Ministry for Primary Industries Manatū Ahu Matua



# The addition of folic acid and iodised salt to bread

New Zealand User Guide on implementing the New Zealand Standards

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## Background

Clause 5 of Standard 2.1.1 – Cereals and Cereal Products of the Australia New Zealand Food Standards Code (the Code)<sup>1</sup> (Mandatory Addition of Iodised Salt to Bread) was included in March 2008 for New Zealand and October 2008 for Australia. It requires that where salt is added to bread (except bread that is represented as organic) it must be iodised. The Standard provided an 18 month transition period, and came into force on 27 September 2009 in New Zealand.

The New Zealand (Permitted Fortification of Bread with Folic Acid) Food Standard 2012 was issued by the Minister for Food Safety and commenced in September 2012. The standard replaces the New Zealand (Mandatory Fortification of Bread with Folic Acid) Food Standard 2007 which was due to come into force on 28 September 2012. The permitted fortification standard continues to allow bread to be fortified with folic acid or L-methyltetrahydrofolate, calcium (L-MTHF) on a voluntary basis.

#### Where will I find the requirements for the addition of iodised salt to bread?

The requirement to replace salt with iodised salt in bread is provided for in Standard 2.1.1 – Cereals and Cereal Products of the Code.

#### Where will I find the permissions for fortification of bread with folic acid or L-MTHF?

The permission to fortify bread with folic acid or L-MTHF is provided for in the New Zealand (Permitted Fortification of Bread with Folic Acid) Food Standard 2012<sup>2</sup>.

<sup>&</sup>lt;sup>1</sup> <u>http://www.foodstandards.gov.au/foodstandards/foodstandardscode.cfm</u>

<sup>&</sup>lt;sup>2</sup> <u>http://www.foodsafety.govt.nz/elibrary/industry/zealand-voluntary-fortification-food-standards/nz-permitted-fortification-folic-acid-standard-2012.pdf</u>

## Purpose of this Guide

The Ministry for Primary Industries (MPI) has developed this User Guide (the "Guide") in consultation with industry representatives, to assist manufacturers, retailers and Food Act Officers interpret and apply the:

- requirements for the mandatory addition of iodised salt to bread; and
- permissions for the voluntary addition of folic acid to bread.

This New Zealand User Guide has been devised from the Food Standards Australia New Zealand User Guide – the Mandatory Iodine Fortification User Guide; and the MPI – Fortification of bread with Folic Acid Q & A<sup>3</sup>. To avoid any potential confusion, New Zealand industry and enforcement officers should refer to this document for guidance, rather than the Food Standards Australia New Zealand Mandatory Fortification User Guide.

The Guide, unlike the Standards, is not legally binding. If you are in any doubt when interpreting the Standards, MPI recommends that you seek independent legal advice.

In addition to the food standards requirements, it is also necessary to comply with other legislation, including the Fair Trading Act 1986, the Food Act 1981, and Food Hygiene Regulations 1974.

<sup>&</sup>lt;sup>3</sup> <u>http://www.foodsafety.govt.nz/industry/sectors/manufacturers-food-beverages/bakery-products/bread-with-folic-acid.htm</u> <u>http://www.foodsafety.govt.nz/elibrary/industry/fortification-bread-folic-acid-QA.pdf</u>

<sup>2 •</sup> NZ User Guide on implementing the NZ Standards

## Part 1: Which bread and bread products must be fortified?

#### What is the definition of bread?

Bread is defined in Standard 2.1.1 – Cereal and Cereal Products of the Code as the following:

"bread means the product made by baking a yeast-leavened dough prepared from one or more cereal flours or meals and water."

"the definition of bread for the purposes of the mandatory addition of folic acid, thiamin and iodised salt to bread or wheat flour for making bread does not include -

- a. pizza bases;
- b. bread crumbs;
- c. pastries;
- d. cakes, including but not limited to brioche, panettone and stollen;
- e. biscuits; or
- f. crackers."

The mandatory addition of folic acid and thiamin to bread or wheat flour for making bread is applicable in Australia only. In New Zealand voluntary fortification of bread with thiamin is permitted under Standard 1.3.2 of the Code and folic acid and L-MTHF under the New Zealand (Permitted Fortification of Bread with Folic Acid) Food Standard 2012.

