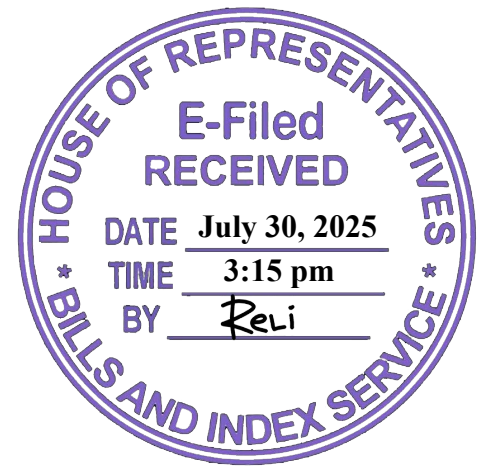


Republic of the Philippines
HOUSE OF REPRESENTATIVES
Quezon City, Metro Manila

TWENTIETH CONGRESS
First Regular Session

House Bill No. 2667



Introduced by Representative Richard I. Gomez, DPA

EXPLANATORY NOTE

Republic Act 8172, entitled “*An Act Promoting Salt Iodization Nationwide And For Related Purposes*” or the ASIN Law, for brevity, was enacted in 1995 to help combat a global health problem, that of iodine deficiency diseases (IDD). While the more well-known IDDs are goiter and hypothyroidism, deficiency in iodine is most debilitating for school age children, as well as pregnant and lactating mothers - it results in mental retardation and stunted growth. In fact, a meta-analysis of 87 studies worldwide showed that iodized salt increases IQ by an average of 8.18 points.¹ While we understand that iodizing salt is perhaps the most cost-effective way to include iodine in the food intake of Filipinos, it is only prudent to take stock of the effects of the ASIN Law on its primary goal, which is to reduce the incidence of IDD in the Philippines.

This analysis reveals the following issues:

(1) While universal iodization was mandated since 1995, test results reveal that, in actuality, a better part of iodized salt consumed in the Philippines falls short of BFAD required standards, bringing down the effective proportion of households using adequately iodized salt.

Data from the UNICEF shows that the percentage of households consuming iodized salt (of all content levels) more than doubled from 23% in 1999 to 53% in 2013 and 57% in 2018. This significant jump is directly attributed to the enactment of the ASIN Law. However, this statistic does not reflect the whole picture because in another study published by the Journal of

¹ Aburto N, Abuduo M, Candelas V, Wu T. Effect and safety of salt iodization to prevent iodine deficiency disorders: A systematic review with meta-analysis. Geneva: World Health Organization. 2014

Endocrinology & Metabolism², most iodized salt consumed in the Philippines does not qualify as adequately iodized salt. When the data was adjusted, the percentage of households consuming adequately iodized salt is only 25.3% in 2003 and 25.7% in 2013, based on data from the National Nutrition Survey (NNS) of the Philippines.

(2) The median iodine levels improved only for School Age Children, despite the implementation of the ASIN Law. The same NNS study showed dissimilar trend results of urine iodine levels for different demographic groups. The median iodine levels of School Age Children have improved from 71 (microgram per liter) $\mu\text{g/L}$ in 1998 to 168 $\mu\text{g/L}$ in 2013, which is within the desired range, that is the good news. However, a declining trend in median iodine levels occurred for the following groups: Elderly aged 60 and above—107 (2008) to 80 (2013), Lactating Women—111 (2003), 81 (2008) and 77 (2013) and Pregnant Women—142 (2003), 105 (2008) and 105 (2013). These same groups experienced increases in proportions of below 50 $\mu\text{g/L}$ level – which is categorized as moderate iodine deficiency, according to the World Health Organization.

(3) We have to consider the dangers of above normal iodine levels, as they usher in a different set of diseases. The same study has found that there are larger proportions of the demographic groups that are now in the above normal range of urinary iodine levels. One of the effects of universal salt iodization is that the whole population is exposed to iodine, even though the reality is that iodine treatment or enrichment requirement depends on each person's needs. Whereas the median iodine levels have increased for School Age Children, we have to recognize that a larger percentage of School Age Children (42%) are in the above normal iodine level range. In comparison, only 26.6% are in the desired iodine level range.

In a recent article in the Manila Bulletin³ (July 2022), Dr. Nicodemus of the Philippine Thyroid Association asserts that among the reasons for iodine deficiency is low dietary intake of milk, eggs, and seafood, which is considered to the best natural source of iodine.

While all of the above findings warrant a reexamination of the ASIN LAW, let us not forget that in the process of implementing universal salt iodization, we have practically decimated the local salt industry, most especially the subsistence and small salt producers.

