



August 12, 2009

New Zealand Food Safety Authority  
68-86 Jervois Quay  
PO Box 2835  
Wellington  
NEW ZEALAND

Tēnā koe

**Re: Proposed Amendment to the New Zealand Folic Acid Standard –  
Discussion document 10/09**

The New Zealand Nurses Organisation (NZNO) welcomes the opportunity to comment on this document and to put forward our reasons for **supporting mandatory fortification of bread with folic acid from 27 September 2009.**

NZNO is the leading professional body of nurses and nursing union representing over 43,000 nurses midwives and allied health care workers, including Māori members of Te Runanga o Aotearoa, the arm through which our Te Tiriti o Waitangi partnership is articulated. We have consulted with members and staff, in particular our professional nursing and policy advisors and specialist Colleges and Sections. All feedback received supported the status quo option, notwithstanding the potential for cost increases of a basic food commodity. The response to the latter concern was that NTDs, which fortification of flour with folic acid would mitigate, are disparately borne by those from lower socio-economic groups who would therefore stand to benefit most.

Nurses comprise over half the health workforce and nurses and midwives are directly involved with individuals and families affected by potentially avoidable neural tube defects (NTDs). Nurses, working in many health settings at all levels of acuity, from neo-natal care to in-home disability support, see first-hand the lifelong challenges and narrowed life choices imposed on those affected, and the financial and physical hardship borne by the families and health system.

While nursing is primarily seen as a specialised form of caring for those who are ill, a key tenet of nursing is to prevent ill-health, and NZNO sees the addition of folic acid to flour as a significant preventative measure. Nursing is also an evidence-based profession. NZNO is confident that the science indicating that the fortification of flour with folic acid safely maximises the opportunity to reduce NTDs is secure and proven.

NZNO recognises that health is reliant on a range of social, cultural and economic factors, outside the control of individuals, which have entrenched disparities. Te Runanga notes, for instance, that with poorer access to healthcare services, partly because of a higher proportion of those living in rural areas, Māori are disproportionately at risk of having children with NTDs. We strongly believe that equitable health status will only be achieved with sound policies focused on public health, rather than “consumer choice” and point to notable successes in the past, for example with the iodisation of salt to prevent goitre, when the former was more clearly the guiding principle.

The discussion document gives an economic justification for this measure which we will not elaborate on except to say that health dollars are precious and there is no shortage of areas where they could be redirected. Similarly, having consistent standards throughout Australasia is commonsense when a significant proportion of flour moves between the countries. Though difficulties in getting an even spread of folic acid in bread is cited as one of the disadvantages of mandatory fortification, we are not aware that this has caused significant problems in any of the 57 other countries where the addition of folic acid to flour is mandatory and which have seen a decreasing number of NTDs. We acknowledge there might be costs to industry – which will of course be passed on to consumers, but this does not seem to have caused major price rises in other parts of the world or posed technological barriers.

We suggest that if the public were properly informed the addition of folic acid would be supported by most consumers. Though widely used, ‘fortification’ may

be a misleading way to describe what amounts to the partial replacement of one B vitamin which, along with many others, has been stripped from most flour. Other more pejorative and histrionic terms such as 'mass medication' and 'adulteration' have been allowed to go almost unchallenged. NZNO is disappointed that much more rigorous rebuttal of such pernicious misinformation did not take place and recommends that the Food Safety Authority and the Minister give more serious consideration to ensuring that the public are better informed. We are aware that public ignorance and the hijacking of the media by small lobby groups has severely affected similar public health issues, most notably resistance to fluoridation where a small number of adult consumers' 'rights' have taken precedence over the majority of children's health. NZNO strongly believes that society, through government agencies must protect those who are vulnerable, especially children, with responsible, evidence-based decisions and not rationalize a failure to act as recognition or even support for 'consumer choice'. Children born with NTDs have no choice.

NZNO does not support amending the commencement date because this

In conclusion NZNO is very concerned that this significant public health initiative, so long in coming, has the potential to be delayed or even abandoned. The issues are very clear: it remains for the government to act on evidence.

We recommend that you:

- **note** our **support** for Option 1 mandatory fortification of bread with folic acid from 27 September 2009
- **initiate** a robust public information programme to counter misinformation and to educate the public

Nāku, nā



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## **NEW ZEALAND NURSES ORGANISATION**

*The New Zealand Nurses Organisation (NZNO) is the leading professional body of nurses and nursing union in Aotearoa New Zealand, representing over 43 000 nurses, midwives and allied health workers.*

*Te Runanga o Aotearoa is the arm through which our Te Tiriti o Waitangi partnership is articulated. Our members include nurses, midwives, students, kaimahi hauora, health care workers and allied health professionals.*

*The NZNO vision is “Freed to care, Proud to nurse”. Our members enhance the health and wellbeing of all people of Aotearoa New Zealand and are united in their professional and industrial aspirations to achieve a safe, sustainable health system for all New Zealanders.*