

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 5

CX/NFSDU 17/39/5-Add.2

Original language only

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

Thirty-ninth Session

Berlin, Germany

4 – 8 December 2017

PROPOSED DRAFT DEFINITION FOR BIOFORTIFICATION

Comments of Kenya, Malaysia, Tanzania and International Association of Consumer Food Organizations (IACFO)

KENYA

Comment: We support the proposed definition as indicated in recommendation 6 of document CX/NFSDU 17/39/5

Justification: The definition as proposed allows different countries to choose methods which may be used to produce bio fortified products based on their national legislations or policies.

MALAYSIA

Malaysia appreciates the opportunity to provide comments for the Proposed Draft Definition for Biofortification prepared by Zimbabwe and South Africa as follows:

- 1) Malaysia proposes to delete the words “[of/and] foods” in the first sentence. Malaysia supports to adopt the text in square brackets “[and/or]” and “[excluding conventional fortification]” and thus proposes to remove all the square brackets.
- 2) Malaysia is of the opinion that the phrase “improved by a measurable level” is more appropriate as it is not in all cases that the nutrient or food component is “to be increased”. There may be some instances where reducing certain related substances in the food maybe helpful. For example, for anti-nutrients, the objective would be to “decrease” these substances, rather than to increase. The proposal to change to “improve” would take care of “to increase” or, in some cases “to decrease”. Therefore, the sentences should read as follows:

Biofortification is the process whereby any nutrients¹ or related substances² of all potential source organisms (e.g. *animal, plant, fungi, yeasts, bacteria*) ~~of [and] foods are increased~~ **improved** by a measurable level {and/or} become more bioavailable³ for the intended purposes⁴. The process applies to any method of production⁵ {excluding conventional fortification⁶}.

TANZANIA

Background of biofortification definition

In the 36th session, the committee agreed to initiate work with a view of developing a common definition of biofortification. In 37th Session, Zimbabwe and South Africa accepted to chair and co-chair an electronic working group to develop a discussion paper and a proposal for the definition. During the 38th Session, the chairs presented a paper and a criterion for the definition of biofortification. Most members raised concern on the method of production that will be applied as to whether it will be conventional agricultural practices or whether it will involve genetic engineering commonly known as GMO. The European Union was also particularly concerned by the use of the term ‘bio’ which to most of its consumers the term implies ‘organic’. It is based on this comment that an eWG was established to discuss the concern raised during the 38th Session of CCNFSDU. A number of Africa countries participated during the electronic working group. The eWG developed 6 recommendations for consideration by the 39th Session of the CCNFSDU.

Issue: Recommendation 1: That CCNFSDU agree with the proposed text for Criterion 1.

Criterion 1: Source Organism

All potential source organisms ((e.g. animal, plant, fungi, yeasts, bacteria) [and/or] food may be Biofortified*
 *Biofortification does not include conventional fortification covered by CAC/GL 9/1987.

Comment: Tanzania support the proposed text

Rationale: The current text has clearly defines the meaning of the term 'source organism'.

Issue: Recommendation 2: That CCNFSDU agree with the proposed text for

Criterion 2: Nutrient and Related Substance To allow for all nutrients and related substances.

Comment: Tanzania support the proposed text

Rationale: The criterion is wide enough to accommodate all possible inclusion in biofortification.

Issue: Recommendation 3: That CCNFSDU agree with the proposed text for

Criterion 3: **Outcome** Measurable increased nutrient and related substance content [and/or] bioavailability

Comment: Tanzania support the proposed text

Rationale: The outcome has taken both the nutrient content and their bioavailability which is key in ensuring the food or products achieve the intended benefits to the consumers.

Issue: Recommendation 4: That CCNFSDU agree with the proposed text and the associated footnote for Criterion 4.

Intended Purpose

The nutrient or related substance is added in an amount sufficient for the intended purpose*

*Paragraph 3.1.1. of the Principles for the Addition of Essential Nutrients to Foods (CAC/GL 9-1987).

Comment: Tanzania support the proposed text

Rationale: The recommendation assures consumer of the intended use which is to increase the nutritional value of the product

Issue: Recommendation 5: That the Committee consider whether the text which reference the footnote should be included as part of the proposed definition for Biofortification. **[Criterion 5: Methods**

Methods* of Production

* To be determined by the competent National/Regional authority]

Comment: Tanzania support the proposed text

Rationale: This criterion allows countries to determine the methods of production based on their policies and legislations.

Issue: Recommendation 6: That CCNFSDU consider the proposed draft definition for Biofortification and associated footnotes for discussion.

"Biofortification is the process whereby any nutrients¹ or related substances² of all potential source organisms (e.g. animal, plant, fungi, yeasts, bacteria)of/[and] foods are increased by a measurable level [and/or] become more bioavailable³ for the intended purposes⁴.The process applies to any method of production⁵ [and excludes conventional fortification⁶]"

Comment: Tanzania support the proposed text including the opening of the square bracket

"Biofortification is the process whereby any nutrients¹ or related substances² of all potential source organisms (e.g. animal, plant, fungi, yeasts, bacteria) [or/[and] foods are increased by a measurable level [and/or] become more bioavailable³ for the intended purposes⁴.The process applies to any method of production⁵ [and excludes conventional fortification⁶]"

Rationale: The current definition together with the footnotes has taken care of critical components related to the nutrient content, its bioavailability of resultant products as well as recognizing different countries regulation/legislations and policies. This will allow countries to make decisive decision on any method of production that they prefer.

INTERNATIONAL ASSOCIATION OF CONSUMER FOOD ORGANIZATIONS (IACFO)

General Comment:

IACFO and IBFAN do not agree with the definition. We wish to take note of the concerns expressed

by the delegates to the 2016 CCNFSDU regarding the lack of clarity to what the definition would cover and that it might include technologies not proven to be safe. IBFAN does not support the continuation of this work. IACFO and IBFAN recommend that the CCNFSDU should **reject** the use of the “Biofortification” terminology.

Rationale:

- Biofortification is not a solution to address malnutrition. Malnutrition is rarely the result of a deficiency of a single or a select few micronutrients. Inadequate diets generally result in multiple nutrient deficiencies. A single nutrient approach can run counter to national nutrition policies and UN recommendations for diversified food-based approach to addressing malnutrition.
- The term biofortification is a deceptive euphemism, which hides the method of production, that can include genetic modification and other technologies which may have health risks.
- In many jurisdictions the term “bio” refers to organically produced foods and food products.
- The term “biofortification” is promotional and should therefore be considered a nutrient claim, hence a marketing tool.
- Biofortification, especially of staple crops, has a negative impact on biodiversity and reduces the variety of crops cultivated.
- Biofortification is a costly technology that will be controlled by the global agricultural inputs industries. Its widespread use will have economic and social consequences by increasing the nutrition gap between the poor and those who can afford a healthy diversified diet.