

**Submission to the Health New Zealand Food Safety Authority;
Consultation on Proposed Amendments to the New Zealand (Mandatory Fortification of
Bread with Folic Acid) Food Standard 2007**

Introduction

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 42 Nationally Organised Societies. It has 31 branches throughout the country attended by representatives of those societies and some 150 other societies. The council's functions are to serve women, the family and the community at local, national and international levels through research, study, discussion and action.

NCWNZ welcomes the opportunity to consider this Discussion Paper on the Proposed Amendment to the NZ Folic Acid Standard.

The response has been prepared by the Consumer Affairs Standing Committee following consultation with the Nucleus Group Committee and other representatives of the Auckland Branch of NCWNZ. As the timeframe for consultation is short, it has not been possible to circulate the amendment proposals to the full membership and branches throughout NZ and receive their opinion.

Background

In many previous submissions written by NCWNZ on this subject, the membership generally agreed with the fortification of bread with folic acid although concerns were expressed in those submissions about the possible risks to public health and safety particularly for at risk groups e.g. children and the aged.

At that time suggestions were made that further research would be advisable to ensure that the addition of folic acid to bread at the recommended dosage was safe and posed no health risks to the consumer. The committee further recommended that the "status quo regarding additives to food should be maintained until the outcome of further research was available before mandatory fortification of the food supply was introduced."

The deferred commencement date as preferred in this amendment to the Standard would allow for the planned review in 2011 of the Australian Standard to provide updated information.

Five Options

The responses from members consulted on the options as outlined in the document were divided in opinion and commented that there were advantages and disadvantages to all three options. Support was divided between 5.1 Status quo and 5.2 Amendment to Commencement date, 5.3 Revocation of the New Zealand Folic Acid Standard received very limited support.

Opinions reflected indecisions and concerns about the options and the difficulty in making a choice that would be beneficial for all consumers. It was recognised that consumption by women of an

adequate amount of folate (and folic acid) immediately prior to and during the first trimester of pregnancy is scientifically proven to reduce the risk of having a neural tube (NID) affected pregnancy.

Member's responses reflected concern that the opportunity to maximise the reduction of NTP's may be jeopardised if folic acid is not added to bread until May 2012. Because of this, members strongly supported an increased education campaign by the Ministry of Health to ensure all women of child bearing age are aware of the need to increase folate/folic acid intake prior to and during early pregnancy.

Members expressed concern – following the recent publicity – that the supplementation with folic acid at the recommended level may:

- Increase the incidence of certain types of cancer
- Increase costs to the consumer of bread products
- Limit consumer choice
- Not deliver the desired outcome
- Result in difficulties associated with getting an even spread of folic acid in bread

As a result of these concerns, a majority of members consulted supported the option 5.2 Amendment to Commencement date.

All responses stressed that labelling should clearly identify the addition of folic acid to bread if the standard is amended to provide for the continuation of voluntary fortification in NZ until May 2012.

6.2 Consumers

Members did not agree that consumer purchasing decisions would be affected if the impending commencement date is delayed until May 2012. Plans to purchase organic bread or reduce the amount of supplements purchased or any other impact that may affect the consumer can be easily changed following public notification of amendment.

6.3 Public Health

As previously discussed, members strongly supported an enhanced education campaign to increase the intake of folate/folic acid e.g. TV, radio, newspapers, pamphlets as health promotion initiatives should the option to amend the commencement date to 31st May 2012 be the preferred choice.

NCWNZ thanks the New Zealand Food Safety Authority for the opportunity to offer comment on this very important health issue.

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