



9 July 2012

Food Policy Team
Biosecurity, Food and Animal Welfare Directorate
Ministry for Primary Industries
PO Box 2526
Wellington 6104
New Zealand

By email: folicacid@mpi.govt.nz

SUBMISSION on the New Zealand (Mandatory Fortification of Bread with Folic Acid) Food Standard 2007.

Thank you for the opportunity to comment on the fortification of bread with folic acid. This submission is from Consumer NZ, New Zealand's leading consumer organisation. It has an acknowledged and respected reputation for independence and fairness as a provider of impartial, and comprehensive consumer information and advice.

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Maintaining consumer choice

Consumer NZ supports Option 2: Limited mandatory fortification from 30 September 2012. We believe this option balances consumer choice with further reducing the incidence of neural tube defects (NTD). We suggest 80 percent (by weight or number of loaves as appropriate) as a minimum percentage that manufacturers must fortify.

To make it easy for consumers to choose whether or not to buy fortified bread, information on which products are fortified should be readily available. At present, the list of fortified breads is accessible online but we would also like the presence of folic acid clearly stated on the front label. The list of fortified breads could also be made available in stores. Messages on the importance of folic acid for reducing NTDS could also be included as part of this information – both online and in stores.

To further maintain consumer choice, we support limited mandatory fortification applying only to bakeries producing a certain level of output. This would also reduce the financial

burden on small producers, so they don't have to pass on the cost of fortification to consumers.

Organic producers should also be exempt. In our opinion, if folic acid is added to organic bread it could not be classified as organic.

We support extending the start date for limited mandatory fortification to 30 September 2013 to allow manufacturers time to reformulate recipes and update packaging. This extension should be used by the Ministry for Primary Industries to set up an appropriate framework for monitoring and reporting on folic acid levels in bread, and folate levels in the general population and also the target group.

Education

Regardless of which option is selected, Consumer NZ would like to see increased health promotion and education strategies to promote the increase of folate through diet, supplementation and fortification in the target population.

If mandatory or limited mandatory fortification proceeds, we are concerned that women in the target group will think that fortification will provide enough folate to prevent NTDs. Education campaigns must be clear that supplementation will still be needed to reach recommended levels.

Monitoring and reporting

To ensure the folic acid fortification – whether voluntary, mandatory or limited mandatory – is carried out consistently and is resulting in the expected reduction in the incidence of NTDs, Consumer NZ would like to see monitoring of:

- folic acid levels in bread (to ensure consistency in fortification levels);
- dietary and blood folate levels of the general population and the target group;
- comprehensive monitoring of NTDs including live births, still births, and terminations.

Please contact me if you require any further information.

Yours sincerely,

Libby Manley