



Submission to Food Standards Australia/New Zealand

Proposal P295 Mandatory Fortification with Folic Acid

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OANZ is an incorporated society with the following objectives:

- To provide leadership and vision for the organics sector at a national level.
- To coordinate the collective resources of the organics sector in the wider interests of New Zealand.
- To establish and effect a well resourced national organisation that is able to advocate and negotiate on behalf of its member organisations.
- To maintain and strengthen a holistic organic philosophy through a focus on healthy food and a sustainable environment.
- To implement the vision of the organic sector to be recognised nationally and internationally as a world leader in organic systems and products.
- To make representations to local authorities and central government where necessary to advance the charitable aims of OANZ.
- To undertake any other activity, including any business activity as, in the opinion of the Council may be incidental to or in the furtherance of any of the objectives of OANZ.

OANZ comprises the following members:

- Soil and Health Association of New Zealand (Inc)
- Bio Dynamic Farming and Gardening Association in New Zealand (Inc)
- New Zealand Biological Producers and Consumers Society (Inc)
- Organic Product Exporters of New Zealand (Inc)
- Organic Farm New Zealand Incorporated
- AgriQuality Limited
- Te Waka Kai Ora
- Organic Dairy Producers Group (ODPC)
- Certified Organic Kiwifruit Growers Association (COKA)

Overall Position:

While recognising the need to reduce the risk of Neural Tube Defects, the organics sector is opposed to proposal P295. We believe there are better ways of achieving the outcomes desired rather than mandatory fortification of all bread making flour with folic acid.

Reasons for our opposition

a. Removal of Choice and Personal Responsibility

Mandatory fortification removes individual choice. Mandatory powers should not be used to control diets. Any intervention that might be justified should be targeted strictly at that sector of the population most at risk.

From the proposal documents we are advised that 30% of the child-bearing female target group will not benefit from fortification because they lack absorption capacity. The proposal involves the medication of the total population for the potential benefit of relatively few. Consumers who do not want to eat fortified bread and are getting the required levels of folate in their balanced diets would have no choice if all bread was fortified.

The processing standards for organic bread restrict the addition of ingredients from non-agricultural origin to a limited number of traditional or chemically simple materials. Examples are salt, pectin and lactic acid. The standards do not permit the addition of synthesised vitamins. Mandatory fortification would be a barrier to consumer choice and would unfairly interfere with a trade built on the principle of minimum intervention in the composition of the food.

b. Conveys the Wrong Message

Mandatory fortification sends the wrong message to our population by suggesting that the application of supplements can be used to overcome the need to eat nutritious, wholesome food.

By adding a folic acid supplement to processed flour products we are promoting the consumption of low nutrient, starchy carbohydrates that are already eaten in excess. Processed flour has much nutrient, including natural folate, stripped from it. The proposal promotes the consumption of wrong food types implying that they are good.

c. Inadequate Consideration of Alternatives

The four options listed in the Initial Assessment Report (October 2004) were precipitously reduced to options (i) and (iii) in the Draft Assessment Report, apparently on the basis of Ministerial input.

- (i) status quo
- (ii) enhanced voluntary fortification
- (iii) mandatory fortification
- (iv) increased health promotion and education strategies.

FSANZ officials advise that there has been no publicly funded education programme on the need for folate in New Zealand and a very inadequate programme in Australia.

Consumer choice can be improved if fortification was confined to certain bread making pre-mix ingredients or post-mix additives instead of all bread making flour. While not ideal, this course of action would at least give some flexibility allowing the production of some organic bread products.

d. Uncertainty and risks associated with elevated folates

Potentially synergistic and antagonistic effects have not been adequately addressed. Elevated folate levels can mask the symptoms of vitamin B12 deficiency or an underlying pernicious anaemia.

The NZFSA website states that 10% of all adults over 65 may be deficient in B12. Vegans are another group at risk of B12 deficiency.

The short guide to the Mandatory Proposal issued by FSANZ in July 2006 states on P.7:

“There are some uncertainties associated with mandatory fortification, particularly chronic exposure to increased folic acid intakes beginning in early childhood.”

This statement appears to be at variance with the assurances given on P.11 of the same report in response to the question “are there any potential adverse effects from taking folic acid”.

The statement in reply reads:

“High doses of folic acid are not known to have any adverse effects on healthy individuals.”

In view of the earlier comment a more cautionary response might have been more appropriate and accurate.

e. Global Trends

There has been a world wide decrease in Neural Tube Defects over the past two decades. Money spent on fortification would be better spent to correct diseases that are on the increase from food related sources.

An Alternative Proposal

As an alternative to mandatory fortification, government health agencies should run publicity campaigns on folic acid supplementation thereby creating market opportunities for those firms willing to supplement.

Health agencies should intensify their publicity campaigns promoting healthy nutritious eating.

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