

**NEW ZEALAND FOOD & GROCERY COUNCIL SUBMISSION ON
CONSIDERATION OF MANDATORY FORTIFICATION WITH IODINE;
KEY ISSUES FOR CONSIDERATION AT FINAL ASSESSMENT.**

The New Zealand Food & Grocery Council (the FGC) welcomes the opportunity to comment on “Consideration of Mandatory Fortification with Iodine; Key Issues for Consideration at Final Assessment”. (the Issue Paper).

The FGC represents the major food and beverage manufacturers and suppliers in New Zealand. The Council's member companies provide 98% of the processed food and beverages supplied to the grocery industry. They are also the major exporters of processed food and beverages. The following comments are therefore representative of a diverse range of views.

The grocery industry contributes over \$9 billion to the domestic economy and is the largest employer in the manufacturing sector. In addition member companies contribute \$1.7 billion towards New Zealand’s export earnings in the form of elaborately transformed manufactured products.

GENERAL COMMENTS

The New Zealand Food & Grocery Council (FGC) agrees that the mild iodine deficiency that is now occurring in New Zealand and parts of Australia as a result of an inadequate iodine intake must be redressed. It supports the implementation of measures that will increase iodine intake in the diet.

It does not however support the approach that is now being considered at Final Assessment, namely:

- The mandatory replacement of salt with iodised salt in bread with a salt iodisation range from 35 – 55mg of iodine per kg of salt.
- Retaining the voluntary permission for iodine in iodised salt and reduced sodium salt by adjusting it from the current range of 25 – 65mg per kg to 35 - 55 per kg.

The FGC remains opposed to a mandatory fortification approach for reasons that have already been advanced in earlier submissions on Proposal 230.

SPECIFIC COMMENTS

Voluntary Approach Supported by the FGC

The FGC remains concerned that the adoption of voluntary strategies to redress mild iodine deficiency have been given insufficient consideration. It is obvious that the mandatory approach will achieve the objectives of increasing iodine intake. Before taking such action however, that will virtually remove consumer choice (of which little heed has been taken), it is submitted that the same objective can be achieved by adopting voluntary measures. A voluntary approach has advantages over a mandatory approach for the reasons outlined below.

FSANZ stated in the Draft Assessment Report it cannot find that the “best available” evidence supports a mandatory measure and yet the Issues Paper continues to support a mandatory approach but has not presented any additional evidence for this stance.

Before adopting a mandatory approach the FGC submits that a voluntary approach should be given in-depth consideration.

FSANZ is aware the Baking Industry, both in Australia and New Zealand, are willing to enter into a Memorandum of Understanding (MOU) that a significant proportion of bread will contain iodised salt. In addition the FGC is willing to identify other food and beverage categories where iodised salt could be substituted for non-iodised salt. A MOU to this effect could also be implemented.

The FGC does not agree with the following statements made at page 18 of the Issues Paper for the reasons stated.

- “Voluntary fortification is not as sustainable, and does not provide as stable and certain an iodine supply as mandatory fortification”.

A Memorandum of Understanding will clearly identify the products that will be fortified with iodised salt and specify the iodisation range. This approach can be just as certain as mandatory fortification. The uptake of these products can be identified, measured and monitored over time.

- “Further, addition of iodised salt to processed foods is currently permitted, and has for many years, but with a minimum uptake by the Australian and New Zealand industry”.

It is only comparatively recently that mild iodine deficiency has been identified and this fact has received little publicity. Now that the industry is aware that there is a deficiency that can be redressed by making iodine more assessable in the diet it would be willing to work with officials to implement measures that will ensure iodine intake is increased, particularly if a communication strategy was implemented to raise consumers’ awareness of the need to have an adequate iodine intake and health claims were permitted.

It is noted that the food industry’s MOU proposed at the Draft Assessment stages has been rejected by FSANZ because the dietary intake estimates it undertook to assess the level of iodine under a voluntary scheme, were found to be “significantly less effective in increasing

iodine intakes than the proposed mandatory fortification” (pages 18 and 19 of the Issues Paper). It would have been helpful if these estimates had been included in the Issues Paper so they could be reviewed and further comment made.

The FGC submits however the range of products referred to in the MOU could be amended to ensure the required levels of iodine intake are obtained. The industry is willing to work with FSANZ to this end. The FGC noted in its submission on the Draft Assessment Report that “if a MOU was entered into with the industry it would need to be developed in association with FSANZ so that the range of products selected would meet the objective of raising the iodine status to the desired level to overcome deficiencies, while ensuring the risks of over-exposure do not occur”.

It is also of interest to note that the option of increasing the use of iodine as a processing aid also warrants consideration as together with the implementation of an MOU it can produce a similar result as a mandatory approach.

