

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

Agenda Item 3

CX/NFSDU 00/3-Add. 1
April 2000

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES

Twenty-second Session

Berlin, Germany, 19-23 June 2000

GUIDELINES FOR THE USE OF NUTRITION CLAIMS: DRAFT TABLE OF CONDITIONS FOR NUTRIENT CONTENTS (PART B) - Comments at Step 6 of the Procedure-

Comments from:

AUSTRALIA
BRAZIL
CUBA
FINLAND
GERMANY
JAPAN
MALAYSIA
SPAIN
UNITED KINGDOM

AUSTRALIA

1 FIBRE

Australia agrees with the policy underlying the draft criteria for fibre claims that such claims should be able to be made for cereal foods as well as for fruits and vegetables. This ensures that consumers are able to be informed about the wide range of dietary fibre sources, and accounts for the various effects of different fibre sources in maintaining health.

Australia has adopted a set of criteria for fibre claims based on the former Codex draft criteria that were once expressed per portion size. The Australian criteria are contained in the Code of Practice, *Nutrient claims in food labels and in advertisements*.

Australia has previously supported retention of a system based on portion size, however we recognise that such a system does not have universal support, and that it would be difficult to standardise internationally because of its dependence on serving sizes that either are prescribed nationally, or as in our case, the prerogative of the manufacturer. We are prepared to consider the Codex approach but remain committed to an *outcome* that is comparable to that of a portion-based system.

We therefore investigated the impact of the Codex draft criteria on the classification of fibre claims among food categories, and compared the results with the current Australian system based on portion size. There are some significant discrepancies in classification of some foods between the two systems, in particular, the present Codex draft criteria discriminate heavily in favour of many fruit and vegetables. Australia therefore proposes a modification to the Codex draft criteria to address the perceived imbalance of classification of fibre claims, and to develop a system that is more comparable to a portion-based approach.

COMPARISON OF CODEX CLASSIFICATIONS WITH AUSTRALIAN PORTION-BASED SYSTEM

The two existing systems of Codex and Australia classify fibre claims according to different types of criteria. They are:

CLAIM	CODEX	AUSTRALIA (serve size nominated by manufacturer)
Excellent Source	nil	not less than 6g/serve
Good Source	not less than 6g/100g OR 3g/100 kcal	not less than 3g/serve
Source	not less than 3g/100g OR 1.5g/100 kcal	not less than 1.5g/serve

The classification of major food types according to each system (based on Australian food composition data) is detailed in Tables A and B in the Attachment. A summary overview is provided in the following table. Differences in classifications are shown in bold; also, where one of the systems disqualifies a fibre claim, ie None, the food is shown in italics;

Table 1 Differences in classification of fibre claims between Codex proposal and Australian system

Foods	Codex	Australia (3-tier system based on portion size)
Wholegrain/bran cereals and products, brans	Good Source	Exc- Good Source
Wholemeal bread	Good Source	Good Source
Wholemeal pasta, dry	Good Source	Exc Source
Brown rice, raw	Source	Source
<i>Brown rice, cooked</i>	None	Source
Rolled oats, raw	Good Source	Source
Rolled oats, cooked	Source	Source
Mixed grain bread	Source	Source
<i>White bread</i>	None	Source
White pasta, dry	Source	Source
White rice, raw and cooked	None	None
<i>Corn flakes</i>	Source	None
Refined breakfast cereals	None	None
Fruit, dried	Good Source	Good Source - Source
<i>Fresh fruit, raw</i>	Good Source	Source
<i>Legumes</i>	Good Source	Excellent - Good Source - Source
Peas and green beans	Source	Good Source
Leafy brassica + broccoli	Good Source	Good Source - Source
Root vegetables	Good Source	Good Source - Source
Processed potato products	Source	Good Source
Potato, unprocessed	Source	None
Sweetcorn	Good Source	Good Source - Source
Avocado	None	None
<i>Other vegetables</i>	Good Source - Source	Source - None
<i>Vegetable juice</i>	Source	None
Nuts	Good Source	Good Source
Peanut butter	Good Source	Source
Potato crisps	Good Source	Excellent Source
Corn chips	Good Source	Good Source
<i>Curry Powder</i>	Good Source	None
<i>Cocoa powder</i>	Source	None
<i>Coffee powder</i>	Good Source	None

Codex

In general, the Codex system is more liberal than the Australian portion-based system as it classifies most fruit and vegetables as Good Sources of fibre, even though the fibre concentration may be as low as 1g/ 100g. This is due to inclusion of the criteria per 100 kcal which is a mode of expression that favours lower energy density foods.

