



The addition of folic acid and iodised salt to bread

New Zealand User Guide on
implementing the requirements

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Background

The New Zealand (Mandatory Fortification of Bread with Folic Acid) Food Standard 2007 was issued by the Minister for Food Safety in September 2007. The standard requires bread (except for bread that is represented as organic) to be fortified with folic acid. The Standard provided a two year transition period, and was to become enforceable on 27 September 2009. The New Zealand (Mandatory Fortification of Bread with Folic Acid) Amendment Food Standard 2009 was issued by the Minister for Food Safety in August 2009. This amendment delays the requirement to fortify bread with folic acid until 31 May 2012.

During the two-year transition period (September 2007 to September 2009), industry were able to add folic acid to bread under the existing voluntary permissions contained in the Australia New Zealand Food Standards Code (the Code)¹. The New Zealand (Mandatory Fortification of Bread with Folic Acid) Amendment Food Standard 2009 permits the addition of folic acid or L-methyltetrahydrofolate, calcium to bread. This continues the voluntary permission to add folic acid to bread prior to the mandatory requirements becoming enforceable on 31 May 2012.

Clause 5 of Standard 2.1.1 – Cereals and Cereal Products of the Code (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 provides an 18 month transition period, and comes into force on 27 September 2009 in New Zealand. During this transition period, industry can add iodised salt to bread under the existing permissions.

¹ <http://www.foodstandards.gov.au/thecode/foodstandardscode.cfm>

Where will I find the requirements for the addition of folic acid to bread?

The requirement to fortify bread with folic acid is provided for in the New Zealand (Mandatory Fortification of Bread with Folic Acid) Food Standard 2007².

The delayed date for the requirement to fortify bread with folic acid is provided for in the New Zealand (Mandatory Fortification of Bread with Folic Acid) Amendment Food Standard 2009³.

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.

² http://www.nzfsa.govt.nz/policy-law/legislation/food-standards/bn-07-030-folic-acid-fortification-std_3.pdf

³ <http://www.nzfsa.govt.nz/policy-law/legislation/food-standards/bn09-058-folic-acid-amendment-standard.pdf>

Purpose of this Guide

NZFSA 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 iodised salt to bread. This guide also covers the voluntary addition of folic acid to bread prior to the requirement for mandatory addition of folic acid to bread on 31 May 2012.

This New Zealand User Guide has been devised from the two Food Standards Australia New Zealand User Guides; the Mandatory Iodine Fortification User and the Mandatory Folic Acid Fortification User Guide. 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 Guides.

The Guide, unlike the Standards, is not legally binding. If you are in any doubt when interpreting the Standards, NZFSA 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.

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, thiamine 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.”*

What bread must contain folic acid and iodised salt?

The following bread products must contain iodised salt from 27 September 2009, and folic acid from 31 May 2012:

- plain white, white high fibre, wholemeal and multigrain bread loaves, buns and rolls
- yeast-containing flat breads (eg pita bread, naan bread)
- focaccia and pide (Turkish bread)
- bagels (white, wholemeal, sweet)
- topped breads, buns and rolls (eg cheese and bacon rolls)

- sweet buns (eg raspberry buns, boston buns)
- fruit breads and rolls, and
- yeast-containing baked English style muffins.

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

Part 2: Exemptions to the mandatory additions

What bread is not required to contain folic acid and iodised salt?

The following products will not be expected to contain folic acid and 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 (ie 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 stollen
- biscuits, and
- crackers.

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 folic acid and iodised salt to bread?

Manufacturers can voluntarily fortify bread with folic acid prior to 13 September 2009 under the current voluntary permissions contained in Standard 1.3.2 - Vitamins and Minerals.

From 25 September 2009 until 30 May 2012, the addition of folic acid to bread (temporary) is permitted under Part 2A New Zealand (Mandatory Fortification of Bread with Folic Acid) Amendment Food Standard 2009.

Clause 10 (3) of Standard 1.1.1 – Preliminary Provisions – Application, Interpretation and General Prohibitions permits the voluntary addition of iodised salt to bread.

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% 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 | Iodine |
|-------------------------------|---------------------------------------|---|
| Level of fortification | 0.8 mg – 1.8 mg/kg bread ⁴ | Replace plain salt in recipe with iodised salt ⁵ |

The mandatory addition of folic acid to bread

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

2 Commencement

“(2) Part 2 of this standard comes into force on 31 May 2012

Part 2 Mandatory addition of folic acid to bread

6 (1) Bread must contain no less than 0.8 mg/kg and no more than 1.8 mg/kg of folic acid.

