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12 November 2019

Consultation: Folic Acid Fortification

Ministry for Primary Industries

PO Box 2526

WELLINGTON 6104

By email: [food.policy@mpi.govt.nz](mailto:food.policy@mpi.govt.nz)

**SUBMISSION on Folic Acid Fortification**

1. **Introduction**

Thank you for the opportunity to make a submission on folic acid fortification. 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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1. **Preferred option**

Consumer NZ supports the mandatory introduction of folic acid fortification. As noted in a 2018 report by the Office of the Prime Minister’s Chief Science Advisor and the Royal Society Te Aparangi, the benefits of mandatory fortification of packaged bread with folic acid outweigh any potential adverse affects.

We support the Ministry for Primary Industries’ preferred Option 3b – mandatory fortification of non-organic wheat flour for bread making purposes. We believe this option balances consumer choice (organic wheat bread and non-wheat varieties will be available) with reducing the incidence of neural tube defects (NTDs).

Option 3b would also result in greater health equity, as shown in Australia by a 74 percent decline in the NTD rate for indigenous communities and a 55 percent decline in the NTD rate of teenage mothers.

We note this option results in significant set-up costs for flour millers. However, this option has been implemented in Australia and New Zealand millers would be able to gain knowledge from the experience of Australian industry partners.

We consider products using fortified flour should include this information in the ingredients list. We would also support small “boutique” manufacturers being able to apply for an exemption.

Consumer NZ does not support Option 3a (mandatory fortification of all non-organic bread). This option would limit consumer choice and be very costly for bakeries to comply. We are concerned the implementation costs will be passed on to consumers.

We also do not support Option 3c (mandatory fortification of all non-organic wheat flour regardless of end purpose). Fortifying wheat flour this way would result in a wide range of products being fortified such as cakes, biscuits, and pasta. Consumer choice would be greatly limited because opting out of fortified foods would be restricted to organic-only across a wide range of products.

**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 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 fortification 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 of fortification levels);
* dietary and blood folate levels of the general population and the target group;
* monitoring of NTDs including live births, still births and terminations.

Thank you for the opportunity to make a submission. If you require any further information, please do not hesitate to contact me.

Yours sincerely



Sue Chetwin

Chief executive