Wholegrain and some refined cereals and cereal products qualify for one or other of the fibre claims, whereas white bread does not qualify at all. A small number of foods such dry beverage powders and spices, also inappropriately qualify for Good Source claims.

Examination of the outcome of the modelling exercise revealed that many foods, particularly fruit, vegetables and coconut products, qualified as one type of fibre source according to one criteria, but as the other type of fibre source according to the other criteria. In other words, the criteria are not mutually exclusive. It is expected however, that the higher claim would be selected under these circumstances.

The Codex system is not open to manipulation because it does not rely on a nominated portion size, although the calculation of energy content can vary marginally depending on the inclusion or otherwise of such energy yielding components as organic acids or dietary fibre.

Australian portion-based system

Under the Australian system, fewer fruit and vegetables qualify for a Source or Good Source of fibre claim. Very few fruit and vegetables qualify as Good Source, a significant proportion qualify as Source, but several do not qualify for a fibre claim.

The greatest discrepancy between the two systems occurs among the fruit and vegetable group, in that a number of fruit and vegetables that qualify for the Codex Good Source claim, are disqualified from carrying a fibre claim in Australia.

In contrast to the Codex System, cereal brans, wholegrain and some refined cereals and cereal products qualify for one of three fibre claims (source, good source, excellent source). However, unlike the Codex system, white bread qualifies as a Source of fibre when a portion size of 2 slices (55g) is used.

The use of a manufacturer-nominated serve size provides some latitude for the classification of foods to vary depending on the choice of serve size. This type of variability is different to that of the Codex system which relies on the operation of dual criteria.

Which system?

The fundamental differences between the Codex and Australian systems are that the Codex proposal provides for:

- the promotion of a greater range of fruit and vegetables mainly as a Good Source of fibre; but excludes
- white bread and other refined cereal foods as Sources of fibre.

Given that the consumption of fibre in most Western countries does not meet national recommended dietary targets, it is important that increased consumption of dietary fibre and fibre-containing foods continues to be promoted. Because the source of cereal or plant fibre may confer different effects on bowel health, cholesterol metabolism, and glucose tolerance, the appropriate classification of fibre claims should reflect those health recommendations that encourage increased or optimum fibre consumption.

Australia contends that the Codex criteria based on the theoretical unit of /100 kcal misclassifies some low-fibre fruits and vegetables as Good Sources of fibre, and that the use of such liberal criteria may mislead some consumers. We therefore recommend that many of these foods should be reclassified from Good Source to Source. This would introduce a clearer distinction, similar to that for cereal foods, between high fibre plant foods such as legumes and dried fruit, and other vegetables and fruit.

A case could be made for white bread, at 2.7g/100g, to qualify for a Source claim, particularly as many lower-fibre fruit and vegetables qualify for a Good Source claim under the Codex proposal. The argument for exclusion of white bread relates to the assumption that consumers are less able to discriminate, within one product type, between Source and Good Source than between no claim and

a claim. They are therefore given less nutritional incentive to change from white bread to less refined breads.

If considered appropriate, white bread could be included within the scope of a Source claim by slightly reducing the minimum g/100g criteria from 3g/100g to 2.5g/100g.

Modified Codex proposal

To overcome the concerns about the possible misclassification of many fruit and vegetables as Good Source, and to make the Codex system more compatible with a portion-based system, Australia proposes that the criteria per 100 kcal be modified such that:

	CODEX
Good Source	not less than 6g/100g OR 3g/100kcal
Source	not less than 3g/100g OR 1.5 2g/100 kcal

Under this proposal:

- foods that have fibre content of 3g/100g or more would continue to qualify as either a Good Source or Source, so most cereal foods would not change classification;
- white bread would continue to be disqualified from a Source claim unless the gram amount of fibre was reduced to 2.5g/100g for the Source claim;
- most dried fruit (12 in number) and some higher fibre vegetables and most legumes (23) would be retained as Good Source;
- some fruit (27), vegetables and legumes (23) would be retained as Source;
- the majority of fruit (88) and vegetables (189) would change classification from Good Source to Source;
- a small number of fruit (8) and vegetables (3) would no longer qualify as a Source (value <2g/100 kcal) in addition to the very few fruit and vegetables that already were excluded; and
- some spices and beverage flavourings would continue to qualify for one or other claim.

