

POLICY BRIEF

A Strengthened Flour Fortification for Improved Maternal and Child Health & Development in the Kyrgyz Republic

Public Fund for Food Security and Nutrition
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Introduction

The updated national data on micronutrient deficiencies and nutrition in the Kyrgyz Republic presents persistently high levels of micronutrient deficiencies among children and women. Micronutrients are crucial for women and child health and development, and deficiencies can potentially have life-threatening consequences. Iron deficiency alone can cause delayed intellectual and physical development in children and high maternal mortality, and folate deficiency among pregnant women can cause serious birth defects to the baby that affect the spine, spinal cord or brain and may cause death. Fortification of industrially processed flour, when appropriately designed and implemented, is an efficient, simple and inexpensive strategy for supplying vitamins and minerals to the diets of large segments of the population and have the potential to save lives. The implementation of the Flour Fortification Law in the Kyrgyz Republic, introduced in 2009, imposes all flour producers to fortify top-grade and first-grade flour with vitamins and minerals approved by authorized health agencies. However, evidence suggests insufficient implementation of the state programme that fails to cover the micronutrient needs of women and children.

Current Status on Micronutrient Deficiencies in the Kyrgyz Republic

Results from the National Integrated Micronutrient and Anthropometric Survey (NIMAS)¹ conducted in 2021 demonstrate a high prevalence of iron deficiency, folate deficiency and anemia among children and women in the Kyrgyz Republic. Micronutrient deficiencies among pregnant women increases the risk for birth defects such as spina bifida and brain damage. Pregnant women with severe anemia are twice as likely to die during or shortly after pregnancy than non-anemic women. Furthermore, iron deficiency among children has consequences for cognitive development which hinders educational performance, potentially affect future earnings. In 2020, 7,375 children with congenital malformations registered. 751 children were registered with birth defects for the first time in their lives, which amounted to 3.0 per 10 thousand children².

¹ Full report with final results will be published by the end of 2022.

² Data from E-Health Center in the Kyrgyz Republic (2021)



