



Historic England

## Dept of Health and Social Care *Adding Folic Acid to Flour Consultation (June 2019)*

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Digital, Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities, to help ensure our historic environment is properly understood, enjoyed and cared for.

This Government consultation to introduce the mandatory fortification of flour with folic acid has been brought to our attention for its possible unintended consequences on traditional corn grinding wind and watermills. Whilst Historic England supports the objective to minimise the risks associated with folic acid deficiency especially amongst pregnant women, the attached '*Position Paper Regarding Proposed Mandatory Fortification of White Flour with Folic Acid*' (June 2019) raises a number of important issues.

Prepared by the Traditional Cornmillers Guild and the Mills Section of the Society for the Protection of Ancient Buildings, it points out, amongst other things, that traditional wind and watermills do not have the equipment to enable them to fortify all flours with folic acid, and that the milling process in such mills is not compatible with the accurate dosing of flours with additives. The document notes that the basic processes and technology used in traditional milling are also inappropriate and impractical for the highly accurate and consistent dosage of the very small amounts that are likely to be proposed.

Many these mills are of considerable historic interest being designated as listed buildings and Historic England would be extremely concerned if such proposals inadvertently puts them at serious risk or discourages others from returning traditional mills to working order.

The position paper puts forward the following three recommendations to overcome this situation:

1. That, if flour is the preferred vehicle for fortification, whether white flours 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.

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We understand from the document that the Traditional Cornmillers Guild and the Mills Section of the Society for the Protection of Ancient Buildings have been involved in discussions with DEFRA when similar issues have been raised in the past. Historic England therefore strongly advises the Department of Health and Social Care to have similar conversations in light of the above recommendations before coming to any firm conclusion, and we would be willing to be part of this if it would help.

A copy of this consultation response has also been sent to the Department for Digital, Culture, Media and Sport as our sponsoring government body.

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Head of Industrial Heritage Strategy  
05 August 2019



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