The distribution of fibre claims according to this proposal is given in Table C in the Attachment. The major differences between the Australian modified proposal, the Codex proposal, and the Australian portion-based system are summarised in Table 2. Differences between the two Codex versions are highlighted in bold.

Table 2 Differences in classification of fibre claims between the modified and original Codex proposals and the Australian system

Foods	Modified Codex	Original Codex	Australia (3-tier system based on portion size)
Wholegrain/bran cereals and products, brans	Good Source	Good Source	Exc - Good Source
Wholemeal bread	Good Source	Good Source	Good Source
Wholemeal pasta, dry	Good Source	Good Source	Exc Source
Brown rice, raw	Source	Source	Source
Brown rice, cooked	None	None	Source
Rolled oats, raw	Good Source	Good Source	Source
Rolled oats, cooked	Source	Source	Source
Mixed grain bread	Source	Source	Source
White bread	None	None	Source
White pasta, dry	Source	Source	Source
White rice, raw and cooked	None	None	None
Corn flakes	Source	Source	None
Refined breakfast cereals	None	None	None
Fruit, dried	Good Source	Good Source	Good Source - Source
Fresh fruit, raw	Source	Good Source	Source
Legumes	Good Source - Source	Good Source	Excellent - Good Source - Source
Peas and green beans	Source	Source	Good Source
Leafy brassica + broccoli	Source	Good Source	Good Source - Source
Root vegetables	Source	Good Source	Good Source - Source
Processed potato products	Source	Source	Good Source
Potato, unprocessed	Source	Source	None
Sweetcorn	Source	Good Source	Good Source - Source
Avocado	None	None	None
Other vegetables	Source	Good Source - Source	Source - None
Vegetable juice	Source - None	Source	None
Nuts	Good Source	Good Source	Good Source
Peanut butter	Good Source	Good Source	Source
Potato crisps	Good Source	Good Source	Excellent Source
Corn chips	Good Source	Good Source	Good Source
Curry Powder	Good Source	Good Source	None
Cocoa powder	Source	Source	None
Coffee powder	Source	Good Source	None

Conclusion

Australia proposes a modification to the Codex proposal that maintains the independence from standardised portion sizes but provides a balanced approach to fibre claims for cereal foods, and plant-based foods, which does not overemphasise the importance of one group over another.

2 PROTEIN

To be submitted at a later date.

3 VITAMINS AND MINERALS

Australia has adopted a system of at least 10% NRV/serve for 'source' claims, and at least 25% NRV/serve for 'good source' claims. Serve sizes are determined by the manufacturer.

15% NRV/100g equates to 10% NRV/serve at serve sizes greater than 66g. Under the proposed Codex system, foods in Australia having a serve size of less than a 67g would be precluded from carrying vitamin and mineral claims. Australia supports a portion based set of criteria as proposed in the last session of CCNFSDU but does not object to the proposed percentages as shown because the Australian system is more liberal than that proposed by Codex.

Australia has adopted a multiple of source to good source of 1:2 for dietary fibre and therefore would support a multiple of source to high of 1:2 for vitamins and minerals.