84%

Adolescent girls 10-18 years
with **folate deficiency**



47%

Children 6-59 months with
iron deficiency



83%

Non-pregnant women 15-49 years
with **folate deficiency**

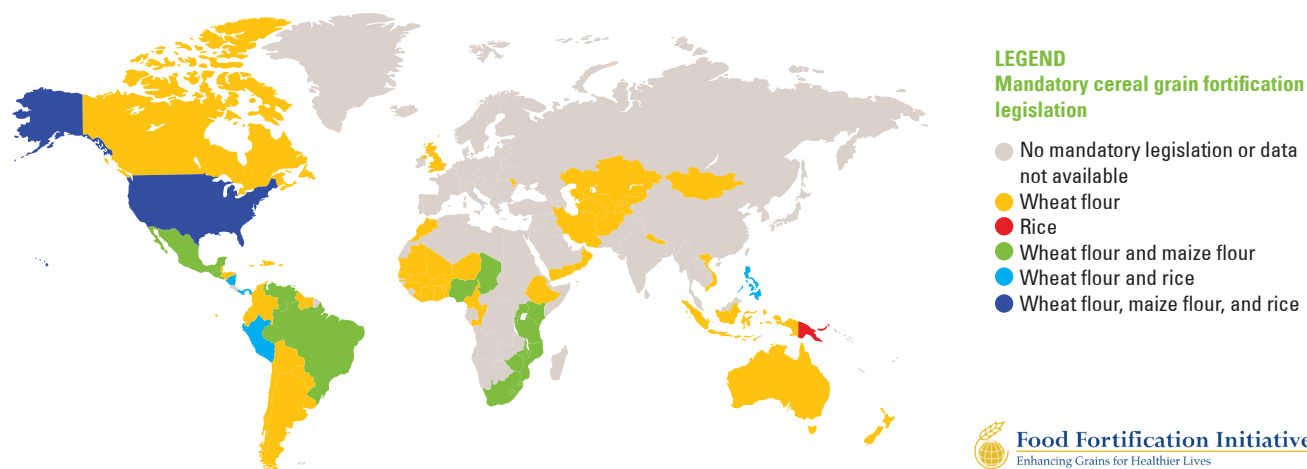


cases of children
with **malformations**
were registered in 2020

Positive Effects of Flour Fortification on Maternal and Child Health

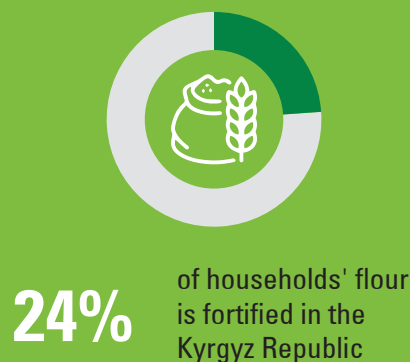
Fortification of flour is a process in which micronutrients are added to the flour and have proven to be the one of the most cost-effective means of combating micronutrient deficiencies. Fortification is a safe nutrition intervention proven to benefit individuals at all stages in life – from contraception to adulthood, with of particular importance for breastfeeding mothers, women of reproductive age. While flour fortification does not require consumers to change their behavior it does require the Government and the industries to make systematic changes to ensure adherence to the fortification regulations.

Mandatory Cereal Grain Fortification Legislation - July 2022



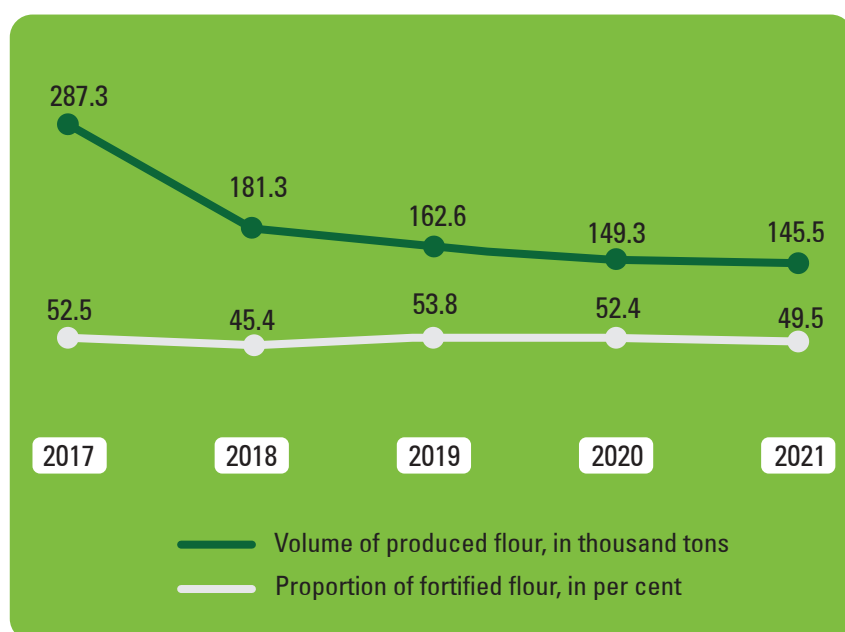
State Policy on Flour Fortification

The Kyrgyz Republic approved the Flour Fortification Law in 2009 with further amendments in 2015, which decreed that both domestically produced and imported flour should be fortified. Specifically, every entrepreneur active in the field of production, transportation, storage and sale of fortified flour is obliged to guarantee its safety and quality in accordance with requirements of technical regulations or normative legal acts and standards. Further, manufacturers or suppliers should carry out certification or declaration of fortified flour on conformity and local producers are required for the domestic market to comply with the national state standard KMS 1353:2019 "Enriched baking wheat flour, general technical conditions". Article 4 of the Law states that the Government, consisting of various ministries and departments, should coordinate and interact with all state bodies to ensure implementation of the Law. However, the rapid assessment reveal that there are no specific state body responsible for implementation of the law. Results from NIMAS demonstrate that 24% of households' flour is fortified, and according to the Electronic Portal of the Public Procurement, only 44 per cent of the budgetary organizations purchased fortified flour from March to August 2022.



Dynamics of Fortified Flour Production

In the Kyrgyz Republic, the demand for flour is more than 600 thousand tons per year. According to the National Statistical Committee, 200 thousand tons are produced domestically per year. The main suppliers of flour to the Kyrgyz Republic are members of the Eurasian Economic Union: Kazakhstan and Russian Federation. In order to reduce the prevalence of anemia and micronutrient deficiencies for the population, and malformations of the brain and spinal cord for children, it is necessary to provide 80% of the population with access to fortified flour. To do this, the country should ensure that all flour produced by local producers is fortified and that exclusively fortified flour is imported. Monitoring data from both Kazakhstan and Russia shows that both countries have a mixed performance with flour fortification: 3 out of 79 Kazakh flour brands and only 4 out of 8 Russian brands were fortified³. This suggests that Kazakhstan and Russia have the ability to produce and supply fortified flour to the Kyrgyz Republic.