#### What bread must contain iodised salt?

The following bread products must contain iodised salt:

- plain white, white high fibre, wholemeal and multigrain bread loaves, buns and rolls;
- yeast-containing flat breads (e.g. pita bread, naan bread);
- focaccia and pide (Turkish bread);
- bagels (white, wholemeal, sweet);
- topped breads, buns and rolls (e.g. cheese and bacon rolls);
- sweet buns (e.g. raspberry buns, boston buns);
- fruit breads and rolls; and
- yeast-containing baked English style muffins.

## Part 2: Exemptions to the mandatory addition of iodine to bread

#### What bread is not required to contain iodised salt?

The following products will not be expected to contain iodised salt under these mandatory requirements:

- bread represented as organic;
- non yeast-leavened bread (bread products that contain no yeast);
- bread products that are not baked prior to being sold to the end consumer (i.e. products that are intended to be baked by the end consumer);
- hot plate products such as pikelets;
- deep-fried products such as donuts;
- pizza bases;
- purpose made breadcrumbs;
- pastries;
- cakes, including but not limited to brioche, panettone and stolen;
- biscuits; and
- crackers.

Note: Breadcrumbs made from returned bread will contain iodised salt because the bread is required to contain iodised salt, and may contain folic acid or L-MTHF.

It is intended that only bread dough be required to contain iodised salt in place of non iodised salt. Salt used as a topping or in other foods added to bread will not be required to be iodised.

#### Can I voluntarily add iodised salt to bread that is exempt?

Manufacturers can voluntarily add iodised salt to food products that are not required to contain iodised salt under Clause 10 (3) of Standard 1.1.1 of the Code. For example, manufacturers who are required to use iodised salt in their bread production may choose to use iodised salt in other products, such as pancakes, crumpets and other hot plate items. In these instances, manufacturers must adhere to labelling requirements (refer to Part 4 of this Guide or Standard 1.2.4 – Labelling of Ingredients).

#### Can I voluntarily fortify bread with add folic acid?

Manufacturers can voluntarily fortify bread with folic acid and L-MTHF under the current voluntary permissions contained in the New Zealand (Permitted Fortification of Bread with Folic Acid) Food Standard 2012.

#### What is "bread represented as organic"

The Fair Trading Act 1986 prohibits traders from misleading the public as to (amongst other things) the nature, characteristics, and quality of goods.

It also prohibits traders from making false or misleading representations that goods are of a particular kind, standard, quality, or have had a particular history.

Therefore, if a trader wishes to represent their product as "organic", to ensure he or she does not breach the Fair Trading Act 1986 all of the product's ingredients must be 100 percent organic through the entire food chain.

To assure consumers that the foods they produce are organic, many organic food producers and manufacturers choose to have their production processes certified organic. Organic certification means that the producer has complied with a set of standards overseen by a certifying organisation. In New Zealand BioGro and AsureQuality are the principal organic certification organisations.

Organic certification standards are not food safety standards. Organic food must comply with the same food safety standards that apply to all food for sale in New Zealand.

## Part 3: What amounts of folic acid and iodised salt need to be added to bread?

|                        | Folic acid                             | lodine   |
|------------------------|--|--|
| Level of fortification | Maximum of 2.5mg/kg bread <sup>4</sup> | Replace plain salt in recipe<br>with iodised salt <sup>5</sup> |

#### The mandatory addition of iodised salt to bread

Clause 5 of Standard 2.1.1 – Cereals and Cereal Products outlines the requirements for the addition of iodised salt to bread. It states that:

"(3) Where salt is added to bread it must be iodised salt.

(4) Subclause (3) does not apply to bread which is represented as organic."

The level of iodisation is regulated under Standard 2.10.2 – Salt and Salt Products where:

"lodised salt means a mixture of salt and (a) potassium iodide or potassium iodate; or (b)

sodium iodide or sodium iodate."

The composition of iodised salt is also regulated in Standard 2.10.2 – Salt and Salt Products:

"lodised salt must contain potassium iodide or iodate, or sodium iodide or iodate equivalent to (a) no less than 25 mg/kg of iodine; and (b) no more than 65 mg/kg of iodine."