Attachment

Table A: CODEX ORIGINAL CRITERIA

GOOD SOURCE >6g/100g	GOOD SOURCE >3 g/100 kcal	SOURCE <6 and >3g/100g	SOURCE <3 and >1.5 g/100 kcal	FOODS EXCLUDED FROM Good Source, and Source
<i>Cereals</i>	<i>Cereals</i>	<i>Cereals</i>	<i>Cereals</i>	<i>Cereals</i>
Bran, unprocessed and processed	Bran, unprocessed and processed			
Wholegrain breakfast cereals	Wholegrain breakfast cereals	Corn flakes		Refined breakfast cereals, including
Muesli		Brown rice, raw		Brown rice, cooked
Some wholegrain biscuit and	Rye crispbread	Some wholegrain biscuits		White rice, raw and cooked
Rolled oats, raw		Some refined savoury biscuits	Rolled oats, cooked	Some refined savoury biscuits
Wholemeal breads	Wholemeal bread, fibre increased only	White bread, fibre-induced; Mixed grain		White bread and white bread products
Wholemeal flour	Wholemeal flour	White flour		Most refined sweet biscuits
Wholegrain pasta, dry	Wholegrain pasta, dry and cooked	Wholegrain pasta, cooked		High sugar and fat sweet cereal
Some muesli bars		White pasta, dry	Some muesli bars	White pasta, cooked
		Source fruit cake		Refined cakes
<i>Nuts and seeds</i>		<i>Nuts and seeds</i>	<i>Nuts and seeds</i>	<i>Nuts and seeds</i>
Most nuts and seeds		Few nuts and seeds		
Coconut products			Coconut products	Coconut cream
<i>Snack foods</i>				<i>Snack foods</i>
Corn savoury snacks				Extruded snacks
Potato savoury snacks				
<i>Vegetables</i>	<i>Vegetables</i>	<i>Vegetables</i>	<i>Vegetables</i>	<i>Vegetables</i>
Most legumes, dry and cooked	Most legumes, dry and cooked	Some processed potato products	Some other vegetables, mostly potato and	Avocado
	Baked beans	Baked beans		
	Most vegetables	Some legumes, cooked		
		Peas and green beans		
		Leafy Brassica veg +		

		broccoli		
		Some leaves eg spinach, parsley		
		Some roots eg carrot, turnip		
		Some sweetcorn		
<i>Fruit</i>	<i>Fruit</i>	<i>Fruit</i>	<i>Fruit</i>	<i>Fruit</i>
	Most fruit, raw	Berries	Few fruit, raw	Few cooked and canned fruit, eg apple
	Some fruit, cooked	Rhubarb	Some fruit, canned and cooked	Grapes
Most fruit, dried	Most fruit, dried	Kiwi fruit		
Passionfruit	Passionfruit	Some banana		
Quince, raw	Quince, raw and cooked	Quince, cooked		
<i>Other foods</i>	<i>Other foods</i>	<i>Other foods</i>	<i>Other foods</i>	<i>Other foods</i>
Curry powder	Curry powder	Cocoa Powder	Some soups, mainly vegetable types	Non-coconut confectionery
Coffee powder	Coffee, powder and ready to drink	Chocolate, nut	Asian sauces	Chocolate, plain
		Licorice	Tomato sauce	Jam, marmalade
			Vegetable juices	Fruit juices, drinks

Table B: CRITERIA USED IN AUSTRALIA

EXCELLENT SOURCE >6 g / serve	GOOD SOURCE >3 g / serve	SOURCE >1.5 g / serve	FOODS EXCLUDED FROM Excellent, Good, and Source
<i>Cereals</i>	<i>Cereals</i>	<i>Cereals</i>	<i>Cereals</i>
Bran, unprocessed and processed			
Wholegrain breakfast cereals	Wholegrain breakfast cereals	Rolled oats, raw and cooked	Corn flakes
Untoasted muesli	Toasted muesli	Mixed grain bread	Refined breakfast cereals including sugared types
Wholemeal bread rolls	Wholemeal bread		
	White bread rolls	White bread and bread products	
		Brown rice, raw and cooked	White rice, raw and cooked
Wholegrain pasta, raw and cooked	Wholemeal flour	White pasta, raw and cooked	White flour
		Wholegrain biscuits	Some refined savoury biscuits
	Fruit buns	Fruit bread	Muesli bars, all types
		Few high sugar and fat sweet cereal products	Most high sugar and fat sweet cereal products
		Fruit cake	Refined cakes
<i>Nuts and seeds</i>	<i>Nuts and seeds</i>	<i>Nuts and seeds</i>	<i>Nuts and seeds</i>
	Nuts and seeds, all types	Peanut butter	
Coconut products		Some coconut products	
		Coconut cream	

