrey Rose as chairman.
   https://doi.org/10.1016/0140-6736(91)90133-A
   Full text: https://www.sjsu.edu/faculty/gerstman/hs261/Lancet1991-338-8760-131-137.htm
4. Geoffrey Rose, *The Strategy of Preventive Medicine*, Oxford University Press, 1992, p. 94. Discussion of 'Addition and removal'. ISBN 0-19-262125-4.
5. Department of Health and Social Care, *Folic acid added to flour to prevent spinal conditions in babies*, 20 September 2021. Statement by Alex Waugh, Director, UK Flour Millers.
   https://www.gov.uk/government/news/folic-acid-added-to-flour-to-prevent-spinal-conditions-in-babies
6. Department of Health and Social Care, *Birth defects prevented by fortifying flour with folic acid*, 14 November 2024. Statement by Joe Brennan, Head of Technical and Regulatory Affairs, UK Flour Millers.
   https://www.gov.uk/government/news/birth-defects-prevented-by-fortifying-flour-with-folic-acid
7. Department for Environment, Food and Rural Affairs (Defra) and Department of Health and Social Care (DHSC), *Summary of responses and government response: Amending the Bread and Flour Regulations 1998*, 17 January 2024. Response to the public consultation held 1 September – 23 November 2022.
   https://www.gov.uk/government/consultations/amending-the-bread-and-flour-regulations-1998-and-the-bread-and-flour-northern-ireland-regulations-1998/outcome/summary-of-responses-and-government-response
8. UK Flour Millers, *About us*, description of association membership, governance and policy development.
   https://www.ukflourmillers.org/about-us
9. Department of Health and Social Care, *Folic Acid*, House of Commons Written Question 15318, asked by Esther McVey MP on 2 July 2026, answered by Sharon Hodgson MP on 10 July 2026.
   https://questions-statements.parliament.uk/written-questions/detail/2026-07-02/15318
10. Department for Environment, Food and Rural Affairs (Defra) and Food Standards Agency (FSA), *Food labelling: loose foods*, GOV.UK, published 3 January 2017. Identifies unpackaged bread as loose food and explains the information that must be provided.
    https://www.gov.uk/guidance/food-labelling-loose-foods
11. *Consumer Protection Act 1987*, section 4(1)(a), providing a defence where a defect is attributable to compliance with any requirement imposed by or under any enactment.
    https://www.legislation.gov.uk/ukpga/1987/43/section/4

UK Flour Millers, mandatory folic acid and deference to 'experts' and government.._.pdf
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