

IBFAN comment:

PROPOSED DRAFT DEFINITION FOR BIOFORTIFICATION
(Prepared by an Electronic Working Group led by Zimbabwe and South
Africa)
At step 3

General comments:

Without a specific description of the method used to modify micronutrients, amino acids and fatty acids and a generic term such as “agricultural methodologies”, the term biofortification cannot be accurately defined. IBFAN rejects biofortification achieved through cross breeding that includes genetic modification as an agricultural methodology resulting in products such as “golden rice”.

The method of using genetic modification as a means to “nutritionally enhance” crops has devastated many family farms; increased factory farming; increased the costs of agricultural inputs; destroyed bee populations; increased the prevalence of allergies in human populations and other unknown health impacts; claims of increased production and improved nutrient content has not materialized.

The impact of biofortified crops on malnourished and undernourished populations has not been adequately investigated. Little is known about the safety and efficacy compared to increased dietary diversity and nutrition education in immunocompromised and vulnerable populations. Malnutrition in young children is a multifactorial condition and generally precipitated by infectious illness such as diarrheal disease and respiratory illness.

Questions have been raised about the possible impact of single nutrient focussed agriculture on biodiversity and the diversity of foods available to support local diets.

What claims will be made for these “enhanced” products. Will they be promoted to appear to be better than normal farm crops and indigenous food crops? What impact will these crops have on crop diversity?

Will the biofortification industries claim to reduce nutrient deficiencies and malnutrition? Will the claims being made on the rationale of reducing rates of malnutrition, obscure the real intent to increase the markets for agricultural inputs with industrially modified seeds? Is a similar model to genetically modified foods being used to promote its products as the champion to address global malnutrition?

Nutrients such as vitamin A can readily be accessed with emphasis on the growth of vitamin rich foods such as green leaves vegetable and other carotene rich foods and nutrition education which can cover the wide breadth of nutrients required and is a sustainable local solutions to addressing situations of nutrient undernutrition.

The lack of consumer acceptance of staple foods with altered colour and texture has also been documented.

Specific comments:

Proposed definitions for Biofortification

IBFAN sees no need to have a new definition that differs from definition 4 by the WHO. The WHO clearly states the methods used to achieve biofortification - conventional plant breeding and/or biotechnology. By omitting the methods used and in particular the information that biofortification can be accomplished through the use of biotechnology fails to fully inform consumers.

IBFAN's comment on the WHO definition is to delete the "improved" and to replace this with "altered" to read:

*...nutritional quality of food crops is **altered** through conventional plant breeding and/or use of biotechnology.*

In Appendix II, Columns 7 and 8, eight Codex members asked for the method of production to be specified and only three stated that there is no need to specify. This is a clear indication that Member States see a need for the method of production to be included in the definition.

Additionally IBFAN notes that methods of production also need to be included in the labelling provisions for foods and food ingredients altered through biofortification.