

## **Response ID ANON-3MRW-NSDX-6**

Submitted to **Adding folic acid to flour**

Submitted on **2019-09-09 11:13:48**

### **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 agree with the proposal

#### **Please explain your answer**

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

SRHSB has long advocated fortification of flour with folic acid. As the international Society for Research into Hydrocephalus and Spina Bifida it is acutely aware of the benefits of mandatory fortification of flour with folic acid worldwide .

It would urge the UK government to proceed with mandatory fortification without delay.

### **Which products should be included**

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

all flour in the UK and other non-wheat products such as 'gluten free'

### **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? :**

There is no preferred alternative as both voluntary fortification of flour and relying on supplementation and folate rich diets in the UK population has been unsuccessful.

### **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?:**

Original guidance had suggested fortifying white flour only. As the UK population has been encouraged to eat a more healthy diet and to eat more wholemeal flour products we would recommend that all flour and non wheat flour products be fortified in order to gain maximum benefit.

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

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There may be a case for exempting some low volume artisan flour millers from the requirement to fortify on the basis of supporting consumer choice and in relation to any technical difficulties which these flour millers may experience in ensuring the appropriate dosage based on low volume batching.

**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?:**

No comment

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

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No comment

### **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 disagree

**Please give reasons for your answer**

**Please give reasons for your answer:**

On the basis of the current regulations regarding voluntary fortification there would be no significant risk if such methods continue. It is important to note that in order to have maximum effect, mandatory fortification, supplementation and a good diet would be still be required.

Recent evidence indicates that the blood folate levels of over 90% of women in the UK are currently below the recommended levels.

### **Impact assessment**

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

I agree

**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?:**

No file was uploaded

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

**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?:**  
Folic Acid has additional health benefits for the whole population. There is no evidence worldwide of any negative impact as a result of mandatory fortification of flour with folic acid. As a public health measure it will have significant health benefits in the UK

### **Practicalities for businesses**

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

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No comment

**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?:**

No comment

**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?:**

No comment

### **About you**

**What is your name?**

**First name:**

Andrew

**Surname:**

Wynd

**What is your email address?**

**Email:**

andy.wynd@sbhscotland.org.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?**

On behalf of a non-governmental organisation

**If other, please specify:**

## **About you and your organisation**

### **What is the name of your organisation**

#### **Name of organisation:**

SRHSB (Society for Research into Hydrocephalus and Spina Bifida)

#### **Type of business/organisation:**

registered medical charity

### **What is your role**

#### **What is your role in your organisation:**

Honorary Secretary of SRHSB, the international research society with an interest in spina bifida and hydrocephalus research. Members include international experts in both basic science and clinical aspects in the field of NTD's and management of hydrocephalus.

The charity is registered in the UK and its membership is world wide.

### **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 :**

G68

The whole of the UK