

# **Folic acid fortification: short guide to the consultation document**

Consultation on the proposed options for increasing the availability of folic acid in food closes on Tuesday 12 November 2019 at 5 pm. Your feedback will help shape the final proposals. We appreciate you taking the time to make a submission.

This short guide provides an overview of why we are reviewing our approach to fortifying food with the B vitamin, folic acid, and the proposed options we are seeking feedback on. As with any snapshot, it leaves a lot out. We advise you to read the relevant parts of the full consultation document before making your submission.

## **The problem**

- The number of neural tube defect (NTD) affected pregnancies such as spina bifida in New Zealand could be reduced if women of childbearing age had higher blood folate levels. Māori women have a higher rate of NTD live births compared to others.
- Most women cannot get enough folate from natural food to reduce the risk of having an NTD-affected pregnancy. Fortifying food with folic acid has been shown to reduce NTDs.
- Supplementation helps but only works for women who plan their pregnancies and know about the importance of taking folic acid prior to pregnancy. Around 53% of all pregnancies are unplanned.

## **Is folic acid safe?**

There is no consistent evidence that folic acid, when fortified in food at the recommended level, has any harmful health effects.

## **Overall objective of the review**

To increase the consumption of food containing folic acid by women of childbearing age to reduce the number of NTD-affected pregnancies, while considering consumer choice, health inequity and impacts on industry.

## **Proposed options**

We are seeking feedback on the following proposed options to increase the availability of folic acid:

- Option 1 – continue with the current voluntary regime which aims to fortify 50% of packaged sliced bread.
- Option 2 – ask industry to enhance the current voluntary scheme so that 80% of packaged sliced bread is fortified.
- Option 3 – introduce mandatory fortification of non-organic:
  - bread (option 3a) – bread would be fortified by bread makers at the bakery
  - wheat flour used for making bread (option 3b) – specialist bread-making flour would be fortified by the flour-millers at the mill; or
  - all wheat flour (option 3c) – wheat flour, regardless of its end purpose, would be fortified by flour-millers at the mill.

## **Criteria used to assess options**

MPI used the following criteria to assess each of the proposed options:

1. Health impacts – will the overall health outcomes improve?
2. Cost effectiveness – will the option be cost effective?
3. Equity – will equitable outcomes be achieved for all women of childbearing age?
4. Consumer choice – will some consumer choice be maintained?

## Assessment of the options

<b>Option 1 – Status quo (voluntary fortification of up to 50% of packaged sliced bread)</b>	
What this means	<p>Only a maximum of 50% of packaged sliced bread (the bread in printed bags) is fortified. It does not include bread from in-house bakeries at the supermarket, bread from fast-food restaurants, or bread from specialist bakeries. In 2017, large commercial bakers who are signatories of a voluntary Code of Practice fortified 38% of packaged sliced bread.</p> <p>Packaged sliced bread that is fortified would continue to be monitored and verified by industry to ensure it is meeting the target fortification level.</p>
Health impact	Limited further NTDs would be prevented from current levels.
Cost effectiveness	Costs (for purchasing folic acid, training staff, testing and auditing) would sit with large commercial bakers.
Equity	Health inequities would continue.
Consumer choice	There would be a wide choice of unfortified bread.

<b>Option 2 – Asking industry to enhance the volume of bread being fortified</b>	
What this means	<p>The large commercial bakeries would need to agree to increase the volume of packaged sliced bread they are currently voluntarily fortifying from 38% to 80%. It would still exclude in-house bakeries, fast-food restaurants, and specialist bakeries.</p> <p>Packaged sliced bread that is fortified would continue to be monitored and verified by industry to ensure it is meeting the target fortification level.</p>
Health impact	82 to 233 further NTDs would be prevented over 30 years if industry were fully compliant with fortifying 80% of packaged sliced bread.
Cost effectiveness	<p>There would be a net monetary benefit of \$12.6 to \$40 million over 30 years once the target volume is reached.<sup>1</sup></p> <p>The additional cost of fortification (buying the folic acid) would sit with large commercial bakers.</p>
Equity	More bread being fortified would help improve health equity compared to the status quo, but it would be dependent on industry meeting the target.
Consumer choice	Some consumer choice would be maintained.

