

UK FLOUR MILLERS BRIEFING DOCUMENT

Assurance and the Traceability of Wheat & Flour

Revised May 2018

Summary

Information relating to quality assurance, food safety and traceability is increasingly sought by customers and consumers. Although UK flour millers use only 'assured' wheat to make their products there is still some confusion about what this means. Individual flours are generally produced by mixing several wheat varieties from multiple sources in a continuous flow-process. For this reason, it is often not possible to indicate specific origins for flour. This briefing has been written to aid in the understanding of these issues with customers.

Background

Many buyers of flour, especially retailers and secondary processors, seek information about the traceability of the flour that they purchase. The UK flour milling sector only uses assured wheat and works closely with the main UK assurance schemes. Other forms of assurance are used for imported wheat such as QS Qualitat und Sicherheit, Ovocom and GMP+. There is confusion about what 'assurance' actually conveys to the customer and this appears to mostly relate to the food safety and good agricultural practice elements contained within the schemes and whether flour millers carry out additional 'assurance' testing.

In addition to using wheat from assured sources where best practice has been followed and the standard robustly audited, most millers will conduct a battery of tests on every delivery at grain intake and their own 'due diligence' testing following HACCP principles and industry good practice.

UK Flour Millers, supported by the AHDB, also conducts regular monitoring to examine aspects such as general levels of mycotoxins, heavy metals, agrochemical residues and flour microbiology.

Following recent food fraud incidents, notably 'horsegate' in 2013/14, and with the introduction of BRCv7 there is now a requirement for food manufacturers to have systems in place to reduce the risk of purchasing fraudulent or adulterated raw materials and to ensure that all product descriptions and claims are legal, accurate and verified. The number of different raw materials used by UK flour millers is low with wheat making up the vast majority of this. In all cases the vulnerability risk is low.

Assurance of wheat

All home-grown wheat used by UK flour millers is assured within one of the two main assurance schemes operating in the UK. The largest of these is Red Tractor which has 18,000 arable members within a well-established scheme. **UK Flour Millers** is represented on the Cereals & Sugar Beet Committee and has taken an active role in ensuring that standards fulfil the requirements of processors and meet food safety aspects. The system has a strong audit base which is under constant review and improvement.

A similar scheme operates mainly in Scotland which is Scottish Quality Crops (SQC). Scotland grows approximately 10% of the national wheat crop and this is used for distilling, malting, flour milling and animal feed. Most of the milling wheat is used for biscuit making. Although 85% of the Scottish cereal crop is assured under SQC, flour millers will only source assured wheat. This was the first assurance scheme to be established and is HACCP based.

There are several other assurance schemes such as the LEAF Marque and Soil Association schemes that are specific. Leaf Marque is a higher-level environmental standard which indicates that the crops have been grown under environmentally responsible IFM principles. Soil Association, Organic Farmers & Growers, and Organic Food Federation certification indicate that any organic product bearing their symbol has been certified. All certifying bodies must comply with national and EU standards.

Two other assurance schemes are relevant to wheat and flour production. The TASCC Assurance scheme and the Gafta scheme, GTAS. TASCC Assurance covers aspects relating to wheat merchants, stores and transport whereas GTAS tends to cover international trade aspects. Gafta has announced that it will cease to offer assurance certification for transport and storage for new members from 1 January 2019; existing members will need to transfer to an alternative scheme by 31 December 2018. This is to avoid unnecessary duplication with other schemes in the market place, such as TASCC.

Information about the main assurance schemes in the UK can be found at:

Red Tractor: www.redtractor.org.uk

Scottish Quality Crops: www.sqcrops.co.uk

TASCC: www.aictradeassurance.co.uk

GTAS: www.gafta.com/Trade-Assurance

Soil Association: www.sacert.org

Traceability of wheat and flour

All wheat used by UK millers is traceable to its point of production e.g. the farm or store of origin. Grain movements within the UK operate within a passport system that identifies the producer together with other information relating to transport, mycotoxin levels and whether storage agrochemicals have been applied. These passports bear a 'sticker' issued by the appropriate assurance body which signifies that the producer was assured at the time of issue.

