



2 April 2008

**ISDI COMMENTS ON  
GUIDELINES FOR THE USE OF NUTRITION CLAIMS: DRAFT TABLE  
OF CONDITIONS FOR NUTRIENT CONTENTS (PART B CONTAINING  
PROVISIONS ON DIETARY FIBRE)**

Alinorm 08/31/26, Appendix II  
(At step 6 of the Procedure)

Answer to Circular letter CL 2007/43-NFSDU

**1. Table of Conditions for Dietary Fibre Contents**

COMPONENT	CLAIM	CONDITIONS	ISDI JUSTIFICATION
<b>B.</b>		<b>NOT LESS THAN</b>	
Dietary Fibre	Source	3 g per 100 g or 1.5 g per 100 kcal <b>(solids)</b>  or [10% of recommended intake] per serving*	<u>Delete</u> [ ] and ( ) and add “liquids” and “solids”
	High	<del>{(liquid foods: 1.5 g per 100 ml)}</del> <b>(liquids)</b>  6 g per 100 g or 3 g per 100 kcal <b>(solids)</b>  or [20% of recommended intake] per serving*  <del>{(liquid foods: 3 g per 100 ml)}</del> <b>(liquids)</b>	<u>Retain</u> the conditions for liquid form.  <u>Rationale</u> : the conditions for liquids are necessary and retaining them is consistent with the Table of GUIDELINES FOR USE OF NUTRITION AND HEALTH CLAIMS CAC/GL 23-1997, Rev. 1-2004.  The proposed rewording is also consistent with the table of the guidelines mentioned above.  For the <u>detailed justification</u> , see the Annex.

\* Serving size [and recommended intake] to be determined at national level.

**2. Definition and properties of dietary fibre**

ISDI, as representative of the international manufacturers of foods for special dietary uses fully supports the comments made by IDF on the proposal for a definition of dietary fibres.

ISDI therefore supports the following definition:

Dietary fibre means carbohydrate polymers<sup>1</sup> with a degree of polymerisation (DP) not lower than 3, which are neither digested nor absorbed in the small intestine<sup>2</sup>. A degree of polymerisation not lower than 3 is intended to exclude mono- and disaccharides. It is not intended to reflect the average DP of a mixture. Dietary fibre consists of one or more of:

- Edible carbohydrate polymers naturally occurring in the food as consumed, carbohydrate polymers, which have been obtained from food raw material by physical, enzymatic or chemical means, synthetic carbohydrate polymers.
- Dietary fibre generally has properties such as:
  - Decrease intestinal transit time and increase stools bulk
  - Fermentable by colonic micro flora
  - Reduce blood total and/or LDL cholesterol levels
  - Reduce post-prandial blood glucose and /or insulin levels.

1) When derived from a plant origin, dietary fibre may include fractions of lignin and/or other compounds when associated with polysaccharides in the plant cell walls and if these compounds are quantified by the AOAC gravimetric analytical method for dietary fibre analysis: Fractions of lignin and the other compounds (proteic fractions, phenolic compounds, waxes, saponins, phytates, cutin, phytosterols, etc.) intimately associated with plant polysaccharides are often extracted with the polysaccharides in the AOAC 991.43 method. These substances are included in the definition of fibre insofar as they are actually associated with the poly- or oligosaccharidic fraction of fibre. However, when extracted or even re-introduced into a food containing non digestible polysaccharides, they cannot be defined as dietary fibre. When combined with polysaccharides, these associated substances may provide additional beneficial effects.

2) Non-Digestible carbohydrates like Galacto-oligosaccharides (GOS) although partly consisting of disaccharides, (allo-lactose and galactobiose) fulfil the properties of dietary fibre and therefore fall within the scope of this definition.

## Annex

### **DETAILED EXPLANATION AND JUSTIFICATION TO SUPPORT THE PRESERVATION OF THE CONDITIONS FOR LIQUIDS FORMS IN THE TABLE OF CONDITIONS FOR DIETARY FIBRE CONTENTS**

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Globally fibre intake is clearly deficient with an average fibre intake by adults below the dietary recommendations; US RDA is set at 30 grammes, whereas the data show an average daily intake of 20 grammes in Europe and 10 to 15 grammes in the USA.

From a nutritional point of view, there is a valuable interest increasing the actual global fibre consumption among populations.

#### Rationale for retaining conditions for liquids

From the nutritional point of view it is important to promote internationally a higher fibre intake and, in this context, all foods, including liquid foods be involved.

Within the daily consumption pattern liquid foods,, in particular beverages, constitute an important part.

Liquid foods can be a source of fibre either through its endogenous fibre content or through fibre supplementation.

As a consequence, it is important to maintain the conditions laid down for liquid foods in these Guidelines for the use of Nutrition Claims.