(2) Subclause 1 does not apply to bread that is represented as organic.”

Folic acid is the only permitted form of folate that can be used to meet these requirements. L-methyltetrahydrofolate, calcium is not permitted to be used for the mandatory addition of folic acid to bread but can be used in bread that is being fortified under the voluntary permissions in the Code or in the New Zealand (Mandatory Fortification of Bread with Folic Acid) Amendment Food Standard 2009.

The voluntary addition of folic acid to bread is not required to meet the mandatory fortification levels. No range or limits have been set for voluntary fortification of bread with folic acid.

⁴ This relates to the actual bread component of the product and does not include for example toppings, fillings or icing.

⁵ From 9 October 2009 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.

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:

“Iodised 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:

“Iodised 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 will be 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, ie 45 mg of iodine per kilogram of salt.

Are there any stock in trade provisions?

Due to the 18 month transition period for iodised salt addition there will be no stock in trade provision. From 27 September 2009 all bread that is required to be fortified must contain iodised salt. From 31 May 2012, all bread that is required to be fortified must contain folic acid, also with no stock in trade provision.

Imported Bread

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

Bread imported into New Zealand will be required to comply and will therefore be required to contain iodised salt from 27 September 2009 and folic acid from 31 May 2012.

Part 4: Labelling requirements

What additional labelling will be required for folic acid and iodised salt?

Ingredient list

Suppliers of bread will be required to list folic acid (or folate) and iodised salt in the statement of ingredients in all breads that contain folic acid and iodised salt.

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

Ingredient labelling requirements are set out in Standard 1.2.4 - Labelling of Ingredients⁶.

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 package⁷.

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 and iodised salt may be made available from the food outlet upon request; however this is not a requirement.

⁶ http://www.foodstandards.gov.au/srcfiles/Standard_1_2_4_Labelling_of_Incred_v101.pdf

⁷ 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 cm²

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

Yes, nutrition and health claims can be made for foods containing folic acid; 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.

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

Will nutrition and health claims be 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 can not 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.

What about use of 'natural' claims?

The New Zealand Commerce Commission considers that 'natural' claims imply the product is made up of natural ingredients, ie ingredients nature has produced, not man made or interfered with by man. Folic acid is not a natural substance; therefore 'all natural' claims for foods containing folic acid may not be used, although the product may be labelled as 'contains natural ingredients' provided the other ingredients are natural. 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'. 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 and will contain iodised salt. Therefore folic acid or folate (if present) and iodised salt 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 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 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 folic acid be added to bread?

It is the responsibility of each bread manufacturer to ensure that they add folic acid at the correct level to meet the folic acid mandatory fortification Standard from 31 May 2012. It is expected that most bread manufacturers carrying out voluntary folic acid fortification will use folic acid fortified improvers or folic acid mixes. Prior to 31 May 2012, voluntary folic acid fortification is not required to meet the mandatory fortification levels stated in the standard.

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.

How should iodine be added to bread?

Iodine will 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.

When will the mandatory addition of folic acid and iodised salt to bread commence?

The requirement to add iodised salt to bread will commence on 27 September 2009 and will become enforceable from this date. The requirement to add folic acid to bread will commence on 31 May 2012. From these dates, all bread (as defined in Part 1 of this Guide) is required to be fortified with folic acid and plain salt replaced with iodised salt. Prior to 27 September 2009 industry may add iodised salt to bread in preparation for the new requirements. Prior to 31 May 2012 industry may also add folic acid to bread in preparation for the new requirements (refer to Part 2 and Part 6 of this Guide).

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

Bread is expected to meet the mandatory addition of folic acid and iodised salt Standards at points of manufacture and sale. Imported bread will be required to contain folic acid and 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 mandatory addition of folic acid and iodised salt to bread be assessed for compliance?

Assessing compliance with food standards is the responsibility of the NZFSA 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).

NZFSA 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 folic acid and iodised salt have been added to bread products at the appropriate level.

These records could include:

- information to prove that folic acid has been added in a quantity sufficient to meet the level required in the mandatory fortification Standard eg a recipe
- evidence that the recipe is being adhered to
- evidence of relevant staff training
- evidence that folic acid or folic acid fortified pre-mix or improver; iodised salt is being used in the recipe eg sales receipts
- results of analytical testing for folic acid content in bread samples, and/or
- use of food control plans/food safety programmes

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

Folic Acid

Bread manufacturers are expected to have appropriate records and systems to demonstrate that folic acid is being added at the correct concentration to meet the mandatory folic acid fortification Standard.