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80% of the flour on the market must be fortified to achieve the expected effect of reducing the prevalence of anemia and micronutrient deficiencies among the population

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Current Coordination and Common Policy on Flour Fortification

A number of legislative issues related to the Flour Fortification Program prevents an efficient implementation of the programme. According to Article 5, local state administrations provide the population with fortified flour within their authorities, and local self-governments (LSGs) - in accordance with delegated state authorities. However, the Law on “*Local State Administrations and Local Self-Government Bodies*” does not monitor the production, storage and sale of flour. Thus, LSGs cannot exercise the authorities provisioned in Article 5 without amending the Law of the Kyrgyz Republic “*On Local State Administrations and Local Self-Government Bodies*” and transferring the relevant resources. Furthermore, the “*Code on Violations and the Code of Misdemeanors*” came into force 1st January 2019, where no sanctions for violation of the law was introduced.

The Flour Fortification Law also imposes regulations and requirements from the local flour producers, but the additional economic cost of additives and quality control results in poor adherence.

³ Report on Monitoring of implementation of the Law “On the enrichment of baking Flour”, Civil Society Alliance for Food Security and Nutrition, 2017

Low Adherence of domestic millers to flour fortification

Wheat flour millers in the Kyrgyz Republic cite two main challenges to fortification:

- the high cost of the premix from local manufactures: 1KG of premix costs 1,230 KGS in which 180g is needed per ton, resulting in an extra cost of 11 KGS per 50kg. The additional cost to monitor the quality control of flour fortification also required.
- low competitiveness with unfortified flour from Kazakhstan. The equipment of enterprises for production of fortified flour has not been monitored since 2011.

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National legislation and legislation of the EAEU

The Kyrgyz Republic's membership in the Eurasian Economic Union (EAEU) poses challenges to the ban of import of non-fortified flour to the Kyrgyz Republic, as the union has agreed on a free movement of goods between member states. The Kyrgyz Republic initiated amendments to TR TC 021/2011 in terms of establishing the circulation of fortified flour in the territory of the Kyrgyz Republic. The draft of this document is at the stage of discussion among the member states of the EAEU.

The Republic of Belarus proposes to consider this issue at the EAEU platform, subject to the provision of appropriate scientific justifications, the Republic of Armenia does not object, provided that these requirements are applied exclusively on the territory of the Kyrgyz Republic, the Republic of Kazakhstan proposed to include its territory in the draft decision providing for the mandatory fortification of first and the highest grade wheat flour, and Russia did not provide its unified position. The Ministry of Agriculture of Russia considers the ban on import of unfortified flour to the Kyrgyz Republic as restriction on free trade. Under such circumstances, the issue of legitimacy of requirements at the regional level for fortification of the highest and first grades flour remains open, which complicates the enforcement of the Flour Fortification Law on a national level. It is difficult for the supervisory authority to decide which legislation (national or EAEU) to rely on, complicating the supervision of the circulation of flour domestically.

Since 2017, in order to import food products, including flour, to Kyrgyzstan, it is necessary to actualize a declaration of conformity with technical regulations (TR). Countries from the EAEU export flour to Kyrgyzstan in availability of Declaration of Conformity TR CU 021/2011 "On Food Safety". However, there are no technical regulations for fortified flour. Accordingly, due to absence of the regulatory requirement for mandatory flour fortification in the EAEU, the distribution of unfortified flour with a certificate of conformity with TR CU 021 is not prohibited. Countries that are not members of the EAEU must register the imported flour.

Public Awareness

Public awareness of the of the positive effects of consuming fortified flour remains low because there is no strategy to inform the public and other parties involved about the importance of fortified flour. The 'Report on Monitoring the Implementation of the Bakery Flour Fortification Law' (2017) stated that 83.2 per cent never check whether the flour is fortified or not when buying flour. According to the Government Decree No. 234-r and the Program for Food Security and Nutrition in the Kyrgyz Republic 2019-2023, Ministry of Agriculture and Ministry of Health are the main agencies responsible for informing the population of the benefits of consuming fortified flour.

Low awareness of representatives of state bodies about the importance of flour fortification to prevent the iron deficiency anemia and congenital malformations in children is one of the reasons of low demand for fortified flour from the population and state organizations (hospitals, schools, kindergartens, boarding schools, military units, penitentiary institutions).