The suppliers of iodised salt are required to ensure that the level of iodine in iodised salt complies with Standard 2.10.2 – Salt and Salt Products. This Standard sets out the compositional requirements for iodised salt. The target level of iodine when manufacturing iodised salt for addition to bread ideally would be the mid-point of the iodisation range,

i.e. 45 mg of iodine per kilogram of salt.

<sup>&</sup>lt;sup>4</sup> This relates to the actual bread component of the product and does not include for example toppings, fillings or icing.

<sup>&</sup>lt;sup>5</sup> This does not apply to the addition of salt (for example rock salt) to the surface of bread; or the addition of other food containing salt during the making of bread.

<sup>6 •</sup> NZ User Guide on implementing the NZ Standards

The voluntary addition of folic acid to bread

The New Zealand (Permitted Fortification of Bread with Folic Acid) Amendment Food Standard 2009 states that:

2 Commencement

"(2) This notice comes into force on 28 September 2012

Part 2 Permitted addition of folic acid to bread

6 (1) Folic acid and (L-methyltetrahydrofolate, calcium) may be added to bread. (2)Bread must not contain more than 2.5 mg/kg of folic acid, or of (L-methyltetrahydrofolate, calcium) or of the total of folic acid and (L-methyltetrahydrofolate, calcium), if used together."

Any bread which meets the definition set out in standard 2.1.1 Cereals and Cereal Products of the Code may be fortified with folic acid or L-MTHF. Bread can contain up to 2.5 mg/kg of folic acid, or of L-MTHF or of the total of folic acid and L-MTHF, if used together.

#### IMPORTED BREAD

Is imported bread required to contain folic acid and iodised salt?

Bread imported into New Zealand must contain iodised salt and must be in compliance with the standard 2.1.1 of the Code.

Imported bread is not required to contain folic acid, but if fortified must be in compliance with the NZ (Permitted Fortification of Bread with Folic Acid) Food Standard 2012.

### Part 4: Labelling requirements

#### What additional labelling is required for iodised salt and folic acid?

#### Ingredient list

Suppliers of bread are required to list folic acid, L-MTHF (or folate) and iodised salt in the statement of ingredients in all breads that contain folic acid, L-MTHF and iodised salt.

A declaration of folic acid, L-MTHF or folate and iodised salt in the ingredient list provides consumers with information about whether their choice of bread contains added folic acid, L-MTHF and iodised salt and may assist them with making purchasing decisions.

Ingredient labelling requirements are set out in Standard 1.2.4 – Labelling of Ingredients<sup>6</sup>.

In some situations, products are exempt from the requirement to label with an ingredient list. These include:

- unpackaged food;
- food made and packaged on the premises from which it is sold;
- food packaged in the presence of the purchaser; and
- food in a small package<sup>7</sup>.

For further details, refer to clause 2 of Standard 1.2.4 – Labelling of Ingredients and clause 2 of Standard 1.2.1 – Application of Labelling and Other Information Requirements. For the products exempt from the requirement to label, consumer information about the presence of folic acid, L-MTHF and iodised salt may be made available from the food outlet upon request; however this is not a requirement.

<sup>&</sup>lt;sup>6</sup> <u>http://www.foodstandards.gov.au/\_srcfiles/Standard\_1\_2\_4\_Labelling\_of\_Ingred\_v101.pdf</u>

<sup>&</sup>lt;sup>7</sup> Small package is defined in Standard 1.2.1 – Application of Labelling and Other Information

Requirements and means a package with a surface area of less than 100 cm<sup>2</sup>

<sup>8 •</sup> NZ User Guide on implementing the NZ Standards

Are nutrition and health claims permitted in relation to the mandatory addition of iodised salt to bread?

Nutrition claims can be made for foods containing iodine; however certain compositional requirements must be met and a declaration made on the nutrition information panel (NIP) or made available to the purchaser upon request (if the product does not need to be labelled).

For further details on nutrition claims refer to Standard 1.2.8 - Nutrition Information

Requirements and Standard 1.3.2. –Vitamins and Minerals. Currently health claims cannot be made in relation to iodine.

FSANZ is developing a new Standard to regulate nutrition, health and related claims under Proposal P293 – Nutrition, Health and Related Claims. The conditions for making claims about the presence of vitamins or minerals and associated health claims are being considered under this Proposal. The new Standard, when gazetted, may therefore impact on the current information on nutrition and health claims.