<sup>1</sup> This cost and all others mentioned in this short guide are discounted at 3.5% per annum.

<b>Option 3a – Mandatory fortification of all non-organic bread</b>	
What this means	<p>All non-organic bread, including bread made of grain other than wheat (such as rice or corn bread) would be fortified. Every individual bakery in New Zealand (2,500-3,500) would be responsible for fortifying during the bread-making process.</p> <p>This would be difficult to implement because of the number of bakeries.</p> <p>All non-organic wheat bread would be monitored and verified to ensure it is meeting the target fortification level.</p>
Health impact	144 to 270 further NTDs would be prevented over 30 years
Cost effectiveness	This would be very costly (\$37.1 to \$72.8 million over 30 years) because of the large number of bakeries that would need to comply and be monitored.
Equity	All bread would be fortified so nothing would be left to chance. This would greatly improve health equity for all socio-economic groups.
Consumer choice	There would be limited choice (only organic bread would remain unfortified).

<b>Option 3b – Mandatory fortification of non-organic wheat flour for bread making purposes (our preferred option)</b>	
What this means	<p>Bread-making wheat flour (non-organic) would be fortified at the flour mill as the wheat is milled. This would affect a small number of mills in New Zealand (7-8 mills).</p> <p>This would result in all non-organic bread and bread-mixes being fortified. Any other products that a baker chooses to make with bread-making flour would also end up being fortified.</p> <p>Flour would be monitored and verified to ensure it is meeting the target fortification level. Bread would also be monitored to ensure there are appropriate amounts of folic acid in the food supply.</p>
Health impact	162 to 240 extra NTDs would be prevented over 30 years.
Cost effectiveness	There would be a net savings of \$32.2 to \$54.6 million over 30 years (although flour millers would face significant one-off set up costs and small ongoing costs).
Equity	There would be much greater health equity as this option would result in most bread being fortified.
Consumer choice	Choice for unfortified bread products would be limited to non-wheat and organic bread (e.g. corn and rye bread that contain no wheat flour).

<b>Option 3c – Mandatory fortification of all non-organic wheat flour (regardless of end purpose)</b>	
What this means	<p>All non-organic wheat flour, regardless of the end purpose, would be fortified at the flour mill as the wheat is milled.</p> <p>Fortifying wheat flour this way would result in the fortification of a wide range of domestically produced food, including bread, cakes, biscuits, pasta, gravy mixes, etc.</p> <p>Flour would be monitored and verified to ensure it is meeting the target fortification level. Flour containing products would also be monitored to ensure there are appropriate amounts of folic acid in the food supply.</p>
Health impact	<p>252 to 405 additional NTDs would be prevented over 30 years. But it is estimated that over a third of children aged 5-8 years may overconsume folic acid because of the wide range of food products that would end up being fortified.</p>
Cost effectiveness	<p>There would be a net savings of \$54 to \$97.9 million over 30 years (although millers would face one-off set up costs and small ongoing costs).</p>
Equity	<p>Equitable health outcomes would greatly improve because all wheat-based products would be fortified (leaving little to chance).</p>
Consumer choice	<p>Opting out of folic acid would be restricted to organic only across a wide range of wheat-flour based products (e.g, bread, pasta, packet gravy, cakes, biscuits).</p>

## Responding to the consultation document

All the proposals and consultation questions can be found in the public consultation document. They are also in the online submission template, which is our preferred way to get feedback.

<https://www.mpi.govt.nz/news-and-resources/consultations/review-of-folic-acid-fortification-of-food/>

## Public roadshows

We will be holding public information sessions in Auckland, Wellington, and Christchurch during October. Please refer to the folic acid consultation page on our website to see the detail and register your interest

<https://www.mpi.govt.nz/news-and-resources/consultations/review-of-folic-acid-fortification>

## Links to important documents

- Consultation document, Increasing folic acid availability in food ([PDF](#))
- MPI Technical supporting document ([PDF](#))
- Sapere cost utility analysis ([PDF](#))
- Prime Minister’s Chief Science Advisor and the Royal Society Te Apārangi 2018 report on the health benefits and risks of folic acid fortification of food ([PDF](#))
- MPI 2018 Folic Acid Monitoring Report ([PDF](#))