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.

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

What other provisions in the Code permit the addition of folic acid 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 folic acid fortification permissions.

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 requirements. 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).

Part 7: 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. Adults get about 250 micrograms of folate from food each day, well below the recommended intake.

New Zealand's current policy recommends that women capable of, or planning a pregnancy, take at least 400 micrograms of folic acid daily for at least four weeks before and 12 weeks after conception. As well as consuming foods rich in folate and folic acid-fortified foods. 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.

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 eg, oranges; wholegrain breads and breakfast cereals. Chick peas, nuts, dried beans and peas are also high in folate, although cooking reduces this level.

What is mandatory folic acid fortification?

Mandatory fortification is the compulsory addition of certain vitamins and minerals to foods in response to a significant public health need. The mandatory folic acid fortification Standard requires that bread, with the exception of bread represented as organic and non yeast-leavened, must contain folic acid. This will mean most bread in New Zealand will contain folic acid from 31 May 2012.

Bread will contain an average of 120 micrograms of folic acid per 100 grams (approximately 3 slices).

Why mandatory folic acid fortification?

For more than ten years, Australia and New Zealand have introduced a number of initiatives to increase the folic acid intake of women planning to or who may become pregnant to reduce the risk of their babies developing NTDs. These have included health claims on food labels, education programs, voluntary folic acid fortification of foods - such as breakfast cereals and bread - and encouraging women to take folic acid supplements. Despite these initiatives, most women of child-bearing age are still not consuming enough folic acid. Mandatory fortification is being introduced to provide additional protection against NTDs.

Mandatory folic acid fortification is expected to reduce the number of NTD affected pregnancies by 4 – 14 each year in New Zealand.

Part 8: About Iodine

What is iodine?

Iodine 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 NZFSA's Total Diet Survey (2003/04) estimate the amount of iodine being eaten by New Zealanders may be at best only 57 percent of what is recommended.

What are good sources of iodine?

Foods that are good sources of iodine include reduced or low-fat milk and milk products, eggs, and seafood (fish, shellfish). Foods that contain seaweed such as sushi and seameal custard are also good sources. Iodised 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.

Iodine 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 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.

Part 9: Bread Fortification

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

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

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

Some breads are exempt from the requirement to add folic acid and 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 folic acid and iodised salt as manufacturers may still be permitted to add these on a voluntary basis. The requirement for mandatory fortification of bread with folic acid has been delayed until 31 May 2012.

Will the addition of folic acid and iodised salt be monitored?

Yes. The Ministerial policy guidelines for mandatory fortification of food products 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 program and reporting on progress. NZFSA and the Ministry of Health will contribute directly to some elements of the monitoring program as part of their on-going work.

NZFSA has developed fact sheets for mandatory folic acid and iodine fortification that are available on the NZFSA website (www.nzfsa.govt.nz).

Part 10: What are the Australian requirements?

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

The folic acid mandatory fortification standard in Australia 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.

Australia has the same requirements as New Zealand for the addition of iodised salt to bread but these do not commence until 9 October 2009.

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

Why is the Australian Standard 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 less than 0.8 mg/kg and no more than 1.8 mg/kg of folic acid) from 31 May 2012. Prior to that date, folic acid or L-methyltetrahydrofolate, calcium is permitted to be added to bread (no range or limit is specified).

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).

Because the mandatory requirement in New Zealand relates to 'bread', it will be up to the bread manufacturer to consider their approach to addition of folic acid which may be through the use of fortified flour or addition of folic acid through some other means. It is important to remember that the baked bread product must contain between 0.8 and 1.8 mg/kg of folic acid from 31 May 2012.

Part 11: Where can I get more information?

NZFSA can provide assistance with navigating the Code. However NZFSA does not provide approval of labels, or food compliance of any type. NZFSA 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 NZFSA at info@nzfsa.govt.nz.

Additional user guides are available on the NZFSA website:

<http://www.nzfsa.govt.nz>

[Food labelling and food advertising](#)

[General Food Labelling Requirements](#)

[Nutrition Information Panels](#)

[Understanding food labels - a simple guide to help you understand and interpret food labels](#)

FSANZ also provides the following user guides:

<http://www.foodstandards.gov.au>

Australian User Guide Mandatory Folic Acid Fortification

Australian User Guide Mandatory Iodine 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