

# codex alimentarius commission



FOOD AND AGRICULTURE  
ORGANIZATION  
OF THE UNITED NATIONS

WORLD  
HEALTH  
ORGANIZATION



JOINT OFFICE: Viale delle Terme di Caracalla 00153 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

**Agenda Item 3**

**CX/NFSDU 08/30/3-Add.1**  
**October 2008**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

### **CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES 30<sup>th</sup> Session**

**Cape Town, South Africa, 3 - 7 November 2008**

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

*- Comments at Step 6 of the Procedure -*

#### **Comments from:**

**BRAZIL  
SOUTH AFRICA**

## **BRAZIL**

Brazil agrees with the adoption of the FAO/OMS definition for dietary fibre: "intrinsic plant cell-wall polysaccharides".

The FAO/OMS proposal, as detailed in the articles published on the European Journal of Clinical Nutrition, supplement 61, December 2007, recognizes the scientific advance on the identification and benefits of oligosaccharides and others carbohydrates, for example, inulin, fructooligosaccharides, resistant starch and modified starch. However, it proposes that these components be grouped on a distinct classification of dietary fibre, considering that its physiologic properties may vary depending on the type of substance used, making it difficult to group all of them on a single definition. When appropriate, specific functional claims must be established for resistant carbohydrates, taking into account even possible variations on its effectiveness and safe levels.

The FAO/OMS document emphasizes that the structural polysaccharides of the plant cell-wall can be chemically quantified. The definition considers the chemical composition and the benefits to health of a diet rich of fruits, vegetables and whole grain products. It recognizes that the benefits of a fibre-rich diet are not just related to any single component, but to the effect of synergistic elements, including micronutrients, phytochemical and low energy density.

The FAO/OMS document questions the use of the approach "non-digestibility" for the definition of dietetic fibre, once: 1) the term "non-digestibility" needs to be defined; 2) the digestibility varies from person to person and depends on several factors (food processing, storage conditions, characteristics of the microflora etc.); 3) it includes dietary components, such as lactose, for some groups and populations; 4) there are no applicable methods for that measured; 5) in the discussion related to the energy metabolism, the concept for "digestibility" is different from the adopted in the definition of dietary fibre.

The proposal directs to a clearer information, guiding the consumer's choice for the ingestion of products whose fibre content reflects consistently the recommendations of the dietary guidelines, the population reference intakes and the epidemiological evidence.

## **SOUTH AFRICA**

1. South Africa would support suggestions NOT to accept the proposed Codex Fibre Definition. Arguments why South Africa does not support the present definition (i.e. Degree of Polymerization) are as follows:
  - a. It will include resistant starch (which has other physiological effects);
  - b. Polymers may be added to food with a fibre claim  
This could open the door for many additions and supplements that may mislead the public (consumer) if it makes a fibre claim.
2. South Africa prefers the WHO/FAO expert consultation definition with a suggestion that extrinsic fibre may be included as part of the Dietary Fibre definition, provided that there is scientific evidence of beneficial effects in the long-term as shown by epidemiological studies.
3. South Africa suggests that any definition should be supported by recommendations regarding the appropriate methods to measure the defined substance.