<i>Snack foods</i>	<i>Snack foods</i>	<i>Snack foods</i>	<i>Snack foods</i>
Potato savoury snacks	Corn savoury snacks		Extruded snacks
<i>Vegetables</i>	<i>Vegetables</i>	<i>Vegetables</i>	<i>Vegetables</i>
Some legumes	Some legumes	Some legumes	Some vegetables
	Peas and beans	Few fresh potato	Most fresh potato
	Baked beans	Some leaves eg spinach	
	Some leafy brassica veg + broccoli	Some leafy brassica veg	
	Some roots eg carrot	Some roots eg carrot	
	Some sweetcorn	Some sweetcorn	
	Most processed potato products	Other vegetables	Some potato and potato products cooked in fat
<i>Fruit</i>	<i>Fruit</i>	<i>Fruit</i>	<i>Fruit</i>
	Most fruit, dried	Few fruit, dried	
	Berries and few other fruit	Most fruit, raw	Few fruit, raw eg grapes
		Most cooked and canned fruit	Few cooked and canned fruit eg apple
	Some banana	Some banana	
<i>Other foods</i>	<i>Other foods</i>	<i>Other foods</i>	<i>Other foods</i>
		Some soups	Non-coconut confectionery
			Licorice
		Milk chocolate with nuts	Chocolate, plain
			Coffee, powder and ready to drink
			Cocoa powder
			Fruit and vegetable juices
			Jam, marmalade
			Fruit juices, drinks
			Curry powder
			Asian sauces

Table C: MODIFIED CODEX CRITERIA

GOOD SOURCE >6g/100g	SOURCE >3 g/100g	SOURCE >2g/100 kcal	FOODS EXCLUDED FROM Good Source, and Source
<i>Cereals</i>	<i>Cereals</i>	<i>Cereals</i>	<i>Cereals</i>
Bran, unprocessed and processed		Bran, unprocessed and processed	
Wholegrain breakfast cereals	Corn flakes	Wholegrain breakfast cereals	Refined breakfast cereals, including sugared types
Muesli	Brown rice, raw		Brown rice, cooked
Some wholegrain biscuits and rispreads	Some wholegrain biscuits	Rye crisp bread	White rice, raw and cooked
Rolled oats, raw	Some refined savoury biscuits	Rolled oats, cooked	Some refined savoury biscuits
Wholemeal breads	White bread, fibre-increased	Wholemeal bread, fibre increased only	White bread and bread products
Wholemeal flour	White flour	Wholemeal flour	Most refined sweet biscuits
Wholegrain pasta, dry	Wholegrain pasta, cooked	Wholegrain pasta, dry and	High sugar and fat sweet

		cooked	cereal products
Some muesli bars	White pasta, dry	Some muesli bars	White pasta, cooked
	Some fruit cake		Refined cakes
<i>Nuts and seeds</i>	<i>Nuts and seeds</i>	<i>Nuts and seeds</i>	<i>Nuts and seeds</i>
Most nuts and seeds	Few nuts and seeds		
Coconut products		Coconut products	Coconut cream
<i>Snack foods</i>			<i>Snack foods</i>
Corn savoury snacks			Extruded snacks
Potato savoury snacks			
<i>Vegetables</i>	<i>Vegetables</i>	<i>Vegetables</i>	<i>Vegetables</i>
	Some processed potato products	Most vegetables	Very few vegetables eg avocado
	Baked beans	Baked beans	
Most legumes, dry and cooked	Some legumes, cooked	Most legumes, dry and cooked	
	Peas and green beans		
	Leafy Brassica veg + broccoli		
	Some leaves eg spinach, parsley		
	Some roots eg carrot, turnip		
	Some sweetcorn		
<i>Fruit</i>	<i>Fruit</i>	<i>Fruit</i>	<i>Fruit</i>
Most fruit, dried	Berries	Most fruit, raw	Few fruit, raw eg grapes
	Rhubarb	Most fruit, canned and cooked	Few cooked and canned fruit eg apple
Passionfruit	Kiwi fruit	Passionfruit	
Quince, raw	Quince, cooked	Quince, raw and cooked	
	Some banana		
	Jackfruit		
<i>Other foods</i>	<i>Other foods</i>	<i>Other foods</i>	<i>Other foods</i>
Curry powder	Cocoa Powder	Curry powder	Non-coconut confectionery
Coffee powder	Chocolate, nut	Coffee, powder and ready to drink	Chocolate, plain
	Licorice	Some soups, mainly vegetable types	Jam, marmalade
		Some vegetable juices	Fruit juices, drinks
		Some Asian sauces	Tomato sauce

BRAZIL

We request the inclusion of liquid victuals “source” or “rich in fiber” with the following values:

Source: 3g per 100g or 1,5g per 100 kcal or 100 ml.

