



IBFAN Comment

PROPOSED DRAFT DEFINITION FOR BIOFORTIFICATION
(for comments at Step 3 through <https://ocs.codexalimentarius.org>)

General Comment:

IBFAN does not agree with the definition. We wish to take note of the concerns expressed by the delegates to 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. IBFAN recommends 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 few select 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 and environmental 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.