



Case to secure opt-out for wind and water mills from proposed legislation requiring mandatory fortification of flour with folic acid

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Objective

- To secure opt-out for wind and water mills from proposed legislation requiring mandatory fortification of flour with folic acid
 - Traditional Cornmillers Guild recognises there are sections of the population deficient in folic acid leading to cases of spina bifida and other birth defects
 - Guild accepts there may be a scientific case for fortification of some flours to reduce such incidences
 - However, the Guild asserts for reasons stated in this presentation that implementation of proposed legislation may cause wind and water mills to have to cease flour production risking their future viability.
 - Proposed opt out would affect flour production totalling no more than 8,000 tonnes per annum = 0.0018% of the total bread flour milled in the UK
 - BUT protect artisan mills & milling businesses in the UK



Summary of Situation



- FSA Position
 - December 2006 - Scientific Advisory Committee on Nutrition (SACN) recommended 'mandatory fortification' of flour with folic acid in order to reduce the number of pregnancies affected by neural tube defects.
 - May 2007, the Food Standards Agency Board agreed unanimously that mandatory fortification with folic acid of either bread or flour should be introduced.
 - October 2007, SACN was asked by the Chief Medical Officer to consider some studies that suggested folic acid might increase the risk of colorectal cancer
 - October 2009 – SACN concluded it should retain its previous recommendations and implementation decision now with Health Minister

Summary of Situation

- Likely requirements of proposed legislation
 - Flour to be fortified with folic acid at levels of between 100 and 450 micrograms per 100 grams
 - All millers of flour to be required to add folic acid
 - Issues around labelling to be addressed



Impact of Proposed Legislation on Traditional Millers



- Cost of Equipment
 - To add folic acid in the small quantities required consistently will require
 - Blending Machinery – cost £5 – 10k
 - Metering Screw Feeder Machine – cost £5 – 10k
 - Screw / Pneumatic Conveyor systems to move flour to blending equipment – cost £5 – 10k
 - **Plus installation = ball park total cost between £30 – 40,000**
- Building Listing prevents installation of equipment
 - Most traditional mills are listed Grade 2* / Grade 1 or Scheduled Ancient Monuments
 - Not acceptable to listing authorities to instal equipment required
 - Mills often do not have the space

Impact of Proposed Legislation on Traditional Millers



- Public Choice
 - Customers choose stoneground milled products for scientifically proven health benefits derived from stoneground milling as opposed to roller milling
 - Customers actively seek flour / artisan bread which is NOT adulterated with additives or supplements
 - These customers are actively making choices regarding their diet with health as a key factor – they can be considered to already be eating balanced diets
- Threat to traditional artisan craft and future of mills themselves
 - Flour production provides main source of income for mills to defray significant costs of maintenance, repair, restoration, staff costs & insurance
 - Costs of required machinery even if installation permitted would bankrupt businesses (see over)

Impact of proposed legislation to fortify flour with Folic Acid

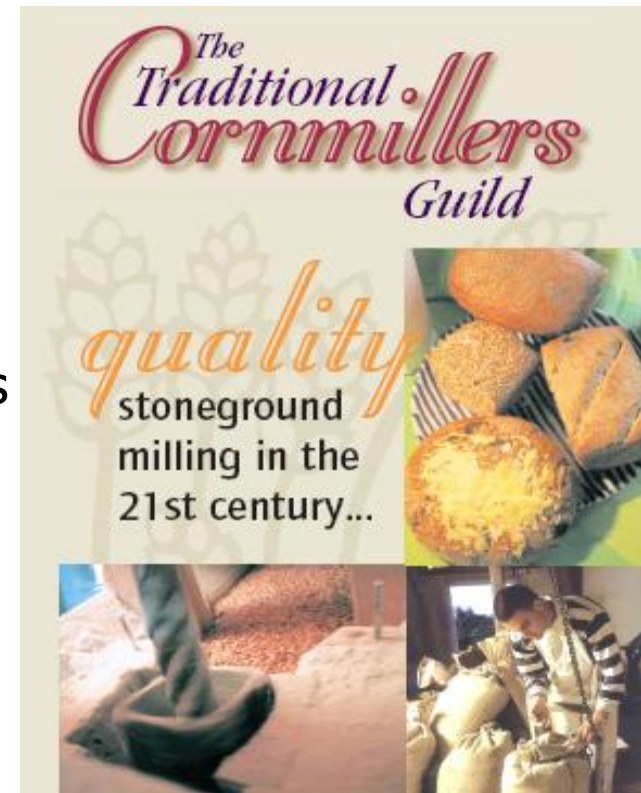
The Financial Impact



- Typical financial position of commercial wind / water mill – currently around 35 in the UK
 - Turnover £70 – 100,000 per annum
 - Costs - £65 – 90,000 per annum
 - Profit - £5 – 10,000 per annum
- Typical financial position of a volunteer mill – currently 73 producing flour in the UK
 - Turnover - £5 - 10,000 per annum made up primarily of voluntary donations & flour sales
 - Maintenance & upkeep £5,000 per year
 - Insurance £2,000 per year

An Introduction

- Founded in 1987 – now 35 member mills
- Members all wind or water millers
- Membership from across the UK
- Members supply
 - Shops including supermarkets
 - Speciality shops & delicatessens
 - Farmers Markets
 - Restaurants
 - Bakeries
 - Direct to the customer
- Sell direct & through distributors
- Mill ~ 6,000 tonnes of flour per year collectively



Impact of proposed legislation to fortify flour with Folic Acid

Criteria for Membership



- Mill uses wind or water power as significant source of power
- Mill uses millstones running horizontally
- Mill is run with high levels of expertise
 - Product knowledge
 - Mill operation
- Mill maintains high levels of product quality and hygiene
- Guild Logo represents “Kite Mark” for quality stoneground flour

Summary



- Without an opt out from the proposed legislation, the future of commercial & volunteer run wind and water mills is put in serious jeopardy as they are prevented from selling traditional stoneground flour
- We risk losing a future for an industry which is enjoying something of a renaissance
 - Sales of artisan flour have never been stronger and have beaten the recession
 - Interest in Real Bread (see Real Bread Campaign) and Artisan Baking is booming
 - Many local schemes are setting up to develop sustainable networks to grow local wheat, mill locally and bake locally
- This legislation presents a serious restriction on our trade as traditional millers

Impact of proposed legislation to fortify flour with Folic Acid