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“We don't provide public education on fortified flour. We didn't think it was necessary”

From interviews with government officials

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83.2%

never check whether the flour is fortified or not when buying flour

Opportunities to Expand Access to Fortified Flour

1. Since 2021, the standards for stock of grain stored in the State Material Reserve Fund (SMR) have been increased to cover the needs of entire population for 90 days.
2. The purchase of premix for flour fortification is provisioned in the budget of the SMR Fund, which can become the basis to create the revolving fund for purchase of a premix for all flour mills in the country. The SMR Fund provides the premix to flour mills as the grain of SMR Fund is processed. The premix is purchased from the local premix manufacturer Biovit LLC.
Facilitate implementation subsidizing or bulk purchasing premix, perhaps through the SMR.
3. An opportunity to jointly with other EAEU countries embed technical technical regulations for fortified flour into TRTC021. This would then require that flour imported to the Kyrgyz Republic is fortified.
4. The additional sub positions for fortified flour were introduced into the Commodity Nomenclature of Foreign Economic Activity of the EAEU by decision of the EAEC Board No. 121, dated September 29, 2020. It makes it possible to distinguish the fortified and unfortified flour when importing and at the markets.
5. Begin a monitoring system where flour samples from domestic mills and flour imports checked periodically. Perhaps the agency responsible for this could be stipulated in Article 4 of the fortification law.
6. The implementation of nutrition information systems, particularly the Neural Tube Defects Register to provide evidence for policy decisions and programming. Congenital disability registries are vital to monitoring the impact of strategies to raise women's folic acid status preconceptionally to prevent Neural Tube Defects.
7. The Kyrgyz Republic joined the global Scale Up Nutrition Movement in 2011 and the Multi-stakeholder Platform (MSP) for Food Security and Nutrition has been operating in the country, consisting of government agencies, NGOs, development partners, academic network and business community. The activities of the parties involved in food security are coordinated on this platform.

Recommendations

The following recommendations are suggested actions to be taken for specific stakeholders within a suggested timeframe.

Short-term

- Prepare a scientific rationale on the role of flour fortification in the prevention of micronutrient deficiencies and anemia among women and children, congenital malformations in the Kyrgyz Republic and the need for amendments to TR CU 021, involving the expertise of WHO, WFP, UNICEF (Ministry of Health)
- Request assistance from development partners in organizing a working meeting with the participation of EAC members, international independent experts who will help strengthen the Kyrgyz position in providing evidence to justify the use of only fortified flour in the Kyrgyz Republic.
- Consider the implementation of the Law "On Fortified Baking Flour" in the Council on Food Security and Nutrition with the participation of members of the Multi-Stakeholder Platform on Nutrition and Food Security (Ministry of Agriculture).
- Consider amending the Law "On Fortified Baking Flour" in order to:
 - clearly articulate the legal prescriptions, defining clear mechanisms for its implementation and the responsible body for implementing and monitoring the implementation of the Law;
 - harmonizing the provisions of the state bodies involved in the implementation of the Law "On Fortification of Baking Flour"
 - expanding the range of entities involved in monitoring including non-profit organizations to participate in monitoring the implementation of the Law and provide objective information (The Jogorku Kenesh of the Kyrgyz Republic).

Medium-term

- The Cabinet of Ministers in the matter of the amendments to TR TC 021/2011 is recommended adhere to national interests in accordance with Article 29 of the EEU Treaty and to seek review by the EEC Board or the EEC Council in accordance with paragraphs 81-82 of the Rules of procedure.
- Develop a national communication strategy to promote fortified flour to the public, generate demand among government and decisions-makers for fortified flour (Ministry of Health, Ministry of Agriculture)
- Re-assess the production capacity of existing mills for the production of fortified flour and determine their needs.
- Ensure a process of external and internal monitoring of fortified flour quality, including the purchase and storage of premix, the availability of proper equipment and record keeping.
- Ensure mandatory supply of fortified flour (Ministry of Education and Science, Ministry of Labor, Social and Migration, Ministry of Health, Ministry of Justice, Ministry of Defense, Ministry of Internal Affairs, Border Service under the State Committee on National Security).

Long-term

- Consider the possibilities of creating economic incentives for flour producers, such as the purchase of premix from the state budget and/or creation of a revolving fund (The Cabinet of Ministers).
- Ensure regular monitoring of the impact of flour fortification at the population level.