



May 2008

**Submission from the Dietitians Association of Australia
Proposal P1003
MANDATORY IODINE FORTIFICATION FOR AUSTRALIA**

The Dietitians Association of Australia (DAA) is the national association of the dietetic profession. DAA represents over 3500 members, with branches in each State and Territory. DAA is a leader in nutrition and advocates for better food, better health, better living for all. DAA welcomes the opportunity to comment on Proposal P1003.

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DAA supports the mandatory replacement of non-iodised salt with iodised salt in bread where the iodisation level is to be in the range of 25 – 65 mg of iodine per kg of salt. DAA agrees that bread represented as organic will be exempt from the requirement. DAA also agrees that the voluntary permission for iodine in iodised salt and reduced salt will be retained at the current range of 25 - 65 mg per kg, to be consistent with the mandatory requirement.

DAA has previously responded to proposals related to mandatory fortification with iodine of foods, indicating general support for the proposal with additional comments. While DAA maintains its position and supports the preferred approach presented in Proposal P1003, it takes the opportunity to make the following points.

A communication and education strategy will be important to ensure various stakeholders are informed about the implications of mandatory fortification with iodine. The following is suggested in addition to general information for consumers:

- Specialist medical practitioners be informed (perhaps through the medical colleges) about the change in food supply of iodine so as to appropriately advise their patients with existing thyroid conditions.
- Health professionals, such as gastroenterologists and dietitians, advising clients with celiac disease be alerted so as to provide appropriate advice regarding provision of an adequate iodine intake.
- Health professionals advising pregnant and lactating women be informed so as to alert their clients about the role of supplements in achieving an adequate intake.

DAA is highly supportive of a monitoring program under the responsibility of the AIHW to evaluate the impact of mandatory fortification with iodine.

- In addition to monitoring the iodine status of the population through surveys of school-aged children, it will also be important to monitor the iodine status of pregnant and lactating women.
- The Assessment Report section 15.1.1.2 identifies an estimated 12% of the population who may receive limited benefit from the proposed mandatory fortification. Although this is a small percentage the absolute number of people at risk of inadequate intake is of concern and efforts should be made to monitor people from different cultures who irregularly eat bread, those who consume only organic bread and those who restrict their bread consumption to reduce their salt intakes.

DAA considers that evaluation of the fortification strategy is essential, and that this should be underpinned by current and relevant information. This will inform any future revision of the mandatory fortification strategy to reduce iodine deficiency in the Australian population.

- DAA acknowledges that there is a naturally high variability in the iodine content of Australian food products. However, it strongly recommends that national food composition databases are continually updated to support evaluation of the implementation of mandatory fortification with iodine.
- Similarly, while DAA acknowledges that surveys of nutritional intake of the population are outside of the scope of FSANZ, it recommends that intake surveys are done regularly to ensure data is available routinely on current intakes which reflect the changing food supply and food intake patterns of the population.

As mentioned in earlier submissions, DAA has some concerns about the use of salt as a medium for the delivery of iodine, as this has the potential to confuse the public health messages of taking less salt for prevention and control of hypertension against the need to take in adequate iodine.

- The communication strategy should take this into account.
- Also, evaluation of the fortification program should provide sufficient information to assess whether manufacturers are reducing the amount of salt added to bread, and therefore whether the amount of iodine added to salt needs to be increased.

DAA acknowledges the practical reasons for using salt in bread as a medium for iodine as outlined in '8 Food vehicle selection' section of the Assessment Report. However it would like to encourage further research into the direct addition of iodine to foods, such as milk, which to date has received little attention.

DAA strongly supports the application of sufficient resources to implement the proposal, especially employment of sufficient personnel as was the case in the voluntary fortification of bread with iodine in Tasmania.