Are nutrition and health claims permitted in relation to the addition of folic acid to bread?

Yes, folate nutrition content claims can be made for bread containing folic acid or L-MTHF. A folate health claim can be made for foods containing folic acid; however where L-MTHF is added to bread a health claim cannot be made.

To make a nutrition content or health claim certain compositional requirements must be met and a declaration of the folate content made on the nutrition information panel (NIP) or made available to the purchaser upon request (if the product does not need to be labelled). However a nutrition content claim cannot be made regarding folic acid.

For further details on nutrition content claims refer to Standard 1.2.8 – Nutrition Information Requirements and Standard 1.3.2. – Vitamins and Minerals.

For further details on nutrition content claims and health claims refer to Standard 1.1A.2 – Transitional Standard – Health Claims.

#### What about use of "natural" claims?

The New Zealand Commerce Commission considers that 'natural' claims imply the product is made up of natural ingredients, i.e. ingredients nature has produced, not man-made or interfered with by man. Iodised salt is not a natural substance; therefore "all natural" claims for foods containing iodised salt may not be used, although the product may be labelled as "contains natural ingredients". Folic acid

and L-MTHF are not natural substances; therefore "all natural" claims for foods containing folic acid or L-MTHF may not be used, although the product may be labelled as "contains natural ingredients" provided the other ingredients are natural. Care should be taken when labelling a product as "contains natural ingredients" to avoid providing the impression that all the ingredients in the product are natural.

## Do I need to include folic acid (or folate) and iodine in the ingredient list of packages containing breadcrumbs made from returned bread?

Breadcrumbs made from returned bread may contain folic acid or L-MTHF and will contain iodised salt. Therefore iodised salt and folic acid or L-MTHF (if present) and must be listed on the ingredient list of the breadcrumb package or the package of foods where breadcrumbs are used as an ingredient.

When breadcrumbs are used as an ingredient of a food, they must be declared as a

"compound ingredient". Compound ingredients can be declared in the statement of ingredients either:

a. by declaring the compound ingredient by name and listing its ingredients in brackets, or

b. by declaring all of the ingredients of the compound ingredient separately as if they were individual ingredients of the final food.

If breadcrumbs contain folic acid, L-MTHF and iodised salt, and are labelled as outlined in (a), and the breadcrumbs make up less than 5% of the final food, the individual ingredients do not need to be declared, including folic acid, L-MTHF and iodised salt (note: allergens and certain food additives still need to be declared).

For further detail on the labelling of compound ingredients refer to clause 6 of Standard 1.2.4 – Labelling of Ingredients and clause 4 of Standard 1.2.3 – Mandatory Warning and Advisory Statements and Declarations.

## Part 5: Implementing the Standard

#### How should iodine be added to bread?

lodine must be added to bread by replacing salt with iodised salt. Bread manufacturers can expect that salt labelled as iodised salt complies with Standard 2.10.2 – Salt and Salt Products of the Code with regards to the correct level of iodisation.

#### How should folic acid be added to bread?

It is the responsibility of each bread manufacturer to ensure that if they add folic acid or L-MTHF, it is at the correct level to comply with the fortification of bread with folic acid Standard. It is expected that most bread manufacturers carrying out voluntary folic acid fortification will use folic acid fortified improvers or folic acid mixes.

Manufacturers who choose not to use a proprietary folic acid containing product should ensure they purchase folic acid that complies with the Code, clause 2 of Standard 1.3.4 – Identity and Purity.

## At what point does bread need to meet the requirements of mandatory addition of iodised salt and voluntary permissions of folic acid?

Bread is expected to meet the mandatory addition of iodised salt and permitted addition of folic acid Standards at points of manufacture and sale. Imported bread will be required to contain iodised salt at the point of import into New Zealand.

The suppliers of iodised salt will be required to meet the level of iodisation in Standard 2.10.2 – Salt and Salt Products at the point of manufacture or sale.

## How will the addition of iodised salt and folic acid to bread be assessed for compliance?

Assessing compliance with food standards is the responsibility of the MPI although manufacturers and retailers of food have an obligation to ensure that food meets the applicable standards and should be able to demonstrate to a Food Act Officer that they have done so (by maintaining appropriate documentation and records as described below).

