CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Item 6 **CX/NFSDU 18/40/7-Add.2**

Original language only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES

Fortieth Session

Berlin, Germany
26 – 30 November 2018

PROPOSED DRAFT DEFINITION FOR BIOFORTIFICATION

Comments of Kenya, Nicaragua and FoodDrinkEurope

KENYA

Recommendations 1 Definition of biofortification

Comment: We support establishment of a definition on biofortification and generally support the proposed text.

Justification: Despite the long use of the term biofortification and existence of plant products whose nutritional profile has been improved thus referred to as biofortified, we appreciate there are various understanding of the use of the term and thus the need for common definition.

Recommendations 2 Use of the term biofortification

Comment: We support use the term as proposed.

Justification: Note 1 allows countries or regions to either by recommendation or legislation use other terms especially where the current term may mislead its or their population.

Recommendations 3 Discussion with CCFL on placement

Comment: We do not support recommendation.

Justification: To avoid a situation where this committee completes the work and there arises a stalemate of where to place the definition, we strongly believe that CCFL should be asked to indicate at this stage where they intended to place the definition if CCNFSDU finally completes its work. This should have even been clarified in the initial stages of project document.

Recommendations 4 Stipulation of areas of use

Comment: We do not support recommendation.

Justification: This should be discussed after we get such request from CCFL.

Recommendations 5 Distinction between biofortified and non biofortified

Comment: We do not support recommendation.

Justification: This clarity if necessary now and future should be completed the same time with the definition.

NICARAGUA

a. Comentarios generales

Nicaragua agradece a Zimbabwe, Sudáfrica y a todos los participantes del grupo de trabajo electrónico por la elaboración del documento de trabajo y por brindarnos la oportunidad de presentar observaciones.

a. Comentarios específicos

Recomendación 1:

Nicaragua considera que para efectos de comprensión la definición debe ser clara y concisa, por tal razón no considera pertinente establecer muchos pies de página dentro de la definición. Se propone incluir el pie de página 5 en el texto principal, tal como estaba planteado anteriormente:

El bioenriquecimiento[1] es todo proceso[2] distinto de la adición convencional a los alimentos[3] por el que se aumentan el contenido o la biodisponibilidad de los nutrientes[4] en cualquiera de las posibles fuentes alimenticias **(por ejemplo: animales, vegetales, hongos**, **levaduras y bacterias),** para los fines nutricionales previstos[5].

Nicaragua apoya la recomendación del GTe, respecto al uso de la definición, es pertinente delimitar su uso y los posibles trabajos vinculados al tema en otros Comités hasta que se finalice la definición.

Recomendación 2:

Se apoya la recomendación sobre el uso del término "Bioenriquecimiento" en el anteproyecto de definición, incluyendo la nota al pie sobre el uso de otros términos equivalentes.

Recomendación 3

Nicaragua recomienda realizar las consultas pertinentes con los Órganos Auxiliares vinculados (CCFL y CCGP), una vez que se finalice la definición.

Recomendación 4

Nicaragua apoya la recomendación del GTe, respecto al uso de la definición, es pertinente delimitar su uso y los posibles trabajos vinculados al tema en otros Comités hasta que se finalice la definición.

FoodDrinkEurope

According to an FAO report (The State of Food and Agriculture, 2013), child micronutrient deficiencies are wide-spread. In addition, many countries suffer the double burden of malnutrition, where adult obesity and child micronutrient deficiencies co-exist.

FoodDrinkEurope supports Codex work on biofortification to enhance developments in nutrition and agriculture as an intervention to combat micro and macro nutrient deficiencies in populations.

In particular, FoodDrinkEurope welcomes Codex work on:

1. A definition that will not mislead consumers to think biofortification means "organic" (given that in some countries "bio" means "organic") or modern biotechnology (*i.e.* Genetically Modified Organisms or GMO).
2. A definition which will reflect the increased nutrient content (micro- and/or macro-nutrients (as protein deficiency is still present in some countries) also when the levels are below those that qualify for "source of" or "rich in" according to fortification standards.
3. A definition which will include also food with increased nutrient availability (when compounds like phytic acid which inhibit iron absorption are decreased) and will reflect the increased amount of nutrient provided.
4. A definition that will help develop communications on the benefit (as consumers might not know why increase in a vitamin A precursor is good for) and the best way to prepare and handle the food (to ensure optimal bioavailability).
5. A definition that will facilitate the development of biofortified processed food products, even when those are sold mainly in urban areas, as such products will create demand for bio-fortified crops and contribute to the up-scaling of biofortification in rural areas as well.

FoodDrinkEurope supports the proposed definition, based on the below explanation:

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[1] Es posible que algunos Estados miembros prefieran usar los términos equivalentes.
[2] El proceso deberá ser determinado por la autoridad nacional o regional competente.
[3] La adición convencional a los alimentos se encuentra cubierta por los Principios generales para la adición de nutrientes esenciales a los alimentos (CXG 9-1987).
[4] Nutriente se define en las Directrices sobre etiquetado nutricional (CXG 2-1985).
[5] Fin nutricional:
- prevenir o reducir el riesgo de una deficiencia demostrada en la población, o corregirla;
- reducir el riesgo de un estado nutricional inadecuado o ingestas insuficientes en la población, o corregirlos;
- cubrir las necesidades o las ingestas recomendadas de uno o más nutrientes;
- mantener o mejorar la salud, y/o
- mantener o mejorar la calidad nutricional de los alimentos.

(for comments at Step 3 through CL 2018/65-NFSDU)

Biofortification[1] is any process[2] other than conventional addition to food[3] whereby nutrient[4] content is increased or become more bioavailable in all potential food sources[5] for the intended nutritional purposes[6].

[1)] Some Member governments may prefer to use an equivalent term.

***[2)] Process** to be determined by the competent national/regional authority.*

*[3)]**Conventional addition to food** is covered by the General principles for the addition of essential nutrients to foods (CXG 9-1987)**.***

[4)] Nutrient** is defined by the Guidelines on nutrition labelling (CXG 2-1985)**.

[5)] e.g. animal, plant, fungi, yeasts, bacteria

[6)] Nutritional purpose:

- preventing/reducing the risk of, or correcting, a demonstrated deficiency in the population;

- reducing the risk of, or correcting, inadequate nutritional status or intakes in the population;

- meeting requirements and/or recommended intakes of one or more nutrients;

- maintaining or improving health; and/or

- maintaining or improving the nutritional quality of food

Explanation:

- **It should be ensured that the definition of biofortification refers to either an increase in nutrient content <u>OR</u> more bioavailability.** For example, in some cases, phytic acid is reduced to allow for higher iron absorption. There may however be challenges in demonstrating increased bioavailability of every biofortified crop; an obligation to demonstrate will be a big barrier for releasing such crops.
- **National/regional authorities should have the competence to define the process in order for freedom of method and correct labelling of method**, which will help the consumer to make informed choices.