The FGC also notes that the implementation of a Communication Strategy is a core part of the Proposal. Thus consumer education could encourage the use of iodised rather than non-iodised salt when discretionary salt is used. Thirty percent of consumers purchase non-iodised salt and thus a not insignificant increase in iodine intake could be obtained if consumers were encouraged to purchase iodised rather than non-iodised salt.

Benefits of the Voluntary Fortification Approach

The following are benefits that would result from the approaches advocated above:

- A voluntary approach would be as effective as a mandatory approach.
- Consumer choice would be maintained.
- The small percentage of the population that must avoid high intakes of iodine could avoid fortified products as there would be a choice.
- The 12% - 13% of the population that do not consume bread would have other food choices from which to obtain a good source of iodine other than foods naturally rich in iodine (which do not play a major role in the diet).
- The Issues Paper notes that “it is unlikely that the proposed suggestion will meet the needs of pregnant and breast-feeding women whose requirements are substantially higher than the rest of the population”. The Issues Paper also recognises that while it is difficult to deliver enough iodine to meet their needs that through the population “receiving sufficient additional iodine it is more likely for women to enter pregnancy with adequate iodine stores decreasing the risk of pregnancy affected by iodine deficiency”.

It has already been noted in the industry’s submissions in respect of folate fortification that women of child-bearing age are not high consumers of bread. If a wider variety of products than bread alone also substituted non-iodised salt with iodised salt, the chances of raising the iodine level of women of child-bearing age, pregnant and breast-feeding women would be increased.

Interestingly these benefits also fulfil the same criteria as mandatory fortification – effectiveness, equity, efficiency, certainty, feasibility and sustainability – that are required for an effective public health strategy. (Page 18 of the Issues Paper).

Consumer Choice

Little attention has been given to consumer choice throughout the assessment of Proposal 230 which, the FGC submits, is a major omission.

It has been noted in earlier submissions on the Proposal that consumer choice is of prime importance to New Zealand consumers. Mandatory fortification is opposed by 80 percent of the New Zealand population, a point that is rarely referenced in the Assessment Reports.

It is interesting to note that the fortification of water with iodine could be a possible option and particularly attractive in Australia where iodine deficiency is not a problem in some States. Fortification of water with iodine would obviously be rejected and is vehemently opposed in some sectors and hence few would choose to become involved with a contentious debate like the one that surrounds the addition of fluoride to water. Why is it therefore acceptable to mandate the fortification of bread with iodine, a staple food, which is opposed by an overwhelming proportion of consumers? It could be argued that it is illogical and inequitable to reject one food vehicle because of the opposition that could result and yet choose another vehicle even though eighty per cent of the population are opposed to the choice.

It is recognised that the Issues Paper states there will be choice because unleavened bread and organic bread will not be required to be fortified with iodised salt but, in reality, this is not a choice. There is a minimum amount of unleavened products in New Zealand and the amount consumed barely registers. Similarly organic bread comprises a very small part of the bread category and is purchased by a very small proportion of consumers. The exemption of organic and unleavened breads does not provide “real” choice to the majority of consumers.

It is essential that the removal of consumer choice must be a core criterion to take into account. A cost benefit analysis of removal of consumer choice must also be undertaken.

Health Claims

As noted above, the ability to make a claim about foods fortified with iodine is helpful to consumers.

The FGC submits however that the proposed wording of a pre-approved general level health claim that “iodine is necessary for normal production of thyroid hormones” would not be understood by the majority of consumers. Furthermore it is not the wording that manufacturers would choose to include on a label.

The wording should therefore be amended to make it understandable to consumers, for example:

- “Iodine is needed to maintain normal body functions, such as control of temperature and metabolism”.

- “Iodine is needed for normal brain development in babies and young children”.

Communication Strategy

The FGC notes that a strategy to guide communication and education initiatives to raise awareness and understanding of the proposed Standard will be implemented. The FGC has stressed throughout the lengthy deliberations on the Proposal, the importance of such a strategy.

Whatever option is finally adopted (mandatory or voluntary), education of the target audiences (identified on page 18 of the Issues Paper) is essential.

Monitoring

Whether or not a mandatory or voluntary approach is adopted, monitoring to ensure its ongoing effectiveness and safety is essential.

CONCLUSIONS

- The Proposal that all bread (with the exclusion of organic bread) is required to substitute non-iodised salt with iodised salt is unreasonable, inequitable and excessive.
- The removal of consumer choice is strongly opposed by the industry. It should be given prime consideration particularly when mandatory fortification is opposed by eighty percent of the New Zealand population.
- Voluntary fortification of a diverse range of products with iodised salt, under the auspices of a MOU, consumer education to use iodised rather than non-iodised salt when discretionary salt is purchased and the promotion of iodine as a processing aid will achieve the same result as mandatory fortification.

Mandatory fortification should only be used as a last resort when other approaches are not available. This is not the case in respect of iodine deficiency.

- Further consideration of a voluntary approach is warranted and justified.

Brenda Cutress
Executive Director
NZ Food & Grocery Council

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