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Mandatory synthetic folic acid in the food supply – UK Flour Millers' ethical responsibility

Alistair Gale <alistairgale@ukflourmillers.org> Mon, Oct 19, 2026 at 9:58 PM
To: Elizabeth Hart <elizmhart@gmail.com>
Cc: Joe Brennan <joebrennan@ukflourmillers.org>

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

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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.

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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

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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

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   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
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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.
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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