



Executive Vice President  
Steven C. Nelson

3340 Pilot Knob Road  
St. Paul, MN 55121 U.S.A.  
Phone: +1.651.454.7250  
Fax: +1.651.454.0766  
E-mail: [aacc@scisoc.org](mailto:aacc@scisoc.org)  
Website: [www.aaccnet.org](http://www.aaccnet.org)

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**TO:** Nutrition Evaluation Division of Health Canada

**FR:** AACC International

**RE: Proposed Policy: Definition and Energy Value for Dietary Fibre**

AACC International (formerly known as the American Association of Cereal Chemists) welcomes this opportunity to provide comments to the Nutrition Evaluation Division of Health Canada regarding the proposed definition of dietary fiber per recent notice of December 7, 2010. AACC International has nearly a half century history of scientific evaluation of dietary fiber definitions and methods.

In 1998, AACC International appointed a committee of dietary fiber experts to evaluate and develop an updated, scientifically sound definition of dietary fiber, and as appropriate, to work with AACC technical committees to adopt Approved Methods relevant to that definition. The expert committee sought worldwide input through a number of public workshops and via an open website (exclusively for the dietary fiber topic). Input was substantial both in the public workshops and on the website (with nearly 1000 comments received, reviewed, and in many cases responded to for clarification).

The expert committee completed their work in 1999, and the resultant definition was adopted by the AACCI Board of Directors in 2000. A comprehensive report of the expert committee's effort and conclusions was published in 2001. The efforts of the expert committee served as a significant resource for other scientific bodies and jurisdictions as they deliberated on dietary fiber issues.

The current AACCI Technical Committee on Dietary Fiber and other Carbohydrates continues to support the definition adopted by the AACC Board of Directors in 2000 while continuing efforts to refine dietary fiber methods. Further, the committee believes the definition is well aligned with the definition recently adopted by the CODEX Alimentarius Commission.

The committee commends Health Canada for seeking to harmonize the definition of dietary fiber. Providing the food industry with the flexibility to incorporate a broader range of dietary fiber sources in Canada thus allowing consumers more opportunity to optimize their intake of dietary fiber is a significant step in helping consumers reach their recommend daily fiber intake goals. In particular, the committee believes that the constituent make up of dietary fiber (see pp 116 to 119 of reference iii) as initially outlined by the AACC Dietary Fiber expert committee is aligned with the definition in the CODEX Alimentarius and the definition proposed by your organization.

**References**

- i <http://www.hc-sc.gc.ca/fn-an/consult/fibre-fibres/index-eng.php>
- ii Cereal Foods World, July, 2000, vol 45, no 7, p 325
- iii Cereal Foods World, March 2001, vol 46, no 3, pp 112-129.
- iv ALINORM 09/32/26 <http://www.codexalimentarius.net/web/archives.jsp>; ALINORM 09/32/REP

**Barry McCleary, Ph.D.**  
AACC International  
President

**Stuart A. Craig, Ph.D.**  
Co-chair AACC International  
Dietary Fiber Technical Committee

**Jonathan W. DeVries, Ph.D.**  
Co-chair AACC International  
Dietary Fiber Technical Committee