

**INCREASING FOLIC ACID
INTAKE
FOR
WOMEN OF CHILDBEARING AGE**

**AN INDUSTRY SUPPORTED SOLUTION
PREPARED BY THE NEW ZEALAND
ASSOCIATION OF BAKERS AND THE NEW
ZEALAND FOOD AND GROCERY COUNCIL**

April 2007

GENERAL COMMENTS

The New Zealand Association of Bakers and the New Zealand Food & Grocery Council continues to endorse strongly the initiative aimed at increasing dietary intake of folic acid by women of childbearing age to reduce the incidence of Neural Tube Defects (NTDs) in newborns.

As we have previously indicated we do not, however, support the mandatory fortification of all bread with folic acid as the solution to this public health problem. We have been actively working with both FSANZ and the New Zealand Food Safety Authority to provide a more appropriate evidence-supported approach.

This Paper represents the views of the New Zealand Association of Bakers (NZAB) and the New Zealand Food & Grocery Council (NZFGC).

The NZAB represents the larger plant bakeries including George Weston Foods NZ Ltd, Goodman Fielder NZ Ltd, Breadcraft (Wai) Ltd, River Mill Bakeries Ltd., Quality Foods Southland, Yarrows (The Bakers), Walter Findlay Ltd and Couplands Bakeries as well as the smaller members of the NZ baking industry represented by the NZ Baking Industry Association.

The NZFGC comprises the major suppliers of food, beverage and grocery products. NZFGC member companies represent 98% of all processed and packaged foods sold by supermarkets and other retail outlets.

We do not believe the alternatives to mandatory fortification of the food supply have been adequately assessed. This view has been vindicated by the Australia New Zealand Food Regulation Ministerial Council's decision to request a review of Proposal 295 Consideration of Mandatory Fortification with Folic Acid. The opportunity for making further advances in the reduction of NTDs via enhancements to the existing voluntary fortification framework has not been thoroughly researched.

This Paper outlines the reasons why the mandatory fortification of bread with folic acid will not achieve the objective of reducing the incidence of NTD's and also outlines an alternative balanced and effective solution to achieve the objective.

REASONS WHY THE INDUSTRY IS OPPOSED TO THE MANDATORY FORTIFICATION RECOMMENDATION

- The Proposal does not meet the requirements of the Ministerial Special Order Policy Principles in respect of Mandatory Fortification. These principles require that the mandatory addition must be the most effective public health strategy to address the health problem, no detrimental excesses and imbalances will result across the general population and the fortification will deliver effective amounts to the target population to meet the health objectives.

- Mandatory fortification of bread will not provide sufficient folate levels in women of childbearing age to be effective. The ineffective targeting will result in inadequate intake of folate amongst the target population and excess intake in non-target groups including young children.

(Bread is a product not widely consumed by women of childbearing age but it is by children, men and older women).

- On their own evidence the Government recognises the Proposal will be ineffective and will require continued supplement use and education campaigns to ensure the outcome is achieved. To obtain enough folic acid from fortified bread women will need to eat eleven slices a day. This is the average amount that women who do eat bread consume in a week.
- There has been a lack of targeted health promotion campaigns, including the promotion of supplements, to assess whether this would be a preferable course of action.
- Mass medication for a small target population results in health risks to non-target population, especially children and the elderly.
- There is a complete removal of consumer choice. Removing consumers right to choose is a serious step for any Government to take and needs to be supported by strong evidence that it is necessary and will be effective.
- Removes the ability to purchase natural or organic breads.

THE EFFECTIVE SOLUTION

The industry believes that the most effective solution is for government to implement a sustained coordinated national folate education campaign aimed at the target group, in tandem with an expanded range of foods, including breads, which industry has permission to fortify voluntarily.

This way forward would retain consumer choice and reduce any risks to health for those not requiring extra folic acid.

In support of this approach we make the following points:

- There are many examples of successful large scale education campaigns aimed at minimising health issues. These include the need to prevent diseases such as HIV/AIDS, health concerns around smoking and the importance of sun protection.
- It is our view that governments and the community will fully support health promotion activities, coupled with an expanded range of foods which industry have permission to fortify voluntarily.

- While folic acid is an important part of the diet of women of childbearing age, it is less so for men, the elderly and young children. However, under a mandatory fortification option, the entire New Zealand population will be targeted to address a need which exists only for women of childbearing age.
- Risk analysis performed in New Zealand by the New Zealand Food Safety Authority have identified that significant numbers of young children will exceed the upper recommended levels on a daily basis. Risks associated with this have yet to be fully quantified.
- Any move to mandate folic acid in bread is that organic and natural bread products will cease to exist as the folic acid additive is a synthetic product. New Zealand consumers have a long history of purchase of these products and it is our view that the ability to provide these choices in the bread category is crucial.

FSANZ has advised that it may give consideration to exempting organic breads from the requirement to add folic acid to provide choice. Even if such a concession was granted, it does not overcome the fact that:

- women of child-bearing age are not high consumers of bread
 - as organic breads are more expensive women who fall within a lower socio economic sector may not purchase such products
 - it is unfairly discriminating to other bread manufacturers who also wish to provide consumer choice.
- The fortification of bread with folic acid imposes an additional regulatory burden on the food manufacturing industry. While the costs of adding folic acid to bread are not high, the cost of monitoring throughout production to ensure the correct levels of folic acid are being maintained will be high. This will increase the cost of bread.

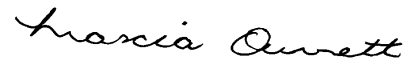
CONCLUSIONS

- FSANZ proposed solution will not be effective and completely removes consumer choice.
- FSANZ and the food industry should not be responsible for a public health issue such as this. We recognise and accept that both FSANZ and the food industry can be part of the solution but we believe it is essential that a public health approach is taken to ensure an effective solution.
- To achieve the objective of reducing the incidence of NTDs in Australia and New Zealand, requires a multifaceted approach that includes:

- Providing women of child-bearing age with information about the importance of folic acid (in the form of supplements or folic enriched or fortified foods and beverages).
- Increasing the range of folate fortified foods and beverages that are consumed by women of child bearing age. It must be noted that voluntary fortification to date (which applies to only a limited range of products) has already successfully reduced the incidence of NTDs by 10% - 30%. By extending the range of fortified products in conjunction with an education campaign will achieve a more effective outcome than the adoption of a mandatory fortification result.
- It is our view that our proposed solution will result in a further decline in the incidence of NTDs in New Zealand without the risk of unintended avoidable consequences to other groups in the population. We would therefore encourage the government to take this approach in the first instance.



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