

The Proposed Draft Definition For Biofortification

COMMENTS OF THE NATIONAL HEALTH FEDERATION ON AGENDA ITEM 5:

THE PROPOSED DRAFT DEFINITION FOR BIOFORTIFICATION

For the 39th Session of CCFNSDU

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The National Health Federation (NHF), a non-profit consumer organization, respectfully submits the following comments:

1. The Definition Must Not Include GM Foods.

The key question here is whether the definition of Biofortification should be broad enough to include genetically modified (GM) (recombinant-DNA) technology within it.

Those pushing a standard for Biofortification, particularly the International Food Policy Research Institute (IFPRI) claim that Biofortification itself as a concept is neutral and that it would be up to each country to decide for itself whether Biofortification would include recombinant-DNA technology or not. To them, Biofortification is simply the process by which the nutritional quality of food crops is improved through plant breeding with the aim of making the nutrients bioavailable after digestion. To most of us, that means “conventional” plant breeding. However, some would like to convert Biofortification into a Trojan horse that will allow GM foods to slip into those countries that currently ban such foods. This approach is completely unacceptable.

At last year’s CCFNSDU meeting, the Chairwoman started off the discussion by giving her incorrect personal opinion that the definition should be as broad as possible and that recombinant technology should be included. Her statement, though, directly contradicted Australia’s admission at the 2015 meeting that if the Committee were to refer to the original 2012 document on the scope of Biofortification, we would see that Biofortification only refers to conventional breeding and so we should clearly exclude GM techniques. At the 2016 CCFNSDU meeting, however, Australia was silent on the issue. NHF agrees with Australia’s 2015 position on this issue.

The EU has raised a valid objection that the very name “Biofortification” would cause confusion in many European countries due to the widespread use of the word “bio” as synonymous with “organic.” Other countries within the EU have been very vocal and support the EU’s position here, arguing that the definition needs to be restrictive, not broad. Once again, the NHF agrees with the EU position here. The term “Biofortification,” at least within European countries, risks consumer confusion as to whether they are purchasing organic products or something else entirely. This confusion cannot be allowed.

2. Biodiversity, Not Monoculture

Last year, the delegation of Ireland very wisely warned this Committee against the risks of monoculture, stating that what was needed here was biodiversity. NHF most definitely agrees with the Irish position.

3. Methods of Production Must Not Be Determined By National Authorities

Allowing GM techniques within the definition of Biofortification through the fiction that “National Authorities may decide” would create a Trojan horse for the introduction of GM foods into markets previously excluding them.

In these days, with ubiquitous international trade, agreeing that the “Methods of Production” can encompass within the ambit of the term “Biofortification” is unworkable as a practical matter. This approach just screams for widespread leakage of GM-based bio fortified foods into GM-excluded trade zones as a one-size-fits-all term would confuse shippers, customs agents, and others involved in the food trade. Consumers and traders would have to be constantly checking on the sources of their “bio fortified” foods and have an excellent memory so that they could determine whether their particular “bio fortified” food might contain GM ingredients or not, or have been produced through GE techniques.

NHF respectfully submits that if there is to be a clear, non-misleading term of art or definition for Biofortification , then it must be uniform worldwide, and that definition most definitely may not allow for GM methods of production.