MPI may use a variety of methods to determine whether compliance with mandatory fortification standards is being achieved, such as sampling and testing bread via retail surveys, audits of manufacturers of bread, audits of suppliers of iodised salt etc.

#### Compliance model principles

In order to show compliance, bread manufacturers are expected to keep records to show that iodised salt has been added to bread products at the appropriate level. If folic acid or L-MTHF is added to bread products it is also expected that manufacturers keep records to show that it has been added to bread products at the appropriate level. These records could include:

- information to prove that folic acid or L-MTHF has been added in a quantity which complies with the maximum level in the permitted fortification Standard e.g. a recipe;
- evidence that the recipe is being adhered to;
- evidence of relevant staff training;
- evidence that folic acid, L-MTHF or folic acid fortified pre-mix or improver; iodised salt is being used in the recipe e.g.sales receipts;
- results of analytical testing for folic acid content in bread samples; and/or
- use of food control plans/food safety programmes.

MPI may take samples for analysis. Results from these tests and the manufacturer's records would be considered in determining compliance.

#### **Iodised Salt**

Bread manufacturers are expected to have appropriate records and systems to demonstrate that where salt is added to bread that iodised salt is being used.

The supplier of the iodised salt is expected to be able to demonstrate that the salt contains potassium iodide or iodate, or sodium iodide or iodate equivalent to (a) no less than 25 mg/kg of iodine; and (b) no more than 65 mg/kg of iodine.

#### Folic Acid

If bread manufacturers are adding folic acid or L-MTHF they are expected to have appropriate records and systems to demonstrate that folic acid or L-MTHF is added and mixed at the correct concentration to comply with the 2012 fortification of bread with folic acid Standard.

## Part 6: Voluntary addition of iodised salt and folic acid to foods

What other provisions in the Code permit the use of iodised salt in foods?

As outlined in Standard 2.10.2 – Salt and Salt Products of the Code, the voluntary permission for iodine in iodised salt and reduced salt will be retained at the current range of 25-65 mg/kg, to be consistent with the mandatory iodised salt requirements in bread. This allows food manufacturers to use iodised salt in other products. For example, manufacturers who are required to use iodised salt in their bread production may choose to use iodised salt in other products, such as pancakes, crumpets and other hot plate items. In these instances, manufacturers must adhere to labelling requirements (refer to Part 4 of this Guide or Standard 1.2.4 – Labelling of Ingredients).

## What other provisions in the Code permit the addition of folic acid and L-MTHF to foods?

Voluntary fortification allows food manufacturers to choose what vitamins and minerals they add to food, providing they are permitted in the Code. Refer to Standard 1.3.2 – Vitamins and Minerals for existing voluntary folate fortification permissions.

## Part 7: About Iodine

#### What is iodine?

lodine is an essential nutrient for growth and development. Iodine occurs naturally in some foods, such as seafood and eggs. Because iodine can't be made in the body we need to get it from the food we eat.

#### Who needs iodine and why?

Everyone needs small amounts of iodine in their diets. Iodine is important for our thyroid hormones. These hormones support normal growth and development in children and help to maintain the body's metabolic rate. As iodine is essential for brain development, it is particularly important that unborn babies (foetus), infants and young children have enough iodine.

#### How much iodine is recommended?

It is recommended that New Zealand adults eat around 150 micrograms of iodine from food each day. Requirements are higher for pregnant and breastfeeding women and lower for children, infants and toddlers.

It is difficult to accurately assess how much iodine is being eaten in the diet, but results of the 2009 MAF Total Diet Study show that estimated mean iodine intakes for each age-gender group were below the Estimated Average Requirement (EAR). This reflects that the iodine content of foods in the New Zealand diet before mandatory addition of iodised salt to bread did not provide adequate amounts of iodine to meet the requirements of many New Zealanders.

#### What are good sources of iodine?

Foods that are good sources of iodine include most bread (except organic and unleavened) since the introduction of mandatory addition of iodised salt to bread, reduced or low-fat milk and milk products, eggs, and seafood (fish, shellfish). Foods that contain seaweed such as sushi are also good sources. lodised salt, if used instead of non-iodised salt, will provide some iodine in your diet.