Most wheat comes directly from the farm so is traceable at mill intake back to the farm where it was grown. However, in farm and central stores (of which through the latter approximately 20% of the UK crop is marketed), wheat is often blended with consignments of similar characteristics before being dispatched to the processor. The grain is still traceable and assured, but because of blending it is not identity preserved.

At the flour mill, virtually all flours are produced by mixing or 'gristing' different wheat types from large capacity holding silos. These are usually different varieties with differing functional characteristics. They will come from many individual farms so that it is rarely possible to trace the flour to a single source. Traceability at wheat level is therefore typically restricted to a group of farms/supply sources, not a single farm. For this reason, it is not possible or appropriate for flour

millers to complete some of the detailed documentation, required by some customers, where this combines assurance and traceability with identity preservation.

Country of origin and provenance

Although the EU Food Information for consumers Regulation (FIR) has introduced new requirements for origin labelling, none of these currently impact on flour. The country of origin or place of provenance must be given if their omission is likely to mislead e.g. if an image associated with the UK is given but the product is made elsewhere. In this example 'produced in [country name]' must be given. The Country of Origin is the country of last, substantial, economically justified processing.

The Place of Provenance is any place where food is indicated to come from where this is not the same as Country of Origin. Stating the business address is not of itself an indication of place of origin.

A major issue for flour producers is that although the majority of wheat used in the UK is of UK origin (85%), use is made of wheat from French, German, Canadian and the USA. When, in poor harvest years, the quality of UK wheat does not provide the required functionality, millers may seek other sources at short notice. This means that labelling of country-of-origin would be impractical in a swiftly-changing situation.

The European Commission prepared an impact assessment to evaluate whether a mandatory indication of the origin is necessary for unprocessed foods, single ingredient products or ingredients that represent more than 50% of a food. In 2015 the Commission published a report stating that "mandatory labelling for primary food products would be of little informative value or meaningless, and may even prove to be misleading by wrongly suggesting that these products possess special characteristics when all similar products have the same characteristics".

UK Flour Millers, through Primary Food Processors (PFP) in Europe, takes the view that current EU voluntary labelling rules are the most realistic approach and we are pleased that this is the accepted position to be confirmed in EU regulation coming into effect in July 2018.

Agrochemical applications

Some enquiries are received about the use of agrochemicals on milling wheat. These often relate to withdrawn agrochemical products or the routes by which applications are controlled or monitored. Often these relate to substances that have never been used on crops in the UK.

All agrochemicals sold or used in the UK must be registered for appropriate uses on specified crops. Once on the market, control of a particular use is monitored within assurance schemes such as Red Tractor. The annual audit checks a log of applications to determine dates, timings and rates of applications made to each crop on a field-by-field basis. Similarly, a check of the agrochemical store is made to ensure that all agrochemicals are appropriate to the crops grown on the individual farm and are within date. Spray application equipment is also monitored with an annual test equivalent to an MOT to ensure that applications are even and accurate.

SAI Platform

Some customers enquire whether UK wheat is compliant with the SAI Platform. SAI Platform is an organisation that builds collaborations around agricultural sustainability, often in the form of working group projects, information sharing and tool development. One of these tools is the Farm Sustainability Assessment (FSA) which operates at a number of levels. Red Tractor Assurance is currently benchmarked with a 'silver' equivalence to FSA under the SAI Platform. This means that Red Tractor assured grain also conforms to this 'silver' level.

The SAI Platform has a set of standards or criteria denoted at essential, basic and advanced. To gain silver equivalence, schemes like Red Tractor, must achieve at least 100% of the essential standards, 80% of the basic and 50% of the advanced. Red Tractor currently meets 100% of the essential, 83% of the basic and 53% of the advanced SAI Platform standards.

Discussions are currently taking place within Red Tractor to consider whether gaining the 'gold' standard would be of benefit.

RED traceability

Customers have sought guidance as to whether the UK wheat used by flour millers is RED compliant under the EU Renewables Energy Directive. This illustrates a degree of confusion since the RED only applies to crops being used to produce energy, such as bioethanol and biodiesel. It does not apply to food crops.

Future Actions

UK Flour Millers will continue to monitor the situation and represent member interests. Some of these discussions with the European Commission will be conducted through the European Flour Millers Association (EFM)