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Position Statement on the Dietary Fibre Decision Tree

AACC International (formerly known as the American Association of Cereal Chemists) welcomes this opportunity to participate in the CCMAS electronic working group on decisions trees - dietary fibre. AACC International has nearly a half century history of scientific evaluation of dietary fiber definitions and methods. The current AACCI Technical Committee on Dietary Fiber and other Carbohydrates provides the following comments.

POSITION: We believe that CODEX adoption of a dietary fiber method decision tree is not necessary.

REASONS:

CODEX Alimentarius Commission adopted a definition for dietary fiber in 2009. The analytical community responded by validating methods specifically to address the definition.

AACC International, in conjunction with AOAC International, validated and approved AACC Approved Method 32-45/ AOAC Official Method of Analysis 2009.01 for Total Dietary Fiber to match the definition. Both CCFSDU and CCMAS have endorsed the method and CAC has adopted it.

Further, AACC International in conjunction with AOAC International has validated and approved AACC Approved Method 32-50 / AOAC Official Method of Analysis 2011.25 for Insoluble, Soluble, and Total Dietary Fiber to match the CODEX definition for situations requiring separation of the insoluble and soluble fractions of dietary fiber. Both CCFSDU and CCMAS should endorse the method and CAC should adopt it with reasonable haste.

Since the original intent behind the development of these new methods was to measure fiber as defined by the CODEX definition, we feel that the above methods should be the only fiber methods granted type I status by CAC. All remaining methods should be moved to type II or type III status depending upon their nature. The analytical community will migrate to the AACC/AOAC methods to comply with the CODEX definition, and the other methods will become obsolete with regard to DF labeling. As the fundamental emphasis of CAC is to facilitate the development of harmonized international standards, we feel it is fitting that the emphasis of CCMAS and CCFSDU should be to move the world analytical communities towards the methods that best fit the CODEX definition of dietary fiber.

No method can ever differentiate all the possible ingredients which may fall into CODEX definition sections 2 and 3, currently or in the future. Users of those ingredients will have to use due diligence regarding their inclusion in the DF definition. Regulatory authorities will rely on ingredient labeling to determine if an ingredient is present that does not satisfy the CODEX definition of dietary fiber.

If CCMAS decides that a decision tree should be pursued, it should first consider conducting a survey of applicable laboratories and companies. If any issues arise regarding the choice of dietary fiber method(s) to apply in general or to a particular sample, a simple, straightforward diagram could then be designed and adopted to serve as an aid in selecting a method or methods.

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