Bread and Flour Regulations (Folic Acid) Bill

House of Commons, Second Reading
Friday 24 February

About the BMA
The British Medical Association (BMA) is an apolitical professional association and independent trade union, representing doctors and medical students from all branches of medicine across the UK and supporting them to deliver the highest standards of patient care.

The BMA calls on MPs to support this Bill, which would require flour to be fortified with folic acid (vitamin B9). The Bill was widely supported by Peers, and we believe it is an important, cost-effective public health measure – furthermore, it would be consistent with the government’s own goal to promote good pre-conception health so that every child gets the best possible start in life.

Key points
- NTDs (neural tube defects) are birth defects of the brain, spine or spinal cord. They are one of the leading causes of infant mortality worldwide.¹
- There is substantial evidence that increased intake of folic acid, a water-soluble B vitamin, reduces the risk of NTDs occurring in pregnancy.
- The BMA supports the mandatory fortification of flour with folic acid as an important public health measure to reduce the risk of common birth defects, and believes it would be in keeping with the government’s stated commitment to promote good pre-conception health.²
- The Scottish, Welsh and Northern Irish governments have backed this measure and written to the UK’s Secretary of State for Health to implement a UK-wide policy. We urge MPs to support this Bill.

Background
Prevalence
NTDs, such as spina bifida and anencephaly, are a result of the neural tube failing to close properly in the early days of embryonic development (approximately 28 days post-conception). When the spine and nervous system do not develop properly in this way it can result in severe disability and morbidity.

Doctors are concerned about the number of pregnancies in the UK that continue to be affected by NTDs. They are one of the leading causes of infant mortality worldwide, and, despite a decline in their occurrence over the last 30 years,³ the UK still has the highest levels of NTDs in Europe.⁴

² Letter from Lord Prior as Parliamentary Under-Secretary of State for Health to Lord Rooker on the Bread and Flour Regulations (Folic Acid) Bill (13 July 2016)
Reducing the risk

The critical period for ensuring adequate folate levels is during the first 28 days of pregnancy to ensure that the spine and nervous system develop properly. Official guidance from NHS Choices recommends that all women who are pregnant, or could become pregnant, “should take a daily 0.4mg (400 micrograms) folic acid supplement from the time [they] stop using contraception until the 12th week of pregnancy”.

Mandatory folic acid fortification

In 2006, the SACN (Scientific Advisory Committee on Nutrition) recommended mandatory folic acid fortification as the most effective way of increasing folate acid intake of women most at risk of NTD-affected pregnancies.

The BMA recommends fortification over supplementation for a number of reasons; some women in the UK are unaware of the benefits of increasing folic acid intake when planning to conceive a child, there is poor compliance with advice to take folic acid pre-conceptually, and as many as half of all pregnancies are unplanned. As a result, the first time many women see a health practitioner for advice about their pregnancy is beyond the 28 days post-conception that it takes for an NTD to develop, which is too late.

There is international evidence from the United States, Canada and Chile (where mandatory fortification programmes have been introduced) which shows fortification can be effective at reducing the rate of NTDs by approximately 25 to 50 per cent.

Fortification of flour with folic acid

Flour is an appropriate vehicle for fortification in the UK as a large proportion of the population regularly consumes flour-based products, which are already fortified with calcium, thiamine, iron and niacin. The use of flour-based products for mandatory folic acid fortification is supported by the SACN, FSA (Food Standards Agency), UK Chief Medical Officers, and devolved administrations in Wales, Northern Ireland and Scotland.

As a component of the Welfare Foods policy, the decision to implement this public health measure in England, Wales and Northern Ireland is reserved by the UK’s Department of Health – Scotland, however, was given autonomy over this matter when the policy was devolved through the Scotland Act 2016. They have expressed intentions to implement a Scotland-only policy if progress UK-wide is not made soon.

The government’s pre-conception health strategy

In a letter following the Bill’s second reading in the House of Lords (dated 13th July 2016), the then Parliamentary Under-Secretary of State for Health stated that the government is not willing to introduce a mandatory fortification policy. Rather, the government will “focus [its] efforts on

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5 NHS Choices, ‘Vitamins and Minerals—B Vitamins and Folic Acid’ (accessed 05 July 2016)
promoting good pre-conception health of both parents to make sure every child gets the best start in life”; and, furthermore, the Minister recommended taking a “more proactive approach” in this regard.

The BMA believes it is for this reason that the government must consider the mandatory fortification of flour with folic acid, as part of its proactive pre-conception health strategy. We know that health promotion in isolation can have limited effectiveness and, therefore, needs to be supported by this type of regulatory policy.

The government has argued that a mandatory folic acid fortification policy should be differentiated from efforts to tackle diabetes, poor diet, smoking, and other health concerns that can to lead to poor pregnancy outcomes – but the BMA believes supporting this policy would be in keeping with, and conducive to, a wider public health strategy to improve pre-conception health. Moreover, it would be inconsistent not to do so as part of a ‘proactive’ approach.

Safeguards
Controls on fortification by the food industry
In the UK, the FSA has set a guidance level of 1mg per day of folic acid for adults; the BMA is aware that extremely large dosages (more than 15mg) can result in digestive problems, insomnia, skin reactions and seizures. However, provided women receive advice on using supplements, and there are appropriate controls on mandatory and voluntary fortification of flour in the food industry (ensuring individuals do not exceed 1mg per day), there is no evidence to suggest a mandatory folic acid fortification programme would cause any harm.

Guidance for women
The introduction of mandatory fortification of flour with folic acid would need to be accompanied by advice for women of child bearing age who do not consume any flour-based products. These women may include those with coeliac disease and gluten sensitivity, some individuals with irritable bowel syndrome, and those on gluten free or carbohydrate free diets.

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