



**National Council of  
Women of New Zealand**

Te Kaunihera  
Wahine O Aotearoa

National Office  
Level 4 Central House  
26 Brandon Street  
PO Box 25-498  
Wellington 6146  
(04) 473 7623  
www.ncwnz.org.nz

19 December 2008

S08.26

**Submission to the Food Standards Australia – New Zealand (FSANZ) on the Voluntary  
Addition of Fluoride to Packaged Water**

NCWNZ is an umbrella organisation representing 45 Nationally Organised Societies and National Members. It has 27 Branches throughout the country attended by representatives of those societies and some 150 other societies. The Council's functions are to serve women, the family and the community at local, national and international levels through research, study, discussion and action. NCWNZ welcomes the opportunity to consider this Draft Assessment Report, Application A588 – voluntary Addition of fluoride to Packaged Water.

The response has been prepared by the Consumer Affairs Standing Committee following circulation of questions to NCW members outlining the proposal and requesting comment and opinion regarding the preferred regulatory approach and consequential amendments to the designated standards.

**Introduction**

The following comments represent the viewpoints and opinions of over 70 NCW members from Branches and individuals throughout the country. As NCWNZ did not receive the *Interim Assessment Report: 9 March to 30 April 2008* during the public consultation period, members' viewpoints were not canvassed at that time and no submission was written.

Current NCW policy supports fluoridation of reticulated water and submissions were written in 1992 (S93.37) and 1994 (S94/68) reflecting the opinions of members at that time.

Many of the responses received to the questions circulated to members regarding this proposal, reflect a wide range of opinion to the addition of fluoride to packaged water. Although some concerns were expressed, the majority of members who considered the proposal support the key messages as outlined in the report (over 80%). A number of the responses, some from the rural community expressed strong viewpoints that fluoride should not be added to reticulated water supply or packaged water (under 20%) on the basis of public health and safety concerns as well as issues about informed consent and choice.

The generally held view is that the addition of fluoride to reticulated water has improved the state of New Zealanders' dental health. Providing consumers with an alternative source of fluoridated water will be an advantage and right of choice. There are many small communities in New Zealand and rural areas, where it is not possible to fluoridate the public water supply, or where there is no reticulated water or only access to tank water. Only 52% of the population has access to a fluoridated water supply and the introduction of fluoride in package water may increase this percentage.





For many people in New Zealand, fluoridated packaged water would be the only means by which they could access fluoridated water other than use of fluoride tablets. Packaged water is becoming increasingly popular, especially among the younger age group and, in particular, teenagers and young adults who, as a result, may be drinking less water with fluoride addition. The fluoride levels in packaged water as proposed are aligned to the recommended target range in the reticulated water supply in Australia and New Zealand which has been approved as a safe level and members approved of this. Members did not generally express concern about public health or safety issues for consumers of fluoridated packaged water when supporting this proposal.

### **Specific comments**

The preferred regulatory option to amend Standard 2.6.2, which is to permit the addition of fluoride to non-carbonated packaged water to between 0.6 and 1mg/l, met with the approval of the majority of NCW members, as it does not exceed that total of naturally occurring and added fluoride in water supplies.

The majority of responses agreed that the measured addition of fluoride to packaged water would have a positive effect on oral health as there is considerable documented evidence of an increase in the prevalence and severity of dental caries in the younger age groups in the population.

- Some concerns were expressed by members that companies/business who supply water to their employees via bulk water coolers may only purchase one or other option, rather than offering a choice of fluoridated or non-fluoridated water. Employees have a right to choose and it was considered cost increases to the employer may affect this provision of choice.
- Members also expressed concerns that consumer choice may be affected by accessibility and availability, especially in rural areas and small communities. Increased costs to the consumer were also considered by many to possibly restrict freedom of choice, particularly for lower socio-economic groups where children may be further disadvantaged.
- A few responses commented that water used for filling water bottles and water coolers may already be fluoridated or residue may remain in bulk water coolers; this would result in an increase to safe upper limits should it occur.
- Supervision and ongoing inspection were considered necessary and important to ensure fluoride levels are consistent with the reference levels stated.
- Other responses, whilst agreeing with the addition of fluoride to packaged water, expressed some concern about the possibility of exceeding the upper level of intake for children and infants up to 8 years of age.

The preferred regulatory option to amend Standard 2.6.2 is that the preferred approach is to require mandatory labelling to indicate that fluoride has been added to non-carbonated packaged water.

Members' responses indicated strong support for providing consumers with adequate information on the product label, thus enabling the consumer to make an informed choice and to prevent them from being misled. The labels should be able to be easily read and preferably indicate fluoride addition in large print and a strong colour as well as include amounts of fluoride added on the label. This will provide the consumer with a clear choice and be easily identifiable.



Members also provided additional comments which included:

- The suggestion that information about the potential effect of fluorosis in children should be included on the label.
- The introduction of the product to the market should be accompanied by a promotion and advertising campaign to educate and inform the public and to ensure that consumers are aware of the change.
- The addition of fluoride should not be used in marketing packaged water and no health benefits should be permitted in advertising as this may be construed as misleading the consumer.
- Labels should possibly include a warning to vulnerable groups in society e.g. infants fed primarily on infant formula, young children, people with liver damage and impaired kidney function.
- Purchasers need to clearly and immediately be able to recognise the difference between fluoridated and non-fluoridated packaged water at point of sale.
- The same testing procedures used for fluoridated reticulated water supply should be used for packaged water with fluoride addition and the test results be available to the public.
- Additional surveillance measures and possible enforcement activities should be implemented as with any new category of food introduced to the market.
- Recommendation that employees involved in the handling or use of chemicals or transport of products undertake training similar to that provided for employees involved in reticulated fluoridated supply.
- Consideration of ecological cost of possibly increasing consumption of packaged water, e.g. 'ecological cost' and 'carbon cost' of plastic bottles. Emphasis placed on use of recyclable plastic bottles only and concerns expressed regarding the increase in plastic bottles to be recycled as environmentally-unfriendly.

### **Conclusion**

The majority of members, who responded, supported the voluntary addition of fluoride to packaged water.

A minority of members, who responded, did not agree with the proposal and opposed addition of fluoride to packaged water.

Responses indicated strong support for mandatory labelling to indicate that fluoride has been added to packaged water to enable consumers to make an informed choice.

The general opinion was that the addition of fluoride to packaged water will offer the consumer an alternative to fluoridated reticulated water or provide a source of fluoride for those who do not have access to a fluoridated water supply.



Members who supported the proposal did not raise any public health or safety concerns that may affect the consumer.

NCWNZ thanks FSANZ for the opportunity to provide feedback on this Draft Assessment Report so that the views and opinions of our members may be taken into account in the completion of the Final Assessment.

Elizabeth Bang  
**National President**

Jan Brown  
**Convener**  
**Consumer Affairs Standing Committee**