Fiber-High: 6g per 100g or 1,5g per 100 Kcal or 100 ml.

Justification: The fruit juice producer countries with high tenor of fibers would be prejudiced without the inclusion of the tenor of fibers for liquid victuals.

CUBA

We are pleased to inform you that the competent authorities of our country have analysed the Guidelines for the Use of Nutrition Claims: Draft Table of Conditions for Nutrient Contents (Part B) ALINORM 99/26, App. II and agree with the contents of this table, provided that the wording “per serving” is deleted.

FINLAND

Provisions on Fibre

Finland proposes that, besides information on the nutrient contents, the package label shall also have a designation indicating how great a share (%) of the recommended daily intake will be obtained through the intake of the food concerned, indicated at least per 100 gram food and possibly even per portion. Possibility of comparing one's own intake with the recommended intake could help the consumer to understand, which role the fibre in the food eaten plays in relation to the recommended daily intake. In Finland, the recommended intake of fibre is 25 - 35 grams per day.

Finland proposes that the levels for a **source of fibre** and a **good source of fibre** will be set at 100 g and/or one portion, and that the levels concerning energy units be abolished. The fibre count of a foodstuff should not be stressed, if the intake remains at a very low level in normal use. That is the case when the intake is clearly less than 100 g per day.

Guidelines for Use of Nutrition Claims

Finland proposes that certain conditions be made for the use of claims **low lactose** and **lactose free**. Intolerance to lactose is a common problem in many countries meaning that the population cannot use conventional milk products. Food industry has developed special low-lactose milk products for those with intolerance to lactose. In accordance with the recommendations given by the Nordic countries, low-lactose foods should contain a maximum of 1 g lactose per 100 g of ready to eat food. Lactose-free food must in principle be free of lactose (non-detectable amounts when analysed).

Finland considers it further necessary that guidelines for the use of **high energy** claims be issued, because also this nutrition claim seems to become more and more usual in the marketing of foodstuffs.

GERMANY

Germany supports the Draft Table of Conditions for Claims for Nutrient Content Part B (Alinorm 99/26, Annex II) in its present form.

Germany prefers the use of percentages of Nutrient Reference Values for protein and vitamins/mineral salts to the indication of quantities in weight units. The use of percentages of Nutrient Reference Values (NRV) is a basic decision which is independent of possible future revisions of the NRVs. When the NRVs are modified this automatically leads to a change in the

quantities for the individual nutrients included in this table without necessarily having to change this part of the Guidelines for the Use of Nutrient Claims.

Germany approves of the possibility to admit portion claims as long as this arrangement is not compulsory with the difficulties to be expected, arising from a world-wide standardization of portions.

Germany holds the view that the quantitative prerequisites for the use of the terms "source" and "high" are correct from the aspect of nutrition physiology.

JAPAN

We propose substituting "Dietary Fiber" for "Fiber" in the Table.

Reasons for the proposal:

"Dietary fiber" is generally used in food-related symposiums as well as throughout the world.

MALAYSIA

Malaysia would like to propose the deletion of the parameter "NRV per 100 kcal" and "NRV per serving". In the case of the former, it depends on the energy density of the food and the levels obtained using this parameter do not necessarily tally with those obtained from per 100 g or per 100 ml. In the case of the latter, there are no standardised serving sizes for foods in many countries. Therefore, the levels of nutrients would vary with differing serving sizes and would not be appropriate for use.

SPAIN

The Kingdom of Spain considers that fibre should be clearly and effectively defined and that an analytical method should be established to determine fibre before a table of conditions is drafted.

UNITED KINGDOM

The UK supports the criteria for source and high protein, vitamin and mineral claims agreed at the 21st Session of the Codex Committee on Nutrition and Foods for Special Dietary Uses, and set out on page 38 of Alinorm 99/26.

With regard to source and high fibre claims, the UK considers that it will only be possible to agree specific claims criteria once a definition and suitable method of analysis for fibre have been agreed.