New Zealand grown vegetables, fruits and grains have very low levels of iodine compared with food produced in other parts of the world. Even with a balanced diet it is difficult for New Zealanders to get enough iodine.

#### lodine deficiency disorders are re-emerging

Low iodine levels in our diet may lead to health issues often referred to as iodine deficiency disorders. This might include poor growth and development in infants and children, thyroid diseases and goitre in adults.

Recent studies have indicated that the iodine status of New Zealanders is declining to the point where intervention is required to ensure that iodine deficiency disorders do not widely affect the New Zealand population. Low iodine status may to be due to:

- people eating more commercially prepared foods (which tend to be made with non- iodised salt);
- a reduction in the use of iodine-containing sanitisers by the dairy industry. We used to get small amounts of iodine in cows' milk when the dairy industry used disinfectants containing iodine;
- less iodised salt being used in home prepared foods because of health messages encouraging consumers to reduce their overall salt intake.

#### Monitoring iodine levels in the New Zealand population

The Ministry of Health and MPI have a joint role in monitoring the effectiveness of mandatory fortification of bread with iodine.

MPI is responsible for monitoring iodine levels in the food supply and can use this information to estimate how much iodine New Zealanders are eating.

In 2010, MPI conducted its first post-fortification analytical survey of the iodine levels in over 500 breads. Results of this survey found that most breads (excluding organic and unleavened breads) now contain iodine from the mandatory replacement of salt with iodised salt. The iodine levels of bread were used to estimate iodine intakes in children 5 - 14 years of age post-fortification. It was found that the percentage of New Zealand children estimated to have inadequate iodine intakes has dropped from 38 to 4 percent because of iodine fortification.

## Part 8: About Folic Acid

#### What is folate/folic acid?

Folate is a B vitamin that is vital for healthy growth and development of blood cells and nerve tissue. Folate is found naturally in food, especially green vegetables and grains.

Folic acid is the synthetic (man-made) form of folate which may be added to manufactured foods and drinks, or taken as a vitamin supplement. Folic acid is more readily absorbed than naturally-occurring folate.

#### Who needs folic acid and why?

Folate is important for everyone for cell growth and reproduction. Folate deficiency can result in a type of anaemia called "megaloblastic anaemia". Megaloblastic anaemia is a blood disorder characterised by the presence of enlarged immature red blood cells (megaloblasts).

Women who don't get enough folate and folic acid before and during pregnancy have a higher risk of their baby developing abnormalities known as neural tube defects (NTDs). The neural tube is the nerve centre of the foetus which grows into the spinal cord. The most common NTDs are spina bifida and anencephaly.

During pregnancy it is difficult to get enough folate from food alone – it would mean eating about one kilogram of cooked spinach or raw broccoli each day!

#### How much folate is recommended?

It is recommended that New Zealand adults consume around 400 micrograms of folate from food each day.

Folate requirements increase during pregnancy and breast feeding. The New Zealand Ministry of Health recommends that women who are planning a pregnancy should take a registered 800 microgram folic acid tablets daily for at least four weeks before and for the first 12 weeks or pregnancy. These registered supplements are available from your local pharmacy or on prescription from your doctor or midwife. If you have a family history of NTDs like spina bifida an even higher dose of folic acid may be necessary – particularly for women who have had a child with an NTD and are planning subsequent pregnancies<sup>8</sup>.

<sup>\*</sup> http://www.health.govt.nz/our-work/preventative-health-wellness/nutrition/folate-folicacid#current\_policy

#### What are good sources of folate?

Foods that are naturally high in folate are vegetables, especially green vegetables such as broccoli, spinach, salad greens; citrus fruit e.g. oranges; wholegrain breads and breakfast cereals. Chick peas, nuts, dried beans and peas are also high in folate, although cooking reduces this level.

Foods fortified with folic acid and L-MTHF are another source of folate. Under Standard 1.3.2 of the Code some foods are permitted to be voluntarily fortified with folate, these include: biscuits, bread, breakfast cereals, cereal flours, pasta, including fruit and vegetable juices and drinks, and food drinks (such as liquid meal supplements).

### Part 9: Bread Fortification

#### Why was bread chosen for the addition of iodised salt and folic acid?

Bread was chosen as the appropriate food vehicle for iodine and folic acid fortification. Bread is consumed regularly by a large proportion of women of child-bearing age across different socioeconomic sub-groups and it is technically possible to add iodised salt and folic acid to it.

