

IBFAN Comment

PROPOSED DRAFT DEFINITION FOR BIOFORTIFICATION

(for comments at Step 3 through <https://ocs.codexalimentarius.org>)

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 [excluding conventional fortification⁶].

¹**Nutrient** is defined by *General Principles for the Addition of Essential Nutrients to Foods* (CAC/GL 09-1987) to mean: any substance normally consumed as a constituent of food: which provides energy; or which is needed for growth and development and maintenance of healthy life; or a deficit of which will cause characteristic biochemical or physiological changes to occur.

²**A related substance** is a constituent of food (other than a nutrient) that has a favourable physiological effect.

³**Bioavailability** - The proportion of the ingested nutrient or related substance that is absorbed and utilised through normal metabolic pathways. Bioavailability is influenced by dietary factors such as chemical form, interactions with other nutrients and food components, and food processing/preparation; and host-related intestinal and systemic factors.

⁴**Paragraph 3.1.1**, *Principles for the Addition of Essential Nutrients to Foods* (CAC/GL 9-1987).

⁵Method of production should be determined by the competent National/Regional authority.

⁶Biofortification does not include conventional fortification covered by CAC/GL 9/1987.

General Comment:

IBFAN does not agree with the definition. We wish to take note of the concerns expressed by the delegates to the 2016 CCNFSU 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. IBFAN recommends that the CCNFSU 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.