For an archipelagic country of 7,641 islands with over 36,000 kilometers of coastline, salt-making is deeply rooted in our culture. Many cultural communities have their own unique ways of making salt depending on their environments and materials at hand. Sadly, many salt making

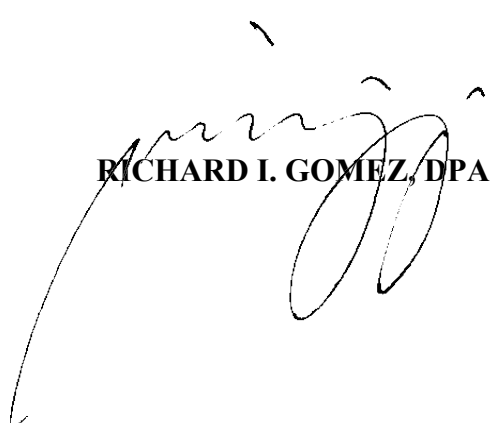
² Perlas, Leah, et al. Iodine Deficiency Disorder Among Filipino School Children, Pregnant and Lactating Women and the Elderly 20 Years After the Act for Salt Iodization Nationwide Law, *Journal of Endocrinology and Metabolism*, ISSN 1923-2861 print, 1923-287X online, Open Access, Volume 7, Number 3, June 2017, pages 86-93

³ Manila Bulletin, Iodine deficiency is a leading cause of thyroid diseases, Jul 13, 2022, MB Lifestyle

practices have been abandoned and forgotten because the ASIN Law had made it economically unviable. Only a handful of these artisanal salts have survived; such as, the *Asin Tibuok* of Bohol, the *Tutul* of Guimaras, and the *Budbud* of Iloilo.

With the effectiveness of the ASIN Law in question, it is high time to relax the mandate of the ASIN Law to restore the legal environment to one that is conducive to cultivating and developing our rich cultural salt-making traditions. Needless to say, most of the small-scale salt producers are also the ones belonging to the most economically disadvantaged groups in society.

In view of the foregoing, this bill proposes to relax the universal iodization of salt for subsistence and small producers/manufacturers of salt in the Philippines. However, medium and large producers/manufacturers will continue to be required to follow iodization standards set by the BFAD.



RICHARD I. GOMEZ, DPA

Republic of the Philippines
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House Bill No. 2667

Introduced by Representative Richard I. Gomez, DPA

**AN ACT AMENDING REPUBLIC ACT NO. 8172, ENTITLED “AN ACT PROMOTING
SALT IODIZATION NATIONWIDE AND FOR RELATED PURPOSES,” RELAXING
COMPLIANCE TO THE IODIZATION PROGRAM FOR SUBSISTENCE, SMALL
SALT PRODUCERS AND ARTISANAL SALT PRODUCERS**

Be it enacted by the Senate and the House of Representatives of the Philippines in
Congress assembled:

SECTION 1. Section 3 of Republic Act No. 8172, entitled “An Act Promoting Salt
Iodization Nationwide and For Related Purposes,” is hereby amended, as follows:

“SECTION. 3. *Purposes.* The purposes of this Act are to:

xxx xxx xxx

b) PROMOTE, SUPPORT, ENCOURAGE AND PARTIALLY require all
producers/manufacturers of food-grade salt to iodize the salt that they produce,
manufacture, import, trade or distribute;

xxx xxx xxx

SEC. 2. Section 5 of Republic Act No. 8172 is to be further amended, as follows:

“SECTION. 5. *Applicability.*

- a) This act shall apply to the entire salt industry, including salt producers/manufacturers, importers, traders and distributors, as well as government and non-government agencies involved in salt iodization activities, AS FOLLOWS:
 - i. SUBSISTENCE AND SMALL PRODUCERS/MANUFACTURERS ARE NOT REQUIRED TO COMPLY WITH IODIZATION PROGRAM AS MANDATED IN THIS ACT.
 - ii. MEDIUM AND LARGE PRODUCERS ARE REQUIRED TO COMPLY AND CONFORM TO THE STANDARDS SET BY THE BFAD.
- b) Iodized salt that conforms to the standards set by the BFAD to meet national nutritional needs shall be made available to consumers AND STRICTLY AND APPROPRIATELY LABELED AS BFAD COMPLIANT, Provided, That the implementation of this act shall be enforced over a period of one (1) year for large and medium producers/manufacturers.
- c) All food outlets, restaurants, and stores THAT make available to customers only iodized salt in their establishment. These establishments shall be monitored with the help of the LGUs’s through its help officers and nutritionists/dieticians or in their absence the sanitary inspectors to check and monitor the quality of food-grade salt being sold or served in such establishments. through its health officers and nutritionists/dietitians or in their absence, the sanitary inspectors to check and monitor the quality of food-grade salt being sold or served in such establishments.

SEC. 3. *Implementing Rules and Regulations.* - The Department of Health (DOH) and the Bureau of Food and Drug (BFAD) in cooperation with the agencies concerned shall formulate the necessary rules and regulations for the effective implementation of this Act within sixty (60) days from its approval.

SEC. 4. *Separability Clause.* — If any provision of this Act is held invalid or unconstitutional, the other provisions not so declared shall remain in force and in effect.

SEC. 5. *Repealing Clause.* — Any other law, issuance or part thereof inconsistent with this Act are hereby repealed or modified accordingly.

SEC. 6. *Effectivity Clause.* — This Act shall take fifteen (15) days after its publication in the *Official Gazette* or in a newspaper of general circulation.

Approved,