Some consumers may want to avoid iodised salt and folic acid in bread. What choice do they have?

Some breads are exempt from the requirement to add iodised salt. These include organic bread, non yeast-leavened bread and frozen bread dough intended to be baked by the end consumer (refer to Part 2 of this Guide). Consumers should check the list of ingredients on these products; some might still contain iodised salt as manufacturers may still be permitted to add these on a voluntary basis.

Fortification of bread with folic acid is on a voluntary basis; consumers wanting to avoid folic acid in bread should check the list of ingredients on bread products.

#### Will the addition of iodised salt be monitored?

Yes. The Ministerial Policy Guidelines for the Fortification of Foods with Vitamins and Minerals states that:

"Any agreement to require fortification should require that it be monitored and formally reviewed to assess the effectiveness of, and continuing need for, the mandating of fortification".

Monitoring the impacts of these requirements is the responsibility of health and food regulatory agencies in New Zealand and at the Commonwealth and state/territory levels in Australia. The Australian Institute of Health and Welfare (AIHW) has been given overall responsibility for the monitoring programme and reporting on progress. MPI and the Ministry of Health will contribute directly to some elements of the monitoring programme as part of their on-going work.

MPI has developed a fact sheet for mandatory iodine fortification<sup>9</sup> that is available on the MPI website – <u>www.foodsafety.govt.nz</u>.

<sup>&</sup>lt;sup>9</sup> <u>http://www.foodsafety.govt.nz/elibrary/industry/lodine\_Fortification-Background\_Information.htm</u>

## Part 10: What are the Australian requirements?

#### How is folic acid and iodised salt added to bread in Australia?

Australia has the same requirements as New Zealand for the addition of iodised salt to bread.

In Australia folic acid fortification is mandatory and applies to wheat flour for bread making, which must contain no less than 2 mg/kg and no more than 3 mg/kg of folic acid.

Bread represented as organic is exempt from mandatory folic acid and iodine fortification in Australia.

## Why is the Australian Standard for folic acid fortification based on wheat flour for making bread rather than bread?

Australian industry and enforcement agencies preferred to fortify wheat flour for making bread at the flour milling level rather than adding folic acid during the bread-making production stage. Australia has a history of mandatory thiamin fortification and therefore has an existing infrastructure for mandatory fortification of flour for making bread.

#### Can I use folic acid fortified wheat flour in New Zealand? What are the requirements?

Wheat flour fortified with folic acid can be used in New Zealand for making bread. New Zealand manufacturers should note that when they use fortified flour they will be required to ensure that the level of folic acid in the baked bread meets the New Zealand fortification requirements (no more than 2.5 mg/kg of folic acid).

Folic acid fortified wheat flour can be used in other products where there are voluntary permissions available (Standard 1.3.2 – Vitamins and Minerals); however it is important that the end product is labelled correctly (refer to Part 4 of this Guide).

## Part 11: Where can I get more information?

MPI can provide assistance with navigating the Code. However MPI does not provide approval of labels, or food compliance of any type. MPI is limited to providing information about the Code only and does not provide legal advice on or interpretation of the Code. The onus is upon suppliers including food companies to ensure compliance with relevant food legislation. You may wish to engage a food compliance consultant or your own legal counsel for further advice.

For information about the Code, contact MPI at <u>nzfsa.info@maf.govt.nz</u> Additional user guides are available on the MPI Food Safety website: <u>http://www.foodsafety.govt.nz</u> <u>Food Labelling Guide</u> <u>General Food Labelling Requirements</u> <u>Food Labelling and Food Advertising</u> <u>Nutrition Information Panels</u> <u>Understanding food labels – a simple guide to help you understand and interpret food labels</u> <u>FSANZ also provides the following user guides:</u> <u>http://www.foodstandards.gov.au/foodstandards/userguides/</u>

Australian User Guide Mandatory Iodine Fortification

Australian User Guide Mandatory Folic Acid Fortification Overview of Food Labelling

Legibility Requirements for Food Labels

Information Requirements for Foods Exempt from Bearing a Label

Ingredient Labelling

Nutrition Information Labelling

Representations about Food